

31 January 2017

Department of Planning and Environment
Online Submission

**Ballina Presbyterian Church - Submission to Ballina High School
Redevelopment Proposal SSD 16_7742**

Whilst Ballina Presbyterian Church (**BPC**) does not object to the Ballina High School Redevelopment (**Redevelopment**) generally, BPC does object to the proposed car parking arrangements.

The Traffic Impact Study prepared by Ardill Payne dated August 2016 (Revision 5) (**Report**) sets out the position of the Department of Education NSW (**Applicant**) with regards to car parking arrangements for the local streets surrounding the Redevelopment.

In summary, the proposed car parking arrangement is that staff, students and parents utilise on-street parking in proximity to the School. That is, the Applicant does not propose to meet the car parking needs generated by the Redevelopment by way of onsite parking allocations (**Car Parking Proposal**)

The Car Parking Proposal is unacceptable for the following reasons:

1. Non-Compliance with the Development Control Plan

- (a) The Ballina Shire Council Development Control Plan 2014 (**DCP**) set outs the requirements for car parking for educational establishments (secondary – high school).
- (b) Those requirements are 1 space for every 10 students and 1 space for every 2 employees.
- (c) The Redevelopment fails to satisfy the car parking requirements of the DCP.
- (d) The Report assumes an error in the DCP as to the age of the students relevant for the car parking ratio, by reference to other DCPs in the surrounding local government areas. However, no evidence is provided as to whether Ballina Council agrees with this assertion. On the face of the DCP, the requirement is to provide 1 space for every 10 students, not 1 space for every 10 students aged 17 or more. The provision as stated in the DCP is the provision that should be applied to the Redevelopment.
- (e) The basis in the Report for ignoring the DCP is stated as the Applicant's policy not to provide onsite parking. This is not a proper planning consideration for overriding the express provisions of the DCP.
- (f) It cannot be the case that proper and considered sustainable transport and parking planning is to not provide any onsite parking. That is simply shifting the impact of the Redevelopment onto local residents, businesses and organisations in the surrounding area.
- (g) The bases for the deviation from the express requirements of the DCP would not be available to a non-government business, organisation or

private applicant. That is, any applicant for development of this scale within Ballina Shire would almost certainly be expected to satisfy the car parking requirements of the DCP. The fact that the applicant had adopted a policy of sustainable travel (reliant on public and bike transport) would be unlikely to be given any weight by Council as the consent authority. Accordingly, there is no reason why the Applicant should be permitted to avoid the DCP's requirements. If this was allowed, the application of the DCP would be unfair and inconsistent – a very regrettable planning outcome.

2. Impact on Local Residents, Organisations and Businesses

The streets in proximity to the Redevelopment and to the Ballina CBD are relatively quiet streets with ample street parking. This benefits local residents in those streets with convenient parking.

Significantly, the precinct in which the Redevelopment is located includes a number of churches and not-for-profit organisations. These include the St Francis Xavier Church, the Uniting Church, the Masonic Club, Meals on Wheels and BPC.

BPC uses its buildings and facilities during the week (that is, beyond just a Sunday morning) for a wide variety of activities such as meetings, bible studies, social gatherings and community groups (the BPC Hall is extensively used by key community groups). Other churches and not-for-profit groups would have comparable usage during the week.

Accordingly, BPC is concerned that the availability and accessibility of parking in the local area (beyond just the streets immediately adjacent to the Redevelopment) will be substantially and adversely affected by the Redevelopment.

The parking needs generated by the Redevelopment – having to be almost completely satisfied by offsite/street parking – will have an unacceptable impact on local residents, churches and community groups in the local area.

BPC is grateful for the opportunity to make a submission and looks forward to being further advised on how the Planning Department has appropriately considered the issue of car parking in the context of the Redevelopment.

Yours faithfully,

The Committee of Management
Ballina Presbyterian Church
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