

**Table 1. RTS Submission - 10424 SSDA**

**Department of Planning, Industry and Environment**

**1. Inconsistency with the Concept Approval**

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>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 STAMP building) plus a link building in Stage 2 of the redevelopment of Saint Ignatius school.</li> </ul>  | <p>SSD 7140 was the subject of three modifications of which 'Mod 3' is of particular relevance to the subject Stage 2 proposal. Mod 3 to the Concept Proposal included amendments to the proposed Wallace Precinct building as two separate building envelopes, being the new Wallace and Student Node-Link Buildings. The works have been separated into two smaller stages, the first being the new Wallace Building and the second being the Student Node-Link Building; the new Wallace Building will represent Stage 2 of the Concept Proposal.</p>   |
| <ul style="list-style-type: none"> <li>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.</li> </ul> | <p>The Section 4.55(1A) Amended Modification Application prepared by Willowtree Planning, dated 4 August 2020 ("<i>Mod 3 Application</i>") set out in section <b>2.1.1 Building Envelope</b> that Stage 2 would only involve the construction of the new Wallace Building:</p> <p><i>"Stage 2 involves the construction of a new five-storey building with basement and new canteen to the north of the original Wallace Building. The new building will house Science, Technology, Engineering, Mathematics and PDHPE faculties as well as pastoral care house areas."</i></p> <p>Whilst the demolition of the original Wallace building remains part of the approved Concept Proposal, the <i>Mod 3 Application</i> was deliberate in not including the demolition of the original Wallace Building as part of the Stage 2 works, stating (again at <b>2.1.1 Building Envelope</b>):</p> <p><i>"Options utilising the original building as shunt space for construction works and beyond to mitigate the requirement for demountable is being explored."</i></p> |

**Table 1. RTS Submission - 10424 SSDA**

	<p>The separation of the new Wallace Building and the Student Node-Link Building into two separate stages was to enable the construction of the new Student Node-Link Building to occur <u>other than</u> as part of Stage 2. The <i>Mod 3 Application</i> did not specify the timing/staging of the construction of the new Student Node-Link Building as this will depend on the sequencing of other elements of the approved Concept Proposal.</p> <p>It is important to note that other future stages of the approved Concept Proposal (particularly the Vaughan Learning Precinct Stage and the Main Building Precinct Stage) will see significant Teaching &amp; Learning capacity (classrooms) taken offline during those works. The existing Wallace Building is planned to act as necessary shunt space to accommodate the College's existing student and staff numbers during those works, minimising (or eliminating) the need for temporary demountable facilities to enable normal College operations to continue. The sequencing of future stages of the Concept Proposal will depend on the College's future needs, priorities and funding. The College therefore requires flexibility in the timing of the demolition of the existing Wallace building to manage the delivery of the Concept Proposal, in whatever sequence that may take.</p> <p>The original (unmodified) Concept Proposal assumed the existing Wallace Building and the existing Administration Building would be demolished together as these two buildings are, in fact, now so wholly integrated that they effectively form one building such that it would be impractical to demolish one without demolishing the other. The demolition of the existing Wallace Building will therefore occur at the same time as the demolition of the existing Administration Building as part of the future stage to develop the new Student Node-Link Building.</p> <p>Given all of the above, we do not believe there is an inconsistency between the SSD-10424 application for Stage 2 and the approved SSD-7140 as modified.</p>
--	--

- 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.

The below table provides a summary of the approved development under the Concept Proposal, particularly as modified under the *Mod 3 Application*, and the proposed Stage 2 works. The approved development that is to be completed as part of Stage 2 is shown in **bold**. It is noted that some of the approved development, specifically the demolition of the existing Wallace and Administration buildings and the new Student Node-Link building works, are separated from Stage 2 and will be subject to further applications.

