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Contact: Sophie Litherland

Response to Submissions - SSDA 10424

Saint Ignatius' College Riverview

2-60 Riverview Street and Tambourine Bay Road, Riverview

Prepared by Willowtree Planning Pty Ltd on behalf of Saint Ignatius' College Riverview

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A national town planning consultancy
www.willowtreeplanning.com.au

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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 built form approval of New Ignis Stage 2 STEMP Building, Saint Ignatius' College Riverview. The EIS accompanied a State Significant Development Application SSD-10424 capturing the works for the Site located at 2-60 Riverview Street and Tambourine Bay Road, Riverview.

The proposal was exhibited from **10 December 2020** to **29 January 2021**, as the notification occurred over the Christmas and New Year period.

In total nine (9) 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:

- Lane Cove Council;
- Environment, Energy and Science Group - Department of Planning, Industry and Environment;
- Heritage NSW - Heritage Council of NSW;
- Environment Protection Authority;
- Transport for NSW;
- Roads and Maritime Services;
- Sydney Water;
- Heritage NSW – Aboriginal Cultural Heritage;
- Community Member.

Of the nine (9) submissions:

- Government Agencies: eight (8) submissions:
    - eight (8) submissions provided support and/or comment.

- General Public: one (1) submissions:
    - One (1) objection.

The Department of Planning, Industry and Environment (DPIE) has also prepared a formal letter outlining additional information and clarifications required prior to the completion of the final assessment and determination of the application. It is acknowledged that the comments received from the Government Architect of New South Wales (GANSW) were incorporated into the formal response prepared by the DPIE.

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

The RTS Report is structured as follows:

- **Part A** Introduction
- **Part B** Key Issues and Applicant's Response
- **Part C** Proposed Amendments to Development
- **Part D** Additional Information and Assessment
- **Part E** Draft Conditions of Consent
- **Part F** Mitigation Measures
- **Part G** Conclusion

The applicant, Saint Ignatius' College Riverview, 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 the concept approval, building design, amenity impact, visual impact, and traffic management. Where individual issues are not discussed in this report, a detailed assessment can be found in **Appendix A** or **Appendix B**. In response to a number of issues raised, the Architectural Drawings prepared by PMDL have been amended and accompany this submission as **Appendix C**. 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 DPIE, Government Agencies, and Organisations and the General Public during the public exhibition process of the proposal. These include:

- Inconsistency with the Concept Approval;
- Built form and visual impact;
- Materiality and Contextuality.
- Construction and traffic management

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

An overview of the parties who made submissions, and their key issues/matters raised for consideration, is provided below.

2.1 GOVERNMENT AUTHORITIES AND AGENCIES

A total of eight (8) submissions were received from Government Agencies and Authorities in response to the exhibition of the EIS, including a formal submission from Lane Cove Council. Specifically, responses were received from:

- Lane Cove Council;
- Environment, Energy and Science Group - Department of Planning, Industry and Environment;
- Heritage NSW - Heritage Council of NSW;
- Environment Protection Authority;
- Transport for NSW
- Roads and Maritime Services;
- Sydney Water;
- Heritage NSW – Aboriginal Cultural Heritage.

Several submissions from Government Agencies and Authorities were received which either confirmed no comments on the application or recommended conditions of consent to be included in the Instrument of Approval, including TfNSW, RMS and Sydney Water.

Lane Cove Council are in support of the application as summarised in **Appendix A**.

DPIE, as the assessing authority, provided an overarching letter, summarising the key matters to be addressed and additional information to be provided. It is recognised that the GANSW did not provide a separate submission response. The comments provided by GANSW were incorporated into the formal response prepared by DPIE.

A response to each of the individual issues raised by the DPIE, Government Agencies and Authorities and other respondents is provided in **Appendix A** accompanying this application.

2.2 GENERAL PUBLIC

A total of one (1) submission was received from the general public during the exhibition period. The submission received objected to the proposal on the basis the proposal *fails to address the valid concerns about architectural language, façade materiality and detailing, and bulk/massing*.

A detailed discussion of matters raised in the public submission is provided in **Appendix B**.

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2.3 STATE DESIGN REVIEW PANEL MEETING NO. 3

As part of the design evolution and to further explain the design development of the proposed New Ignis Stage 2 STEMP Building, a third State Design Review Panel (SDRP03) via GANSW was held on the 9th June 2021 prior to the formal lodgement of the RTS. Following this meeting and the issue of the panel minutes on the 21st June 2021, a further discussion was held with the assessment team of DPIE and members of GANSW on the 24th June 2021.

The project design team has prepared an amended Design Analysis Report (**Appendix D**) which consolidates the initial design thinking and process, using the same rationale and justifications to arrive at a revised design for the building, one with a greater emphasis on context over futuristic expression.

It does not attempt to cover each iteration of design evolution in response to GANSW feedback, but rather the final informed design and how it relates to the analysis of the site and its physical and cultural history, the College's brief and vision and the seed of the design concept.

It should be noted that although aesthetic consideration has been a key element of the design development there are far greater considerations that must be part of the design process including budget, compliance and functionality. Once the design idea was established all efforts were made to stay true to the design intent to achieve the most authentic visual outcome. However, as with all design, there is a reality that requires concessions to be made to achieve necessary and desirable outcomes to meet other key considerations. The design has been reviewed and the specific concerns of the SDRP03 have been implemented where warranted.

