NSW GOVERNMENT | Planning & Infrastructure

MAJOR PROJECT ASSESSMENT:

Concept Plan for the Australian Catholic University, Strathfield Campus

167-169 and 179 Albert Road, Strathfield

Proposed by Australian Catholic University Limited

MP 10_0231

Director-General's
Environmental Assessment Report
Section 75I of the
Environmental Planning and Assessment Act 1979

January 2013

ABBREVIATIONS

CIV	Capital Investment Value
Council	Strathfield Council
Department	Department of Planning & Infrastructure
DGRs	Director-General's Requirements
Director-General	Director-General of the Department of Planning & Infrastructure
EA	Environmental Assessment
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPI	Environmental Planning Instrument
MD SEPP	State Environmental Planning Policy (Major Development) 2005
Minister	Minister for Planning & Infrastructure
PAC	Planning Assessment Commission
Part 3A	Part 3A of the *Environmental Planning and Assessment Act 1979*
PEA	Preliminary Environmental Assessment
PPR	Preferred Project Report
Proponent	Australian Catholic University Limited
RtS	Response to Submissions

Cover Photograph: Photograph of existing buildings on site (Source: Proponent's EA)

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EXECUTIVE SUMMARY

Australian Catholic University Limited (the proponent) is seeking Concept Plan approval for the expansion of the Australian Catholic University's Strathfield Campus, within the Strathfield Local Government Area. The university is seeking to expand the Strathfield Campus to accommodate the increase in student population expected over the next 10 years.

The proposal (as exhibited) sought approval for six building envelopes between two and four storeys in height; an increase in student numbers to 2,400 students at any one time and enrolments to 4,800 based on Equivalent Full Time Student Load; an increase in staff numbers to a maximum of 260 staff; expanded hours of operation; increased on-site car parking (from 346 to a minimum of 674 spaces in basement and at ground level); improved access arrangements; and pedestrian linkages throughout the campus.

The Environmental Assessment (EA) was exhibited for an extended period of 42 days between 18 January 2012 and 29 February 2012, with submissions being accepted up to 14 March 2012. The department received 633 submissions, including 6 submissions from public authorities and 627 submissions from the public (the majority against the proposal).

On 10 July 2012, the proponent submitted a Preferred Project Report (PPR) and a Response to Submissions. The PPR and Response to Submissions reduced the number of students on site at any one time; increased the number of car parking spaces on-site; modified building heights and setbacks and deleted the proposed signalised intersection at Barker Road and South Street. The revised proposal now seeks approval for 2,000 students on site at any one time (decreased from 2,400 students) and a minimum of 747 car parking spaces (an increase of 73 spaces).

The PPR and Response to Submissions were exhibited for 30 days between 25 July 2012 and 24 August 2012. The department received 937 submissions, including 4 submissions from public authorities and 933 submissions from the public (the majority against the proposal).

On 24 October 2012, the proponent submitted a Response to the PPR Submissions. The Response to the PPR submissions provided further additional information to clarify points raised in the PPR, along with a Green Travel Plan as requested by the department. A further 37 public submissions were received raising objections to the proposal.

Strathfield Council made submissions during the exhibition of the EA, PPR and Response to Submissions and to the Response to the PPR submissions objecting to the proposal.

The key issues in respect of the proposal are:

- impacts associated with the increase in student numbers and hours of operation;
- transport management and parking impacts on and off the site;
- suitability of the built form;
- impacts upon residential amenity; and
- impacts upon the heritage significance of the site.

The department obtained independent advice from a traffic specialist to inform its assessment of the key traffic related issues with the existing and proposed expanded university. Critically, the independent assessment concluded that the subject site is capable of providing for additional students subject to the successful implementation of the proposed transport management measures. These include increased on-site car parking, a new student timetable and adherence to the mode share targets in the Green Travel Plan.

In order to ensure the mode share targets are achieved and to manage impacts associated with the expansion of the university, the department has recommended a staged increase of student numbers as follows:

- no increase in student numbers until the construction of the basement car parking area beneath the existing sports fields is complete and operational (existing requirements are maintained with no more than 750 students permitted on the site at any one time between the hours of 8.00am and 5.00pm);
- an increase to 1,600 students (at any one time) once the basement car parking area is constructed and is operational; and
- an increase to 2,000 students (at any one time) and 2,800 per day when it can be demonstrated that the mode share targets and reduced on-street parking associated with the operation of the university are being consistently achieved.

Through the successful implementation of the transport management measures included within the Green Travel Plan, the impact of the operation of the university upon the surrounding residential locality will be offset. On this basis, the proposed increase in student and staff numbers can be supported.

The department has included requirements for detailed independent reviews to be undertaken to ensure that the mode share targets and reduced on-street parking are consistently achieved.

This recommendation provides a future assessment and approval framework for a staged increase to student numbers. This effectively defers any approval for additional student numbers and places the onus on the proponent to demonstrate that key travel management and on-street car parking issues have been properly resolved prior to any final approval for the intensification of the use of the campus.

In addition, the department considers that the modified built form is appropriate having regard to the existing built form and heritage context of the university. The detailed design of these buildings will also be subject to further detailed assessment during subsequent applications to construct the buildings.

Other key recommendations to address agency and community concerns include: a complaints handling register; a Student Travel and Campus Monitoring Plan; a construction management plan; and future assessment requirements for further consideration of the shuttle bus service, transport and traffic impacts, landscaping and construction and operational impacts.

Subject to the above, the department is satisfied that the site is suitable for the proposed development and will improve the level of education facilities on the site, providing a significant public benefit for current and future students.

The department is satisfied that the identified impacts have been adequately addressed through the EA, PPR and Response to Submissions and by way of modifications to the Concept Plan approval. Future assessment requirements have also been recommended that must be considered at the future application stage and detailed design of the development.

The Concept Plan is therefore recommended for approval.

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1. BACKGROUND

1.1 Site Description

The Australian Catholic University (ACU) campus at Strathfield (the site) comprises two properties being 167-169 Albert Road (Edward Clancy Building campus) and 179 Albert Road (main campus), Strathfield. The site is located within the Strathfield Local Government Area, approximately 15 kilometres west of the Sydney CBD (**Figures 1** and **2**).

***Figure 1**: Site Locality – Regional Context (Source: Google Maps 2012)*

The site accommodates the following, as shown in **Figures 3** and **4**:

- 167-169 Albert Road (Lot 12 DP 1058289) comprises the Edward Clancy Building (part two and part three storey building), a separate single storey building and parking for 38 vehicles. The Edward Clancy Building campus is located approximately 80 metres to the east of the main campus, with pedestrian and vehicle access off Albert Road.
- 179 Albert Road (Lot 11 DP 869042) comprises the main campus and includes a number of buildings up to three and four storeys in height with parking for 308 vehicles. Sporting fields are provided to the north of the buildings, which are shared between the site and St Patrick's College. The main campus site has vehicle access off three points along Barker Road, one through the main entrance point midway along the Barker Road frontage, an additional car parking access point to a ground level parking area near the western boundary and a separate service entry between these two driveways. Pedestrian access is available off Barker Road, Albert Road and Edgar Street.

Mount St Mary College (the main campus) is listed as a locally significant heritage item under the SPSO 1969 and Draft Strathfield LEP 2011. The Edward Clancy Building campus does not contain any heritage listing.

The combined site has an area of 6.65 hectares, with the main campus comprising 5.88 hectares and the Edward Clancy Building campus comprising 0.77 hectares.

1.2 Surrounding Development

As shown in **Figure 2**, the site is surrounded predominantly by residential properties (consisting of one and two storey dwellings), with St Patrick's College adjoining the main campus site to the north and the Institute of Counselling and the Sydney Adventist College (ceasing operation in late 2012) to the east of the Edward Clancy Building campus.

Homebush and Strathfield train stations are located approximately 1.3 to 1.5 kilometres from the site in a north-northeast direction, with regular services operating across the rail network. Public bus services operate past the site, with the ACU also operating shuttle bus services for students and teachers between the campus and Strathfield Station.

***Figure 2**: Site outlined in yellow (Source: Google Maps 2012)*

1.3 Previous Uses

Since the initial construction of 'Mount Royal' in 1887 ('Mount Royal' now forms part of the Edmund Rice Building), the main campus site has been utilised for a number of uses by the Christian Brothers. The site became part of the Catholic College of Education in 1981-82, which was later, converted to the Australian Catholic University in 1993.

The Edward Clancy Building campus was used as a mansion ('Clewer') before being converted into a nursing home. A new 104 bed wing was built by the St. Vincent de Paul Society (opened in 1966), followed by a new 52 bed wing that required the demolition of 'Clewer'. The nursing home was renovated and reopened in 2005 as the Edward Clancy Building following the proponent's purchase of the site in 2002.

Figure 3: *View of existing buildings on main campus looking north from reception car park (Source: Proponent's EA)*

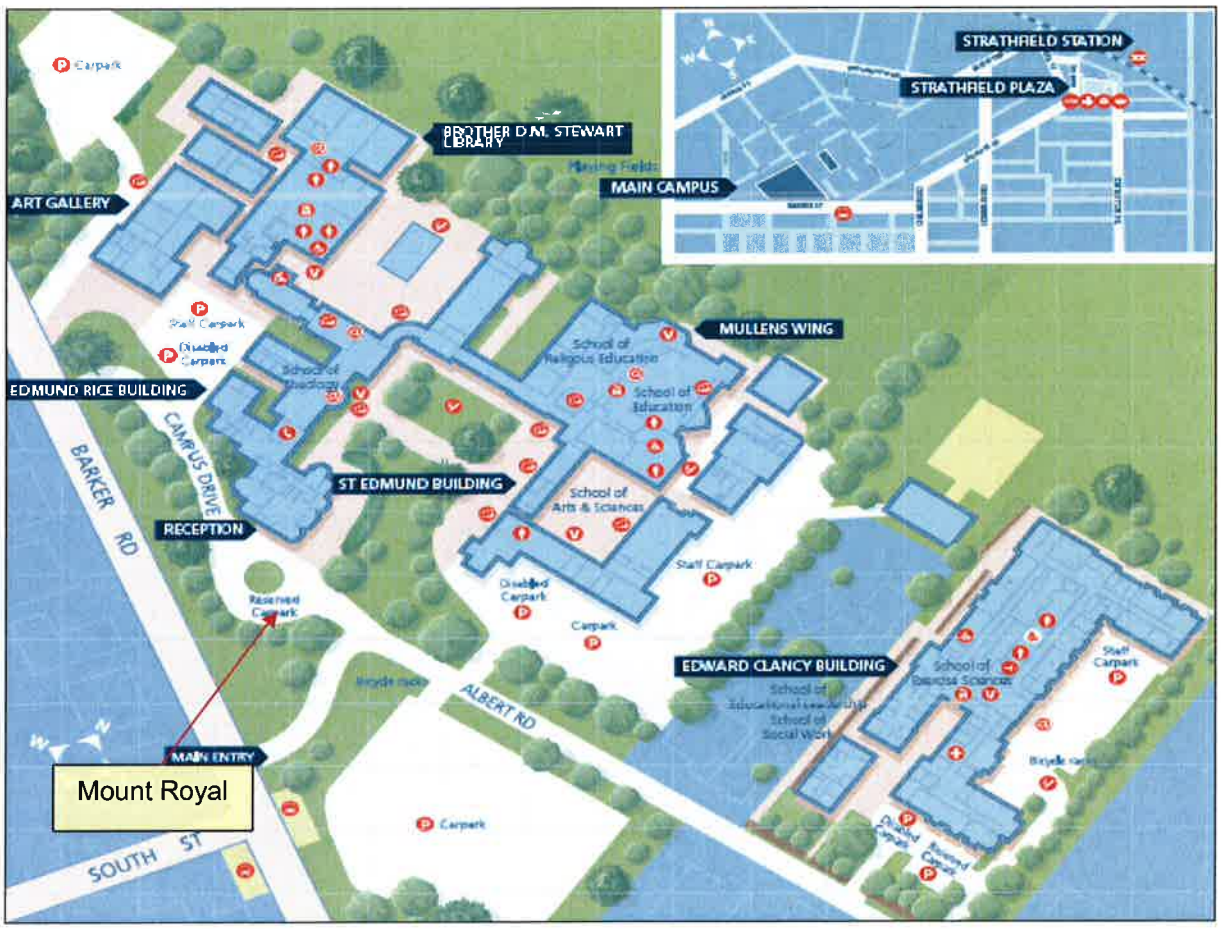

Figure 4: *Existing Campus layout (Source: Proponent's EA)*

1.4 Approvals Relevant to Application

Main campus

On 16 December 1994, the NSW Land and Environment Court granted approval for the erection of a new lecture theatre, teaching spaces and staff office space associated with the existing campus buildings on the main campus site.

