

WILLOWTREE PLANNING



6 June 2022

REF: WTJ21 –151

Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Nima Salek

**PROPERTY AT 48 VICTORIA ROAD AND 2A-2B GORDAN ROAD, ROZELLE
SSD-27208140**

Dear Nima,

We write in response to the **SSD-27208140**, for the St Aloysius College (SAC), Rozelle Campus. Specifically, this letter and attachments provides a response to the additional Request for Information (RFI) dated 27 May 2022. This RFI responds to the meeting held with Inner West Council and the Department of Planning and Environment (DPE) on the 23 May 2022. The applicant, St Aloysius College, and its specialist consultant team have reviewed and considered all matters raised in this RFI, which relate to traffic and heritage. **Table 1** below provides a detailed response to the key matters raised and outlines the proposed amendments to comply with these matters.

The following are also provided with this response;

- Appendix 1: Heritage Report Addendum
- Appendix 2: Updated Transport and Accessibility Impact Statement (TAIA)
- Appendix 3: Traffic Response to Council and DPE

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TABLE 1. RESPONSES TO DPIE SUBMISSION

Matters Raised	Response
Department of Planning and Environment	
<p>DOPU, Swept Paths, and Parking Demand</p> <p>Inner West Council (Council) has reviewed the RtS and raised concerns regarding the inadequacies of the drop-off/pick-up zone (DOPU), the shuttle bus swept paths and on-site parking demand. Council's comments to the RtS are attached to this letter (Attachment A). The Department agrees with the concerns raised by Council and requires you to address all of these matters comprehensively.</p>	<p>This is addressed in further detail below and within the TAIA (Appendix 2) and traffic response (Appendix 3).</p>
<p>Heritage Impact Assessment</p> <p>The submitted Heritage Impact Assessment states that the proposal will reuse the existing classrooms with no physical changes proposed. The RtS and Building Code of Australia (BCA) report stipulate that some works have to be undertaken for the adaptive reuse of the local heritage building at 2A-2B Gordon Street. An amended Heritage Impact Assessment or an addendum statement is required to acknowledge the proposed works and conduct a detailed assessment of the impacts of the internal fitouts on the heritage significance of the item.</p>	<p>The Heritage Report Addendum (Appendix 1) has been updated to ensure the full scope of works is detailed within the heritage building. These works are found to have no impact on the heritage item.</p>
<p>Transport and Accessibility Impact Assessment</p> <p>The Department notes that the submitted Transport and Accessibility Impact Assessment (TAIA) incorrectly assumes that there are 19 car spaces available within 2A-2B Gordon Street, whereas there are only 16 spaces car parking available. This means that only one car space would be allocated to the school, when Sydney Community College is in operation (Monday to Friday) and uses 15 car spaces. However, the TAIA indicates that 4 car spaces would be available for the school. Additionally, the TAIA also states that 1 – 2 car spaces would be available for the theatre use on weekday mornings.</p>	<p>Two (2) additional spaces are proposed for the car park to provide a total of 18 spaces. At a worst case scenario where all three (3) land uses are operating concurrently there may be an overflow of approximately three car parking spaces. the remaining three (3) spaces at peak times will therefore need to be accommodated on-street. The parking surveys demonstrate sufficient availability in the surrounding streets to accommodate this demand without having a negligible impact on the availability of on-street parking.</p> <p>It is also noted that the parking demands of the Sydney Community College are at their peak during weekday evenings, as this is when the majority of classes are available, and as such it is unlikely the full capacity of 15 spaces would be required during school hours. The Theatre is able to utilise some spaces for staff should there</p>