Contained within the Design Analysis Report is a detailed response to each item raised at the SDRP03 meeting with a summary in terms of design response provided below in **Table 1**.

Table 1. Summary of Design Responses to SDRP03

Item No.	Summary of Design Response
Connection with Country and Landscape	
Item 1 Use the stories learnt during the Connecting with Country consultation to move beyond the application of pattern onto surfaces and integrate the learnings into the design development of the landscape and built form.	Refer to the Indigenous Landscape Strategy provided as part of Appendix 9 submitted with the original SSDA application. These assisted in informing the evolving concepts of space in the design.
Item 2 Embed and seek opportunities to enrich the landscape and built form with Aboriginal knowledge such as the rock shelter and stories that connect the harbour to the campus	Taking note of significant rock shelter sites indicated on page 7 of the Indigenous Landscape Strategy (Appendix 9 of SSDA), there is intent to explore the geological formations via soffit art and story art walls that area seamlessly integrated with the design
Item 3 Consult with Cammeraygal Clan throughout the development of the garden areas, especially regarding the usability, amenity, and plant species selection (which should be cultural and sensory).	The inclusion of a harvestable bushfoods palette supports a connection and caring for Country approach, providing therapeutic and mindfulness opportunities for students to engage with nature and culture." (Page 15 of Indigenous Landscape Strategy, Appendix 9 of SSDA)
Item 4 Provide multiple opportunities for all users of the Ignis building to connect	The design has provided a range of spaces from nook seating along the primary axis from the administration to the gym to more flexible play space and lawn.

with the landscape, including as part of a journey to and through the building and via places to dwell.	
Item 5 Ensure all garden beds have enough light, access to natural rainwater and protection to thrive year-round**.**	The planting strategy has been to adopt a range of planting mixes derived from endemic and native vegetation groups which would be situationally suited to the design. From shady mixes for more sheltered zones to the more grassy and light-loving mixes for zones which receive more impact from the sun and wind. In addition utilising a proposed rainwater tank to reuse rainwater across the planting zones.
Item 6 Provide further greenery and/or trees in the courtyard to reference the campus' unique setting	The design has provided open play spaces that encourages flexible and active use suited to high school boys. The addition of more trees in this space will slow this zone down. The design already provides many spaces for much slower and individualised activity
Item 7 Ensure the area under the Figtree has suitable ground coverage and supporting amenity for rigorous student use	A raised timber decking has been proposed for the base of the Fig tree, this decking would provide enough flexibility and be resilient for everyday student activity
Item 8 Establish play/court areas that are not in conflict with student movements. Outdoor and entry spaces should be multi-use, safe and accommodate all users	Accessibility has been a key focus of the design. Opportunities for play have been offset from main axis ways so as to not impede on movement.
Item 9 Provide infrastructure such as plug-in points to outdoor study nooks.	The school is already very technologically integrated, currently providing a plethora of accessible power outlets for students and staff. In this design the intent is to have students be able to use their laptops and devices comfortably in the proposed study spaces, with an ability to access wifi provided by the school.
Architecture	
Item 10 Reference the sketch of the 'rock shelter' to develop the floating form of the Ignis building through reconsidering materiality, transparency and functions of the ground plane to give the impression of the building mass sheltering the ground floor below.	Materiality was a primary consideration in developing the concept of the rock shelter. The choice of colour for the masonry base was informed by: • *the COLA's deep plan and predetermined soffit height (as the building to marry in with floor levels of existing buildings) and aim to keep this light to achieve better quality of light in that area.* • *the ambition to complement the masonry colours of adjacent existing buildings.* Whilst it is acknowledged that from an aesthetic sense they impact the ability to provide a pure solution for the base that is "all transparent" and reads as one deep recess, it has been carefully considered and designed to accommodate the uses and best maintain this design intent. It is important to note that with the base being recessed it will read in shadow for much of the day, achieving the effect of a homogeneous base.

	GANSW comments regarding the colour of masonry base and arrangement of openings have been addressed in a slightly modified design to achieve greater consistency within the base.
Item 11 & 12 Establish and build on a hierarchy of key design components: the ground plane, columns, soffit, floating built form, and facade treatments Develop the three sections of the façade and simplify the horizontal cues.	The hierarchy of the design is detailed within the Design Analysis Report as 5 levels being: 1. Masonry base 2. Floating form design to read as one element with central cut out 3. Breakup of the NNE façade into three parts, two flanking ends and a central atrium- a celebration of the building use. 4. A simple end statement on the east façade revealing the functions behind in a single transparent element. 5. A south elevation that maintains the idea of the base and building above whilst respecting the scale and articulatio of the heritage Main Building.
Item 13 Provide a continuous soffit to unify the façade above the ground floor	The atrium soffit has been retained as we do not believe its removal benefits the design for the following reasons. 1. Aesthetically we believe the extended soffit at the atrium is appropriate gesture as it reinforces the atrium as a celebrated element providing invitation into the COLA. 2. Functionally because it meets the College's brief for an extended COLA (weather protection and shade) at this location including protection to the canteen queuing area below. When asked to revise the effective diamond hood sun shading we were forced to recess the atrium wall to achieve necessary shading from the flanking sides and roof soffit because, on their own, the horizontal and vertical blades cannot achieve the required results. In recessing the atrium the cover to the Canteen was impacted requiring a further design solution that addressed this need, being the sloping soffit.
Item 14 Provide a cohesive architectural language for the Ignis building and the courtyard by reducing the number of different geometric elements	The design development process has been through a significant journey. From evolution of the concept to the first and second iterations which took on board the GANSW commentary. The perceived fussiness and number of geometric elements has resulted in design changes throughout the design development process, including: • departure from the diagonal sun shading grid to a regular horizontal and vertical arrangement along with the grouping of windows and recessed spandrels within single apertures • consistency of approach to apertures creating a greater cohesiveness.