This approval included conditions limiting the hours of operation of classes to between 8.00am and to 9.00pm Monday to Friday. The library is permitted to open between the above hours and from 8.00am to 5.00pm on Saturday. No classes are permitted on Saturday or Sunday.

Under this approval students enrolled at the main campus are restricted to 1,100 by day and 700 by night, with the number of teachers employed not to exceed 190. A further limitation was placed on the number of students in attendance on the site at any one time to 510 between the hours of 8.00am and 5.00pm (day) and 247 between 5.00pm and 9.00pm (night) Monday to Friday.

Edward Clancy Building campus

On 15 October 2002, Council granted approval for a change of use of the former nursing home to a teaching facility (educational establishment) with associated offices. Hours of operation are restricted to 8.00am - 9.00pm Monday to Friday and student numbers are not to exceed a maximum of 240 students at any given time.

On 21 December 2011, Council granted approval for alterations and additions to expand the Exercise Performance and Rehabilitation Gym and provide a new Movement Rehabilitation Clinic on the Edward Clancy Building campus. Hours of operation and student numbers were maintained as per the existing approval.

Key Parameters of Previous Approvals

Due to the above approvals, the following key parameters now govern the site:

- 1,100 enrolled students by day and 700 enrolled students by night, totalling 1,800 enrolled students per day. This applies to the main campus site only as no cap applies to the Edward Clancy Building;
- Number of students on the main campus and Edward Clancy Building is limited to:
  - 750 between the hours of 8.00am and 5.00pm;
  - 487 between the hours of 5.00pm and 9.00pm;
- 190 teachers limited to the main campus and there is no limit for the number of teachers for the Edward Clancy Building.

As seen in the above, the student number restrictions do not correlate with the number of students enrolled.

Inconsistency of how the number of students is counted and reported has led to a disparity in the information provided with this application. This is discussed in detail in **Section 5.1**.

2. PROPOSED PROJECT

2.1. Project Description (as exhibited)

The proposal as exhibited in the EA sought Concept Plan Approval for:

- six building envelopes (across four precincts) between two and four storeys in height;
- increased on-site car parking (from 346 to 674 spaces) in basement and at ground level;
- access arrangements;
- pedestrian linkages throughout the campus; and
- student and staff numbers and hours of operation.

2.2. Preferred Project Report / Response to Submissions

Following the conclusion of the public exhibition of the EA, the department placed a copy of all submissions received on the Department's website, requested that the proponent address the submissions that were received and advised that a number of issues required further consideration and justification.

The proponent responded to the submissions and the department's issues through the submission of a PPR and Response to Submissions report that was placed on the department's website and also exhibited between 25 July 2012 and 24 August 2012. The proposal as amended within the PPR and Response to Submissions is detailed in **Table 1** below.

Aspect	**Description**
Project Summary	**Concept Plan for the Expansion of the Australian Catholic University, Strathfield Campus**
Student / Staff Numbers	Student numbers across the two sites by 2016: • maximum 4,800 students enrolled (Equivalent Full Time Student Load); • maximum 2,000 students on campus at any one time; and • maximum 2,800 students on campus per day. Staff numbers to a maximum of 260 across the two sites.
Hours of Operation	Hours of operation of the two sites (includes Library on main campus): • 7.00am to 10.00pm Monday to Friday; and • 8.00am to 5.00pm Saturday and Sunday.
Car parking	Car parking over the two sites to a maximum of 747 spaces: • Additional 371 car parking spaces provided at ground and basement level for use by the proponent on the main campus (increased from 308 spaces currently available); • Retention of 38 spaces within the Edward Clancy Building campus; and • Additional 30 spaces in the north-western underground car park to be allocated to St Patrick's College for staff parking only.
Building Envelopes / Heights *Note: maximum heights exclude plant and lift overruns*	Building envelopes in four precincts (across the main campus only): • Precinct 1 – two building envelopes consisting of a part three / part four storey building to a maximum RL 47.60 (15.3 metres above ground level); • Precinct 2 – building envelope up to four storeys and a maximum RL 46.0 (12.54 metres above ground level); • Precinct 3 – building envelope up to three storeys and a maximum RL 42.80 (10.8 metres above ground level); and • Precinct 4 – two building envelopes up to two storeys and a maximum RL 41.0 (7 metres above ground level).
Gross Floor Area (GFA)	Maximum additional GFA of 13,590m^2, comprising: • Precinct 1 – 5,900m^2 GFA; • Precinct 2 – 3,450m^2 GFA; • Precinct 3 – 3,200m^2 GFA; and • Precinct 4 – 1,040m^2 GFA.

Aspect	Description
Traffic arrangements and vehicular access	Traffic arrangements and vehicular access including: • provision of new access off Edgar Street into the basement car parking area beneath the sports field for access by St Patrick's College staff only; • provision of new access off Barker Road into western car park located beneath Precinct 3 and main access into underground car parking area beneath the sports field, which will require roadworks on Barker Road and relocation of existing bus stops; and • increase of the frequency and number of shuttle bus services that provide access between the site and Strathfield Station.
Project Staging	• Stage 1 – north-western basement car park (262 spaces for the proponent and 30 for St Patrick's College) and Precinct 1 works including widening of the main gate (exit), and construction of the library learning commons building with basement car parking (174 spaces); • Stage 2 – demolition of the existing handball courts, refurbishment and reuse of existing library, new services / storage and / or education buildings in Precinct 4; • Stage 3 – Precinct 2 works include construction of a new building for educational uses, lecture theatres and research space and ground level parking for 70 spaces; and • Stage 4 – Precinct 3 works include construction of a new arts and sciences building with basement car parking (158 spaces).

Table 1: *Key Project Components*

Key changes to the proposal between the EA and the PPR and Response to Submissions (revised layout in **Figures 5** and **6**) include:

- reduction of students at anyone time at the campus from 2,400 to 2,000;
- increased on-site car parking to a minimum of 747 spaces, of which 30 spaces are dedicated to St Patrick's College;
- partial reduction of building height of Precinct 1 with the deletion of the western part of the top floor;
- increased building height of Precinct 3 by 0.8 metres;
- increased setback to the western side boundary for Precinct 3 from 10 metres to 15 metres; and
- deletion of the signalised intersection at the corner of Barker Road and South Street.

In response to the submissions to the exhibition of the PPR and Response to Submissions, the proponent provided further additional comments to address concerns raised by the public and Council.