**Table 1. Comparative Summary**

Mod No.	Summary of Approved Development
Concept Proposal (including Modifications) SSD7140	<p>Proposed Staging of the Works Associated with the Wallace Building:</p> <ul style="list-style-type: none"> <li>• <b>Stage 2 – New Wallace Learning Building, including Food and Beverage</b></li> </ul> <p>New Student Node – Link Building:</p> <ul style="list-style-type: none"> <li>• Demolish the existing Administration Building and replace with a new facility in the same location linking the Main Block and Vaughan Buildings.</li> </ul> <p>New Wallace Learning Building:</p> <ul style="list-style-type: none"> <li>• Demolition of existing Wallace Building;</li> <li>• <b>Move the approved location of the building and establish an alternative connection to the Vaughan Building;</b></li> <li>• <b>Construction of an additional level over the approved 4 level (total 5 levels)</b></li> <li>• <b>Ground level to accommodate to C.O.L.A. and Canteen</b></li> </ul> <p>Future Recreation Courts Precinct:</p> <ul style="list-style-type: none"> <li>• Remove approved podium design and replace with reduced proposal that focuses on the reinvention of existing outdoor and area left from the removal</li> </ul>

## Response to Submissions - Government Agencies

SSD 10424 - St Ignatius' College Riverview

		of Wallace to create purposeful and quality outdoor recreation space.
	Stage 2 SSD10424	<p>Stage 2 - New Wallace Learning Building, including Food and Beverage:</p> <ul style="list-style-type: none"> <li>Construction of new five (5) storey building with a maximum RL52.00 at the heart of the Campus to accommodate modern, flexible teaching and learning spaces;</li> <li>Provide improved learning opportunities for Science, Technology, Engineering, Mathematics and PDHPE as a STEMP facility, along with six (6) Pastoral Care House areas, and staff rooms;</li> <li>The ground floor will accommodate a C.O.L.A, multi-purpose Hall and Canteen (Food and Beverage) with servicing by a loading area on basement level;</li> <li>Refurbishment of existing O'Neil Building to allow integration of New Ignis Stage 2 STEMP Building to connect to existing fabric;</li> <li>New North Landscaped Area;</li> <li>New Landscaped Area between the existing Wallace Building and the New Ignis Stage 2 STEMP Building; and</li> <li>Upgrade courtyard to improve the integration of the learning space and create a sense of place.</li> </ul>
	Approved Development to be completed in Future Stages (subject to further applications)	<p>New Student Node – Link Building:</p> <ul style="list-style-type: none"> <li>Demolition of existing Wallace Building;</li> <li>Demolish the existing Administration Building and replace with a new facility in the same location linking the Main Block and Vaughan Buildings.</li> </ul> <p>Future Recreation Courts Precinct:</p> <ul style="list-style-type: none"> <li>Remove approved podium design and replace with reduced proposal that focuses on the reinvention of existing outdoor and area left from the removal</li> </ul>

	<table><tr><td data-bbox="1104 204 1303 285"></td><td data-bbox="1303 204 2033 285">of Wallace to create purposeful and quality outdoor recreation space.</td></tr></table>		of Wallace to create purposeful and quality outdoor recreation space.
	of Wallace to create purposeful and quality outdoor recreation space.		

**Table 1. RTS Submission - 10424 SSDA**

<ul style="list-style-type: none"> <li>Considering the identified inconsistencies between the Stage 2 application and the Concept Proposal, the Department requires you to lodge a concurrent application <b>to modify SSD-7140</b> to ensure that the Stage 2 application is consistent with the Concept Proposal.</li> </ul>	<p>As advised by DPIE on 9<sup>th</sup> March 2021 a modification is not required.</p>
<p><b>2. Built Form</b></p>	
<p><b>Visual Impact Assessment</b></p>	
<p>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.</p>	<p>To complement the updated Architectural Documentation (<b>Appendix C</b>), an addendum Visual Impact Statement was prepared by Hatch Roberts Day and accompanies this submission as <b>Appendix E</b>. The assessment concludes that while the built form would clearly make a qualitative change to the appearance of the site and setting, the visual impacts assessed from multiple viewpoints surrounding the site result in impacts considered to be LOW / NONE. This is mostly due to the proposal's integration with the existing built form environment and its compact configuration.</p> <p>There are limited public open views towards the site that are not already screened by landscape detectors. Where visible, the proposal is consistent with the surrounding character and the proposed architectural design helps integrate the proposal into its setting and make it visually attractive</p> <p>The proposal is considered to provide several key measures designed to mitigate the potential visual impacts:</p> <ul style="list-style-type: none"> <li>- High quality landscaping and well-located screen planting to reduce the visual impact in close proximity;</li> <li>- Use of native planting to reinforce the character of the existing vegetation</li> <li>- Scale and bulk consistent with the existing buildings</li> <li>- Facade treatment and articulation to reduce the height impact</li> </ul>

