



Henry Burnett
Principal Planner
DFP Planning Pty Ltd
Email: [REDACTED]

5 October 2022

Our Ref: CRS2012/8100

Dear Henry

5 Malvina Street, Ryde - Proposed Pavillion Building Ryde Secondary College Works

Thank you for providing the opportunity to comment on the Review of Environmental Factors (REF) document under part 5 of the *Environmental Planning and Assessment Act 1979* (EPA Act 1979) proposed to be taken without consent at Ryde Secondary Collage, 5 Malvina Street (the site)

A list of requirements from Council are included in the attached submission for consideration in the preparation of the REF. Upon completion of the Final REF document Council would request that it be issued to Council for review and further consideration before the works are undertaken to ensure key issues are satisfactorily addressed by the Proponent.

Please note that due to scope of works which has the ability to impacts pedestrians and the public domain, further inputs are required to be prepared and submitted to Council before the works are undertaken and after the works have been completed. Please refer to the body of this submission for these requirements.

Please note that under the *Environmental Planning and Assessment Regulations 2021 (EPAR 2021)*, the REF document may require to be notified on the NSW Planning Portal depending on the cost of works (more than \$5 Million) or if separate approvals are required under a different Act. Refer clause 171 of the EPAR 2021. This should be confirmed by the Proponent.

If you require any additional information regarding this matter, please contact Nic Najar- Town Planner – Development Advisory Services on [REDACTED] or email to [REDACTED]

Yours sincerely

Nicholas Najar
Town Planner - Development Advisory Services.

RESPONSE TO REF REQUEST - CITY of RYDE

Project: Ryde Secondary College Works
Location: 5 Malvina Street, Ryde
Proponent: School Infrastructure NSW (SINSW)

Council Reference: CRS2012/8100

City of Ryde requests that the following matters be addressed/ included, in the preparation of the REF:

1. Further documentations required for Council review

- Finalised Review of Environmental Factors
- A pre and post construction dilapidation report will be required to be submitted to Council to adequately protect the recently constructed public domain works (undertaken by Council).
- Engineering design plans showing the upgrades to the street lighting as required (refer to below comments)
- Clarification on the intended OSD stormwater management system. Is it temporary or permanent?

2. Review of Environmental Factors (REF)

Council notes the Proponents proposed list of supporting documentation that will be utilised in preparation of the REF. Council supports the Proponents intention to inform the REF with a variety of experts inputs.

In addition to those expert reports which will inform the REF, the REF should address the following:

- Details of the proposal proposed to be taken under the REF with confirmation that the scope of the works is permissible under Part 5 of the EPA Act 1979, not requiring consent under Part 4.
- The REF should address the relevant Review of Environmental Factors Guidelines and satisfactorily address clause *171 Review of environmental factors—the Act, s 5.10(a) of the Environmental Planning and Assessment Regulations 2021 (EPAR 2021)*
- A detailed Environmental Planning Instrument assessment against the relevant provision. This include but are not limited to:
 - EPA Act 1979
 - EPAR Act 2021
 - Relevant SEPPs (Transport and Infrastructure SEPP 2021)
 - Ryde Local Environmental Plan 2014
 - Ryde Development Control Plan (Where relevant)
 - Planning for Bushfire Protection 2019
- A Crime Prevention Through Environmental Design Assessment

- Due to the proximity of the works near R2 Low Density Receivers on Forrest Road and Malvina Street the works will need to ensure that impacts are managed on these nearby receivers.
- Potential environmental impacts and proposed mitigation measures to be addressed in the REF include but are not limited to:
 - Visual Impact and Landscaping
 - Air quality
 - Noise and Vibration
 - Waste Management
 - Biodiversity
 - Bushfire
 - Water quality and Hydraulic
 - Flooding and Stormwater
 - Traffic Management and Pedestrian Access
 - Public Domain (maintain without damage)
 - Sediment Control
 - Construction and Demolition Management

3. Arborist Report

There are many significant existing trees along Forrest Road that will be impacted by the development, including *Lophostemon confertus* (Brushbox). Therefore an Arboricultural Impact Assessment (AIA) is required.

