



Response to Submissions State Significant Development 7140

Staged Redevelopment of the Saint Ignatius College Riverview School Campus and Stage 1 Works

2-60 Riverview Street and Tambourine Bay Road, Riverview

Lot 10 DP 11422773

Prepared by Willowtree Planning Pty Ltd on behalf of
Trustees of the Jesuit Fathers – St Ignatius College
Riverview

March 2016

Document Control Table

Document Reference:	69337_Response to Submissions		
Date	Version	Author	Checked By
16 February 2016	Draft	M. Chipchase	M. O'Donnell
15 March 2016	Final	M. O'Donnell	M. O'Donnell

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Response to Submissions

SSD 7140 – Staged Redevelopment of the Saint Ignatius College Riverview School Campus
2-60 Riverview Street and Tambourine Bay Road, Riverview

TABLE OF CONTENTS

PART A	PRELIMINARY	2
1.1	INTRODUCTION	2
PART B	EXHIBITION AND SUBMISSIONS.....	3
PART C	RESPONSE TO SUBMISSIONS	4
PART D	CONCLUSION.....	19

APPENDICES

Attachment 1 - Events Management at Saint Ignatius College, Riverview

Attachment 2 – Response to NSW Department of Primary Industries – Douglas Partners

Response to Submissions

SSD 7140 – Staged Redevelopment of the Saint Ignatius College Riverview School Campus
2-60 Riverview Street and Tambourine Bay Road, Riverview

PART A PRELIMINARY

1.1 INTRODUCTION

This Response to Submissions (RTS) has been prepared by Willowtree Planning on behalf of Trustees of the Jesuit Fathers – St Ignatius College Riverview, and is submitted to the New South Wales Department of Planning and Environment (DP&E) in support of a staged redevelopment of the Saint Ignatius Riverview School Campus and stage 1 works at 2-60 Riverview Street and Tambourine Bay Road, Riverview.

This RTS Report responds to, and addresses, the submissions received following the public exhibition of the proposal.

Clause 85A of the Environmental Planning and Assessment Regulation 2000 permits the Director-General of the DP&E to require the Applicant to provide a written response to issues raised in submissions. This RTS report aims to fulfil the request from the Director General.

This RTS report is structured as follows:

Part A	Introduction, overview of the proposed development and the site
Part B	Overview of the exhibition period and summary of the submissions received
Part C	Response to the submissions
Part D	Conclusion

1.2 SITE LOCATION

The land which is the subject of this development comprises approximately 40 hectares including the Main Campus (Senior School) and the Regis Campus (Primary School). The site is legally described as Lot 10 in Deposited Plan 142773 and is owned by The Trustees of the Jesuit Fathers incorporated under the Roman Catholic Church Communities' Lands Act No 23 (NSW).

Response to Submissions

SSD 7140 – Staged Redevelopment of the Saint Ignatius College Riverview School Campus
2-60 Riverview Street and Tambourine Bay Road, Riverview

PART B EXHIBITION AND SUBMISSIONS

An Environmental Impact Statement was prepared to support the SSD 7140 and assesses the relevant impacts. The Report and accompanying documentation was placed on exhibition 10 December 2015 also made available on the NSW Department of Planning and Environment (DP&E) website. During this period, submissions were invited from anyone with an interest in the Project.

A summary of all the submissions received by the public and the various agencies is detailed in **Tables 1 to 7** in Part C.

In total, two (2) public submissions were received from surrounding land owners.

Submissions were received by the following agencies and Council's:

- NSW Department of Planning & Environment;
- Environment Protection Authority, Parramatta;
- Road and Maritime Services, Parramatta;
- NSW Department of Primary Industries, Sydney;
- Lane Cove Council.

Part C of this RTS provides responses to each of the submissions received.

Response to Submissions

SSD 7140 – Staged Redevelopment of the Saint Ignatius College Riverview School Campus
2-60 Riverview Street and Tambourine Bay Road, Riverview

PART C RESPONSE TO SUBMISSIONS

Table 1 – NSW Department of Planning & Environment		
#	Summary of Submissions	Response
<i>Management and patronage of school campus associated events.</i>	<i>Details regarding the types of events held on the school campus and the number of patrons at the events held on campus outside of school hours be provided, including details of event management, in particular traffic, parking and pedestrian management.</i>	Please refer to Attachment 1 of this document that outlines the Schools events and management process.