Table 1. RTS Submission - 10424 SSDA	
	<ul style="list-style-type: none"> <li>- Material and colour selection that blend with the surrounding environment and reduce the visual impact</li> </ul>
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).	As above
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.	<p>We acknowledged the DPIE's concerns regarding solar access to the open space section between the existing Wallace building and the proposed STEMP Building. The updated Architectural Documentation (<b>Appendix C</b>) provides additional solar access diagrams for both the equinox and solstice. It is apparent from the included shading diagrams that solar gain into existing Wallace building is minimally impacted by the siting of the Stage 2 Ignis Building. The sections provided shows that the deeply recessed external walls of existing Wallace's north façade are already shaded by the building's colonnade for most of the day. The additional overshadowing of existing Wallace's north facade by the Stage 2 building is negligible.</p> <p>However, it is acknowledged that space between existing Wallace and the Stage 2 building will be in shadow for the majority of the day as this space is south of the new Stage 2 Ignis Building. It is important to note that the removal of the existing Wallace building, whenever that occurs, does not alleviate this. In siting any building there is recognition that south elevations and spaces will be in shade all day. In recognition of this the promenade between existing Wallace and Stage 2 Ignis Building is designed as more of a transient space that student and staff move through rather than one where they will gather for long periods, except in summer when it is desirable to do so. This space has therefore been carefully designed to provide as much activation as possible.</p>
The Department requires you to submit additional solar access diagrams to demonstrate how these areas would receive satisfactory solar access during the above times.	As above

**Table 1. RTS Submission - 10424 SSDA**

**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.

In response to the matters raised by the DPIE, the State Design Review Panel and public submission an amended façade design has been proposed and detailed extensively in the accompanying Revised Design Report by PMDL (**Appendix C**).

One of the primary changes to the design is the revision of the two feature sun shading devices on the NNE and E faces of the building. The revised design addresses two key aspects:

- 1. It achieves an appropriate sun shading solution that meets both the requirements of Section J and the College's endeavour (from lessons learnt in Stage 1) to also address winter sun and glare and ensure the atrium space has the desired comfort level without need for AC for the majority of the year.*
- 2. It addresses the GANSW concerns about the 'foreign' diagonal pattern and perceived 'busyness' of the screening devices, which were a direct response to shading sun at key times of the day.*

Considerable investment has been made into developing a solution for the sun shading that drew greater reference from Stage 1 and respected the horizontal and vertical nature of the existing flanking buildings. By recessing the atrium and providing an 'eyebrow' to it, significant shading was achieved to the glazed facade that subsequently only required vertical blades at key locations and angles to achieve the desired shading in summer and winter. A similar approach was taken on the eastern elevation, reinforced by making the whole end of the building one shading element, as opposed to an element applied to the end of the building. The vertical screens enable greater visibility into and out of the building, providing the opportunity to better celebrate the use beyond and frame key views to the College and broader Sydney context

The design and scale of the proposed development reflects the operational requirements of the school; minimises the building footprint so as to maximise landscaping and open space; maintains a green and vegetated character;



**Table 1. RTS Submission - 10424 SSDA**

	<p>minimises the appearance, bulk and scale through façade articulation, massing, roof modulation, setbacks and landscaping; and equitably treats level changes to create appropriate transitions across the grounds.</p> <p>The revised design draws greater reference from and achieves better adherence to the immediate building context insofar as simplifying the lines of the sun shading from diagonal to horizontal and vertical elements and the more ordered arrangement the window openings. The change in window arrangement reinforces the horizontal nature of the NNE facade apertures, directly referencing the adjacent O'Neil building and the backdrop of the Wallace (temporarily) and Ramsay buildings. The southern facade draws subtle reference from the Main building in the size, repetition, hierarchy of openings but avoids a literal copying of these elements to ensure it reads appropriately as a modern interpretation and fulfils the daylight requirements of the learning spaces beyond. The materiality of this facade has been simplified to that of the masonry base, Equitone upper volume and standing seam cladding of the plant</p> <p>The simplification of the building facades in scale, articulation, and materiality contributes to refining the design to its key design intent. Whilst the overall form and intent is retained the reduction in building scale, redesign of the shading devices, grouping and stacking of window openings and rationalisation of material selection, contribute to achieving a 'calmer' and more contextual solution that retains a contemporary learning and modern aesthetic.</p> <p>This has been achieved by some bolder design changes to the sun shading, moving from a diagonal to regular grid, through to subtle changes to the Equitone panel finish, departing from the literal masonry bond pattern and replacing expressed joints with butt joints. The latter has been done to retain a degree of cladding pattern and sufficient texture to break up the expanse of façade</p>
--	---