An AIA is required of all trees being impacted by the proposal. Trees on adjoining sites where any part of the development will encroach into the Tree Protection Zone (TPZ) of those trees and any street trees. This Assessment is to be carried out as per the requirements of Australian Standard AS4970-2009 Protection of trees on development sites. In the AIA must consider the impacts of the development including:

- Fences
- Stormwater proposals
- Cut and fill
- Retaining Walls that will be required
- Car parking and driveway
- Any encroachment on the TPZ and Structural Root Zone of trees on site or on adjoining sites

The AIA must also include a tree protection plan (drawing) showing the TPZs for the trees as required by Australian Standard AS4970-2009 and protection of trees on development sites. This plan should show the Structural Root Zones and is superimposed on the site plan showing the development and the assessed trees.

4. Stormwater Management

- The proposed system incorporates a series of above ground rainwater tanks to accommodate the storage requirements. This is unconventional but was agreed in preliminary consultation with the civil consultant who advised that the structure was

temporary. It would appear from the scope of works proposed however that this is a permanent structure and must be clarified. If it is permanent, the OSD storage will need to be combined into a single location. Additionally the application will need to address the WSUD requirements in the DCP.

- Notwithstanding the above, if the structure is temporary it will be warranted that a placard be mounted on each of the tanks noting that each are a component to the OSD storage system and must not be removed / modified, as per Figure 1-10 in the DCP Part 8.2 (*Stormwater and Floodplain Management*) - Technical Manual. To facilitate maintenance, the discharge control pit must be clearly marked.
- The failure mode for the collective OSD system is less than ideal and will likely entail surcharge from each of the rainwater tanks. As all tanks are in an external area this does not present significant ramifications though the design should be a single storage if the structure is permanent.

5. Traffic

Requirements

The traffic impact assessment to be provided as part of the Review of Environmental Factors (REF) needs to address, at a minimum, the following matters:

- An analysis of the existing traffic conditions within the surrounding road network, including but not limited to a description of the surrounding road hierarchy, current weekday peak hour vehicle movements (coinciding with the peak morning and afternoon school drop-off/pick-up periods) and an assessment of the existing performance levels of nearby intersections.
- An analysis of the existing parking conditions (i.e. current peak parking demand and capacity) within the on-site car park and on the surrounding local roads (e.g. Malvina Street, Forrest Road) within walking distance to the site. This assessment needs to be based on parking and patronage surveys undertaken between 8:00am – 10:00am and 2:00pm – 4:00pm to coincide with the peak morning and afternoon school drop-off/pick-up periods.
- Details of the existing and projected (future) staff and student populations.
- A forecast of the additional peak hour vehicle movements and peak parking demand based on the projected increases in staff and student populations associated with the subject proposal.
- Identification of potential traffic impacts on road capacity, intersection performance and road safety associated with the proposed development.
- Proposals to mitigate any traffic impacts to minimise private vehicle trips to ensure nearby roads and intersections operate with an acceptable level of service as well as address potential road safety concerns.
- Proposals to improve walking and cycling, such as connections into existing walking and cycling networks, high quality end-of-trip facilities and adequate bicycle