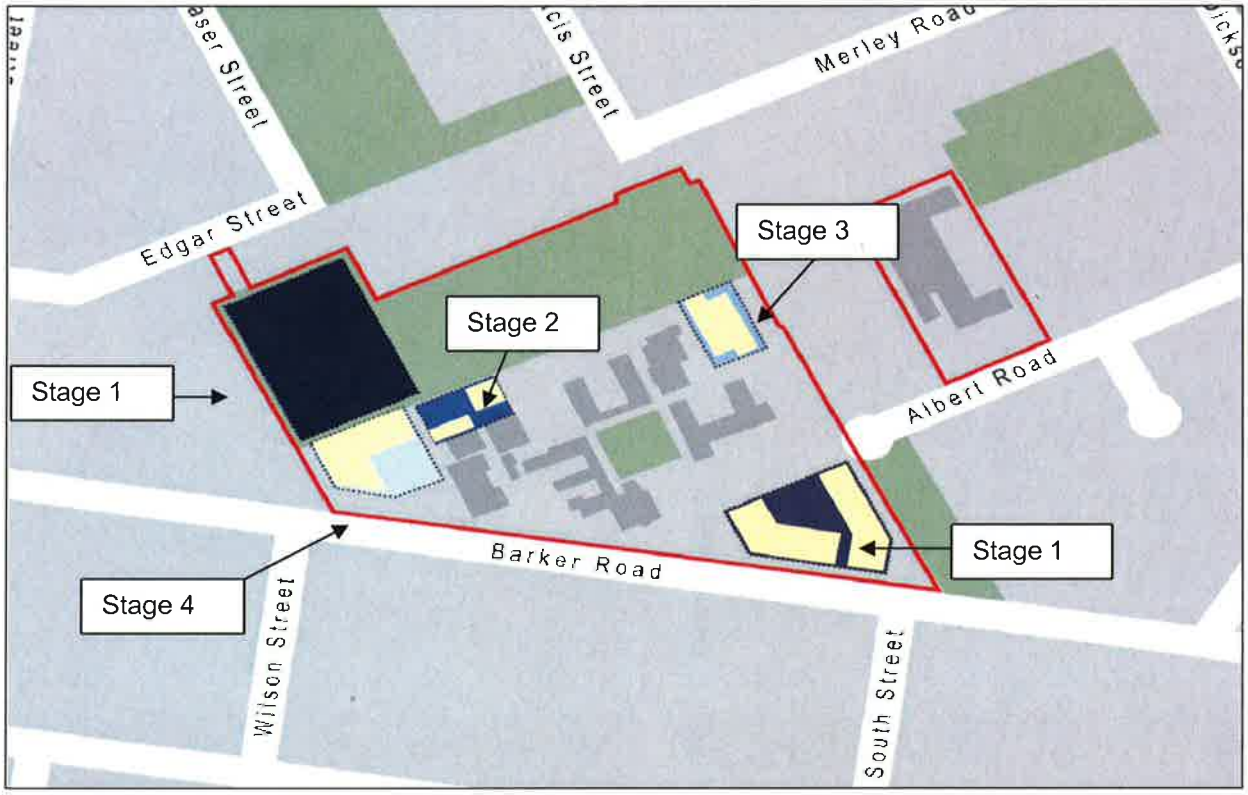

Figure 5: *Proposed staging of the development (Source: Proponent's EA)*

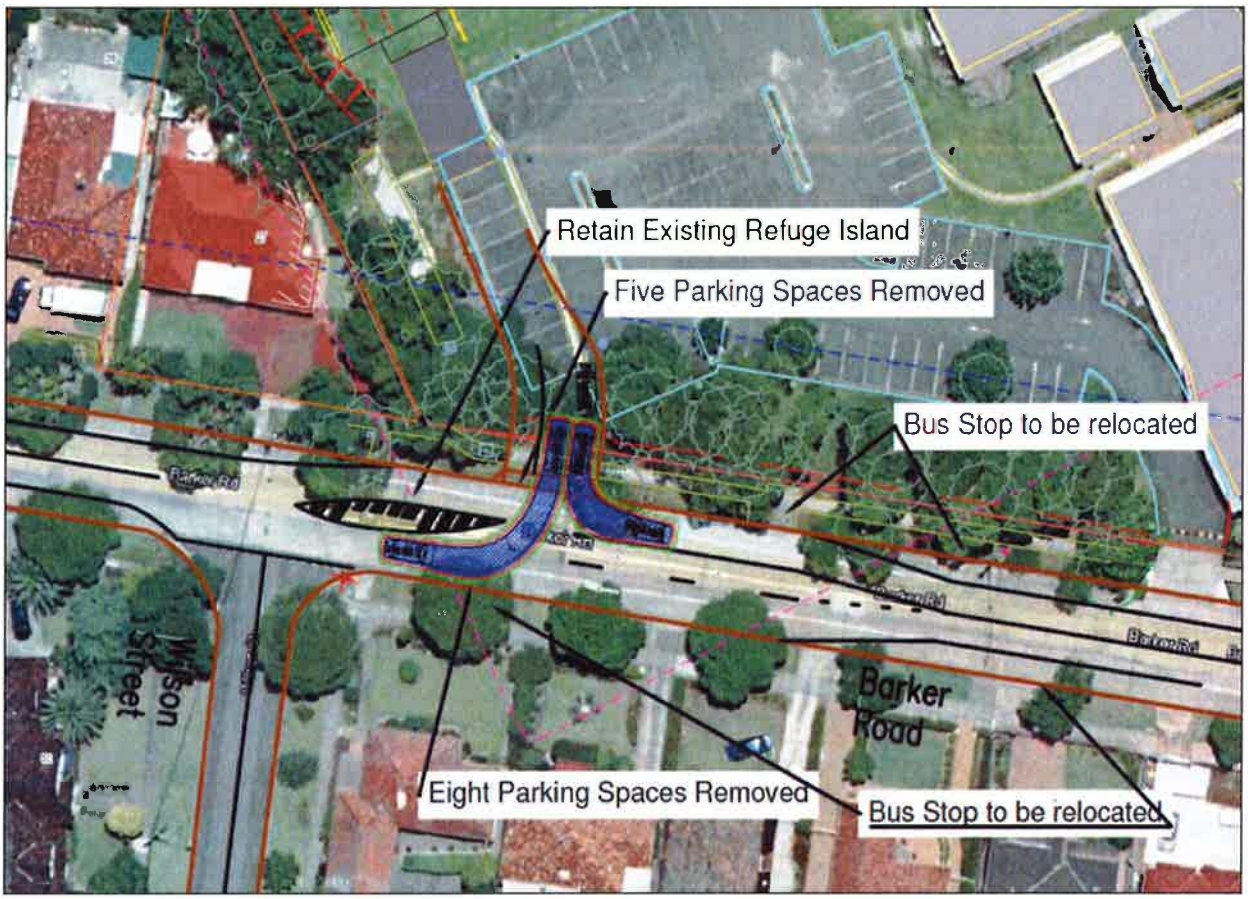

Figure 6: *Proposed road works as a result of new access to Precinct 3 and underground car park (Source: Proponent's PPR / RtS)*

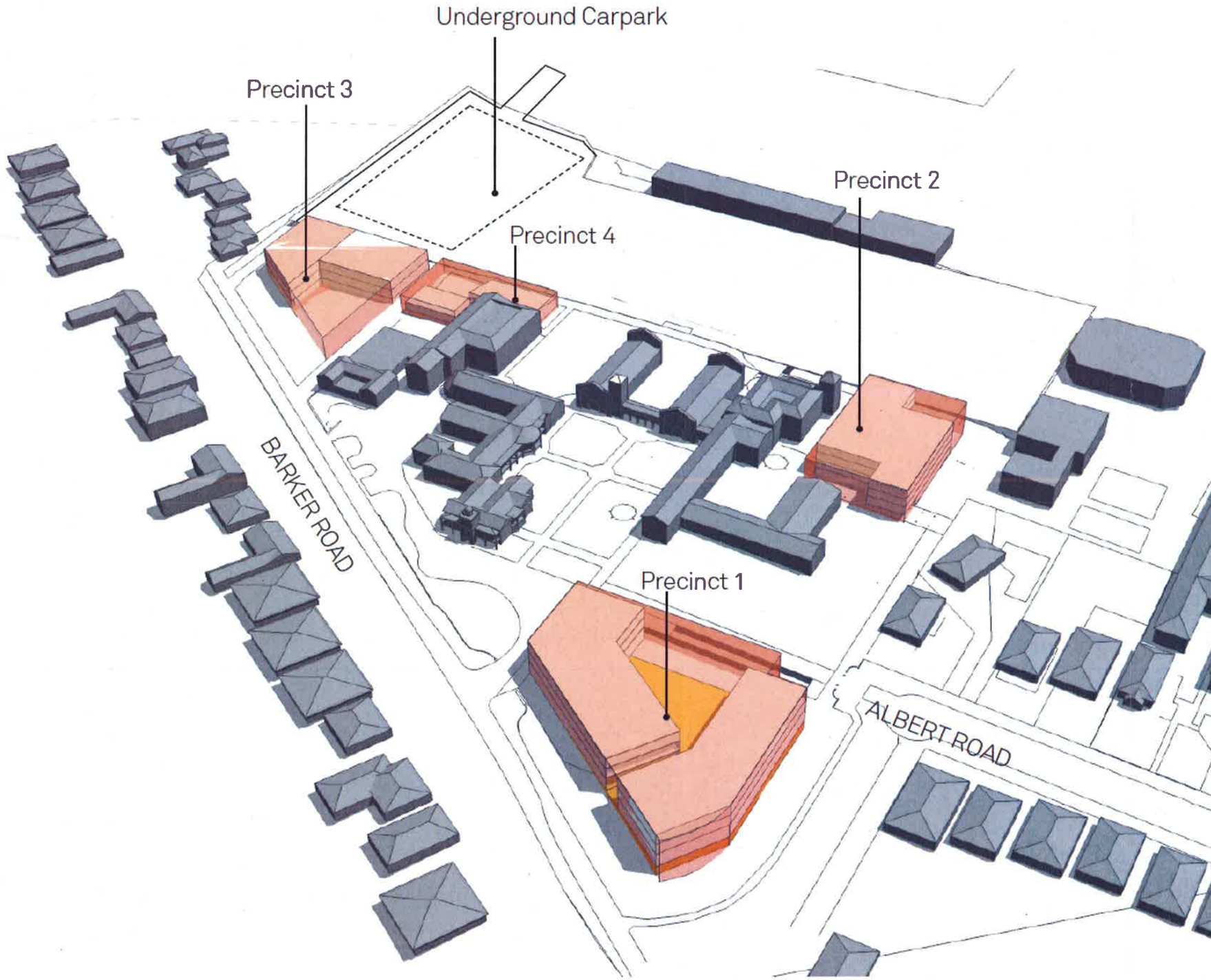

Figure 7: *Proposed building envelopes (Source: Proponent's PPR / RtS)*

2.3. Project Need and Justification

NSW 2021

NSW 2021 is the NSW Government's strategic business plan for setting priorities for action and guiding resource allocation. NSW 2021 is a ten year plan to rebuild the economy, provide quality services, renovate infrastructure, restore government accountability and strengthen the local environment and communities. The proposal provides improved educational infrastructure within an existing university campus and proposed traffic and parking arrangements to minimise impacts upon the surrounding community.

The department considers that the proposed expansion of the educational facilities would provide public benefits to the wider community through the generation of additional jobs (operational and construction) and additional tertiary education places. The Concept Plan would also facilitate the planned development of the campus over a period of 10 years.

Metropolitan Plan for Sydney 2036

The Metropolitan Plan for Sydney 2036 is a strategic document that guides the development of the Sydney Metropolitan area towards 2036. The Plan has been developed to enhance Sydney's population growth, plan for its changing population, generate more suitable and affordable housing and jobs closer to home, create more efficient transport and infrastructure delivery whilst ensuring Sydney develops into a more sustainable city and maintains its global competitiveness.

The proposed concept supports the growth of Sydney's economy through providing additional educational infrastructure which provides additional opportunities and improves the skills of the students attending the site. This provides a benefit to the economy in the long term. Improving learning opportunities against existing and likely impacts upon the community has been carefully considered. Overall, it is considered that the proposal, once fully implemented, will potentially reduce impacts upon residents and improve the quality of education provided on the site.

Draft Inner West Subregional Strategy

The site falls within the area covered by the Draft Inner West Subregional Strategy, with the Australian Catholic University being identified as a 'knowledge asset and key industry'.

The proposal is considered to assist in the continuation of this important knowledge asset within the region through the introduction of new buildings that support the existing use of the site. The expansion of the site has been carefully considered against the concerns raised by the community and how best to integrate the new buildings with the existing significance of the site.

The proposal is considered to improve access to the site, while reducing the need to drive to the campus through the implementation of a Green Travel Plan that supports the continuation and expansion of the existing shuttle bus service. As a result, an improvement to the inter-relationship of the campus with the surrounding residential context is predicted.

2.4. Concept Plan

The proponent has applied for approval of a Concept Plan under section 75M of the *Environmental Planning and Assessment Act, 1979* (EP&A Act). The Concept Plan application seeks approval for student numbers, car parking, building envelopes and land uses described above in **Section 2.2**.

Any further development of the site will require separate and detailed development applications to be submitted to the Strathfield Council for consideration.

3. STATUTORY CONTEXT

3.1. Major Project

The proposal is a Major Project under Part 3A of the EP&A Act because it is development for the purpose of educational facilities under the provisions of the former clause 20 of Schedule 1 of *State Environmental Planning Policy (Major Development) 2005*. The proposal has a capital investment value over $30 million.

Part 3A of the EP&A Act, as in force immediately before its repeal on 1 October 2011 and as modified by Schedule 6A of the Act, continues to apply to transitional Part 3A projects. Director-General's environmental assessment requirements (DGRs) were issued for this project prior to 1 October 2011, and the project is therefore a transitional Part 3A project.

Consequently, this report has been prepared in accordance with the requirements of Part 3A and associated regulations, and the Minister (or his delegate) may approve or disapprove of the carrying out of the project under Section 75O of the Act.

The Minister has delegated his functions to determine Part 3A applications to the Planning Assessment Commission (PAC) where an application has been made by persons other than by or on behalf of a public authority and also in cases where the relevant local council objects to the proposal and there are more than 25 public submissions in the nature of objections, as is the case for this application. Therefore, the application is to be determined by the PAC under delegation from the Minister.

3.2. Permissibility

Strathfield Planning Scheme Ordinance 1969

Under the Strathfield Planning Scheme Ordinance 1969 (SPSO 1969) the main campus is zoned 5(a) Special Uses (Ecclesiastical) and the Edward Clancy Building campus is zoned part 5(a) Special Uses (School) and part Residential 2(a) (**Figure 8**).