Table 2 – Environment Protection Authority, Parramatta		
#	Summary of Submissions	Response
<i>Environment Protection License (EPL)</i>	<i>On the basis of the information provided, the proposal does not constitute a Scheduled Activity under Schedule 1 of the Protection of the Environment Operations Act 1997 (POEO Act). The EPA does not consider that the proposal will require an Environment Protection License (EPL) under the POEO Act.</i> <i>Accordingly, the EPA has no comments regarding the proposal and has no further interest in this proposal.</i>	No further action required.

Table 3 – Road and Maritime Services, Parramatta		
#	Summary of Submissions	Response
<i>Traffic Management Plan</i>	<i>Council are to be made aware of the potential risk of construction vehicles mixing with school age children and appropriate measures are to be in place as a condition of consent for the Traffic Management Plan at different stages of this development.</i>	A Construction Traffic Management Plan (CTMP) report would be prepared by a suitably qualified person and submitted for consideration as part of the Construction Certificate application

Response to Submissions

SSD 7140 – Staged Redevelopment of the Saint Ignatius College Riverview School Campus
2-60 Riverview Street and Tambourine Bay Road, Riverview

Table 4 –NSW Department of Primary Industries, Sydney		
#	Summary of Submissions	Response
<i>Water Sources</i>	<p><i>Relation to Point 14 of the SEARS – Assess impacts on the Lane Cove River, aquatic environment and riparian corridors potentially affected by the proposal and mitigation measures to manage any impacts.</i></p> <p><i>The EIS and attached Appendix M outlines that all development will be undertaken within current building envelopes and adjacent area. No development is to occur within the riparian areas or in the estuary channel. There will be no requirement to undertake excavations within waterfront land. The mitigation measures outlined within the stormwater management strategy will minimize impacts on the Lane Cove River.</i></p>	Please refer to Douglas Partners Response at Attachment 2 of this document.
<i>Assess Impacts on ground water, including groundwater quality, quantity and connectivity</i>	<p><i>The EIS and the attached Appendix M and Appendix R indicate that impacts on groundwater would be negligible. However as indicated on page 27 of Appendix R, the diagram title, "Cross-section AA" there is a volume of material to be removed between borehole 3 and borehole 4. This material is marked as "filling". Whilst no water was encountered in boreholes 2,3 and 4, groundwater was encountered at two meters depth in borehole 1. The proponent has not supplied DPI Water with the inflow rate in this bore so it cannot determine if there will be a reduction in the groundwater resource pool of less than three megalitres as outlined in the Aquifer Interference Policy.</i></p> <p><i>Secondly, Borehole 1 is at a higher elevation than the other boreholes so it is probable that groundwater will be encountered in the area to be excavated.</i></p>	Please refer to Douglas Partners Response at Attachment 2 of this document.
	<i>It is recommended that a condition be applied to the project approval requiring the proponent to notify DPI Water if groundwater is encountered during construction, providing information regarding the calculated volume of water to be extracted either directly or indirectly.</i>	Noted, and any future condition will be accepted.

Table 5 – Lane Cove Council		
#	Summary of Submissions	Response
<i>Conditions</i>	<i>Conditions of Consent Letter relating to the Staged Redevelopment of Saint Ignatius College Riverview School Campus and Stage 1 Works (SSD 7140) was issued on the 27 January obtaining fifty-six (56) conditions relating to the approval.</i>	The proponent has reviewed the recommended Conditions of Consent by Lane Cove Council, and is generally satisfied compliance with these conditions can be achieved.

Response to Submissions

SSD 7140 – Staged Redevelopment of the Saint Ignatius College Riverview School Campus
2-60 Riverview Street and Tambourine Bay Road, Riverview

Table 6 – Transport for NSW

#	Summary of Submissions	Response
Construction Management Plan (CTMP)	<i>Transport for NSW (TfNSW) has undertaken a review of the supporting documents associated with the proposal. It is requested that the applicant is conditioned to develop a Construction Management Plan (CTMP). The CTMP should manage the impact of development construction on general traffic, bus operations, pedestrians and cyclists movements during the construction period.</i>	A Construction Traffic Management Plan (CTMP) report would be prepared by a suitably qualified person and submitted for consideration as part of the Construction Certificate application.