<p>The number of car spaces within the site (being 16) cannot cater for the three concurrent uses on a weekday, based on the above data. You are requested to clarify this issue and provide suitable evidence of negotiations and/or agreements that would be in place to ensure that sufficient car parking is available for each of the uses during a typical weekday.</p> <p>In this regard, the Department agrees with Council's concerns and requires that you clarify this matter in detail.</p>	<p>be the need for setups for shows, however this would be sporadic and is not thought to have any major impact to the surrounding street parking capacity.</p> <p>A lease has been agreed between the owner of the site (the Trustee of the Roman Catholic Church for the Archdiocese of Sydney) and SAC which allows for the use of four parking spaces on the site. The leasing arrangement has been structured to ensure all three (3) occupants are accommodated for.</p> <p>This is addressed in further within the TAIA (Appendix 2) and traffic response (Appendix 3).</p>
<p>Pedestrian Footpaths</p> <p>According to TAIA, the existing width of the pedestrian footpaths along Maney Street and Quirk Street are 1.3 and 1.5 meters (m), respectively. These footpaths are proposed to be used as part of the walking route from DOPU to the school site. It is proposed that a staff member will supervise and marsh students during the pick-up and drop-off time. The amended TAIA is required to assess and confirm the suitability of these pedestrian footpaths to service eight students and one staff safely.</p>	<p>The pick-up and drop-off area will be continuously monitored during the arrival and departure periods before and after school to ensure vehicles are not queuing on Maney Street due to parking for extended periods of time. As demonstrated in the TAIA, given the low volume of students to utilise this area (being approximately eight (8) in a 30minute period) and the limited amount of cars it is demonstrated that there would not be any queueing along Maney Street. SAC has committed to a Green Travel Plan (GTP) which discourages private drop off of children, and will actively encourage students to utilise either public transport or the private shuttle service.</p> <p>As there are only a small number of students expected to be dropped off/picked up and given the site caters to 14-15 years old, it is not considered necessary to marshal the students to and from the school. The anticipated eight (8) students will arrive over a half hour period and therefore are unlikely to cause significant impacts to footpath congestion along Maney Street, Quirk Street and Gordon Street. Therefore, the footpaths are considered adequate to allow for students to walk to and from the pick up drop off point on Maney Street without causing significant impacts on footpath capacity. Nevertheless, as aforementioned the pick-up and drop-off will be continuously monitored during before and after school periods to alleviate any risk of congestion.</p> <p>This is addressed in further within the TAIA (Appendix 2) and traffic response (Appendix 3).</p>
<p>Alternative DPOU Locations</p>	<p>Within the Traffic Response (Appendix 3) an assessment of the alternative frontage streets (Victoria Road, Gordon Street, Quirk Street and Prince Street) has been</p>



<p>The RtS states that many alternative locations have been considered for the DOPU. The amended TAIA is required to include the consideration of the other DOPU alternatives and provide the evaluation of each option separately, to establish that Maney Street is the only available option for use as a DOPU.</p>	<p>provided which demonstrates their unsuitability for pick up/drop off. Therefore, Maney Street was the only possible street frontage for the school to provide a pick up/drop off. Further traffic management or mitigation measures if required can be provided in a Traffic Management Plan as a condition of consent.</p>
<p>Proposed Plans Please provide a table listing all the proposed plans.</p>	<p>A table listing all the proposed plans has been provided within Table 2 of this letter.</p>
<p>Inner West Council</p>	
<p>1. Pickup/dop off area and congestion</p>	
<p>The proposed pickup and drop-off arrangements in Maney Street remain an issue. Even with the relocation of the area to the north in Maney Street, the narrow road width indicates that queuing of vehicles could occur, which will result in the temporary obstruction of the street. Alternatively, the queued vehicles may stay in 'No Stopping' areas at the corner of Maney Street and Quirk Street, which is an issue and could encourage unsafe pickup and drop-off practices. Although the response indicates that the pickup and drop-off areas will be staffed, this area is approximately a 150m walk to the school campus, which may be a challenge to be adequately managed by staff.</p>	<p>The TAIA (Appendix 2) demonstrates that the capacity of the proposed on-street pick-up and drop-off spaces will not reach capacity. Therefore, queueing along Maney Street is not expected to occur during these times. However, SAC has committed to staff being present to monitor the situation to ensure that cars do not stop in the bays for any length of time and subsequently block oncoming traffic on Maney Street.</p> <p>It is also not anticipated that the full number of vehicles would be dropping students off given the shuttle bus provided from the main campus and the options to utilise existing public transport services. As aforementioned, it is anticipated, if necessary a maximum of eight (8) students may use the pick-up/drop-off zone during peak times and as demonstrated in the TAIA the designated pick-up/drop-off zone is able to accommodate the forecast maximum during the peak period.</p> <p>This is addressed in further within the TAIA (Appendix 2) and traffic response (Appendix 3).</p>
<p>The TAIA indicates eight vehicles during a 30-minute period, which is a concern, particularly during the afternoon pickup period. The likelihood of the pickup and drop-off areas being filled to capacity remains a safety issue for Council.</p>	<p>The pick-up and drop-off spaces will be supervised to ensure that vehicles do not park longer than necessary. This will provide sufficient availability of car spaces, to prevent any potential for queuing. As indicated within the TAIA (Appendix 2), this is modelled as a worst case scenario and given the current high level use of public transport and availability of shuttle buses from the main campus, it is unlikely for queueing to occur.</p>