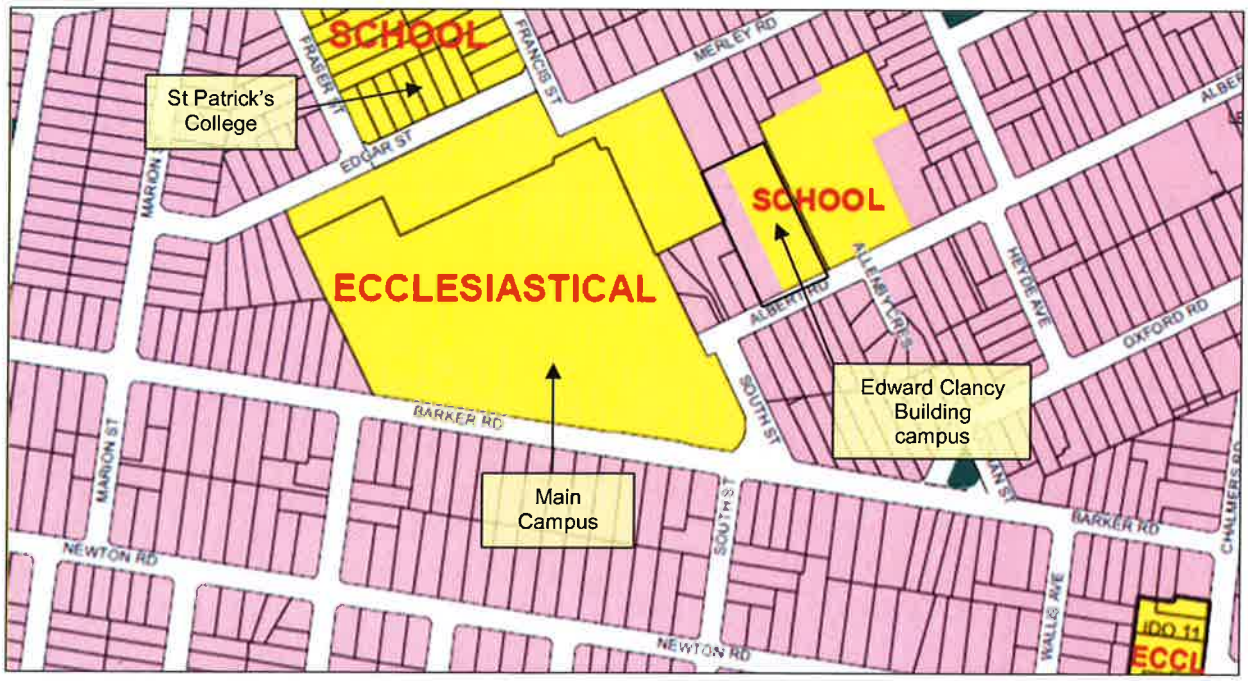

Figure 8: *Existing zoning under SPSO 1969 (Source: Strathfield Council website)*

In the 5(a) Special Uses (Ecclesiastical) and (School) zones, any purpose ordinarily incidental or subsidiary to the purpose identified is permissible with consent. The SPSO does not define

the term 'Ecclesiastical', however the department considers that this pertains to the use by the church or the clergy. The former use of the site by the Christian Brothers and subsequently the Catholic College of Education would support this definition.

The transformation of the site into a dedicated university, linked to the Catholic Church, has developed over the years through various changes in operation, including as a training college and teaching by the Christian Brothers prior to becoming part of the Catholic College of Education in 1981-82, which was later, converted to the Australian Catholic University in 1993.

The department also notes that the use as a university has been established by Council as being permissible by recently approving alterations and additions to the main campus that were considered to be subsidiary to the predominant permissible function of the site.

In addition, educational establishments are permissible in the Residential 2(a) zone.

Notwithstanding the above, State Environmental Planning Policy (Infrastructure) 2007 permits development for the purposes of educational establishments on land on which there is an existing educational establishment. The proposal is considered to be permissible with consent under SEPP (Infrastructure) 2007.

Draft Strathfield Local Environmental Plan 2011

Under the Draft Strathfield Local Environmental Plan 2011 (Draft Strathfield LEP 2011), 179 Albert Road is proposed to be zoned SP2 Infrastructure (Educational Establishment) and 167-169 Albert Road is proposed to be zoned R2 Low Density Residential (**Figure 9**).

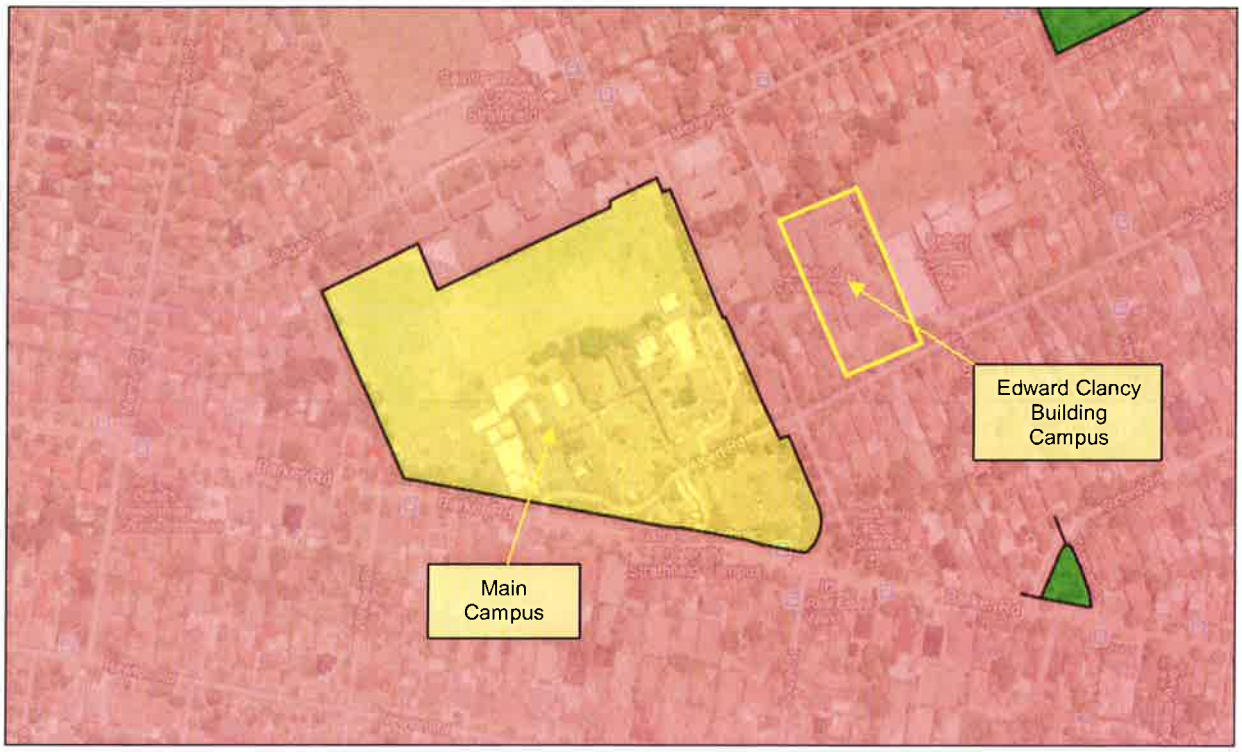

Figure 9: *Proposed zoning under Draft LEP 2011 (Source: Strathfield Council website)*

In the SP2 Infrastructure zone, development that is ordinarily incidental or ancillary to development for educational establishments is permissible with consent. The proposal is considered to meet these requirements as a continuation of the existing educational use of the site and is therefore permissible with consent.

Educational establishments are not identified as a permissible use in the R2 Low Density Residential zone, however as stated above, SEPP (Infrastructure) 2007 permits development for the purposes of educational establishments on land on which there is an existing educational establishment. As the use of the subject site is defined as an 'educational establishment' under the SEPP (Infrastructure) 2007, the proposal is considered to be permissible with consent.

3.3. Environmental Planning Instruments

Under Sections 75I(2)(d) and 75I(2)(e) of the EP&A Act, the Director-General's report for a project is required to include a copy of, or reference to, the provisions of any State Environmental Planning Policy (SEPP) that substantially governs the carrying out of the project, and the provisions of any environmental planning instruments (EPI) that would (except for the application of Part 3A) substantially govern the carrying out of the project and that have been taken into consideration in the assessment of the project.

The proposal is considered to be consistent with the relevant SEPPs including the SEPP (Infrastructure) 2007, SPSO 1969 and Draft Strathfield LEP 2011. The department's consideration of relevant SEPPs and EPIs is provided in **Appendix D**.

3.4. Objects of the EP&A Act

Decisions made under the EP&A Act must have regard to the objects of the Act, as set out in Section 5 of the Act. The relevant objects are:

(a) to encourage:
- *(i) the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,*
- *(ii) the promotion and co-ordination of the orderly and economic use and development of land,*
- *(iii) the protection, provision and co-ordination of communication and utility services,*
- *(iv) the provision of land for public purposes,*
- *(v) the provision and co-ordination of community services and facilities, and*
- *(vi) the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and*
- *(vii) ecologically sustainable development, and*
- *(viii) the provision and maintenance of affordable housing, and*

(b) to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and

(c) to provide increased opportunity for public involvement and participation in environmental planning and assessment.

The proposal is consistent with objects (a) (ii) (vii), in that:
- the proposal includes the expansion of an existing university site to provide additional services for students and staff;
- the proposal includes measures to limit the impact upon existing vegetation; and
- the proposal includes measures that support ecologically sustainable development.

3.5. Ecologically Sustainable Development

The EP&A Act adopts the definition of Ecologically Sustainable Development (ESD) found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

(a) the precautionary principle,

(b) inter-generational equity,

(c) conservation of biological diversity and ecological integrity,
(d) improved valuation, pricing and incentive mechanisms.

The department considers that the proposal represents a sustainable use of the site, as it utilises existing areas previously used for parking of vehicles or existing buildings. Where possible the proposal includes the retention of existing vegetation, limiting the impact of the proposal upon the existing vegetation. The proposal also seeks to reduce private vehicle dependency by increasing the number of shuttle bus services between the site and Strathfield train station to support student growth and includes the implementation of an alternative timetable which aim to limit the frequency of student trips to the campus

Future development of the Concept Plan will explore key ESD opportunities in design considerations, provision of open space and infrastructure. Noting this, the department considers that the proposal is consistent with the key principles of ESD.

The department's consideration of relevant ESD principles is included at **Appendix D**.

3.6. Statement of Compliance

In accordance with section 75I of the EP&A Act, the department is satisfied that the Director-General's environmental assessment requirements (DGRs) have been complied with.

Concerns have been raised by residents that the DGRs have not been adequately addressed, as the consultation undertaken by the proponent prior to the lodgement of the Environmental Assessment did not provide sufficient detail of the proposal and did not provide enough opportunities to raise concerns. At the time of reviewing the EA prior to exhibition, the department was satisfied that the consultation undertaken was adequate and the level of information included within the EA was adequate to enable exhibition to occur.

