



27 January 2021

TfNSW Reference: SYD20/00093/03 (A35968265)
DPIE Reference: SSD-10424

John Doubleday
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Doubleday,

**ST IGNATIUS' COLLEGE RIVERVIEW STAGE 2 - 2-6 RIVERVIEW STREET,
RIVERVIEW**

Reference is made to the Department of Planning, Industry and Environment (DPIE) email dated 9 December 2020 regarding the abovementioned application which was referred to Transport for NSW (TfNSW) for comment.

Legislation came into effect on 1 December 2019 that brings together Roads & Maritime Services (Roads and Maritime), and TfNSW. This response reflects the advice from the new organisation

TfNSW has reviewed the submitted documents and provides the following comments for your consideration in the determination of the application:

General Comments

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.

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 & 267.

Active Transport Considerations

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.

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.

Comment

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:

1. Motorcycle parking spaces; and
2. Bicycle racks, secured lockers and end of trip facilities.

Although the proposal is not required to adhere to the LDCP 2010, the EIS and supporting documentation does not promote TfNSW Policies to 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.

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.

Sustainable Travel and Access Plan/ Travel Access Guide

General Comment

Remove any reference to Ferry's.

Comment

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.

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.

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 and Council for endorsement prior to the issue of the first Occupation Certificate.

Construction and Traffic Management Plan

Comment

Traffic and Access Assessment Report (TAAR) - Appendix 1: Preliminary Construction Traffic Management Plan illustrates construction traffic accessing the site via Riverview Drive. Appendix 1 and 2 also incorrectly identify the proposal as Stage 1.

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 & Egress shows all construction truck access and egress traveling south on Tambourine Bay Rd and entering the grounds at Loyola Drive.

Recommendation

TfNSW currently runs buses down Riverview Drive, a narrow two-lane local road with on-street 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.

If you have any further questions, Ms Zhaleh Alamouti would be pleased to take your call on 8849 2331 or please email development.sydney@rms.nsw.gov.au. I hope this has been of assistance.

Yours sincerely



Pahee Rathan
Senior Land Use Assessment Coordinator