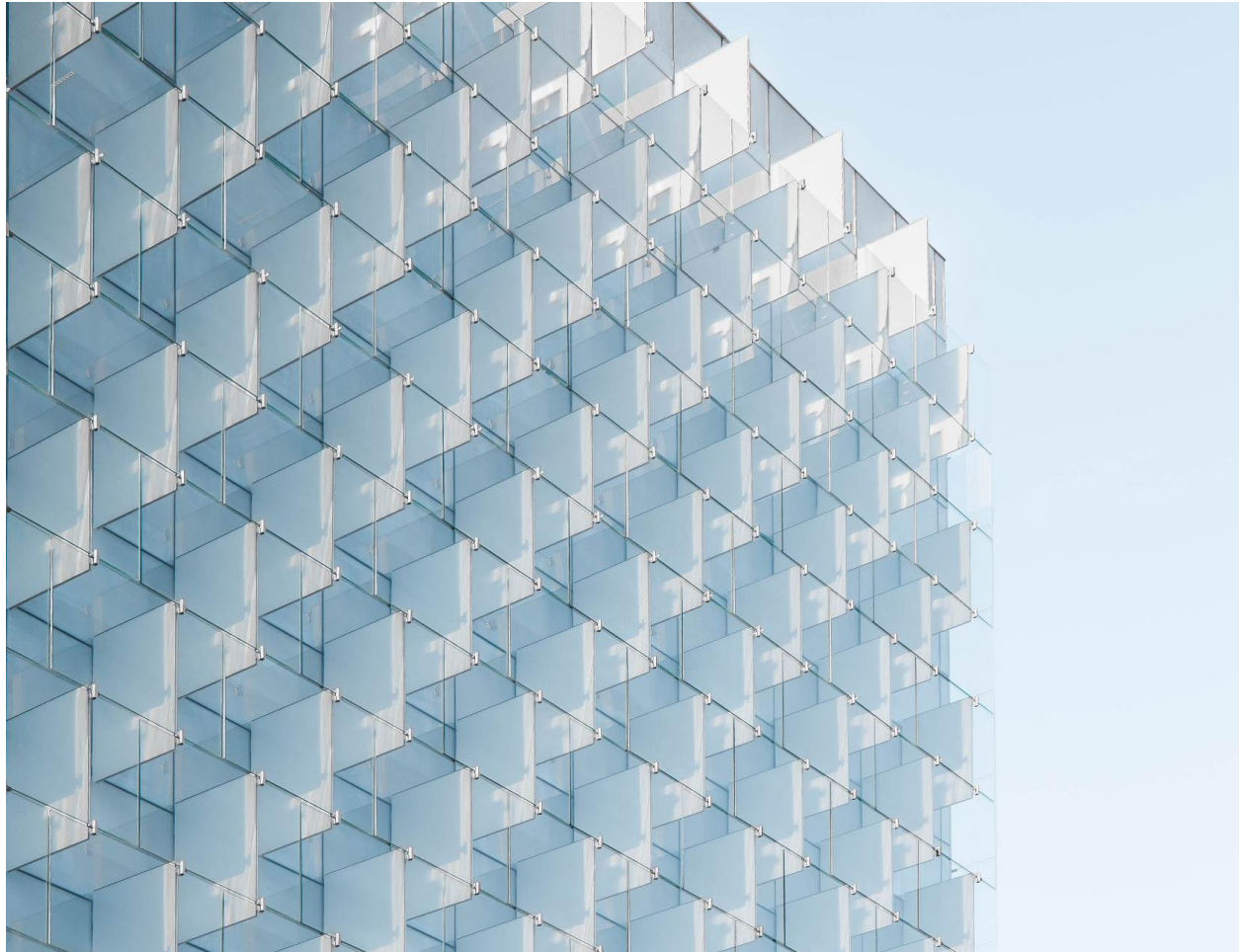


WILLOWTREE PLANNING



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Contact: Sally Prowd



Response to Submissions St Aloysius College – Rozelle Campus SSD - 27208140

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Appendix	Document	Prepared by
A	Public Submission Response	Willowtree Planning
B	Updated Traffic Impact Assessment	Traffix
C	Updated Acoustic Report	Stantec
D	BCA Report (Gordon St)	BCA Logic
E	BCA Report (Victoria Rd)	BCA Logic
F	Updated Plan of Management	St Aloysius College
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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 Environmental Impact Statement (EIS) for the St Aloysius College – Rozelle Campus. The EIS accompanied a State Significant Development Application SSD-27208140 capturing the works for the Site located at 48 Victoria Road and 2A/B Gordon Road, Rozelle.

The proposal was exhibited from 19 November 2021 to 16 December 2021.

In total 14 submissions were received in response to the public exhibition of the EIS. The submissions were from both government agencies and the general public, as summarised below:

- General public; and
- Community groups.

Three responses from various agencies were also received for the submission including:

- Transport for NSW (TfNSW);
- Inner West Council; and
- Environment Protection Authority (EPA).

Of the 14 submissions:

- 12 were objections; and
- 2 provided general comments.

The Department of Planning and Environment (DPE) 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.

Clause 82 of the *Environmental Planning and Assessment Regulation 2000 (as amended)* (EP&A Regulation) permits the Planning Secretary of the DPE 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** Proposed Amendments to Development
- **Part D** Additional Information and Assessment
- **Part E** Mitigation Measures
- **Part F** Conclusion

The applicant, St Aloysius College (SAC), 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 and outlines the proposed amendments to the exhibited EIS matters. 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, acoustic impacts, and student safety. Where individual issues are not discussed in this report, a detailed assessment can be found in **Appendix A**. Some minor amendments to the traffic arrangements have been proposed and detailed in an updated Traffic Assessment (**Appendix B**). The amendments made are discussed in detail in **Part C** of this report.