4. CONSULTATION AND SUBMISSIONS

4.1. Exhibition

Under section 75H(3) of the EP&A Act, the Director-General is required to make the EA of an application publicly available for at least 30 days. Public exhibition of the EA occurred from 18 January 2012 until 29 February 2012 (an extended period of 42 days) on the department's website; at the Department of Planning and Infrastructure's Information Centre and at Strathfield Council. The department advertised the public exhibition in the Sydney Morning Herald and Daily Telegraph on 18 January 2012 and the Inner West Courier on 17 January 2012; and notified surrounding landholders and relevant State and local government authorities in writing.

The department received 633 submissions during the exhibition of the EA, including 6 submissions from public authorities and 627 submissions from the general public.

Given the level of public interest in the EA, the department considered it appropriate to advertise the PPR and Response to Submissions in the Sydney Morning Herald and Daily Telegraph on 25 July 2012 and the Inner West Courier on 24 July 2012; and notified landholders and relevant State and local government authorities in writing.

The department received 937 submissions during the exhibition of the PPR and Response to Submissions, including 4 submissions from public authorities and 933 submissions from the general public.

Following the submission of the Response to PPR Submissions report from the proponent on 24 October 2012, the department received a further 39 submissions from the public objecting to the proposal. Council also maintained its objection to the proposal.

A summary of the issues raised in submissions is provided below.

4.2. Public Authority Submissions

Six submissions were received from public authorities in response to the EA; a further 4 submissions in response to the PPR and Response to Submissions and 2 to the Response to the PPR Submissions. Key issues include:

Strathfield Council	
EA	Council objects to the proposal and raises the following key issues: • compliance with existing approved student numbers; • bulk and scale of the development and its impact upon the locality; • impact of the built form upon the heritage significance of the site; • impact of existing and increased use of the site on traffic and parking; • accuracy of information included within the application; and • impact of proposal upon residents. Council states that any decision to approve the Concept Plan (based on the current plans and supporting information) would fall within bounds of manifest unreasonableness on the basis that if approved, the Minister will have failed to consider the impact on heritage, traffic, intensification of use in the form of student numbers; the discordant nature of the proposed expansion in the setting of the Strathfield community; and in doing so will have made a decision that is so unreasonable that no reasonable decision maker could have taken that course. Council also requested that a public hearing be held by the Planning Assessment Commission.
PPR and Response to Submissions	Council maintains its objection to the proposal and states that the PPR and Response to Submissions fail to address the DGRs and the concerns raised in the submissions to the EA, in particular:

	• traffic, parking and access (issues with access arrangements off Barker Road and traffic and parking impacts upon the locality); • built form and neighbourhood character (issues with impact upon existing residential character of the surrounding locality); and • student numbers (issues with existing approvals and extent of impact on amenity). Council notes that legal proceedings have commenced in relation to student numbers and impacts on local amenity. Council advises that the proponent has acquired the adjoining Sydney Adventist College at 149-163 Albert Road (within 100 metres of the campus), which may lead to potential environmental impacts.
Response to PPR Submissions	Council provided comment on the Response to PPR Submissions, including the following: • increase of students to 2,000 at any one time is an increase of 167% from the currently approved requirement of 750 students; • the surveys undertaken by McLaren (Council's traffic consultant) have not double counted students; • class audits are not the best way to count student numbers; • the Green Travel Plan is impractical as it can't be supported by existing services; • proposed parking arrangements are unworkable and deficient; and • the Concept Plan will result in intolerable traffic impacts.
Transport for NSW	
EA	TfNSW generally supports the rationalisation of on-site parking and site access to improve the legibility and pedestrian convenience and safety. TfNSW requested: • information on the estimated total trips generated by proposal to assist in identifying future public transport needs and demand for parking; • the proposed travel management measures be further developed and integrated through development of a Campus Travel Plan; • State Transit Authority to be consulted regarding the configuration of the Barker Road and South Street intersection; and • the construction traffic management plan to address impacts on pedestrian and bicycle access and on bus service / stops.
PPR and Response to Submissions	The PPR and Response to Submissions were referred to TfNSW for comment. No comments were received.
Roads and Maritime Services	
EA	RMS supports the comments provided by Transport for NSW. RMS provided comment on the signalised intersection at Barker Road / South Street and requested that further assessment be undertaken on the impact of removing on-street parking spaces to cater for the traffic signals. RMS requested that the Transport and Accessibility Study be amended to have regard to the comments provided by RMS and Transport for NSW.
PPR and Response to Submissions	RMS raised no objection to the proposal however recommended that the department consider increasing the number of shuttle bus services between the site and Strathfield Train Station to ensure that a reasonable modal split to public transport is provided. RMS recommended future assessment requirements for the car parking areas and that a Construction Traffic Management Plan be provided.
Environmental Protection Authority	
EA	EPA raised no concerns with the proposal.
Heritage Council of NSW	
EA	The Heritage Council advised that the environmental assessment has soundly assessed heritage issues and impacts. Concerns were raised with the potential impact of Precinct 1 on the setting and views of the existing buildings and vegetation. New buildings and alterations are to reinforce the consistency, integrity and quality of design of the significant historic pattern of development within the site. Other concerns were raised with the removal of the former handball courts, however archival photographic recording, interpretation and conservation works for other historic

	buildings on the site were considered to balance this impact. The Heritage Council recommended modifications to the proposed built form and retention of significant vegetation.
PPR and Response to Submissions	The Heritage Council noted: • the amendments to building setbacks, reduction in height of Precinct 1 and the conservation measures in the modified Statement of Commitments: • the agreement to complete a nomination for listing the site on the State Heritage Register; and • the commitment that future applications for development would be assessed against the criteria contained in the guideline for infill development. The Heritage Council recommended conditions to manage archaeology and requested that all subsequent applications be referred to the Heritage Council for further review and comment prior to determination.
Sydney Water	
EA	SW advised that the wastewater system has sufficient capacity to service the proposal, subject to an extension of the mains and a possible deviation for the buildings along the south east corner. SW also advised that should the development generate trade wastewater, no guarantee is provided that SW will accept the trade wastewater to its sewerage system. An application is to be submitted to SW for assessment.
PPR and Response to Submissions	No additional comments.

4.3. Public Submissions

Submissions to the EA

A total of 627 submissions were received from the public, with all except two submissions objecting to the proposal. Key issues raised in public submissions objecting to the proposal are listed in **Table 2**.

Issue	Proportion of submissions (%)
Parking and associated impacts upon local streets	94
Traffic congestion along local streets	90
Height and scale of proposed buildings	81
Impact upon residential amenity (noise and rubbish) and reduction in privacy	81
Impact upon heritage significance of site	76
Accuracy of submitted Environmental Assessment and therefore failure to comply with Director-General's Requirements	76
Impact of proposed student numbers and hours of operation	71
Adequacy of consultation	69
Appropriateness of site	46

Table 2: ***Summary of Issues Raised in Public Submissions***

The two submissions supportive of the proposal raised the following:
- additional provision of parking on-site rather than within local streets;
- underground parking reduces the visual impact of existing above ground car parks;
- new teaching and learning buildings would replace inadequate existing facilities; and
- continuation of the Catholic community in Strathfield.

Submissions to the PPR

A total of 933 submissions were received from the public in response to the PPR being exhibited and placed on the department's website, with all except one submission objecting to the proposal. Issues raised in public submissions objecting to the proposal include:

- concerns with how the proponent calculates student numbers;
- impact of the proposal upon local streets, including the introduction of an entrance to the site opposite residential properties and near the intersection of Barker Road and Wilson Street;
- impacts associated with increased hours of operation;
- justification provided for the extension of hours based on security guards opening and closing the site;
- false and misleading analysis in the reporting of the proposal, which has led to the claim that the ACU is not a credible applicant;
- failure to address issues raised in objection to the exhibited EA;
- failure to address the DGRs;
- impacts of the proposed built form being out of character with the local area;
- increased car parking numbers on-site is inadequate to cater for the proposal;
- whether the proponent charges a fee for parking on-site, which may then result in additional parking on-street; and
- impact upon property values and a reduction in residential amenity.

One submission was received generally in support of the proposal on the basis that it seeks to resolve car parking issues and that the built form does not overshadow anyone. The submitter also commented that the proposed building envelopes do not appear to be overly large. The submission also questioned what would replace the university if the proposed expansion did not occur.

Submissions to the Response to the PPR Submissions Report

A further 37 submissions were received from the public in response to the proponent's Response to PPR Submissions Report. All submissions (including a petition with 17 signatures) objected to the proposal and included similar issues to those previously stated above.

The department has carefully considered the issues raised in submissions and concerns raised thereafter in its assessment of the application in **Section 5**. The department is satisfied that the concerns raised, particularly in relation to student numbers, traffic, parking and amenity impacts, will be minimised and appropriately managed through the proponent's PPR and the department's recommended modifications and future assessment requirements.

4.4. Proponent's Response to Submissions

The proponent provided a response to the key issues raised by the public submissions in response to the exhibition of the EA and PPR. Key changes to the scheme are summarised in **Section 2.2**.

The proponent's full response to submissions to the EA and PPR is included at **Appendices A** and **C**. The department is satisfied that the issues raised in submissions have been comprehensively addressed, either through this report or by the proponent.

5. ASSESSMENT

The department considers the key issues for the project to be:

- student numbers;
- traffic and parking arrangements;
- built form;
- hours of operation; and
- heritage.

All other issues are considered to have been satisfactorily addressed in the EA, PRR and additional information in support of the application.

5.1. Student and Staff Numbers

The Concept Plan proposes a progressive increase to the number of students and staff to be accommodated across the site by 2016 as shown in **Table 3** and **Figure 10**. At full capacity, it is proposed that there will be:

- a maximum 4,800 students enrolled (based on equivalent full time student load);
- a maximum 2,800 students on campus per day;
- a maximum 2,000 students on campus at any one time; and
- a maximum 260 staff.