<b>Table 1. RTS Submission - 10424 SSDA</b>	
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.	As above <b>Appendix C</b> and <b>Appendix D</b>
<b>3. Construction and Traffic Management Plan</b>	
<ul style="list-style-type: none"> <li>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).</li> </ul>	In response to the DPIE's query on the access of trucks during construction and the turning circle of construction vehicles on Site, a turn path assessment has been prepared ( <b>Appendix G</b> ). The turn path analysis has been prepared based on the closest vehicle within <i>AutoTURN</i> to a dog / trailer truck arrangement with a total length of 18.840m which reflects the anticipated trucks which will be used for the excavation and the largest truck expected to access the Site. This mirrors the assumptions of the CTPMP report (Appendix 15 of original SSDA) and confirms there is adequate road space and manoeuvring space to accommodate the expected largest vehicle during construction of this stage of the proposal. This also includes the proposed area to accommodate trucks when loading / unloading.
<ul style="list-style-type: none"> <li>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.</li> </ul>	As above and <b>Appendix G</b>
<b>4. Administrative errors in EIS</b>	
<ul style="list-style-type: none"> <li>Please correct errors in report, including but not limited to: <ul style="list-style-type: none"> <li>Incorrect reference in glossary to GPT (should be GTP).</li> <li>Error, page 58: "The design of the built form and been informed".</li> <li>Incorrect reference to bus routes and ferry services in Appendix 15.</li> </ul> </li> </ul>	<p>Noted and revised</p> <p>Noted and revised</p> <p>The 'error' with the description of bus route 253 that: 'Route 253 does not operate via North Sydney. It operates via the Warringah Freeway'. We</p>

Table 1. RTS Submission - 10424 SSDA	
	acknowledge the 'error' in Table 20 of Appendix 10 but note that the route is correctly described throughout the remainder of the documentation.
<b>Lane Cove Council</b>	
Council does not raise any concerns in relation to the proposed modifications, and in principle supports the proposal.	Noted
<p>Most significantly, the proposed development would include a new 5-storey building which is approximately 20m in height. The new building would breach the 9.5m height control in the Lane Cove LEP 2009.</p> <p>The non-compliance with the height control is considered acceptable in this instance based on the following:</p> <ul style="list-style-type: none"> <li>▪ The proposal is consistent with the previously approved building envelope in the Stage 1 application;</li> <li>▪ The height and scale is lower or similar in scale to other buildings on the campus (Doyle and Vaughn) and is considered in character with the envisioned built form of Saint Ignatius College;</li> <li>▪ The proposed new building is centrally located within the Site amongst the main campus cluster, and would not be highly visible when viewed from the Lane Cove River or neighbouring sites;</li> <li>▪ The building would not result in adverse privacy or overshadowing impacts to neighbouring properties; and</li> <li>▪ The proposal would not have any adverse impact on the heritage significance of the main quadrangle precinct.</li> </ul>	Noted
The proposal would result in an additional 5,117sqm of gross floor area, and a total of FSR 0.183:1 which complies with the FSR control of 0.5:1.	Noted
However, Council recommends the continued inclusion of the previously recommended standard conditions in the original Stage 1 works for the Saint Ignatius' College (SSD 7140). The attached conditions re to be retained in any future consent to ensure the amenity of adjoining and nearby residents are appropriately considered and these structures are integrated with Council services and infrastructure.	Noted

<b>Table 1. RTS Submission - 10424 SSDA</b>	
<b>Environment, Energy and Science Group</b>	
<b>Biodiversity</b>	
A Biodiversity Development Assessment Report (BDAR) Waiver request was approved on 13 August 2020.	No further action required.
<b>Flooding</b>	
EES advises that all relevant flood risk management issues have been adequately addressed and there are no outstanding requirements for this stage of the development proposal.	No further action required.
<b>Heritage NSW, Department of Premier and Cabinet</b>	
The subject site is not listed on the State heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site has low to nil potential for historical archaeological deposits. Therefore, no further heritage comments are required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.	No further action required.
<b>Heritage NSW, Aboriginal Cultural Heritage</b>	
<p>It is noted that there are 6 Aboriginal sites registered on the Aboriginal Heritage Information Management System located within the report study area. None of these sites are located within the area of proposed works and therefore no impacts to Aboriginal Cultural Heritage (ACH) values have been identified. The ACHAR has been prepared in reference to the relevant guidelines as required by the SEARs (Requirement 11).</p> <p>The management and mitigation recommendations provided in Chapter 9.0 (page 34) of the ACHAR and Section 7.6 (page 68) of the EIS are considered to provide appropriate provisions for the conservation of ACH values in the study area. It is recommended that these recommendations are incorporated into Appendix I of the EIS: Draft Management and Mitigation Measures.</p>	Noted and to be revised to reflect recommendations in Appendix I.
<b>RMS - Transport for NSW</b>	
<b>General Comments</b>	