PART B KEY MATTER AND APPLICANT'S RESPONSE

This part of the report provides a detailed response to the key matters raised by DPE, Government Agencies, and the General Public during the public exhibition process of the proposal. These include:

- Traffic and Parking;
- Noise;
- Student safety; and
- Consultation.

A response to each of the individual issues raised by the DPE, Government Agencies and Authorities and other respondents is provided below. A summary and response to the submissions made by the General Public is provided in **Appendix A**.

A total of four (4) submissions were received from Government Agencies and Authorities in response to the exhibition of the EIS, including a formal submission from Inner West Council. Specifically, responses were received from:

- DPE;
- TfNSW;
- Inner West Council; and
- EPA.

To date no further referral agency responses have been received.

2.1 DEPARTMENT OF PLANNING AND ENVIRONMENT

DPE, as the assessing authority, provided an overarching letter, summarising the key matters to be addressed and additional information to be provided.

A response to each of the issues raised by the DPE have been addressed in below.

Table 1. DPE Request for Information	
Matter Raised	Response
<i>1. Traffic and Transport and Parking</i>	
The Department has reviewed the submitted a Transport and Accessibility Impact Assessment (TAIA) and agrees with the concerns raised by Transport for NSW and Inner West Council in relation to the overall traffic generation, inadequacies of the drop-off/pick-up zones and subsequent impacts on the on-street parking. Consequently, the Department requests that you comprehensively address all of these matters and those raised in the community submissions.	An updated Traffic Impact Assessment (TIA) has been provided at Appendix B . Further detailed responses to all issues raised by TfNSW and Inner West Council are provided at Appendix G .
Additionally, the Department notes that the traffic and on-street parking surveys were conducted during COVID-19 lockdown period on 7 October 2021. Therefore, the results may not reflect the usual amount of traffic and available on-street parking. The Department	Additional parking surveys were conducted on the 10 February 2022 and the results are included within the TIA (Appendix B). These surveys reinforced the availability of parking along the western side of Maney Street and as such the proposed on-street





Table 1. DPE Request for Information	
Matter Raised	Response
considers that the traffic surveys should be re-conducted due to this reason and the TAIA amended accordingly.	pick up and drop off is not considered to impact on street parking availability.
The EIS does not include any details of the use of the ground floor of 2A-2B Gordon Street, nor does it indicate how many parking spaces would be required to cater for the other uses within the site including the church use. The TAIA also does not assess how the overall car parking area would operate with the concurrent uses on the site and whether the available car parking spaces are sufficient to cater for all of the uses within the site. Consequently, the Department requests that you submit a parking layout plan and mark the nominated parking spaces for the proposed development as well as all of the other uses within the site.	The proposal intends to utilise four (4) car parking spaces on the Gordon Street site for staff parking Monday to Friday (during school hours only) The Genesian Theatre would require 10 staff spaces and operates largely after school hours during the week. The Sydney Community College (SCC) operates during the week and would utilise a maximum of 15 spaces during the week. The Church would only utilise parking on the weekend. The four (4) dedicated spaces on site would be available to SAC staff as required during the school day and then utilised by the other uses accordingly after hours. Further detail around parking is provided in the TIA (Appendix B).
2. Noise	
The site at 48 Victoria Road adjoins a busy road. However, the submitted Acoustics Report does not predict the acceptable noise level for the students using the outdoor play on this site adjoining the busy road. You should amend the Acoustic Report to assess the adverse impacts that students will experience in this open space as a result of the traffic noise along Victoria Road. Should the report conclude that the impacts are unacceptable, then additional noise mitigation measures and barriers may be required and must be outlined in the response to submissions.	<p>An updated Acoustic Report is provided at Appendix C. The traffic noise impacts to the playground have been assessed, and it is recommended that the barrier to Victoria Road is made solid (refer to Section 6.1 of the Acoustic Report).</p> <p>The fencing along Victoria Road has been changed into solid material to ensure the appropriate acoustic attenuation can be achieved.</p>
The noise surveys in the Acoustic Report does not consider the uses on the eastern side of 2A and 2B Gordon Street to be sensitive users, although the Department notes that a number of residences are located in this year. You should provide a clear reason as to why these areas have not be added as sensitive receivers and amend the report to include an appropriate assessment of all affected noise sensitive receivers.	The updated Acoustic Report (Appendix C) has assessed potential noise impacts from the classrooms to the properties on Maney Street and Prince Street as requested (refer to Section 5.6 of the Acoustic Report). It was found that any noise impacts to these properties would be negligible and no further attenuation measures would be required.
3. Details of Development	
The application seeks approval to relocate 200 students from St Aloysius Kirribilli campus to Rozelle, during ongoing construction works within that campus. However, the EIS does not	The proposal is for a permanent school campus and this application does not seek any temporary use