	2011	2012	2013	2014	2015	2016
Maximum EFTSL	3,600	4,060	4,400	4,500	4,600	4,800
Students on Site per Day	1,800	2,400	2,500	2,600	2,700	2,800

***Table 3**: Proposed student number increase to 2016 (Source: Proponent's PPR / RtS)*

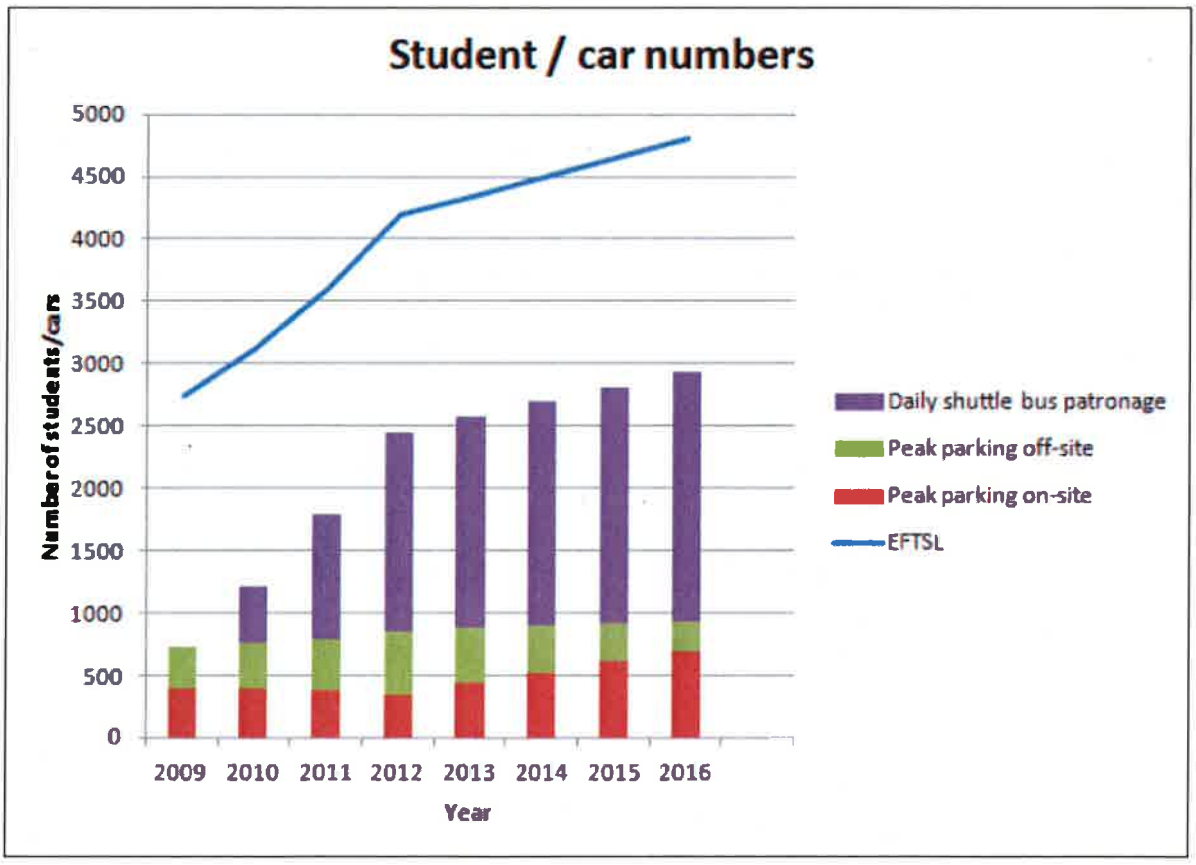

***Figure 10**: Proposed student travel characteristics to 2016 (Source: Proponent's PPR / RtS)*

Student and teacher numbers are currently limited to the following:

- 1,100 enrolled students by day and 700 enrolled students by night, totalling 1,800 enrolled students per day. This applies to the main campus site only as no cap applies to the Edward Clancy Building;
- Number of students on the main campus and Edward Clancy Building is limited to:
  - 750 between the hours of 8.00am and 5.00pm;
  - 487 between the hours of 5.00pm and 9.00pm;
- 190 teachers limited to the main campus and is no limit for the number of teachers for the Edward Clancy Building.

The proposed increase in student numbers has generated significant concern from the public and Council during the exhibition of the EA and PPR and Response to Submissions. In particular, concerns were raised that the proponent is currently exceeding the current approved limits which is causing an impact on the surrounding locality in terms of the number of students and staff entering and exiting the campus, increased traffic generation, on-street parking congestion and increased amenity impacts (noise, littering and the like).

The proponent disputes the claims raised by Council and the public that they are not complying with the existing approvals and has advised that the maximum number of students in class at any one time is no greater than 750.

A key issue with the department's assessment of the proposal for increased student numbers is the lack of clear and reliable data that demonstrates the number of students currently using the site. This disparity in the information led to the department requesting additional information from the proponent to justify the current proposal.

Proponent's justification

The proponent has advised that the existing timetabling means that students could attend the university between four to five days a week. It also requires students to attend lectures potentially at sporadic times throughout the day. This has created a high student attendance turnover and results in additional student trips to and from the site.

In combination with the proposed increase in student and staff numbers, the proponent is proposing to introduce an alternate timetabling system (**Table 4**) to overcome the existing turnover of students across the day and therefore endeavour to reduce the associated impact this has on the adjoining residential properties.

Under this timetabling system (broken up into twelve groups of 400 students), students would attend classes in consolidated sessions across one full day and two half days, rather than the existing sporadic attendance across four or five days.

Monday		**Tuesday**		**Wednesday**		**Thursday**		**Friday**	
8.00-14.00	14.00-20.00	8.00-14.00	14.00-20.00	8.00-14.00	14.00-20.00	8.00-14.00	14.00-20.00	8.00-14.00	14.00-20.00
A1	A1	B1	B1	C1	C1	D1	D1	C2	C3
A2	A2	B2	B2	C2	C2	D2	D2	D1	D2
A3	A3	B3	B3	C3	C3	D3	D3	D3	A1
B1	B2	C2	C3	D3	A1	B1	B2	A2	
B3	C1	D1	D2	A2	A3	B3	C1	A3	

***Table 4**: Proposed student timetable (Source: Proponent's PPR / RtS)*

For example, cohort A1 (highlighted in yellow) would attend the university all day Monday, but only half of the day on Wednesday and Friday. As can also be seen, cohort A1, A2, A3, B1, B3, B2 and C1 would also attend on Monday, which would result in a total of 2,800 students (being 400 students by seven cohorts) attending the site across the day.

The timetable has been structured with classes beginning at 8.00am and concluding at 8.00pm (last class to commence at 7.00pm) with a changeover time at 2.00pm to reduce school related traffic. The Library is proposed to be open until 9.30pm on Monday to Friday, which will then allow students and staff time to exit the site before the university closes at 10.00pm. The department notes that any changeover impact at 2.00pm is limited due to the fact that classes generally conclude at half past the hour or ten minutes to the hour, thus allowing students time to leave while students arrive.

A maximum of 260 full time equivalent staff across the day are proposed to attend the two campuses.

Council's comments

Council raised concern that the proponent is breaching the student number limits provided by the existing consents and as a result local residents are being adversely impacted.

Council considers that the increase of students to 2,000 as now proposed in the PPR (on campus at any one time) is an increase of 167% is unreasonable and will cause unacceptable amenity impacts. Council also disputes the use of class audits to justify compliance with the existing approvals.

Council's submission suggests that the current impact and effect of student numbers (whether within the current development consent or in breach) is a relevant factor in the consideration of the application. Council maintains that the proposal is unacceptable given the current impacts and the predicted additional impacts associated with the proposal.

Council engaged McLaren Traffic Engineering to conduct student counts and analyse traffic issues associated with the application. In relation to the number of students, McLaren observed that 1,439 and 1,467 students, based on counts undertaken on 2 May 2012 and 16 May 2012 respectively, were found to be on the site (note that these counts included students at the Sydney Adventist College that does not form part of this application). Council is therefore of the opinion that the university is in breach of the current approval conditions and is currently pursuing legal action through the NSW Land and Environment Court.

Department's consideration

As a premise to its assessment, the department acknowledges the wider public benefits associated with the best possible utilisation of existing educational facilities in New South Wales. The department also understands that there is a need to manage the intensity of the use of the site in order to maintain a reasonable amenity for surrounding residents.

It has been previously established by Council that the best way to manage this issue for the ACU Strathfield campus is to limit or cap student numbers on the site (as discussed in **Section 1.4**). Whilst many university campuses across the Sydney Metropolitan Area are not constrained by the same limitations, the department accepts that given the particular constraints provided by the low density suburban land use and local road network, the intensity of the use of the site should be managed appropriately.

However, the department does not support a student enrolment cap as the key management benchmark. The department considers that the Equivalent Full Time Student Load enrolment cap reference does not necessarily correlate to students being on the site and therefore the impact upon the surrounding locality is difficult to quantify. Rather, a figure of students on-site at

any one time is a more appropriate measure providing it can be appropriately monitored. Where a student is enrolled but does not actually attend the university or only attends infrequently, has the potential to provide a false perception of overall student numbers at any one time.

The department's assessment of the proposal has sought to address whether the proposed student numbers are capable of being accommodated on site at any one time, while considering the potential impacts upon surrounding residents.

Following an initial review of the proposal, the department raised concerns with the proposed increase of students from 750 to 2,400 at any one time. As a result the proponent modified the proposal in the PPR and Response to Submissions. The number of students proposed to be on the campus at any one time has now been reduced from 2,400 to 2,000 along with an additional restriction of no more than 2,800 students being on the campus throughout the day.

The revised lecture timetable effectively reduces the required student attendance on the site as the current timetable requires students to attend the site between four to five times per week. The revised timetable would reduce the attendance requirements to one full day and two half days. This has the effect of reducing student turnover and reduces the number of trips to and from the site.

In addition, the recommended cap for students (maximum of 2,000) on the site at any one time provides a clear and strict requirement for the university to adhere to. This cap also assists in controlling potential amenity impacts on the surrounding locality.

The Department has also included a definition for a student as being a person enrolled in the Australian Catholic University, irrespective of whether they are in class or utilising other university facilities. This definition provides for an accurate basis on which to monitor student numbers on the campus eliminating the current disparity in student number calculations that exists between the proponent and Council. Details of the department's recommendation to stage the increase of student numbers over time so as to monitor and manage impacts on the locality are discussed in **Section 5.2.1**.

5.2. Transport Impacts

As discussed in Section 5.1, the department considers that the key issue associated with the proposed increase in student numbers relates to parking and traffic impacts on the surrounding residential area. These impacts particularly relate to a lack of on-site car parking, limited public transport and subsequent student reliance on cars and on-street car parking.

Following an initial assessment of the proponent's response to these issues, which included consideration of the implications associated with the new timetable, the Department requested the proponent prepare a Green Travel Plan. The Green Travel Plan provides information on how student travel is to be provided and managed to and from the site along with a suite of measures designed to minimise on-street parking demand and traffic, whilst also accommodating increased student numbers.

The department commissioned Parsons Brinckerhoff (Traffic Consultant) to undertake an independent review of the travel and transport impacts of the proposal. The department has along with Parsons Brinckerhoff carefully considered each of the related issues as set out below.

5.2.1. Car Parking & Travel Management

The level of proposed parking and associated impacts upon surrounding streets was a key issue raised by Council and the public. In particular, submissions raised concerns that the expansion of the university would exacerbate the already congested on-street car parking conditions surrounding the university. Submissions also complained of vehicles being parked

across driveways and other conflicts between residents and students. Submissions also suggested that all parking necessary for the operation of the university be provided on-site.

The site currently provides 346 car parking spaces, being 308 spaces on the main campus and 38 spaces on the Edward Clancy Building campus. Of the 346 spaces:

- 251 spaces are allocated to students;
- 90 spaces are allocated to staff; and
- 5 spaces are reserved for short stay and administration parking.

Surveys indicate that up to 506 vehicles currently park on-street during peak periods.

It is proposed to increase the number of on-site car parking spaces for use by the university to 717 spaces (an increase of 107%). The proposal also includes 30 spaces for St Patrick's College staff within the basement car park beneath the existing playing field accessed off Edgar Street. Currently St Patrick's College has limited on-site parking and is largely dependant on on-street parking.

The proposed location and number of car parking spaces is shown in **Figure 11** below. Of the 717 car parking spaces to be provided for use by the university, 150 are to be allocated for staff and 567 for student parking.