<b>Table 1. RTS Submission - 10424 SSDA</b>	
<p>Section 5.7.1 in the Traffic and Access Assessment Report (TAAR), contains incorrect route information in Table 20. Route 253 does not operate via North Sydney. It operates via the Warringah Freeway from Lane Cove.</p> <p>Section 5.7.2 in the TAAR states there is a ferry. The ferry route has just been cancelled and replaced by school buses. Take out mention of Ferry on page 253, 264, 265 &amp; 267.</p>	<p>We acknowledge the 'error' in Table 20 of the TAAR but note that the route is correctly described throughout the remainder of the documentation.</p> <p>At the time of preparation of the TAAR and GTP in August 2020, ferry services were in place serving the site. The proposed cancellation of the ferry service did not occur, and we have confirmed with Captain Cook Cruises that the commuter and school service remains running for 2021.</p>
<b>Active Transport Considerations</b>	
<p>Future Transport 2056 emphasises the importance of walking and cycling for short trips and reinforces the importance of walking and cycling to increase the catchment of public transport as part of the whole customer journey.</p> <p>Building Momentum - State Infrastructure Strategy 2018-2038 includes recommendations related to walking and cycling, including integrating transport with land use; managing travel demand; unlocking capacity in existing assets; and improving population health outcomes through more active transport.</p>	<p>The GTP provides an outline of plan operation and interfaces for communication with site users at Section 6.7. The GTP also indicates the potential for part of a PDHPE class to look at health benefits of active transport at Section 6.4.1.</p>
<b>Comment:</b>	
<p>Table 1. LDCP 2010 Assessment provided in Appendix 1 – Lane Cove Development Control Plan 2010 as supporting documentation to the EIS states the Proposal is in compliance with Part R Traffic, Transport and Parking of the LDCP 2010, as addressed in the TAAR. However, the following requirements of the LDCP 2010 are not discussed in the TAAR, nor are they apparent in Appendix 6 – Architectural Drawings submitted with the EIS:</p> <ol style="list-style-type: none"> <li>1. Motorcycle parking spaces; and</li> <li>2. Bicycle racks, secured lockers and end of trip facilities.</li> </ol> <p>Although the proposal is not required to adhere to the LDCP 2010, the EIS and supporting documentation does not promote TfNSW Policies to</p>	<p>The concerns raised and commentary provided disregards the previous original masterplan traffic impact assessment report undertaken as part of the Concept Proposal SSD 7140 which is the basis of this proposal.</p> <p>The proposal does not intend to increase the student or staff population, therefore does not trigger any requirement for end of trip facilities or bicycle parking. It appears there is a retrospective view in the above comment that overall masterplan requirements for such facilities are necessary for this particular application which we do not agree. Despite this, the proposed Ignis Building includes in the Basement level- 3 x shower and change facilities (1 x male, 1 x female, 1 x accessible). In addition, the College currently has the following existing end of trip facilities and bicycle parking:</p>

**Table 1. RTS Submission - 10424 SSDA**

encourage and cater for increased rates of walking and cycling, and does not align with TfNSW Policies for integrating transport with land use to encourage and promote a mode shift from single occupancy vehicles to public and active transport.

- 35+ internal bike storage within the College ground
- 4x 8 (32) bike capacity racks adjacent to 3<sup>rd</sup> Yard - external/undercover.
- 4x 3 (12) bike capacity racks at Gartlan Centre- external/undercover.
- Gartlan Centre - 1x male and 1x female staff shower and change facility.
- TKC 2x male and 1x Female staff Shower and change facility.
- In addition, an almost infinite amount of impromptu bike parking options around the campus.

Given the above, any further bike parking and facilities are not required necessary as part of the proposed New Ignis Stage 2 STEMP Building project.