<p>Although it has been indicated that pedestrian movements between the two schools would be staffed, Council recommends the installation of a TfNSW approved pedestrian fencing in Gordon Street to address the potential jaywalking issues. In addition, it is recommended that the Applicant explores options to provide access to the property directly from Maney Street to minimise pedestrian travel distance.</p>	<p>SAC proposes to supervise students arriving to/from school to ensure their safety, with many students to be arriving by private shuttle. Given this high level of supervision, it is likely that this would deter jaywalking.</p> <p>Fencing is not considered an appropriate way to deter jaywalking, as vehicle crossover areas would not be fenced, and still allow for jaywalking.</p> <p>Given the main school building and playground is located at 48 Victoria Road, it is not considered that providing an access from Maney Street would be appropriate. Furthermore, the existing buildings located on the Gordon Street site do not provide the opportunity for an additional access way.</p> <p>This is addressed in further within the TAIA (Appendix 2) and traffic response (Appendix 3).</p>
<p>2. Shuttle Bus Swept Paths</p>	
<p>As shown in Figure 1 below, the swept paths show that the manoeuvre is very tight, and the gate encroaches within the 300mm clearance bands either side of the vehicle. Further investigation should be undertaken to explore whether there is scope to widen the entry gates and driveway.</p>	<p>The updated swept path provided within Appendix H of the TAIA report (Appendix 2) shows that there is sufficient width of the driveway to accommodate both the body of the vehicle and the 300mm clearance on either side of the vehicle (red line) which meets the requirements of AS 2890.2 (2018).</p> <p>This is addressed in further within the TAIA (Appendix 2) and traffic response (Appendix 3).</p>



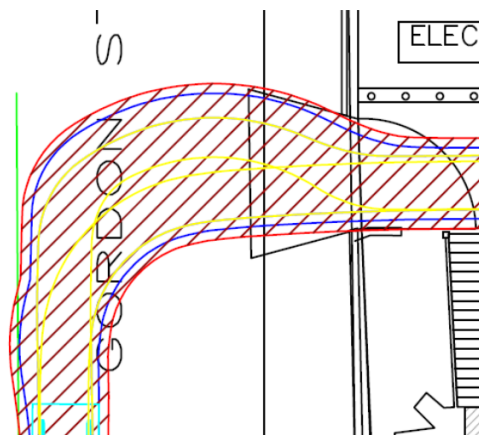


Figure 1: Shuttle Bus – gate encroachment. Source: TAIA submitted by the applicant.

As shown in Figure 2 below, the swept path also details that the shuttle bus will impact a bollard protecting the electricity substation and drops off the edge of the kerb shown circled in red (Figure 3). Further investigation should be undertaken to explore whether there is scope to set the kerb back and to relocate the bollard to allow for better manoeuvrability of the shuttle bus.

The swept path analysis has been amended and is presented in Appendix H of the TAIA (**Appendix 2**). This updated swept path analysis shows that the shuttle bus can manoeuvre clear of the bollards, with a 300mm clearance on either side of the vehicle.

This is addressed in further within the TAIA (**Appendix 2**) and traffic response (**Appendix 3**).



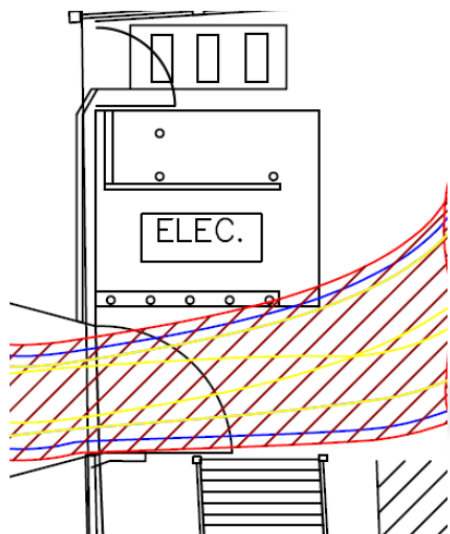


Figure 2: Swept paths - bollard and kerb: Source: TAIA submitted by the applicant.