Item 15 Reconcile conflicting elements such as circular columns supporting a building with a rectilinear language**.**	We would argue that there is no visual conflict in circular columns supporting a rectilinear form and successful outcomes of this are provided within the Design Analysis Report. Not only appropriate in an aesthetic sense circular columns are also appropriate from a functional, safety and maintenance perspective. Square columns in a school environment, particularly in a boy's school, are far more susceptible to being damaged and causing injury, and therefore being a maintenance burden
Item 16 Ensure the louvres to the façade of the atrium are orientated for optimal shading to justify the departure from the horizontal language of the rest of the built form.	The placement of the louvres were carefully contemplated in providing shading whilst also achieving low maintenance and fire separation. The horizontal elements have been positioned and vertical blades arranged and angled to specifically address shading needs and extensive shading studies have been undertaken to determine this as well as meeting Section J requirements plus requirements of the College.
Item 17 Enhance the hierarchy of key design components by developing a selection of key details to be used throughout the building**.**	Will be addressed in design development
Item 18 Select materials that reference the muted tones of the natural setting to ensure the building ages well over time.	The Design team has been very conscious to achieve external finishes that both respect context and age appropriately, particularly in the selection of the panelled facade of the upper building volume. From a contextual point of view it was determined that an aluminium or composite panel with any degree of gloss finish was not appropriate but that a panel with the inherent colour of Equitone in matt finish and natural tone, appropriately detailed, was the right solution

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 the DPIE, as well as the local community.

The proposed changes are illustrated in the revised Architectural Drawings (**Appendix C**) as prepared by PMDL.

The following amendment have been made to the built form of **SSDA 10424** to respond appropriately to the submissions.

3.1 PROPOSED DESIGN AMENDMENTS

The following revisions to the design are in response to the comments from the State Design Review Panel (SDRP02 and SDRP03) and to provide further information regarding the materiality and contextuality of the Stage 2 application:

SDRP02

- Reduction in overall scale of building by reducing parapet and skirt of building to decrease the appearance of the overall building form.
- Omission of flared facades flanking central atrium, reducing perceived 'fussiness' of NNE elevation.
- Change in fenestrations on the NNE facade to reduce the number and create a more regular arrangement of apertures that better reference the horizontality of O'Neil and Wallace buildings.
- Revisions to the central atrium diagonal sun shading to reduce the perceived 'busyness' of the device and its departure from existing contextual references.
- Recessing the central atrium by pushing back the curtain wall to connect with internal pod. Base of the central atrium raised to better reveal and celebrate the COLA and enhance the human scale.
- Revisions to east elevation shading in keeping with changes to the central atrium and reducing the scale, dominance and perceived 'busyness' of this device.
- Revisions to south facade to draw greater reference from the heritage facade of Main building and address scale of this elevation to ensure appropriate resolution as backdrop to Main Building.
- Revisions to the plant room volume to better integrate it into the architectural resolution of the new building form and treatment.

SDRP03

- Review of window spandrel conditions around the building to achieve consistency in materiality and detail.
- Review of the soffit edge colour at base level to be consistent with the sloping soffit to the atrium and enhance the appearance of the upper volume 'floating' above its base.
- Review of base brick colour to mid - dark tone to again reinforce the appearance of the upper volume 'floating' above its base and to improve connection to and extension of the ground plane finish.
- Review the window and wall proportions at the base level to provide consistency in treatment and achieve the appearance of a unified base element.

It is acknowledged that no further amendments are proposed as it is considered the building height and bulk have been appropriately addressed in the original EIS submission and as part of the Concept Approval.

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;
- Aboriginal cultural heritage;
- Noise and vibration;
- Services and utilities;
- Sediment and erosion control;
- Stormwater management and drainage;
- Geotechnical matters;
- Heritage;
- Visual Impact and View Loss;
- 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:

- Supplementary Architectural Plans;
- Traffic Statement;
- Visual Impact Assessment.

The matters requiring further assessment are addressed below. These sections should be read in conjunction with the matrixes included in **Appendix A** and **Appendix B**.

4.2 INCONSISTENCY WITH CONCEPT APPROVAL

The proposed development seeks detailed built form and use approval to provide new teaching and educational facilities in the form of the New Ignis Stage 2 STEMP Building. The Concept Masterplan SSD 7140 was approved on 24 June 2016 for:

Concept Proposal for the staged redevelopment of the St Ignatius College Riverview Senior School Campus over a 30 year period, comprising:

- *Demolition works;*
- *Construction of new buildings and recreation facilities;*
- *Refurbishment and expansion of existing buildings;*
- *Vehicular access, car parking and pedestrian circulation arrangements;*
- *New recreation and outdoor spaces; and*
- *Associated landscaping.*

SSD 7140 was the subject of three modifications of which 'Mod 3' is of particular relevance to the subject Stage 2 proposal. Mod 3 to the Concept Proposal included amendments to the proposed Wallace Precinct building as two separate building envelopes, being the new Wallace and Student Node-Link Buildings. The works have been separated into two smaller stages, the first being the new Wallace Building and the second being the Student Node-Link Building; the new Wallace Building will represent Stage 2 of the Concept Proposal.