Table 7 – Public Submissions

#	Summary of Submissions	Response
Patricia and Wenda Lucas		
<i>Amenities facility located opposite residential homes on the lower end of Tambourine Bay Road.</i>	<p><i>It is noticed there would appear to be an additional large amenities facility located opposite residential homes on the lower end of Tambourine Bay Road (shown on Proposed Site Concept Layout and Proposed Staging Plan of the St. Ignatius Riverview Masterplan).</i></p> <p><i>In perusing the Masterplan, there appears to be no reference anywhere in the documentation to this or details thereof concerning location, size, design or proposed use of such a facility on the Tambourine Road side of the Campus. (There is reference to the amenities facility in front of the Communal Precinct).</i></p> <p><i>Any proposal to build a facility in such a close proximity to residents would affect the amenity, outlook and enjoyment of this tranquil environment for such residents, who are only divided from the School's No.1 field by a narrow access road to Tambourine Bay. The school also invites use of its campus and facilities during school holidays to external parties, which would extend the use of this facility.</i></p> <p><i>Such a building in this location would not be in keeping with the streetscape of Tambourine Bay and its Public Reserve. It would be more akin to including a commercial looking building within a residential/parkland area.</i></p>	<p>Early concepts for the proposal that were submitted with the SEARs request (refer DA402 Rev A on Department of Planning and Environment - Major Projects Website – SEARS folder) did identify an amenities block as identified by Patricia and Wenda Lucas.</p> <p>The current Concept Master Plan and Stage 1 Proposal under assessment no longer proposes the amenities block in question adjacent Tambourine Road. The College has contacted Patricia and Wenda Lucas personally and confirmed this is the case.</p>
	<i>In light of absence of information on the building identified as "amenities" on the Proposed</i>	Noted, see above response.

Response to Submissions

SSD 7140 – Staged Redevelopment of the Saint Ignatius College Riverview School Campus
2-60 Riverview Street and Tambourine Bay Road, Riverview

	<i>Site Concept Layout and Proposed Staging Plan, should a proposal for an additional facility be planned, and, given the scope of the school grounds, it would be appreciated if consideration could be given in the Planning Stages to not locate a building within close proximity for residents.</i>	
<i>Existing trees</i>	<i>A further concern would be any impact on the deciduous trees along the eastern boundary that might ensue. These trees in summer provide valuable shade yet in winter provide sunshine for residents and visitors.</i>	No plans or Stages within the Concept Plan envisage removal of any trees along the eastern boundary of the site.
Public Submission – (Name withheld)		
<i>Traffic Flow Survey</i>	<i>As a local resident living in close proximity to the college, I am most concerned that the information provided by the college regarding the traffic flow around the Riverview Street and Tambourine Bay Road intersection is quite misleading and does not give an accurate representation of the facts. On studying the submission, they chose Saturday the 5th September as the day to conduct the weekend traffic flow survey around the school. That particular Saturday was one where several Riverview teams had 'bye' games and the majority of other Riverview teams had 'away' games, so were not playing at the school that day. Had they chosen the 22nd August, 2015 as the day to conduct the weekend survey, the results would have been very different. On that day, most Riverview teams had 'home' games, with the resulting influx of players and parents from opposing teams increasing the traffic in the area. Saturday sport brings a large number of buses, cars and people to the area, and results in crowded roads and street parking. Buses from visiting schools park in Tambourine Bay Road, while waiting for sporting games to finish, and create a safety issue for residents attempting to enter or exit their own driveway due to restricted vision and the sheer number of cars travelling to the college. Residents cannot have events at home during the day on such occasions, as our guests cannot find parking. The area near the local shops, York's Corner, becomes so congested that you have difficulty driving through that section of Tambourine Bay Road. The queues along Tambourine Bay Road to exit at River Road are very long. This is despite an alternative access to River Road available via Pengilly Road and Fox Street.</i>	<p>The traffic analysis undertaken for the weekend conditions found that the internal road network has spare capacity to accommodate potential additional demands.</p> <p>In consultation with Council the dates of the weekday and weekend surveys were decided to reflect typical demands of the school on each day.</p> <p>It is noted that whilst the school has more than adequate on site parking provision to accommodate typical operational demands, there are a proportion of sport attendees who choose to park within the unrestricted on street network. As with all operations at the school, the school will continue to work with staff, parents and visitors to encourage on site adequate parking and to deter on street parking when not required.</p> <p>In the case of the parking of buses, the school will investigate further and ascertain the reasons behind the choice of parking on street when the school provides adequate parking provision for buses when required.</p>
<i>Parking for Events</i>	<p><i>The College states that they open fields for parking for big events, however if it has been raining in the days prior to the event, they do not allow cars to park on the grass, the gates are closed and the cars therefore park in the surrounding streets. Events such as the Riverview Gold Cup bring even more cars and people to the area, resulting in cars parking across driveways, up on the footpath, etc. It is chaotic.</i></p> <p><i>By changing the length of the road within the college, and making it a shorter journey, it will compress the time required for cars and buses to enter, drop off and exit, thereby compressing the traffic flow and increasing frequency of cars on local streets.</i></p>	<p>The traffic report included parking studies on a weekday and weekend day and confirmed not only did the school provide adequate parking in accordance with the DCP but adequate parking to accommodate current demands.</p> <p>The comment that the shortening of the road would increase the frequency of cars on local streets is not supported. As stated in the masterplan, the proposal will not result in any additional students at the school.</p>

