

Mr Philip Dean  
Operations Director  
Tambourine Bay Road  
Lane Cove  
New South Wales 2066  
01 February 2021

Dear Mr Dean

**Saint Ignatius College Riverview Redevelopment Stage 2 (SSD-10424)  
Response to Submissions**

The exhibition of the development application including the Environmental Impact Statement (EIS) for the above proposal ended on 29 January 2021. All submissions received by the Department during the exhibition of the proposal are available on the Department's website at:

<https://www.planningportal.nsw.gov.au/major-projects/project/26871>

The Department requires that you provide a response to the issues raised in those submissions, in accordance with clause 85A(2) of the Environmental Planning and Assessment Regulation 2000. Please note that the comments from Ausgrid and the Heritage Division, Department of Premier and Cabinet are outstanding. The Department will provide you with a copy of their submission when received. Please provide a response to the issues raised in these submissions within two months of this letter.

The Department has also undertaken a preliminary assessment of the EIS and, in addition to the issues raised in submissions, requires that the matters in **Attachment 1** be addressed in full.

Note that under clause 113(7) of the Environmental Planning and Assessment Regulation 2000, the days occurring between the date of this letter and the date on which your response to submissions is received by the Secretary are not included in the deemed refusal period.

If you have any questions, please contact John Doubleday, who can be contacted on (02) 8275 1129 or at [john.doubleday@planning.nsw.gov.au](mailto:john.doubleday@planning.nsw.gov.au).

Yours sincerely



Karen Harragon  
Director, Social And Infrastructure Assessments  
Social & Infrastructure Assessments

**as delegate for the Planning Secretary**

## ATTACHMENT 1 – KEY ISSUES

### 1. Inconsistency with the Concept Approval

- The EIS for the approved Concept Proposal, as modified (SSD-7140-Mod-3) proposed the demolition of the existing Wallace building and construction of the new Wallace Learning Centre (the current STEMP building) plus a link building in Stage 2 of the redevelopment of Saint Ignatius school.
- However, the EIS for the SSD-10424 application states that the demolition of the existing Wallace building does not form a part of SSD-10424 (Stage 2 application) to allow of accommodation of students during building works. The Stage 2 application also does not include the construction of the link building. While the Department agrees that some flexibility is needed to allow for alterations to timeframes of building works approved under a Concept Proposal, the proposed changes have led to inconsistencies with the approved SSD-7140 as modified.
- The EIS does not recognise these inconsistencies nor provides a comparison with the Concept Proposal to demonstrate compliance of the Stage 2 application with SSD-7140. Consequently, the Department requires you to:
  - provide a table to indicate how this application complies with the conditions of consent for the Concept Proposal.
  - overlay the Stage 2 detailed plans over the Concept Proposal site layout to demonstrate compliance (or non-compliances) between the proposed and the approved site layouts.

Considering the identified inconsistencies between the Stage 2 application and the Concept Proposal, the Department requires you to lodge a concurrent application **to modify SSD-7140** to ensure that the Stage 2 application is consistent with the Concept Proposal.

## 2. Built form

- Visual Impact Assessment
  - The SEARS required the EIS to provide a visual impact assessment to identify potential impacts on the surrounding built environment. The EIS states this assessment has been conducted in 'Part H' of the EIS and in 'Appendix 7'. However, the Department's review of the EIS concludes that an appropriate and adequate assessment has not been undertaken.
  - The Department requires a visual impact assessment to be undertaken, to the satisfaction of the SEARS and submitted as part of the Response to Submissions Report (RtS).
- Shadow Diagrams and solar access
  - The Department notes from the submitted shadow diagrams that sections of the proposed open spaces at the ground level between the existing Wallace building and the proposed STEMP building would be overshadowed between 9am and 3pm, winter solstice.
  - The Department requires you to submit additional solar access diagrams to demonstrate how these areas would receive satisfactory solar access during the above times.
- Materiality and contextuality
  - The Department notes that the EIS responds to comments from the State Design Review Panel in the Design Analysis Report (Appendix 7). However, there is insufficient information relating to the materiality and contextuality of the Stage 2 application that will be assessed and form part of any approval should it be granted.
  - The Department requires you to provide further details on the proposed façade styles and design contextuality, and to address any other comments provided by the State Design Review Panel.

## 3. Construction and Traffic Management Plan

- The Department seeks clarification on the access of trucks during construction. Primarily, further information is to be provided on the long vehicle turnaround area to be installed along Loyola Drive, and the management of the reversing of long / heavy vehicles (Figure 7, Appendix 15).

- The Department requires more information on the turning circle and size of the largest construction vehicles to be used during the proposed works to ensure that the vehicles can appropriately manoeuvre on the site.

#### **4. Administrative errors in EIS**

- Please correct errors in report, including but not limited to:
  - Incorrect reference in glossary to GPT (should be GTP).
  - Error, page 58: “The design of the built form and been informed”.
  - Incorrect reference to bus routes and ferry services in Appendix 15.