Table 2. Summary of Modifications

Mod No.	Summary of Modification	Type	Date of Approval
Mod 1	Installation of solar panels in the Therry Learning Precinct and the Vaughan Learning Precinct	4.55(1A)	11/01/2018
Mod 2	Alterations to the approved landscaping and changes to the existing handball court in the senior school campus	4.55(1A)	19/05/2018
Mod 3	• Modifications to allow staging of works associated with the Wallace Building. • Changes to the new Student Node – Link Building envelope. • Changes to the location and height of the construction of the Wallace Building envelope	4.55(1A)	11/08/2020

We note that the previously referred to new Wallace Building is now named New Ignis Stage 2 STEMP Building. Despite this, the subject Stage 2 proposal remains completely consistent with the Concept Proposal as modified. To clarify, we have provided the below **Table 3** which details the relevant approved development under the Concept Proposal and the proposed subject Stage 2 works. The approved development that is to be completed as part of Stage 2 is shown in **bold**. It is noted that some of the approved development, specifically the demolition of the existing Wallace and Administration buildings and the new Student Node-Link building works, are separated from Stage 2 and will be subject to further applications.

Table 3. Comparative Table

Mod No.	Summary of Approved Development
Concept Proposal (including Modifications) SSD7140	Proposed Staging of the Works Associated with the Wallace Building: • **Stage 2 – New Wallace Learning Building, including Food and Beverage** New Student Node - Link Building: • Demolish the existing Administration Building and replace with a new facility in the same location linking the Main Block and Vaughan Buildings. New Wallace Learning Building: • Demolition of existing Wallace Building; • **Move the approved location of the building and establish an alternative connection to the Vaughan Building;** • **Construction of an additional level over the approved 4 levels (total 5 levels)** • **Ground level to accommodate to C.O.L.A and Canteen.**

	Future Recreation Courts Precinct: • Remove approved podium design and replace with reduced proposal that focuses on the reinvention of existing outdoor and area left from the removal of Wallace to create purposeful and quality outdoor recreation space.
Stage 2 SSD10424	Stage 2 - New Wallace Learning Building, including Food and Beverage: ▪ Construction of new five (5) storey building with a maximum RL52.00 at the heart of the Campus to accommodate modern, flexible teaching and learning spaces; ▪ Provide improved learning opportunities for Science, Technology, Engineering, Mathematics and PDHPE as a STEMP facility, along with six (6) Pastoral Care House areas, and staff rooms; ▪ The ground floor will accommodate a C.O.L.A, multi-purpose Hall and Canteen (Food and Beverage) with servicing by a loading area on basement level; ▪ Refurbishment of existing O'Neil Building to allow integration of New Ignis Stage 2 STEMP Building to connect to existing fabric; ▪ New North Landscaped Area; ▪ New Landscaped Area between the existing Wallace Building and the New Ignis Stage 2 STEMP Building; and ▪ Upgrade courtyard to improve the integration of the learning space and create a sense of place.
Approved Development to be completed in Future Stages (subject to further applications)	New Student Node – Link Building: • Demolition of existing Wallace Building; • Demolish the existing Administration Building and replace with a new facility in the same location linking the Main Block and Vaughan Buildings. Future Recreation Courts Precinct: • Remove approved podium design and replace with reduced proposal that focuses on the reinvention of existing outdoor and area left from the removal of Wallace to create purposeful and quality outdoor recreation space.

As detailed extensively in the EIS, the proposed development will form Stage 2 of the previously approved Concept Plan (**SSD 7140**). The approved location was modified (**SSD 7140 Mod-3**) following lessons learnt from the Stage 1 Therry project regarding the need for shunt space during construction to maintain satisfactory operation of the College and minimal impact on the learning opportunities and outcomes. To that end, the revised Masterplan retains the existing Wallace Building for specifically this purpose, as shunt space during not only the construction of the New Ignis Stage 2 STEMP Building but during further stages of the learning precinct Masterplan, when other buildings come offline for their refurbishment.

The sequencing of the masterplan has been deliberately not predetermined to enable the College to undertake works appropriate to and supporting the ongoing coherence of learning and pastoral needs and ambitions, the safety and wellbeing of its students and staff, the efficient ongoing operation of its facilities and infrastructure and the funding requirements and debt levels that can be sustained by the College.

Considering the above, it should be noted that the proposed removal of the existing Wallace Building requires flexibility in terms of intended delivery of each Precinct (as prescribed under SSD 7140 (as modified)) as it depends upon the College's needs and priorities. The demolition of the Wallace Building was not intended to be part of the Stage 2 works. The demolition of existing Wallace, whenever it occurs in the sequencing, is reliant on the refurbishment of the Main Building to relocate administration and staff facilities from the existing administration building.

Once this is achieved the Administration building and Wallace can be demolished to create a new link building and the associated landscape works that will connect *Stage 2 Ignis* to Third Yard. The delivery of New Ignis Stage 2 STEMP Building and the future demolition of the existing Wallace Building will not detrimentally impact the operations of the School and will be timed and delivered to ensure a fluid transition period.

