



Response to Submissions - SSDA 8669 – MOD 1

St Aloysius College

47 Upper Pitt Street, Kirribilli

**Prepared by Willowtree Planning Pty Ltd on behalf
of St Aloysius**

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TABLE OF CONTENTS

PART A PRELIMINARY..... 3

1.1 INTRODUCTION..... 3

PART B KEY MATTERs AND APPLICANT’S RESPONSE..... 4

2.1 NORTH SYDNEY COUNCIL 4

2.2 GENERAL PUBLIC 4

2.3 RESPONSE 4

PART C ADDITIONAL INFORMATION..... 6

PART D CONCLUSION 6

APPENDICES

PART A PRELIMINARY

1.1 INTRODUCTION

This Response to Submissions (RTS) has been prepared in response to the community and agency submissions received during the public exhibition of the Modification Report (MOD) for the St Aloysius College redevelopment modification, SSD-8669-Mod-1 for the Site located at 47 Upper Pitt Street, Kirribilli.

The proposal was exhibited from 31 March 2021 to 16 April 2021.

In total 17 submissions were received in response to the public exhibition of the MOD. The submissions were from both government agencies and the general public, including North Sydney Council, Milson Precinct, and the general public.

The Department of Planning, Industry and Environment (DPIE) has also prepared a formal letter outlining additional information or clarifications required prior to the completion of the final assessment and determination of the application. Revised Plans have been prepared to respond to these comments.

Clause 82 of the *Environmental Planning and Assessment Regulation 2000 (as amended)* (EP&A Regulation) permits the Planning Secretary of the DPIE to require the applicant to provide a written response to issues raised in submissions. This Response to Submissions (RTS) aims to fulfil the request from the Director-General.

The RTS Report is structured as follows:

- **Part A** Introduction
- **Part B** Key Issues and Applicant's Response
- **Part C** Additional Information
- **Part D** Conclusion

The applicant, St Aloysius College, and its specialist consultant team have reviewed and considered all matters raised in the submissions. This report provides a detailed response to the key matters raised. The items raised in the submissions have been addressed through the provisions of the further information contained in this response report, which relates to traffic and student numbers. In response to a request for further information on the monitoring cameras, additional details about the cameras have been provided. A revised drawing was also requested and is attached at **Appendix 1**.

PART B KEY MATTERS AND APPLICANT'S RESPONSE

This part of the report provides a detailed response to the key matters raised by in the submissions. These include:

- Traffic and Parking Arrangements;
- Student population; and
- Monitoring and reporting.

A response to the key issues raised is provided below. It is recognised that there were many issues raised in submissions that related to the consented development scheme and as such are not considered relevant to re-examine as they have no direct relation to the modifications proposed.

2.1 NORTH SYDNEY COUNCIL

A comment was received from North Sydney Council, which did not raise any objection to the proposed changes in principle. North Sydney Council raised concerns over certain activities that would call for influxes in students (and visitors) greater than the 20 allowed and requested additional mechanisms to limit this occurring regularly and for ongoing monitoring and reporting of campus population numbers.

It is considered that any events that may require additional visitors or all students on site (for example awards nights) would be infrequent and would have limited additional impacts. The school already hosts such events and it is considered that they are already appropriately managed, and would not increase in frequency.

2.2 GENERAL PUBLIC

A total of 16 submissions were received from the general public in response to the exhibition of the MOD. Milsons Precinct (community group) objected to any increase in student numbers, as it notes that additional students will be regularly present on any special occasions.

The key matters raised relate to overall student numbers and the impacts that any increase in capacity would have on traffic, parking and amenity of the surrounding neighbourhood. Some submissions also raised concerns over privacy of residents due to the technology, accuracy of this technology and monitoring and reporting of student numbers.

Table 1 below provides a break down of the key matters raised throughout the public submissions.

Table 1. Summary of Public Submissions	
Matter Raised	Frequency
Traffic and Parking	14
Monitoring and reporting	7
Student Numbers	6
Use of public facilities	2
Privacy	1
Noise	1

2.3 RESPONSE

The applicant has previously addressed issues such as traffic and parking for the school in the approved SSD application and it is considered that the proposed modification will have no additional impacts on traffic. Furthermore, comments regarding use of public facilities are not considered relevant to this proposal. Noise impacts have also been previously considered in the SSD application.

Monitoring and Privacy Issues

The monitoring cameras will act as a live number count of teachers and students and will alert the executives when the threshold is being approached. When the remote learning environment is arranged, it is noted that the students and teachers will have specified remote days and would not be required to be on campus. The threshold monitoring is an additional check and mechanism to ensure that the remote opportunities are operating as required.

The monitoring cameras have no capability of facial recognition and rely purely on a data count of individuals that cross the school threshold. For this reason, there would be no data stored for any persons passing or that were captured in the public domain, unless they entered the school gates. The footage from the cameras is not intended to be kept as a recording that could be reviewed, and will be used as a data count collection. As the cameras are connected to the CCTV system, there is the ability to privacy screen or further block public areas from the field of view so that a more limited view of the gate is provided.

Two types of cameras are being considered, and they would have different fields of view, either angled down from a standalone post or directly down from above the gate. It is considered that plans showing these fields of view would not necessarily be accurate or reflective of the final technology, given it is not proposed to come into effect until after the development has been built.

It is considered that there would be no amenity or privacy impacts from the use of monitoring cameras.

PART C ADDITIONAL INFORMATION

The Department has requested additional information relating to the field and angle of view that the surveillance monitoring cameras would capture. Revised plans showing those cameras which are located close to or within the public domain. As outlined above relating to privacy concerns, the cameras only capture those students or teachers that pass the threshold of the school site and the footage will not be kept and replayed, it is purely a data numbers counting mechanism.

It is noted that should there be concerns over privacy of the public, the monitoring system is linked directly to the CCTV System and further privacy screening can be added onto those areas in the public domain so that this footage is obscured.

It is also noted that Drawing AW110, Level 0 Plan has been updated and is replaced by Drawing A0100 Revision C (**Appendix 1**).

PART D CONCLUSION

The applicant, St Aloysius College and its expert consultant team have considered all submissions made in relation to the public exhibition of the proposal. A considered and detailed response to all submissions made has been provided within this report and the accompanying documentation.

It is considered that proposed modification to the conditions of consent, will not cause any adverse impacts on the environment and community. Further explanation of the technology used.

In summary, the development warrants the support of the Minister and we therefore recommend that approval be granted to the proposal.