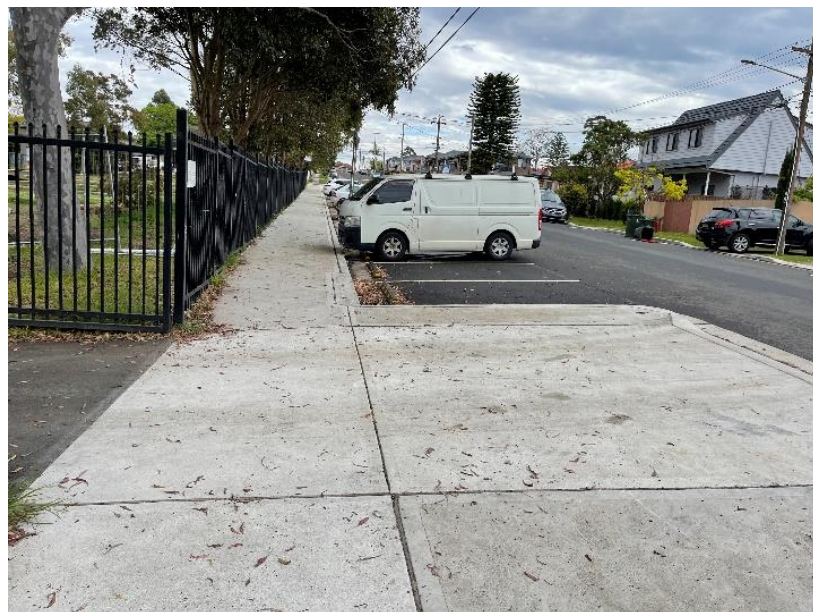
- parking for employees, students and visitors (provided in accordance with the relevant rates, specifications and standards).
- Ensure that there is adequate parking provision on site to minimise the impact to the surrounding parking amenity. At a minimum:
 - Each full-time staff needs to be provided with a parking space on site.
 - There needs to be adequate disabled parking spaces (particularly for students) in accordance with BCA standards.
 - The vehicular driveway, off-street car/bicycle parking and heavy vehicle servicing arrangements needs to comply with AS2890.1, AS2890.2, AS2890.3 and AS2890.6.
 - The inclusion of a preliminary Construction Traffic and Pedestrian Management Plan (CTPMP) to demonstrate the proposed management of the impact of the traffic and parking demand associated with the construction of the proposed development. In particular, the CTPMP should address the following:
 - Assessment of cumulative impacts associated with other construction activities (if any) in the vicinity of the site
 - An assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity
 - Details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process
 - Details of anticipated peak hour and daily construction vehicle movements to and from the site
 - Details of the vehicular access arrangements for construction vehicles
 - Details of the largest construction vehicle to be used and provide a swept path assessment to demonstrate that such vehicles are capable of accessing/vacating the construction site via the surrounding road network without any issues
 - Details of the parking arrangements for construction workers/personnel. Please note that Council will not support any arrangement that will result in the loss of the existing on-site parking for staff of the school (including people with disabilities)
 - Details of temporary cycling and pedestrian access during construction
 - Measures to mitigate impacts, including to ensure the safety of pedestrian and cyclists during construction

6. Public Domain

Public Domain Comments:

- The site lies outside of a Town Centre boundary and therefore the development is subject to the standards and requirements of the City of Ryde Development Control Plan DCP 2014 Part 8.3 driveways and Part 8.5 - Public Civil Works, and DCP 2014 Part 8.2 - Stormwater Management.
- A site visit was undertaken on 27/09/2022 to gauge the condition of the public infrastructure surrounding the site with close attention paid to pedestrian access routes surrounding the site. The following was noted on the inspection:

- Malvina Street and Forrest Road have been upgraded as part of the Capital Works Program and works were completed on December 2021, refer photos below.
- Upgraded works include new footpath, kerb and gutter and full width road resurfacing. Also included were the provision of wheel stops to prevent vehicles overhanging onto the footpath.





- Due to the recent upgrade works undertaken by Council, public domain restorations will not be required for the development.

Additional Documentation and approval Required:

- A pre and post construction dilapidation report will be required to be submitted to Council to adequately protect the recently constructed public domain works (undertaken by Council).
- If defects are found in the post-construction dilapidation report, drawings are to be submitted to Council defining the scope and details of road restoration works to be undertaken. Engineering drawings prepared by a Chartered Civil Engineer (registered on the NER of Engineers Australia) are to be submitted to, and approved by Council's City Works Directorate prior to commencement any restoration civil works. The works shall be in accordance with City of Ryde DCP 2014 Part 8.5 - Public Civil Works, and DCP 2014 Part 8.2 - Stormwater Management. The applicant is to pay to Council fees for assessment of all engineering and public domain plans and inspection of the completed works in the public domain, in accordance with Council's Schedule of Fees & Charges at the time of the issue of the plan approval, prior to such approval being granted by Council.
- Any relocation/adjustment of all public utility services affected by the proposed works shall be clearly indicated in the proposed design. All of the requirements of the Public Authority shall be complied with Utility Services: All telecommunication and utility services are to be adjusted to match the new finished footpath/nature strip levels.

- To improve public safety for the school development, the street lighting shall be upgraded along Forrest Road and Malvina Street to improve pedestrian safety. The existing streetlighting must be brought up to the current Australian Standards. This development will increase the road users pattern flow for the area, as such it must comply with AS1158, that is, distributor/collector roads need to be lit to V5/PR3. The applicant shall submit concept engineering design plans and specifications, prepared by a suitably qualified and experienced electrical engineer, reflecting the lighting upgrade works noted above.

End of Report