In summary, despite the demolition of the Wallace Building forming part of the modification SSD 7140 Mod-3, it was clear in both the conditions of approval and scoping document for the subject Stage 2 proposal that the demolition of the Wallace Building is not intended to be included as in the Stage 2 SSD 10424.

Figure 1 below shows the approved Concept Proposal as per SSD 7140 Mod-3 with all stages of the learning precinct Masterplan fully completed.

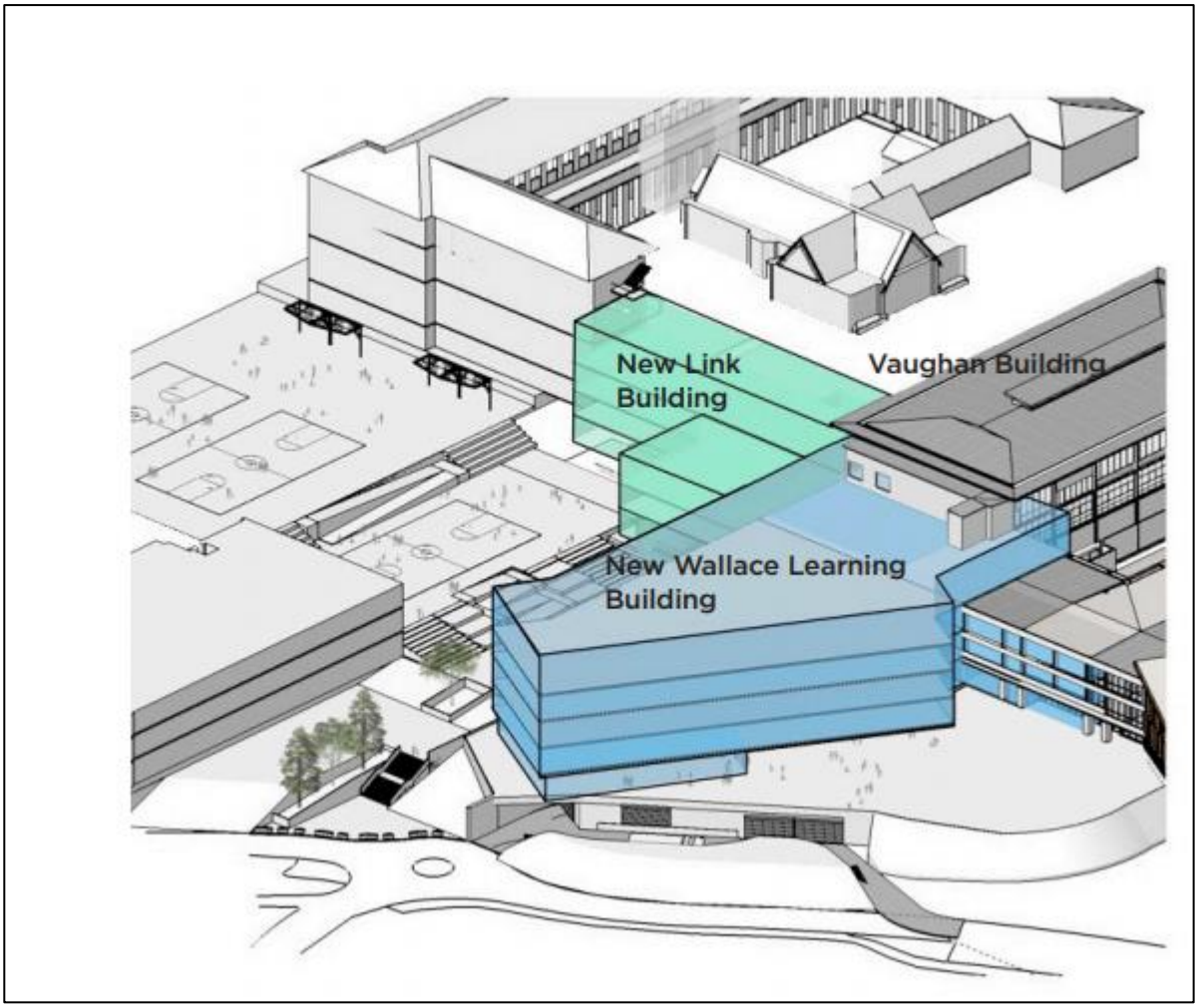

Figure 1. Approved Concept Proposal SSD 7140 Mod-3 (Source: PMDL Architects, 2020)

As requested by DPIE, **Figure 2** below overlays the proposed Stage 2 plans and the approved Concept Proposal demonstrating compliance between the proposed and approved site layouts. The New Ignis Stage 2 STEMP Building is shown within the approved Concept Proposal building envelope (blue volume). The existing Wallace and Administration buildings are retained in Stage 2. In a future stage (subject to further applications), the existing Wallace and Administration buildings will be demolished and the new Student Node-Link building (green volume in Figure 1) will be constructed.