Table 1. DPE Request for Information	
Matter Raised	Response
<p>specify whether a time limited approval for the use of the site as a school, is sought for. This is crucial to the assessment of the application, given, a long-term use of the site as a school would have several other implications that may otherwise not be experienced in a short-term or temporary use. In this regard, all of the following matter need to be clarified:</p> <ul style="list-style-type: none"> whether you seek approval for a time limited (temporary) or permanent development consent for the use of both the sites as a school. the age group of the students to be catered for in the campus noting that the drop-off/pick-up operations as well as public transport requirements would vary significantly for primary and high schools. The TAIA should be amended to reflect the impacts of the use of the campus considering the specific age group. details of community events and miscellaneous activities beyond proposed operation hours, noting that the EIS and the TAIA state that there would be after hour use of the premises with no supporting assessment provided. consideration of the cumulative impacts of all of existing uses within 2A-2B Gordon Street in conjunction with the proposed new use (in terms of noise, traffic, safety etc). whether any before or after care operations are included, if primary school students are accessing this campus at Rozelle. 	<p>arrangements. Clarification on the details of the development are provided as follows:</p> <ul style="list-style-type: none"> Permanent development consent for the proposed school is sought for both sites. The students would be between the ages of 12-15 (Years 7 to 10). Students of this age have been considered in the traffic analysis, noting that these students would not be able to drive independent vehicles. This is detailed in the Plan Of Management (POM) (Appendix F). Out of school events or activities may be occasionally held on the site, where this is considered appropriate. As detailed in the POM, notification will be given to surrounding residents for any events at the campus (Appendix F). Any large scale events would still be held on the main Kirribilli campus and various sporting fields already associated with SAC. The cumulative impact of existing uses of Gordon Street have been assessed within the TIA (Appendix B). Given the other uses mainly operate weekends or after school hours, this has been further considered in Section 4.5 below. No before or after care facilities are proposed on the site.
4. Operational Management Plan	
<p>The submitted OMP dated October 2021 is in draft format and is not accepted. You must submit a revised preliminary OMP addressing the following matters:</p> <ul style="list-style-type: none"> implementation of the acoustic report recommendations (such as restricting the play times to 2 hours per day). details of management measures to ensure safe student movements between the two sites and/or from/ to the drop-off and pick-up areas on the 	<p>An updated POM (Appendix F) has been provided which outlines;</p> <ul style="list-style-type: none"> The restriction of play times to 2 hours per day, being the two lunch breaks. Details of how students would move between the two sites has been provided, and will include supervised crossing between lesson times and at break. Further information regarding waste generation has been provided including collection times.





Table 1. DPE Request for Information	
Matter Raised	Response
<p>street (location of which are currently unknown)/.</p> <ul style="list-style-type: none"> details of waste generation estimation and waste storage areas within the site as well as timing of collection of waste to avoid conflict with the users of the site. 	
<i>5. Building Code of Australia (BCA) Assessment and Access Report</i>	
<p>Level 1 of the site at 2B Gordon street has been identified as class 5 building in the submitted BCA assessment. The Access report considers the use to be for office purposes and staff room. However, according to the EIS and architectural plans, Level 1 of 2B Gordon street would be used as classrooms. Noting this significant discrepancy, the Department requires to you submit an amended BCA Assessment and Access Report to be consistent with the EIS.</p>	<p>Level 1 of Gordon Street will be used as classrooms. The BCA Report is attached at Appendix D.</p> <p>The Access Report only refers to the Victoria Road site as no works are being undertaken on the Gordon Street site which require an access assessment, as this will be a leased space. It is noted that the only works undertaken to the Gordon Street site include removal of the existing kitchen, some minor restoration/painting and replacement of a balustrade.</p>
<p>A detailed assessment of the proposal against all relevant deemed to-satisfy provisions of the BCA has been provided within Annexure D of BCA Assessment report. As the proposal is located on two separate sites, you are requested to provide two separate assessments for each building in an amended BCA Assessment report.</p> <p>The amended BCA Assessment report must address BCA compliance requirements and impacts on heritage items/ conservation areas (if any).</p>	<p>Two separate BCA reports have been prepared and attached at Appendix D and E. These reports address the BCA compliance requirements and impacts on heritage items as required.</p> <p>The Gordon Street building will be retained, with only minor painting works, removal of the kitchen and upgrade of a balustrade to take place. Given the age of the building on this site, these provisions will not be at the relevant BCA standards, however no students with accessibility issues will need to utilise these classrooms. The POM details this issue in further detail (Appendix F).</p>
<i>6. Crime Prevention through Environmental Design (CPTED)</i>	
<p>Please provide further information on how other operations access to the sites will be limited to ensure that non-school personnel do not have access to the school premises.</p>	<p>The access to the Victoria Road site will be limited and monitored by staff. The access points will be via the Victoria Road entrance. Access to Gordon Street is shared among other users, however these are largely not within the same school hours. Access into the building will be restricted to students and monitored by the teachers present in these classrooms.</p>





Table 1. DPE Request for Information	
Matter Raised	Response
	The School will ensure that all evacuation and lock down procedures are in place on the campus.
7. Community Engagement	
<p>The EIS engagement overview indicates that the community engagement plan for the Rozelle community has not captured the affected community on the north side of Victoria Road. Further community engagement is required to provide opportunities to the community to collaborate on the proposed development.</p>	<p>It is noted there was an error with the consultation mapping and the full extent of consultation was not shown. The north side of Victoria Road was engaged as demonstrated in Figure 1 below.</p>  <p>Figure 1: Consultation Map</p> <p>It is not considered that any further consultation is required to be undertaken.</p>
Additional Matters Raised by DPE	