**Recommendation:**

The Traffic and Assessment Report provided as part of the EIS does not address TfNSW policies for integrating transport with land use, or the requirements of the Lane Cove DCP 2010 regarding off-street bicycle parking, motorcycle parking and end of trip facilities. It is requested that the Applicant amend their proposal and associated EIS supporting documentation to satisfy the minimum requirements of the Lane Cove DCP 2010.

It is requested that prior to the issue of the first Occupation Certificate, the applicant be conditioned to provide off-street bicycle parking spaces, motorcycle parking spaces and end of trip facilities in line with the Lane Cove DCP 2010 and in accordance with AS2890.3.

As above. We do not accept that a condition to require additional bicycle spaces is warranted given the existing provisions on the college grounds noting that the Lane Cove DCP does not apply to the SSD.

**Sustainable Travel and Access Plan/Travel Access Guide**

**General Comment**

Remove any reference to Ferry's.

See above confirmation of Ferry service still running.

**Comment**

**Table 1. RTS Submission - 10424 SSDA**

TfNSW does not consider the documentation submitted by the Applicant to have adequately addressed the SEARs requirement for travel demand management measures including a Green Travel Plan and the provision of facilities to increase the non-car mode share for travel to and from the site.

TfNSW acknowledges that COVID-19 has impacted the way people travel on the transport network. However, the reliance on 2015 travel survey data (for students) and 2016 JTW data (for staff) as a proxy for either the current or pre-COVID-19 mode split for students and staff travelling to and from the site is not considered to be sufficient to inform the mode share targets and actions of the subject GTP.

Further, the GTP states a 'list of postcodes where enrolled students live showed that students have origins from across Sydney'. There is no analysis nor any discussion of how this information was used to shape the development of the subject GTP.

TfNSW does not support postponing the implementation of the GTP. A GTP is a living document; there will be actions which can be implemented at or prior to the issue of the first Occupation Certificate for the proposed development under SSD-10424.

TfNSW notes that the subject development does not propose any increase either the staff or student population at the college.

We support the idea that the GTP is a living document. However, as made clear in the GTP at Section 1, the COVID-19 pandemic has altered travel patterns and has led to significant burdens on institutions such as schools, in terms of compliance with public health requirements, in a dynamic environment.

Using College resources to implement the GTP during the pandemic, when the transport situation could change rapidly, would place a burden on the College which would be of limited use, due to the changing transport situation. As such the statement in the GTP at the end of Section 1 that the implementation requirements for the GTP, which are not specified in the SEARs, should be determined in consultations between the DPIE and the College, remains valid

**Recommendation**

Prior to the issue of the first Occupation Certificate, the Applicant should develop a Green Travel Plan in consultation with TfNSW. The GTP is to be updated based on student catchment data including the number and/or proportion of students living in each postcode and a 2021 travel survey of school staff and students which captures at a minimum how they travelled to school prior to COVID-19 (if applicable) and their current mode of travel to and from the site.

We do not agree that the 2015 data is too old to be useful. Mode shares do change over time, for various reasons, but they are very unlikely to change substantially at an established school over the course of 3 or 4 years. As such, the extent of target setting and measures to address the targets, also, are unlikely to change substantially.

Collecting travel information from a previous year presents some real issues:

**Table 1. RTS Submission - 10424 SSDA**

Analysis of the 2021 travel survey data and school catchment data is to be used in conjunction with previous 2015 student travel survey data to inform mode share targets and actions for implementation under the GTP.

The Green Travel Plan should include, but not be limited to:

- analysis of 2021 travel survey data and school postcode data and discussion of how this data has informed the mode share targets and actions of the GTP;
- identifying the number of staff and students within reasonable walking / cycling distance;
- staged mode share targets for staff and students which reflect a commitment to increase non-car mode share for travel to and from the site;
- include strategies that encourage the use of public and active transport and discourage the use of single occupant car travel to access the site; for staff and students;
- include the provision of bicycle parking, dedicated end of trip facilities including
- but not limited to lockers, showers and change rooms and e-bike charging station(s) for staff and students to support an increase in the non-car mode share for travel to and from the site;
- prepare a Transport Access Guide for staff and students providing information about the range of travel modes, access arrangements and supporting facilities that service the site; and
- determine a communication strategy for engaging with students, staff and visitors regarding public and active transport use to the site and the proportion of the health and wellbeing benefits of active and non-car travel to the site.