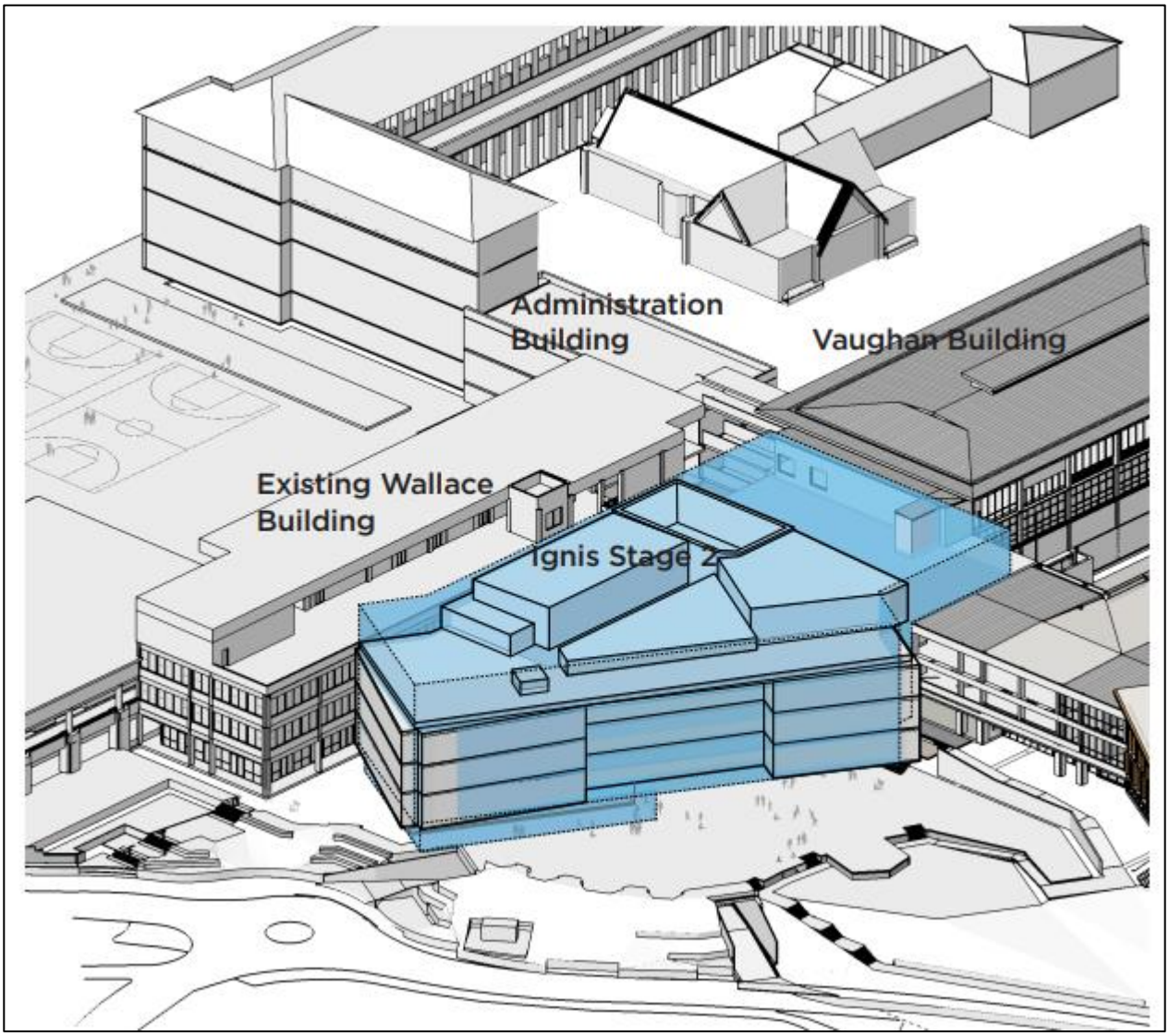

Figure 2. Overlay of Stage 2 and approved Concept Proposal (Source: PMDL Architects, 2021)

4.3 CONNECTION WITH COUNTRY AND LANDSCAPE

The SDRP03 meeting and the issue of the panel minutes on the 21st June 2021, identified a number of landscape and connection to Country related issues which had not previously been raised by GANSW or DPIE. The design process and development of the proposal was carefully guided by strategies that centred around indigenous learning, culture and systems. The Indigenous Landscape Strategy provided in Appendix 9 of the original SSDA application goes into explicit detail of connection to country and the development of the landscape proposed as part of the Stage 2 development.

It was apparent at the informal meeting held on the 24th June 2021 with DPIE and GANSW representatives that this document had not been fully reviewed and a number of the items raised by the SDRP are addressed within this document. This has been carefully detailed as part of the Design Review Analysis at **Appendix D** and summarised above in **Section 2.3**.

4.4 BUILT FORM AND CONTEXTUALITY

In response to the matters raised by the DPIE, the State Design Review Panel and public submission an amended façade design has been proposed and detailed extensively in the accompanying Design Report Analysis Report by PMDL (**Appendix D**).

One of the primary changes to the design is the revision of the two feature sun shading devices on the NNE and E faces of the building. The revised design addresses two key aspects:

> *1. It achieves an appropriate sun shading solution that meets both the requirements of Section J and the College's endeavour (from lessons learnt in Stage 1) to also address winter sun and glare and ensure the atrium space has the desired comfort level without need for AC for the majority of the year.*

3. *It addresses the GANSW concerns about the 'foreign' diagonal pattern and perceived 'busyness' of the screening devices, which were a direct response to shading sun at key times of the day.*

Considerable investment has been made into developing a solution for the sun shading that drew greater reference from Stage 1 and respected the horizontal and vertical nature of the existing flanking buildings. By recessing the atrium and providing an 'eyebrow' to it, significant shading is achieved to the glazed facade that subsequently only required vertical blades at key locations and angles to achieve the desired shading in summer and winter. A similar approach was taken on the eastern elevation, reinforced by making the whole end of the building one shading element, as opposed to an element applied to the end of the building. The vertical screens enable greater visibility into and out of the building, providing the opportunity to better celebrate the use beyond and frame key views to the College and broader Sydney context

The design and scale of the proposed development reflects the operational requirements of the College; minimises the building footprint to maximise landscaping and open space; maintains a green and vegetated character; minimises the appearance, bulk and scale through façade articulation, massing, roof modulation, setbacks and landscaping; and equitably treats level changes to create appropriate transitions across the grounds.