Table 1. DPE Request for Information	
Matter Raised	Response
Pedestrian routes with footpath widths should be included in the TIA	TIA has been updated to include these details (Appendix B).
A Drop Off and Pick Up (DOPU) zone is proposed on the western side of Maney Street. Provide a scaled plan to indicate the accurate location and length. Provide details of alternative DOPU locations.	The TIA shows the location of the proposed DOPU. Many alternative locations have been considered for the DOPU, including along Gordon Street, however it is considered that Maney Street is the most appropriate and least disruptive to traffic flows.
Insufficient information has been provided to clarify the allocation of car parking spaces on the site. Appendix G states that the peak parking demands of other uses on the site will not coincide with the school use. However, according to the Operational Plan of Management, the other uses of the site operate during school hours. The TIA should provide the details of allocated parking for each use on the site including the number of parking spots allocated for the use of the unit which is proposed to be used as the school in the future. In addition to clarifying the allocation, the TIA should also assess the impacts of allocation of 4 spaces to the school, on the other concurrent uses within the sit and proposed mitigations measures if required.	The TIA has been updated to demonstrate the parking requirements of the other uses across the site. It is noted that the school requires four (4) spaces during its operations, the Genesian Theatre requires a maximum of ten (10) parking spaces for staff on site, and SCC requires 15 spaces. As further detailed below in Section 4.2.3 below, these parking demands occur at different operational times and as such there would be no conflict of the uses. This is further details in the TIA (Appendix B).
Electronic copy of the SIDRA modelling files as previously required by TfNSW	SIDRA modelling can be sent to TfNSW directly as this modelling file type is not supported on the Major projects portal.
TAIA proposes that the shuttle service between the Kirribilli and Rozelle campuses will drop off and pick up the students within the car park at 2A/B Gordon Street. The updated swept paths for vehicles entering and exiting 2A/B Gordon Street show that the vehicle body envelope will collide with the bollards around the existing padmount. which is unacceptable. Additionally, it is better to consider a 600mm Clearance Envelope for the shuttles. Please provide additional information to address this issue.	The swept paths have been updated within the TIA (Appendix B) to demonstrate that there are no conflicts with bollards on 2A-2B Gordon Street, as the background drawing incorrectly shows five (5) bollards instead of four (4).
Council stipulates that Gordon Street has an existing truckload limit of 4 tonnes. In this regard, the RtS should verify whether the Shuttle bus complies with this limit.	As detailed by TfNSW that this weight limit only applies to traffic moving through the area and not to traffic going to a specific destination (which the shuttles would do). The shuttle buses would weigh 3,955kg and as such is below the 4 tonne limit.





Table 1. DPE Request for Information	
Matter Raised	Response
TAIA, on page 26, states that the development proposes 12 space bicycle rack; however, on page 37, the provision of 10 space bicycle rack is presented. Please rectify the inconsistency within the document.	Noted. This has been rectified, there is provision for 12 bicycle spaces.
<p><u>BCA report for 2A/B Gordon Street building work</u></p> <ul style="list-style-type: none"> As previously requested, please provide a list of works that are proposed for 2A/B Gordon Street. This was requested earlier by the Department. However the RtS has not included any clear information in this regard. The BCA report should also be amended to reflect any amendments to the internal building fabric. Additionally, the submitted heritage impact assessment states that the proposal will reuse the existing classrooms with no physical changes proposed. If the RtS identifies any physical changes to this building, the Heritage Impact Statement needs to be amended to address these changes and the associated impacts. The BCA report refers to drawing numbers that have not been submitted before and refers to the first floor (I1) access to two stairways. An amended BCA report is required to clarify these matters, and a plan has to be marked to demonstrate details of the proposed changes and the 2 stairways. 	<p>No physical building work is proposed to Gordon Street, the works proposed would include minor interior refurbishment such as painting, removal of a kitchen and the upgrade of a balustrade on the stair case. The building fabric will not be impacted.</p> <p>No physical changes are proposed and as such the heritage report has not been updated.</p> <p>The BCA report (Appendix D) has been updated to clearly demonstrate the appropriate drawing and to show the existing 2 stairways. It is noted that the second stairwell is not proposed to be utilised as part of the School.</p>
<p><u>Fence screening</u></p> <p>The proposal includes a 2m high fence on the boundary which may not be visually pleasant. Additional information should be submitted to clarify how this fence would be screened from the public domain to reduce its visual impacts.</p>	<p>The fence was always included within the proposed development and is required to be a solid screen for acoustic mitigation to the playground area. The detailed design of the fence is proposed to be developed in consultation with relevant stakeholders and can be submitted to DPE for approval as a condition of consent. The Landscape Plans have provided an overall concept idea about what the fence would look like, however further detail will be developed</p>





2.2 TRANSPORT FOR NSW

TfNSW raised a number of matters in relation to traffic generation and bus stop locations, a response to each of the issues raised have been addressed in **Table 2** below.

Table 2. TfNSW Comments	
Matter Raised	Response
<p><u>Traffic Model</u></p> <p>The report does not include evidence of any model calibration and validation to enable a critical assessment of the traffic impacts of the intersection at Victoria Road and Gordon Street. When validating the model, the Applicant should demonstrate that the model meets the requirements of TfNSW Traffic Modelling Guidelines.</p> <p>Recommendation: The Applicant should submit details to TfNSW for acceptance, of the baseline conditions and will be assessed to be satisfactorily validated for the various school time periods of the day, in accordance with the procedures set out in the models' reference publication. TfNSW requests an electronic copy of the SIDRA modelling files for review and verification, to be provided as part of the 'Response to Submissions' (RtS).</p>	<p>A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).</p> <p>The SIDRA 9 model has been calibrated and validated through a variety of methods. This modelling can be provided to TfNSW as required.</p>
<p><u>Shuttle Bus</u></p> <p>It is proposed that pick-up and drop-off by the private coach, be conducted from the public bus stop located along the southern side of Victoria Road at Evans Street (Stop ID: 203922).</p> <p>Safety and Performance is one of the six key outcomes identified in Future Transport 2056. With the release of the NSW Road Safety Plan 2021, TfNSW has set a long-term goal for a trauma-free transport network by 2056 and a 'Towards Zero' vision for NSW.</p> <p>The westbound kerbside lane of Victoria Road is subject to Clearway Restrictions between 0600-1000 and 1500-1900 Monday to Friday and</p>	<p>A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).</p> <p>Two (2) shuttle buses will be provided that can drop students within the car park of Gordon Street.</p>