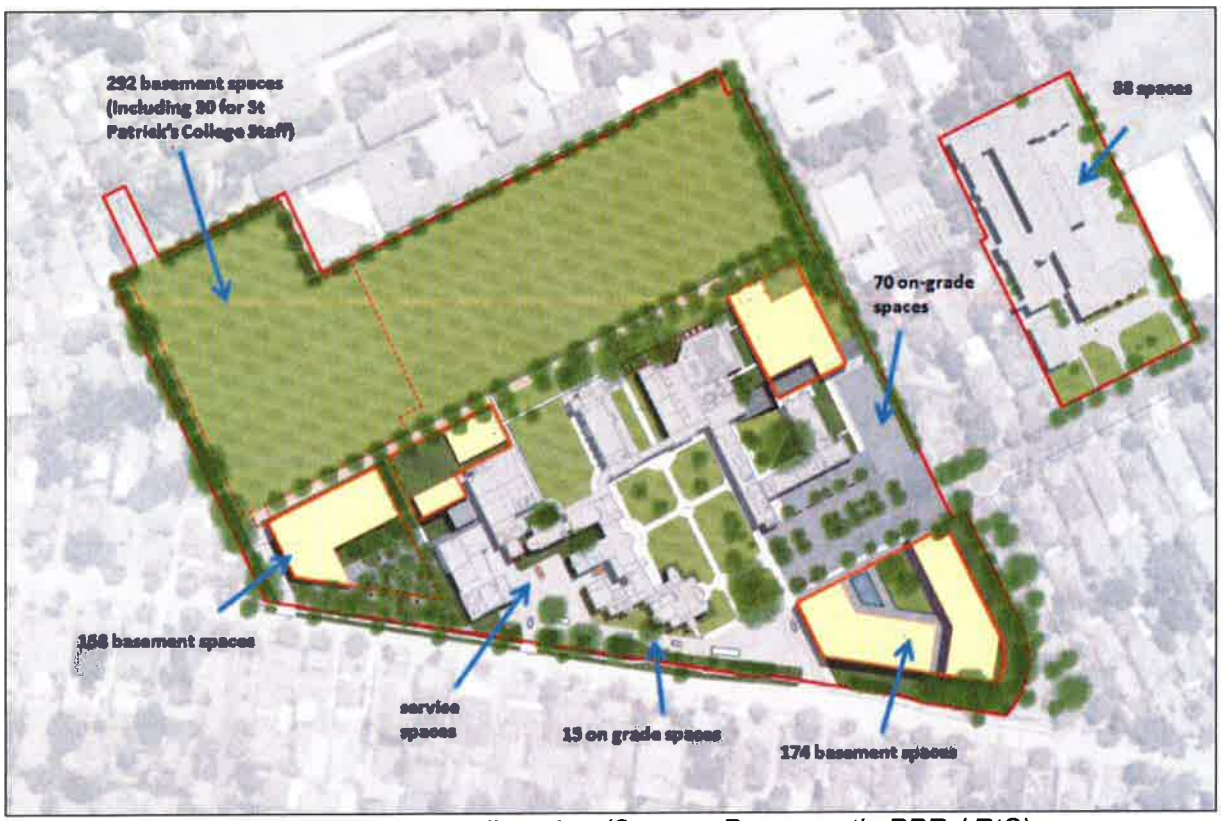

Figure 11: *Proposed car parking allocation (Source: Proponent's PPR / RtS)*

It should also be noted that there are no specific car parking rates that apply to the redevelopment of the site. Rather, car parking is determined by a requirement under Council's DCP to prepare a specific traffic study for the proposal. Accordingly, the proponent submitted a traffic and accessibility study along with a Green Travel Plan (prepared by ARUP).

Proponents Justification

The proponent's Green Travel Plan provides a suite of measures to reduce student reliance on cars and on-street car parking. Key components of the transport strategy include:

- reduced vehicle dependency primarily with an enhanced shuttle bus service linking to Strathfield Station approximately 1.5 kilometres away;
- alternative timetabling arrangements that reduce the number of student trips to and from the campus each day by providing consolidated periods of attendance across fewer days (as discussed in **Section 5.1**);
- provision of 371 additional on-site parking spaces (and an additional 30 spaces for use by the neighbouring St Patrick's College;
- alternative transport options; and
- opportunities for staff and students to take out interest free loans from the university for annual travel passes.

The Green Travel Plan sets the following mode share targets, shown in **Table 5** below.

Mode	Mode Target	Number of students in three hours	Number of students in one day
Public Transport	55%	1,100	1,540
Private car driver	30%	600	840
Private car passenger / drop off	8%	160	224
Motor bike / scooter	1%	20	28
Bicycle	2%	40	56
Walk	4%	80	112
Total	**100%**	**2,000**	**2,800**

***Table 5**: Extract of mode share targets to 2016 (source: Proponent's Response to PPR Submissions)*

The majority of students are expected to arrive by public transport (55%) or as a driver in a private car (30%). The remaining 15% of students are expected to be dropped off by private car or arrive by alternative transport options. To achieve the mode share targets the proponent is providing incentives such as free travel on the shuttle bus to and from Strathfield train station and interest free loans for staff and students for annual travel passes.

To further alleviate on street car parking demand the proposal also seeks to improve the shuttle bus service providing a total capacity for 2342 passengers per day and alter the lecture time table to reduce student trips throughout the day and the week. The new timetable will also enable students to share on-site car parking spaces as they may be utilised twice on any one day where students are attending half day sessions only provided there is sufficient change over time between the morning and afternoon lectures. This is recommended to be included in a amendment to the Green Travel Plan.

ARUP, found that parking on-site is currently maximised throughout peak periods with overflow parking provided within the surrounding streets. Surveys indicate that on-street parking has increased during 2009, 2011 and 2012 from 329 to approximately 506 vehicles during peak periods.

As a result of the predicted increased patronage of the free shuttle bus service identified in the Green Travel Plan and the provision of additional on-site parking, ARUP estimates that on-street parking is predicted to reduce to approximately 230 vehicles by 2016. This represents a 54% reduction when compared to the current peak periods.

ARUP also confirmed that on-site parking will be free for students and staff, with further details of parking layouts, access control and security to be provided in future development applications.

Other means of travelling including walking and cycling are forms of transport with a lesser mode share, but are nevertheless encouraged to reduce traffic generation on the local road network and parking within surrounding streets. Parking for approximately 130-250 bicycles and 30-40 motor bikes will also be provided on site.

Independent Advice
Parsons Brinckerhoff has carefully reviewed the Green Travel Plan and the existing operation of the shuttle bus service. The success of the shuttle bus in achieving the mode share targets is critical to any student number increase.

The free shuttle bus service has been successful thus far in accommodating student numbers using the service but passenger surveys show inconsistent use throughout the year. This is illustrated in the ARUP surveys (March 2012 and August 2012) undertaken of the shuttle bus service between the site and Strathfield Railway Station. The surveys indicate that bus patronage ranges from approximately 1,650 students per day to 840 students per day.

Parsons Brinckerhoff considers that the 55% mode share is achievable but is concerned that achievement may be problematic given the inconsistent patronage identified by the surveys. To address this issue, Parsons Brinckerhoff recommends a staged increase in student numbers (discussed in **Section 5.2.4**). The staged approach intends to reduce on-street parking numbers by ensuring that the proposed mode share targets are achieved prior to any future increase to the proposed maximum student numbers.

In support of the proposed staged increase, Parsons Brinckerhoff has recommended that the mode share targets be set to achieve a net reduction in on-street parking and that an independent survey company be engaged to undertake future surveys prior to any future consideration of an increase in student numbers.

In order to manage the impact of the university's expansion, it is recommended that the main parking area under the sports fields be constructed prior to any increase in student numbers. Following this, a provisional increase to 1,600 students is considered satisfactory and then any further increase would be dependant upon further mode share surveys and on-street parking surveys (discussed in **Section 5.2.4**) demonstrating that the mode share targets are being consistently achieved. This recommendation is based on the calculation (based upon current student travel behaviour) that 1600 students may be accommodated on the site without creating further on-street parking demand above existing levels, as this could be offset by the additional on-site car parking spaces (provided in Stage 1).

Parsons Brinckerhoff also considered whether the option of implementing a 'Resident Parking Scheme' would be suitable to alleviate university parking issues within the surrounding streets. Resident Parking Schemes function on the premise that on-street parking is time restricted to the general public with local residents able to apply for a permit that exempts them from such time restrictions. The ability to apply for a permit is dependent on whether the resident has off street parking available on its property. It was observed that the majority of residents appear to have adequate on-site parking and therefore it is likely that residents would not be eligible for a permit under the scheme. Also, the implementation of the restricted parking scheme may impact on other areas outside of the designated timed parking area as students look for parking that has no restrictions.

Parsons Brinckerhoff also notes that the proposal states that between 130 and 250 bicycle spaces are to be provided on the site. Parsons Brinkerhoff recommends that future applications identify appropriate locations for the provision of bicycle storage, end of trip facilities and the routes cyclists would use to access the site.

Department's Consideration

The department has carefully considered the proposed increase in student numbers, student reliance on cars and associate impacts on on-street car parking and the amenity of surrounding residential areas.

The department notes that the assessment of this issue is complex given the disparities between the existing student numbers and shuttle bus patronage. This is also acknowledged by Parsons Brinckerhoff which notes that the reports produced in support of and opposing the proposed expansion have provided a partial and sometime inconsistent picture of current traffic, parking and transport access to the university.

Notwithstanding, the department considers that the Green Travel Plan provides three key measures which are likely to mitigate the current and predicted impacts associated with the operation of the university. These are:

- a 107% increase in on-site car parking spaces;
- the new timetable that is designed to reduce student trips; and
- strict compliance with the mode share targets, to reduce traffic and on-street parking demand.

The department notes that achieving the mode share targets is critical to any student number increases. In order to ensure the mode share targets are achieved to manage traffic and car parking impacts associated with the expansion of the university, the department has recommended a framework for a staged increase of student numbers, as follows:

- no increase above current student numbers until the construction of the basement car parking area beneath the existing sports fields is complete and operational;
- an increase to 1,600 students (at any one time) once the basement car parking area is constructed and is operational; and
- an increase to 2,000 students (at any one time) and 2,800 per day when it has been demonstrated that the mode share targets and reduced on-street parking associated with the university operation are being consistently achieved.

Essentially, the framework intends to manage on-street parking numbers by ensuring that the proposed mode share targets are achieved prior to any future increase to the proposed maximum student numbers. The Department notes the proponent proposes to provide incentives to encourage increased patronage of public transport and facilities to encourage other modes of transport such as free shuttle bus travel and financial assistance for public transport passes. However, it is possible that additional measures may be required to achieve the mode share targets before the proponent can achieve the maximum student numbers. In any case, the department's recommended framework for the proposed increase in student numbers requires that prior to any approval for any increase to the 2000 students on site at any one time, it must firstly demonstrate that the anticipated mode share targets are being consistently achieved.

In order to supplement and support this recommendation, student travel behaviour and the staged increase of student numbers will need to be closely monitored. Subsequently, the department recommends prior to any further applications being submitted consistent with the Concept Plan approval, that the proponent prepares a Student Travel and Campus Monitoring Plan (STCM) in consultation with Strathfield Council to the satisfaction of the Director-General.