The revised design draws greater reference from and achieves better adherence to the immediate building context insofar as simplifying the lines of the sun shading from diagonal to horizontal and vertical elements and the more ordered arrangement the window openings. The change in window arrangement reinforces the horizontal nature of the NNE facade apertures, directly referencing the adjacent O'Neil building and the backdrop of the Wallace (temporarily) and Ramsay buildings. The southern facade draws subtle reference from the Main building in the size, repetition, hierarchy of openings but avoids a literal copying of these elements to ensure it reads appropriately as a modern interpretation and fulfils the daylight requirements of the learning spaces beyond. The materiality of this facade has been simplified to that of the masonry base, Equitone upper volume and standing seam cladding of the plant.

The simplification of the building facades in scale, articulation, and materiality contributes to refining the design to its key design intent. Whilst the overall form and intent is retained the reduction in building scale, redesign of the shading devices, grouping and stacking of window openings and rationalisation of material selection, contribute to achieving a 'calmer' and more contextual solution that retains a contemporary learning and modern aesthetic.

This has been achieved by some bolder design changes to the sun shading, moving from a diagonal to regular grid, through to subtle changes to the Equitone panel finish, departing from the literal masonry bond pattern and replacing expressed joints with butt joints. The latter has been done to retain a degree of cladding pattern and sufficient texture to break up the expanse of façade.

Further to the SDRP03 meeting as discussed above in Section 2.3, the design team have reviewed the design where warranted and implemented the following improvements to the façade design:

1. Review of window spandrel conditions around the building to achieve consistency in materiality and detail.
2. Review of the soffit edge colour at base level to be consistent with the sloping soffit to the atrium and enhance the appearance of the upper volume 'floating' above its base.
3. Review of base brick colour to mid - dark tone to again reinforce the appearance of the upper volume 'floating' above its base and to improve connection to and extension of the ground plane finish.
4. Review the window and wall proportions at the base level to provide consistency in treatment and achieve the appearance of a unified base element.

We trust the above and the accompanying Design Analysis Report (**Appendix D**) and Architectural Plans (**Appendix C**) address the specific concerns raised by GANSW in the SDRP03 meeting.

4.5 SOLAR ACCESS

We acknowledged the DPIE's concerns regarding solar access to the open space section between the existing Wallace building and the proposed STEMP Building. The updated Architectural Documentation (**Appendix C**) provides additional solar access diagrams for both the equinox and solstice. It is apparent from the included shading diagrams that solar gain into existing Wallace building is minimally impacted by the siting of the New Ignis Stage 2 STEMP Building. The section provided shows that the deeply recessed external walls of existing Wallace's north façade are already shaded by the building's colonnade for most of the day. The additional overshadowing of existing Wallace's north facade by the Stage 2 building is negligible.

However, it is acknowledged that space between existing Wallace and the New Ignis Stage 2 STEMP Building will be in shadow for the majority of the day as this space is south of the new building. It is important to note that the removal of the existing Wallace building, whenever that occurs, does not alleviate this. In siting any building there is recognition that south elevations and spaces will be in shade all day. In recognition of this the promenade between existing Wallace and New Ignis Stage 2 STEMP Building is designed as more of a transient space that student and staff move through rather than one where they will gather for long periods, except in summer when it is desirable to do so. This space has therefore been carefully designed to provide as much activation as possible.

4.6 VISUAL IMPACT ASSESSMENT

To complement the updated Architectural Documentation (**Appendix C**), an addendum Visual Impact Statement was prepared by Hatch Roberts Day and accompanies this submission as **Appendix E**. The assessment concludes that while the built form would clearly make a qualitative change to the appearance of the Site and setting, the visual impacts assessed from multiple viewpoints surrounding the site result in impacts considered to be **LOW / NONE**. This is mostly due to the proposal's integration with the existing built form environment and its compact configuration.

There are limited public open views towards the site that are not already screened by landscape detectors. Where visible, the proposal is consistent with the surrounding character and the proposed architectural design helps integrate the proposal into its setting and make it visually attractive

The proposal is considered to provide several key measures designed to mitigate the potential visual impacts:

- High quality landscaping and well-located screen planting to reduce the visual impact in close proximity;
- Use of native planting to reinforce the character of the existing vegetation
- Scale and bulk consistent with the existing buildings
- Facade treatment and articulation to reduce the height impact
- Material and colour selection that blend with the surrounding environment and reduce the visual impact

4.7 TRAFFIC AND TRANSPORT

As demonstrated in the Traffic and Parking Assessment (Appendix 10 of the EIS), the proposed development will be suitably accommodated on the existing road infrastructure and will not unreasonably compromise neighbouring amenity. Notwithstanding, several matters have been raised following the exhibition period that required further clarification.