<p>between 0800 to 2000 Saturday and Sunday. Dwell times associated with the boarding and alighting of students would cause unacceptable delays. Furthermore, there is no layover area for a pick-up and the marshalling of any buses on the classified road network is unacceptable.</p> <p>Recommendation: As part of the RtS, the Applicant should detail how school shuttle buses can be accommodated near the school without undertaking these activities on the classified road network – such as the local road network.</p>	
<p><u>School Operation Management Plan</u></p> <p>The proposed development relies on managing students from Victoria Road by bus and those crossing Gordon Street which have to be encouraged to cross at Victoria Road. It is unlikely that this can be safely managed and relies on a staff member to be always present. The consequences are that students may cross midblock between stationary vehicles queued back from Victoria Road.</p> <p>The traffic model output indicates that queues will extend down Gordon Street beyond the school. Furthermore, it is noted that Levels of Service (LoS) leaving Gordon Street on approach to Victoria Road is LoS(E) and LoS(F) which is an environment inappropriate for students where the footpaths are narrow.</p> <p>Recommendation: TfNSW requests that the Applicant addresses this as part of the RtS.</p>	<p>A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).</p> <p>Staff supervision points have been noted within the POM (Appendix F), with the safety of students an important consideration.</p>
<p><u>School pick-up and drop-off Arrangement</u></p> <p>There is no identified location where students can be picked up or dropped off either by car or bus. The pick-up and drop areas should be located where pedestrian and vehicular conflicts are minimised. The location should consider and incorporate all aspects of student safety, convenience, and comfort.</p> <p>Drop off and pick up zones should be exclusively available for use during the facility's operating hours with spaces clearly marked accordingly, close to school to avoid unnecessary circulation and re-entering the classified road network. All access for students should be provided via the local road network and the access point on the</p>	<p>A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).</p> <p>The proposed pick up and drop off location has been relocated to Maney Street to ensure that queues do not impact nearby intersections.</p> <p>These pick up and drop off locations will allow for a 30minute period before and after school only and the zone is not required for all day use.</p>





<p>local road should be as far as possible away from classified road (Victoria Road) and existing signalised intersection (Victoria Road / Gordon Street).</p> <p>Recommendation: It is requested that the Applicant be conditioned to undertake a Road Safety Audit (RSA) for the school pick-up and drop off area in accordance with Austroads Guide to Road Safety Part 6: Managing Road Safety Audits and Austroads Guide to Road Safety Part 6A: Implementing Road Safety Audits. The RSA is to be undertaken by an independent, TfNSW accredited, road safety auditor. Based on the results of the Road Safety Audit, the applicant shall review mitigation measures for the operational plan, bus shuttle operation, and determine a suitable pick-up / drop-off location for students.</p>	
<p><u>Swept Paths</u></p> <p>TfNSW notes that the submitted swept paths for vehicles entering the two locations on Gordon Street are not acceptable in their current form (appendix E and F in the Transport Impact Assessment).</p> <p>Recommendation: TfNSW requests that the Applicant addresses this as part of the RtS in which the swept paths showing vehicle entering and exiting the roadway using the current driveways and line-marking through Gordon Street.</p>	<p>A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).</p> <p>Updated swept paths have been included in the TIA.</p>

2.3 ENVIRONMENT PROTECTION AUTHORITY

The EPA had no comments and required no further consultation on the project.

2.4 INNER WEST COUNCIL

Inner West Council has objected to the application on several grounds as outlined in .

Table 3. Inner West Comments	
Matter Raised	Response
<i>Traffic Signals and Pedestrian Safety</i>	
Objection to the proposal as an intersection modelling assessment, at the Gordon Street and Victoria Road traffic signals, addressing the additional pedestrian movement between the	A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).





Table 3. Inner West Comments	
Matter Raised	Response
two school buildings throughout the operating hours of the proposed campus, has not been provided. Additional movement is expected to impact the level of service on Gordon Street.	The school will limit the number of times students cross during school hours and will supervise these crossings. These crossings will happen during school hours which are outside of traffic peaks.
The issue of pedestrian safety has not been addressed for students or staff moving between the two sites as there is a likelihood of pedestrians jaywalking.	As all crossings will be under staff supervision, as detailed within the POM (Appendix F), there will not be the opportunity for jaywalking to occur.
<i>Pick up/drop off Area and Congestion</i>	
Objection to the proposed pickup/drop off area provided in Maney Street, as this would result in the loss of existing 2P Resident Parking Scheme areas. Additionally, this arrangement would create the possibility of vehicles queuing in Quirk Street and blocking off the street. The same queuing issue also applies in Gordon Street, which is a Regional Road carrying about 3,000 vehicles per day.	A detailed response has been provided at Appendix G and within the updated TIA (Appendix B). The pickup/drop off bay has been relocated further north on Maney Street to alleviate any possibility of queues impacting intersections. These zones are only required 30minutes before and after school time.
The TAIA only depicts one pick-up/drop-off route to the proposed pick-up/drop/off area in Maney Street, i.e., via Victoria Road. No details regarding alternative routes and potential impacts on existing traffic have been provided should staff or students arrive from other directions.	A detailed response has been provided at Appendix G . Alternative routes have been detailed in the updated TIA (Appendix B).
<i>On-street parking, traffic movement & congestion</i>	
Parking availability during morning and afternoon peak hours on surrounding streets indicates about 70% occupancy. This reflects a parking threshold where an increasing proportion of vehicles are looking for a parking space in the area. Objection is raised as there are narrow end-end streets with inadequate turning areas, such as Prince Street and Quirk Street (west of Gordon Street), which will result in unnecessary localised congestion as the narrow width of these streets do not allow for two-way passing.	A detailed response has been provided at Appendix G and within the updated TIA (Appendix B). Additional parking surveys have demonstrated there is sufficient capacity to accommodate the pickup and drop off spaces.
The TAIA does not discuss the loss of existing parking on the site.	A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).