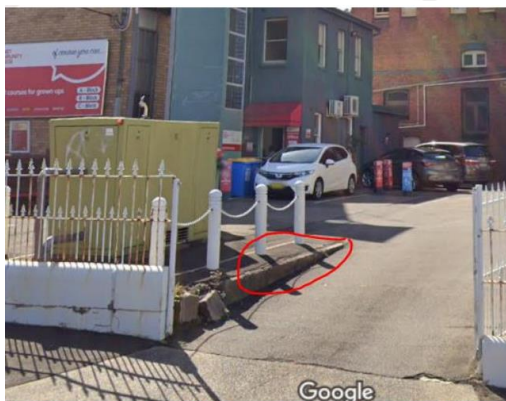


Figure 3: Swept paths - bollard and kerb. Source: Google

3. On Site Parking Demand



<p>The previous consent on the site required the carpark to be upgraded to comply with AS2890.1:2004. Appendix C of the TAIA details the new compliant layout, which reduces the on-site parking availability from 20 spaces to 16 spaces. However, the TAIA does not acknowledge the reduction in on-site parking and the impact this will have on the off-street parking demand.</p>	<p>In addition to the 16 spaces available on site, there is the ability to provide an additional two (2) spaces to be line marked within the carpark. This will provide a total of 18 spaces for all uses on site. Therefore, up to three (3) spaces will need to be accommodated on-street during the rare occasion when all three (3) land uses will be operating on-site. The parking surveys demonstrate sufficient capacity for on-street parking for this to be accommodated.</p> <p>This is addressed in further within the TAIA (Appendix 2) and traffic response (Appendix 3).</p>
<p>The parking demand statement at Appendix D also does not account for the reduction in parking as evidenced by the table provided by the applicant (Table 1). Based on this table, it appears that the peak on-site demand is 21 spaces while only 16 spaces are provided. This shortfall will need to be addressed in the TAIA.</p>	<p>The shortfall of three (3) spaces can be accommodated on-street and this is now addressed in Appendix C of the TAIA (Appendix 2).</p> <p>This is addressed in further within the TAIA (Appendix 2) and traffic response (Appendix 3).</p>
<p>The TAIA indicates that four on-site parking spaces will be allocated to the school, which, after school hours, will be utilised by other uses on the site. However, the TAIA also indicates that the four spaces will be used for waste collection. In addition, the TAIA does not address any parking demand the school generates for after hour activities, such as maintenance and cleaning or after school activities, which will impact on- and off-site parking.</p>	<p>The four (4) spaces allocated to the school are not used for waste collection. The TAIA has been updated to clarify that waste collection would be conducted within the carpark outside of operational hours (for all uses) to ensure sufficient manoeuvring area for the vehicle to turn around. The vehicle would then be able to use the full area of the unoccupied carpark. Other servicing such as maintenance and cleaning are able to use the service vehicle space located at 48 Victoria Road outside of school hours.</p> <p>This is addressed in further within the TAIA (Appendix 2) and traffic response (Appendix 3).</p>
<p>The TAIA indicates that that the church will only use the parking area on Sundays. Further details/clarification should be provided to validate this.</p>	<p>SAC has confirmed that the parish holds mass at 10:30am to 11:30am on a Sunday and between 7:00am-7:30am on a Wednesday, only, which do not coincide with other uses on site. In addition, the parish hosts 3-4 funerals and weddings per year and currently has no plans to expand their operations. It is noted that for these functions, no parking within the site for patrons is permitted. Therefore, the parking demand from the parish does not contribute to the overall parking demand during school operational hours on a regular basis.</p> <p>This is addressed in further within the TAIA (Appendix 2) and traffic response (Appendix 3).</p>



Table 1: On-site parking demand as provided in the TAIA. Source: TAIA submitted by the applicant.

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 6.00-10.00pm and on Sunday afternoon matinee 1.00-5.00pm.	19 spaces
St Joseph's Catholic Parish	Sunday	19 spaces



As required by DPE, a table of all the current proposed plans and landscaping plans is provided within **Table 2** below.

TABLE 2. PROPOSED PLANS	
Plan	Date
Architectural	
DA100 Site Plan	April 2022
DA101 48 Victoria Rd Demolition Plan L0	April 2022
DA102 48 Victoria Rd Demolition Plan L1	April 2022
DA103 48 Victoria Rd Proposed Plan L0	April 2022
DA104 48 Victoria Rd Proposed Plan L1	April 2022
DA105 48 Victoria Rd Roof Plan	April 2022
DA200 48 Victoria Rd Elevations	April 2022
Landscape	
101 Landscape Master Plan, Issue F	November 2021
102 Softworks Plan, Issue F	November 2021

It is concluded that the above response provides clarity on all issues raised, and that this will allow DPE to finalise their assessment.

It is recommended that this response and information is passed onto Inner West Council as soon as possible, to ensure their queries are closed out.

We would appreciate if you could provide Willowtree Planning an updated timeframe to complete assessment and the anticipated date for the Independent Planning Commission meeting.

We look forward to continuing to work with DPE in reaching a favourable outcome for this Site.

Your sincerely,



Sally Prowd
Associate
Willowtree Planning Pty Ltd

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- Appendix 1: Heritage Report Addendum
- Appendix 2: Updated TAIA
- Appendix 3: Traffic Response