In response to the parking and transport matters, a supplementary statement has been prepared by Positive Traffic, accompanying this submission as **Appendix F.**

4.7.1 Construction and Traffic Management Plan

In response to the DPIE's query on the access of trucks during construction and the turning circle of construction vehicles on Site, a turn path assessment has been prepared (**Appendix G**). The turn path analysis is based on the closest vehicle within *AutoTURN* to a dog / trailer truck arrangement with a total length of 18.840m which reflects the anticipated trucks that will likely be used for the excavation and the largest truck expected to access the Site. This mirrors the assumptions of the CTPMP report (Appendix 15 of the EIS) and confirms there is adequate road space and manoeuvring space to accommodate the expected largest vehicle during construction of this stage of the proposal. This also includes the proposed area to accommodate trucks when loading / unloading.

4.7.2 Incorrect public transport routes

The 'error' with the description of bus route 253 that: 'Route 253 does not operate via North Sydney. It operates via the Warringah Freeway'. We acknowledge the 'error' in Table 20 of the Traffic and Access Assessment Report (TAAR) but note that the route is correctly described throughout the remainder of the documentation.

At the time of preparation of the TAAR and GTP in August 2020 ferry services were in place serving the site. In late 2020, a cancellation of the ferry service was proposed, however due to public backlash the cancellation of the ferry service did not occur. We have confirmed with Captain Cook Cruises that the commuter and school ferry service continues to operate in 2021.

4.7.3 End of trip facilities and bike parking

TfNSW have raised concerns regarding the lack of information regarding integrated transport and land use and the requirement to provide motorbike and bicycle parking in accordance with Lane Cove DCP. The concerns raised and commentary provided disregards the previous original masterplan traffic impact assessment report undertaken as part of the Concept Approval SSD 7140 which is the basis of this proposal.

The proposal does not intend to increase the student or staff population, therefore does not trigger any requirement for end of trip facilities or bicycle parking. It appears there is a retrospective view in the above comment that overall masterplan requirements for such facilities are necessary for this particular application which we do not agree. Despite this, the proposed Ignis Building includes in the Basement level- 3 x shower and change facilities (1 x male, 1 x female, 1 x accessible). In addition, the College currently has the following existing end of trip facilities and bicycle parking:

- 35+ internal bike storage within the College ground
- 4x 8 (32) bike capacity racks adjacent to 3rd Yard - external/undercover.
- 4x 3 (12) bike capacity racks at Gartlan Centre- external/undercover.
- Gartlan Centre - 1x male and 1x female staff shower and change facility.
- TKC 2x male and 1x Female staff Shower and change facility.
- In addition, an almost infinite amount of impromptu bike parking options around the campus.

Given the above, any further bike parking and facilities are not required necessary as part of the proposed New Ignis Stage 2 STEMP Building project.

4.7.4 Green travel plan

We support the idea that the GTP is a living document. However, as made clear in the GTP at Section 1, the COVID-19 pandemic has altered travel patterns and has led to significant burdens on institutions such as schools, in terms of compliance with public health requirements, in a dynamic environment.

Using College resources to implement the GTP during the pandemic, when the transport situation could change rapidly, would place a burden on the College which would be of limited use. As such the statement in the GTP at the end of Section 1 that the implementation requirements for the GTP, which are not specified in the SEARs, should be determined in consultations between the Department of Planning and the College, remains valid.

The fact that the incremental transport demand of the proposal remains at zero also confirms that the traffic and transport impacts are negligible and the GTP should not be a measure to mitigate the impact of the development.

A response to each of the individual issues raised by TfNSW is provided in **Appendix A**

PART E DRAFT CONDITIONS OF CONSENT

Several government agencies have provided draft conditions to be incorporated into the SSDA consent. The majority of the conditions are standard conditions of consent and can be complied with prior to the issue of a Construction or Occupation Certification.

Further commentary in regards to the recommendations of provided by TfNSW is provided at **Appendix A** and we seek the support of TfNSW and DPIE with regards to these matters.

PART F MITIGATION MEASURES

The collective measures required to mitigate the impacts associated with the proposed works are detailed in **Table 4** below. These measures replace those outlined in the original EIS were applicable.

Table 4. Mitigation Measures	
Visual	Saint Ignatius' College Riverview will maintain a design which is: - High quality landscaping and well located screen planting to reduce the visual impact in close proximity; - Use of native planting to reinforce the character of the existing vegetation - Scale and bulk consistent with the existing buildings - Facade treatment and articulation to reduce the height impact - Material and colour selection that blend with the surrounding environment and reduce the visual impact.
Traffic and Parking	Saint Ignatius' College Riverview will operate in accordance with the Green Travel Plan and provide an updated CTPMP prior to construction.

PART G CONCLUSION

The applicant, Saint Ignatius' College, Riverview 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, Saint Ignatius' College Riverview has sought to refine the project design.

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, generally remain 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;
- Has been designed to limit visual impacts when viewed from the surrounding locality;
- Is of a high architectural standard, and the built form is compatible with the surrounding character of the locality;
- Retains and respects the Site's heritage significance whilst development new facilities which are in-keeping with the heritage-built form;
- The proposed development will result in an improved educational environment for the School through:
    - Enabling an excellent academic space;
    - Providing appropriate and functional open space for students;
    - Will modernise outdated educational facilities for future generations;
    - Create an inclusive, supportive, and secure environment.
- The proposal will make a positive contribution to the built form of the School and create an attractive streetscape and interface with the local character in Lane Cove

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