Table 3. Inner West Comments	
Matter Raised	Response
	There is no loss of parking on site. The four uses operate at different times and can still utilise the required number of parking spaces.
<i>Shuttle Bus Provisions</i>	
<p>Objection is raised to the proposed use of Bus Zones in Victoria Road for set down or pickup of passengers. Private coaches are not permitted to use these Bus Zones and no alternative has been provided.</p> <p>Note: Gordon Street has an existing truck load limit of 4 tonnes. Allowing shuttle bus movements will affect residential amenity and would further exacerbate congestion and vehicle movement.</p>	<p>A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).</p> <p>The proposal will include two shuttle buses that can utilise the Gordon Street site for pick up and drop off.</p>
<i>Traffic and Parking Comments</i>	
Assumption of the traffic distribution is based on the Kirribilli campus and certain proportion of students with shorter travel distances that would opt to be driven to the proposed college.	<p>A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).</p> <p>The school does not anticipate any change to the existing catchment, noting the intention is for one year cohort to utilise the campus with the rest of the schooling to continue at the Kirribilli campus.</p>
The peak car travel in the AM is 44 vehicles. The report mentions that the proposal will result in 8 vehicles arriving during a 30-minute period, which is considered conservative. In particular, the proposed new Campus may result in additional students from the locality, which may not use the proposed shuttle bus service or public transport.	<p>A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).</p> <p>As noted above, the catchment is not anticipated to alter, and the existing travel mode surveys indicate the majority of students catch public transport to school, with this not anticipated to change.</p>
The proposed four (4) off-street parking spaces are in conflict with other uses on the subject site. In this regard, the TAIA does not provide details with regard to the existing and approved uses at No. 2A and 2B Gordon Street. The TAIA does not provide details of how the off-street parking spaces at this site will be allocated between the proposed school, out-of-hours uses of the church and school, and rehearsals and events at No. 2A and 2B Gordon Street, St Joseph's Church and any other uses on site. On-street parking in surrounding streets are in high demand throughout the day.	<p>A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).</p> <p>Four (4) spaces will be leased on this site during school hours. After these hours the other uses on site can utilise the spaces as required.</p>





Table 3. Inner West Comments	
Matter Raised	Response
<p>The TAIA does not provide sufficient details with regard to construction traffic impacts and management. Insufficient information has been provided with regard to predicted construction vehicle movements, in particular larger vehicles and trucks that cannot access the two sites and how this will be managed in coordination with other construction occurring in the area, and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated as required by SEARS. It should be noted that works for WestConnex Rozelle Interchange and the Rozelle Parkland will continue beyond 2023.</p>	<p>A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).</p> <p>Minor construction works are required, mainly being fit out at which stage contractors may be able to park on-site. During the lift core and concrete pours, additional traffic management will be required. Further detail of this management can be conditioned to be coordinated with Council and TfNSW.</p>
<p>The TAIA should be updated to include measures proposed to ameliorate adverse impacts on the traffic movement, congestion and on-street parking. In addition to the objections and concerns raised above, a list of works that should be considered are:</p> <ul style="list-style-type: none"> ▪ Quality end-of-trip bicycle facility (e.g., lockers, showers, changing rooms, repair equipment) be provided to students, staff and visitors. ▪ A sheltered bicycle rack area ▪ A Green Travel Plan be provided, which should be required to be updated at regular intervals to encourage the use of the existing bicycle and walking network. ▪ Kerb extension be provided in the east side of Gordon Street and an RMS spec pedestrian fencing be provided to stop jaywalking. Council will not consider approving a crossing facility across Gordon Street. ▪ Additional requirement for a 40km/h school zone in Gordon Street be provided. ▪ In this regard, should the development be approved, an application to Transport for NSW will be required for necessary school zone implementation. ▪ Provision for EV charging facility (3-phase power) and car share spaces within the off-street carpark. 	<p>A detailed response has been provided at Appendix G and within the updated TIA (Appendix B).</p> <p>Based on the existing school campus, cycling uptake is almost none, and as such the proposed end of trip facilities are considered to meet expected demand.</p> <p>A Green Travel Plan can be conditioned accordingly.</p> <p>Any kerb extension would require authority from TfNSW and is not considered essential for this development to operate. Should this be required, a condition of consent can be incorporated. However, as the driveways would still be open it is not considered that this would be an effective measure to restrict students crossing.</p> <p>The 40km/hr zone will be required by TfNSW and is done through a separate process, should the application be granted approval.</p> <p>The proposed car parking spaces are leased as part of an existing use, which did not require the provision of EV charging or car share. It is onerous to require these additional provisions given there is limited additional traffic impacts from the proposal.</p>
<i>Landscaping</i>	
No objections are raised with regard to the proposed tree removal, subject to replacement	Noted.





Table 3. Inner West Comments	
Matter Raised	Response
planting of a mix of trees and shrubs as depicted on the proposed landscape plan.	