Response to Submissions

SSD 7140 – Staged Redevelopment of the Saint Ignatius College Riverview School Campus
2-60 Riverview Street and Tambourine Bay Road, Riverview

<p><i>By building a new boarding facility on a currently grassed area, the area available for grass parking will be reduced, again increasing the number of cars parking on surrounding streets. As they clearly and repeatedly state they have no intention of increasing the number of students, the existing boarding house should be demolished to replace the space lost for car parking on the grass.</i></p> <p><i>The college is also used for other events, not mentioned in the application, and that are in no way relate to the function of the school. By improving hall and catering facilities, the College will be able to increase the number of events held outside normal school operating times, thereby also affecting local traffic flow over a longer period of time in the day/evening.</i></p> <p><i>The application by the College quotes Lane Cove council parking requirements for schools. They are only considering requirements for staff parking, they are not considering the other events which bring additional cars and buses to the school on a very regular basis after school and on the weekend. St Ignatius Riverview is not like any other school within the Lane Cove Council area - it has Saturday sport during Term time (bringing large numbers of vehicles and people to the college throughout the day), is used at night, during holidays and on weekends for other events, not related to the function of the school, and is generally operating as a business. Brewer Swimming operates at the College and conducts swimming classes at the College 3 mornings and afternoons per week and during school holidays. This also increases traffic to the College, not related to the function of the school.</i></p> <p><i>As a condition of approval of the application, the College should be required to provide adequate additional dedicated parking on site for cars and have dedicated bus parking for sporting events. The amenity of the local area must be ensured and the local residents not impacted by the influx of people, cars and buses to the area. This has only increased over time, and will continue to do so as more events are held at the school. If the College purports to be a school, it should have some restrictions as to the number/type of events that can be held there.</i></p> <p><i>I am not against the building improvement program, but am most definitely concerned re the College's lack of appreciation and recognition for need for additional dedicated parking in their plans to address existing traffic and parking problems.</i></p>	<p>The majority of the current events occur outside typical school operating periods when traffic demands of general school operations are not present.</p> <p>As confirmed in the traffic report which included traffic surveys during an early morning and weekday evening period, current traffic demands around the school (and which would include the current event / use traffic) are generally low and well below available capacity.</p>
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Response to Submissions

SSD 7140 – Staged Redevelopment of the Saint Ignatius College Riverview School Campus
2-60 Riverview Street and Tambourine Bay Road, Riverview

PART D CONCLUSION

This RTS provides a response to each item raised by the public and agencies during exhibition. As demonstrated, the proposal can be undertaken without resulting in unacceptable environmental impacts.

Based on the findings of the Environmental Assessment, this RTS and the supporting documentation, it is recommended that the proposal be supported by the Department of Planning and Environment, subject to appropriate conditions