The Applicant shall submit a copy of the final Green Travel Plan to TfNSW at [development.sco@transport.nsw.gov.au](mailto:development.sco@transport.nsw.gov.au) and Council for endorsement prior to the issue of the first Occupation Certificate.

- Respondents may provide their general or typical mode of transport for the year in question, as opposed to the snapshot mode of transport used on a specific nominated day – snapshot surveys provide a better estimate of typical mode shares for the College, rather than trying to re-weight an unknown mix of single day and typical modes, doing a snapshot survey retrospectively from months ago is not practical
- A proportion of students would not have travelled to the College in the nominated survey year (likely 2019) – nonetheless some of these out-of-scope respondents may feel compelled to provide an answer, even if it's not applicable
- Asking about their current mode of transport in the same survey increases the potential for respondent confusion, with potentially 2021 mode recorded as 2019 mode and vice versa.

In order to provide control over the sample and provide adequate error checking for such a post-survey, it is likely that we would require identifying information from respondents and additional control questions. This would increase respondent burden, affecting results. Also, we would generally seek to avoid collecting any identifying information due to privacy issues, especially from minors.

Comparing the results of this post-survey of 2019 with the 2015 snapshot survey could then result in one of the following situations:

- Broad agreement in mode shares between the surveys – whether the 2021 post-survey is solid or not, or
- Substantial divergences in mode shares from the two surveys – trying to disentangle the source of such differences (e.g., is it due to survey method issues, or due to changes in underlying student/staff travel, etc;) is likely to be problematic and distract from the GTP preparation.

We would suggest the approach to be taken is:

- Work on the basis of the current GTP (including the 2015 survey and 2016 Census).



**Table 1. RTS Submission - 10424 SSDA**

	<ul style="list-style-type: none"> <li>This would address particular comments by TfNSW and measures in the GTP – most of which (within reason) would be affected by different starting point mode shares targets in a relatively minor way.</li> <li>When the pandemic lifts (in 2022 or 2023) undertake a fresh base line snapshot survey, which would feed into the potential amendment of targets and associated GTP measures, as per the living document nature of the GTP. This survey would also commence the cycle of the mode share monitoring element of the GTP.</li> </ul>
<b>Construction and Traffic Management Plan</b>	
<b>Comment</b>	
<p>Traffic and Access Assessment Report (TAAR) - Appendix 1 illustrates construction traffic accessing the site via Riverview Drive. Appendix 1 and 2 also incorrectly identify the proposal as Stage 1.</p> <p>Section 3.0 Construction Truck Routes within the CTPMP states the Stage 2 Development site is located wholly within the Campus grounds approximately 450m south along Loyola Drive from the intersection with the Public Road network. Figure 4 – Truck Ingress &amp; Egress shows all construction truck access and egress traveling south on Tambourine Bay Rd and entering the grounds at Loyola Drive.</p>	The Preliminary Construction Traffic Management Plan included in the TAAR is from Stage 1 of the Concept Proposal and was included as a background document.
<b>Recommendation</b>	
TfNSW currently runs buses down Riverview Drive, a narrow two-lane local road with onstreet parking allowed along parts of Riverview Drive. To minimise the risk of buses and trucks blocking each other, TfNSW recommends the Construction Truck Routes outlined in the CTPMP provided as supporting documentation to the EIS.	Noted. Truck access routes are to be in accordance with the those outlined in the CTPMP provided as Appendix 15 to the EIS.
<b>Sydney Water</b>	
<b>Water Servicing</b>	
<ul style="list-style-type: none"> <li>Potable water servicing should be available via a 100mm CIL watermain (laid in 1937) on Riverview Street.</li> </ul>	No further action required.

**Response to Submissions - Government Agencies**

SSD 10424 - St Ignatius' College Riverview

**Table 1. RTS Submission - 10424 SSDA**

<ul style="list-style-type: none"><li>▪ Amplifications and/or extensions may be required.</li></ul>	
<b>Wastewater Servicing</b>	
<ul style="list-style-type: none"><li>▪ Wastewater servicing should be available via a 150mm VC wastewater main (laid in 1991) located within the property boundary.</li><li>▪ Amplifications and/or extensions may be required.</li></ul>	No further action required.
This advice is not formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our web page in the Land Development Manual.	No further action required. It is noted a Section 73 application will need to be eventually lodged with Sydney Water.