2.5 GENERAL PUBLIC

A total of 14 submissions were received from the general public in response to the exhibition of the EIS.

In summary twelve (12) submissions objected to the proposal with two (2) outlining concerns with traffic and questions on the submission but not objecting to the school use itself.

below provides a breakdown of the key matters raised throughout the public submissions.

Table 4. Summary of Public Submissions	
Matter Raised	Frequency
Traffic	14
Parking	12
Traffic Safety	10
Noise Impacts	10
Consultation	5
Out of Hours Events	5
Accessibility to Amenities	5
School/School culture	3
Construction Traffic and Parking	2
Construction Noise	2
Visual Privacy	1
Student Pedestrian Traffic	1

A detailed discussion of matters raised by the community is provided in **Appendix A**.

One additional public submission was received after the exhibition period relating to the use of coaches along local streets. The proposal has been modified to allow for smaller coaster buses to be accommodated on-site.





PART C PROPOSED AMENDED DEVELOPMENT

Since the conclusion of the public exhibition of the proposal, generally minor amendments have been made to the proposed development in response to the issues and comments raised by DPE, Inner West Council and other government agencies, as well as the local community.

No changes to the overall development are proposed, however some amendments have been made with regards to traffic and transport, and acoustic treatments. A minor update to the Architectural Plans (**Appendix H**) have been made which ensure that the lift can be constructed and results in the relocation of this lift away from the existing built form. It is noted that the works to Gordon Street include the removal of the existing kitchen, minor interior painting works and the replacement of a balustrade in the stairwell.

The updated Architectural Plans are listed below for reference:

- DA100 Site Plan, dated April 2022
- DA101 48 Victoria Rd Demolition Plan L0, dated April 2022
- DA102 48 Victoria Rd Demolition Plan L1, dated April 2022
- DA103 48 Victoria Rd Proposed Plan L0, dated April 2022
- DA104 48 Victoria Rd Proposed Plan L1, dated April 2022
- DA105 48 Victoria Rd Roof Plan, dated April 2022
- DA200 48 Victoria Rd Elevations, dated April 2022

An updated Traffic Impact Assessment, Plan of Management (POM), BCA Report and Acoustic Assessment have been provided with this RTS submission, detailing the amendments and to address the relevant comments made during the exhibition process. Further detail of the proposal has been provided within the updated reports to provide clarity around the proposal.

The following key changes have been made to address the points raised;

- Minor relocation of the lift to ensure it can be constructed;
- Two shuttle buses will run and drop students off within the Gordon Street site;
- Relocation of pick up and drop off bay north on Maney Street;
- Solid acoustic boundary wall to ensure appropriate attenuation for the play area; and
- Restrict outdoor play to maximum 2 hours per day for residential amenity.

It is acknowledged that no further amendments are proposed as it is considered all other matters have been appropriately addressed in the original EIS submission and subsequent response.





PART D ADDITIONAL INFORMATION AND ASSESSMENT

4.1 OVERVIEW

The exhibited EIS assessed the potential impacts of the overall development against a range of matters relevant to the proposed development. Except where addressed in this report, the conclusions of the original assessment remain unchanged. The following matters were assessed in the exhibited EIS:

- Planning matters including assessment against the relevant State and Local Planning Policies;
- Built Form, Architecture and Urban Design;
- Environmental amenity, including solar access, acoustic privacy, visual privacy, views and wind impacts;
- Landscaping;
- Traffic and parking, including during construction and operation;
- Sustainability;
- Social impacts;
- Biodiversity and riparian management;
- Noise and vibration;
- Services and utilities;
- Sediment and erosion control;
- Stormwater management and drainage;
- Geotechnical matters;
- Heritage;
- Ecological Sustainable Design;
- BCA;
- Access;
- Fire Engineering; and
- Waste management.

In response to the matters raised, the following consultant reports and supporting documentation has been updated in support of the EIS:

- Architectural Plans;
- Traffic Impact Assessment;
- Acoustic Assessment;
- BCA Reports;
- Plan of Management.

The matters requiring further assessment are addressed below.

4.2 TRAFFIC AND TRANSPORT

The TIA has been updated to provide further clarity and assessment of the relevant traffic impacts (**Appendix B**). As consistent with the original EIS, it is considered that any traffic impacts associated with the proposed development would be minor and not impact on the capacity of the surrounding road network. The proposed changes to the shuttle bus provision and pickup/ drop off location is not anticipated to have any substantive change to the overall traffic generation and as such the original findings of the EIS are maintained.

4.2.1 Shuttle Buses

The proposed development has been altered to include provision of two smaller shuttle buses (25 seat capacity) that will operate between the main campus at Kirribilli and the proposed Rozelle campus. These buses will be able to pick up and drop off students within the site on Gordon Street, which will be





appropriately managed and monitored by staff to ensure this is done safely and efficiently. Swept path analysis for the shuttles has been provided in the TIA (**Appendix B**) to demonstrate that these buses can manoeuvre into and off the site in a forward direction.

4.2.2 Pickup & Drop Off

The pickup and drop off location has been relocated slightly further north on Maney Street, this is to reduce any impacts on the nearby intersections. The revised location is identified in **Figure 2** below. It is considered that these bays would only be required for 30 minute before and after the school day, and at all other hours could be utilised as current resident street parking.



Figure 2. Proposed pickup/ drop off location (Source: Traffix, 2022)





4.2.3 Car Parking Gordon Street

The existing carpark on the Gordon Street site has 19 car parking spaces, which are proposed to be shared between all uses including the Sydney Community College, Genesian Theatre, the Church and SAC.

The carpark is owned by St Josephs Catholic Parish and has a license in place with entities who lease its premises. The licences operate under a 'first-come-first-served' basis. This carpark is utilised by all tenants on the site in a shared manner and it is not foreseen that there would be any conflicts arising as further examined in .

Table 5. Parking Allocations		
Use/ Tenant	Operational Hours	Car park requirement
Sydney Community College	Monday-Thursday: 9.30am-9.30pm Friday & Saturday: 9.30am-5.00pm	15 spaces
St Aloysius' College	Monday-Friday: 8.00am-4.00pm	4 spaces
Genesian Theatre Company	Monday-Sunday: 10am-12.00am	1-2 spaces
Genesian Theatre Company Performances	Friday and Saturday 6.00pm-10.00pm Sunday afternoon matinee 1.00pm-5.00pm.	19 spaces
St Joseph's Catholic Parish	Sunday	19 spaces

4.3 NOISE IMPACT

The Acoustic Assessment has been updated (**Appendix C**), and further looks at any impacts on neighbouring residential properties. The findings of the original EIS are maintained, with there being minimal to negligible impacts on adjoining residential properties, with only some potential impacts from the outdoor play area. To ensure that impacts can be appropriately mitigated, the outdoor play space is limited to use for only 2 hours each day, as detailed in the POM (**Appendix F**).

It has also been recommended to ensure noise attenuation from the adjoining road noise is achieved, that the proposed fencing would be a solid barrier. This solid fencing will be incorporated as the detailed landscaping proposals are completed. The detail of this boundary fence and artistic treatment is to be developed and conditioned accordingly.

It is considered that the proposal is acceptable with regards to noise.

4.4 PLAN OF MANAGEMENT

The POM (**Appendix F**) has been updated to provide further clarity and detail around the operations of the Rozelle campus. The following key points have been included;

- The campus caters for students between 13 to 15 years of age.
- Any extra curricular activities that may take place on site would be restricted to the year group and the community would be notified.
- Supervision at pickup and drop off, and crossing Gordon Street will ensure student safety.





- Accessibility of the campus for disabled students.
- Detailed waste processes have been included and waste is anticipated to be collected by contractors at in line with existing waste collection for Sydney Community Centre to minimise disruption.

It is anticipated that the Plan of Management will ensure limited impacts the community and importantly the safe operation of the Rozelle campus.

4.5 CUMMULATIVE IMPACT

The proposed school development will operate across two (2) sites, with the Gordon Street site only utilising four existing classrooms as a tenant. The other operations on the Gordon Street site include;

- Genesian Theatre – there is a current development application (DA 2020/0800) to allow this to operate. The hours of operation are between 10am and 12am seven days a week to allow for set up and rehearsals. Performances are limited to Fridays, Saturdays and Sundays.
- Sydney Community College (SCC) – the SCC currently operates on site with classes commencing at 8:30am. However, the majority of classes are scheduled for the late afternoon/ evening.
- Church/ Parish Hall – This is mainly operational on the weekends and for sporadic events. It is also understood that the crypt space is utilised by a local Indigenous community organisation for storage purposes.

The proposed school use would operate standard school hours and largely falls outside of the peak times for the other uses on site. While it is unlikely that the uses on site would all be at peak operation at the same time, it is anticipated that all uses could operate effectively on the site.

Each of the uses on Gordon Street have already been approved or are in operation. As demonstrated in the updated Acoustic Report (**Appendix C**), the operations of the School with the existing site conditions will not impact on the acoustic amenity of surrounding uses. The TIA (**Appendix B**) has also demonstrated that with all uses in operation, there would be minor increases to traffic, and this would not cause significant delays or add to parking stress and would not compromise safe operation of any uses or surrounding residences.





PART E MITIGATION MEASURES

The collective measures required to mitigate the impacts associated with the proposed works are detailed in **Table 6** below. These measures replace those outlined in the original EIS where applicable.

Table 6. Mitigation Measures	
Noise	Measures to mitigate noise will be implemented in line with the Acoustic Report (Appendix C). Outdoor play areas will be utilised for a maximum of 2 hours per day and a solid fence will be incorporated along the boundary fronting Victoria Road on the Victoria Road site only.
Construction Impacts	A detailed Construction Management Plan (CMP) will be prepared by the appointed contractor prior to the commencement of works. A detailed Traffic Construction Traffic Management Plan will also be prepared prior to the commencement of external site works including the lift and playground area. This plan will be created in consultation with TfNSW and Inner West Council and is anticipated to be conditioned accordingly.
Traffic and Parking	St Aloysius College – Rozelle campus will operate in accordance with the Green Travel Plan (Appendix B).
Waste Management	The targets of waste reduction and collection of waste will be as outlined within the POM (Appendix F).





PART F CONCLUSION

The applicant, SAC 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.

In responding and addressing the range of matters raised by government agencies and authorities, SAC has sought to refine the proposal, in particular in relation to the location of bus and pickup and drop off spaces.

As outlined within this report, the analysis of the amendments to the proposed development confirms that all key elements of the proposed development, as originally proposed and exhibited, have remained unchanged. To the benefit of the overall project, the environmental impacts of the amended development remain consistent with, or represent an improvement on, the original application. The proposal continues to have significant planning merits as it:

- Will create additional jobs during construction and operation, and represents an investment in the local economy;
- Retains and respects the Site's heritage significance;
- Re-instates the historic use of the site, by providing an additional school campus within the Inner West;
- Provides an opportunity for tailored education and learning for SAC for one (1) year group; and
- Ensures negligible environmental impacts and maintains amenity to surrounding residential development.

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