The key objective of the Student Travel and Campus Monitoring Plan (STCM) will be to monitor the travel behaviour of students consistent with the objectives and mode share targets identified within the Green Travel Plan and secondly to monitor the number of students on campus at any one time consistent with the staged increase in student numbers recommended by the Department.

It is further recommended that the STCM include robust methodologies to monitor and audit student travel behaviour and students onsite, provide for appropriate frequencies for monitoring over the academic year, provide for contingencies where monitoring indicates inconsistencies with either the mode share targets or relevant on-site student numbers, and provides for a clear communication strategy for all monitoring results.

For the purpose of monitoring, the Department defines a student as being a person enrolled in the Australian Catholic University, irrespective of whether they are in class or utilising other university facilities. This definition provides for an accurate basis on which to formulate relevant monitoring strategies and would eliminate the current disparity in student number calculations that exists between the proponent and Council. This definition should be used as the basis for calculating all future student numbers for the purposes of ensuring future compliance with the staged approval requirements.

The department has also considered the merits of implementing a Resident Parking Scheme. The department is of the view that such a scheme is unlikely to be effective as the introduction of restrictions may simply spread the impact of parking from around the university to other residential streets not currently impacted by on-street parking. Further, the department is not convinced that the implementation of the scheme would benefit local residents and notes resident objections to such a scheme.

The Department has also considered community concerns regarding vehicles parking across driveways and other amenity issues such as students littering. To address this issue, the department recommends a complaints handling procedure be prepared, in consultation with council, which would provide a clear and effective process for handling complaints of this nature. The procedure would include:

- a formal complaint/incident reporting procedure;
- an investigation procedure; and
- a complaint resolution procedure.

A record of the complaint and action taken would also need to be made publicly available on request.

Finally, details must be provided in future applications that identify cycle access routes, storage requirements and end of trip facilities for cyclists. Upgrades of existing routes are further considered later in this report.

Overall, with the successful implementation of the new timetable, increased on-site car parking, and strict compliance with the mode share targets, the department is confident that the proposed increase in student and staff numbers is capable of being provided on the site. Further, the department considers the impacts of the proposal upon surrounding residences can be offset subject to full compliance with the department's recommended staged approach.

5.2.2. Traffic impacts to the local road network

Traffic generation and impacts upon the efficiency of the local road network were concerns raised by Council and the public. Concerns were also raised with the proposed access arrangement off Barker Road into the proposed basement car parking areas.

The local road network in the vicinity of the site is subject to through traffic and other traffic associated with residential and educational establishments within the locality. The two main roads that service the site are Barker Road and Albert Road.

Barker Road is a collector road that currently provides three entrance points to the site, with the main entrance being the entry point located midway along the Barker Road frontage. An alternative parking area entrance is provided to the west, while a service access point is provided between the main access and western access point (**Figure 12**).

As Barker Road provides access to the majority of on-site parking within the university (note that the Edward Clancy Building campus is accessed off Albert Road and contains parking for 38 vehicles), the impact of the additional traffic generated by the proposal on the operation of Barker Road is a key consideration in this application, which is discussed in detail below.

Albert Road provides vehicular access to the Edward Clancy Building campus and pedestrian access to the main campus. Albert Road is two lanes wide, with car parking spaces provided along each side.

The RMS has commented that the proposal will not have a significant impact on the classified road network and therefore RMS does not raise any objection to the proposal. RMS deferred comment on traffic and parking impacts of the proposal on the local road network to Strathfield Council.

McLaren, on behalf of Council, has advised that should the proposed Concept Plan be supported, residents (those to the south of the campus and along Barker Road) will experience intolerable conditions in regard to the traffic and parking overspill consequences of the proposal.

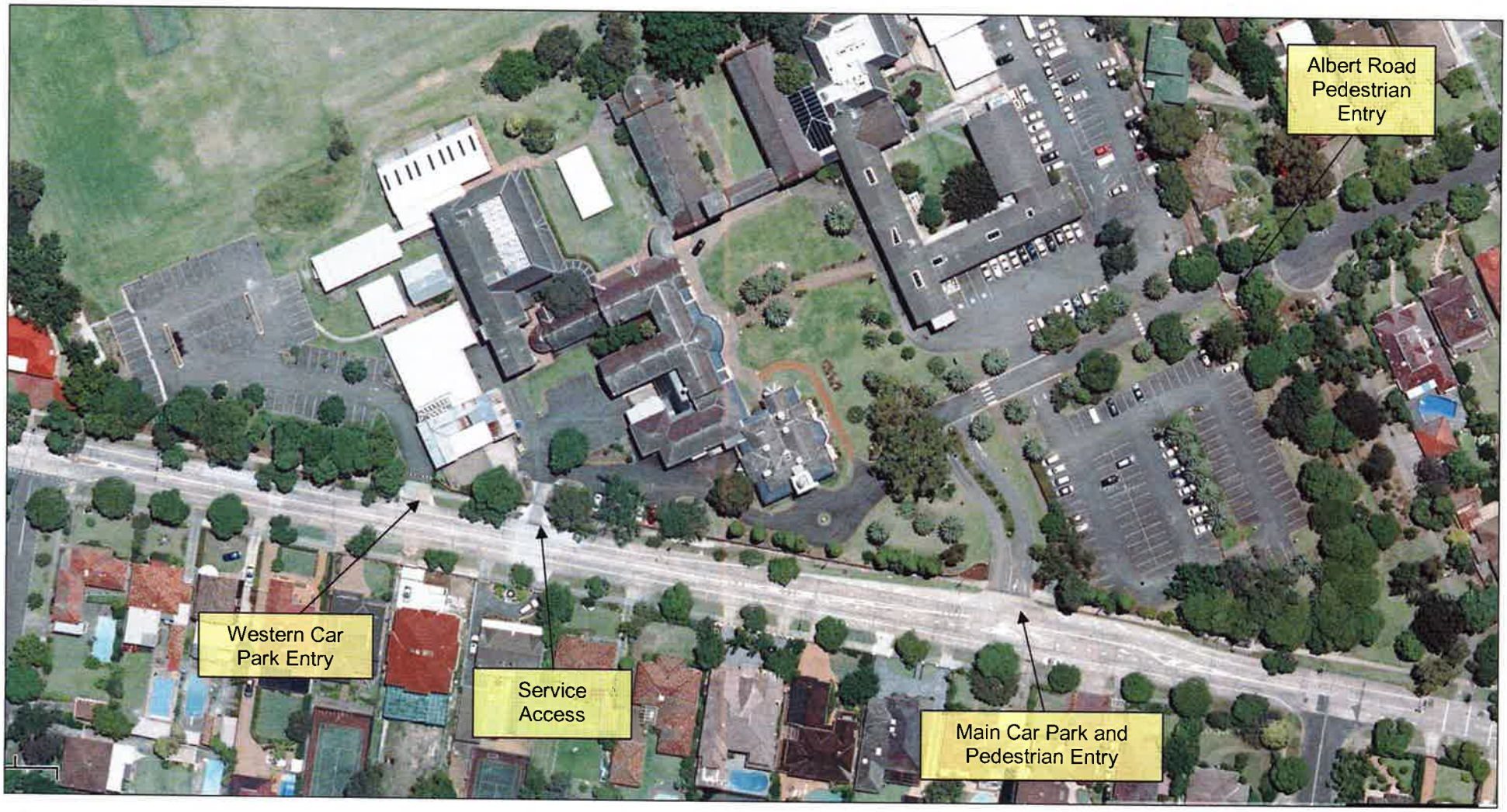

Figure 12: *Existing site entrance locations (Source: Google Maps 2012)*

Traffic studies undertaken for the university by ARUP indicate that based on a two-way weekday average, Barker Road near South Street (eastern portion of the main campus) carries 7,413 vehicles per day and Barker Road near Wilson Street (western corner of the main campus) carries 5,715 vehicles per day. ACU related traffic contribution to this total is considered to be 2,438 vehicles per day (including the shuttle bus service).

This data is inconsistent with additional information received from residents, which indicates that in February 2012 along Barker Road, 9,383 vehicles were counted between Newton Road and Chalmers Road. This disparity compared to those counted by ARUP could be a result of where the traffic counts were conducted and the time of year.

ARUP estimates that the likely two-way traffic generated as a result of the proposal is:

- 195 additional vehicle trips per day along Barker Road near South Street (3% increase on top of the existing 7,413 vehicles per day); and
- 105 additional vehicle trips per day along Barker Road near Wilson Street (2% increase on top of the existing 5,715 vehicles per day).

ARUP, on behalf of the proponent, has confirmed that the proposed Barker Road access arrangement to the basement car park area would result in the loss of eight spaces on the southern side of Barker Road and five spaces on the northern side of Barker Road. This will be partly off-set by the re-introduction of four spaces as a result of the deletion of the existing driveway to the at-grade car park.

ARUP maintains that the proposed Barker Road access arrangement to the underground car park area complies with the safety requirements of Austroads Guide to Road Design.

Independent advice

Parsons Brinckerhoff estimated that an increase of only approximately 200 vehicle trips across the day (instead of the 300 vehicle trips stated by ARUP) will access as a result of the increase in student and staff numbers by 2016.

Traffic volumes on Barker Road are considered to be currently within the functional capacity (i.e. between 2,000 and 10,000 vehicles per day) of a collector road with or without the influence of university related traffic. Noting the minor additional traffic movements as a portion of the existing volume of traffic, Parsons Brinckerhoff considers that the daily volumes of traffic would be acceptable for a collector road following the increase in traffic resulting from the proposal.

The impacts would remain acceptable even when considering the existing higher traffic volumes provided in survey information provided by residents. With the achievement of the proposed mode share targets, Parsons Brinckerhoff concludes that Barker Road will remain within its functional capacity.

Parsons Brinckerhoff advised that the design of the new access off Barker Road into the basement car park complies with intersection stagger arrangements, however the future geometry and impacts for on-street parking can be further considered by Council's Local Traffic Committee as part of the assessment of any future application to construct the works.

Department's Consideration

The department has considered the traffic impacts of the proposal upon Barker and Albert Roads. It is acknowledged that any increase in student and staff numbers has the potential to impact upon the existing traffic flow along Barker Road.

The department considers that Barker and Albert Roads are capable of catering for the increased vehicle movements into the site as a result of the proposal, especially considering the prediction based on Parsons Brinckerhoff's estimate that there will only be a 1.7% increase in

traffic generation over the existing 7,413 vehicles per day or 2.1% increase in traffic generation over the recent survey (provided by residents) of 9,383 vehicles.

The department also notes that the measures contained in the Green Travel Plan have the added benefit of reducing traffic generation. If the proposed measures (such as the mode share targets) are successfully implemented, the impact upon the road network is potentially reduced, compared to the current situation.

The department notes the Parsons Brinckerhoff's advice that even with the introduction of a new access point off Barker Road, combined with increased parking spaces on-site that the level of service along Barker Road will be maintained at a satisfactory level.

Detailed design of the new access point off Barker Road and Edgar Street into the underground car parking area can be further considered as part of the assessment of the relevant future applications.

5.3. Built Form

The Concept Plan proposes six building envelopes in four development precincts (refer to **Figure 7**), with heights ranging from two to four storeys across the main campus site. Existing building heights on the site range from single to up-to three storeys (**Figure 13**), with ridge heights at four storeys. Adjoining properties to the site include a mixture of 1 and 2 storey residential properties.

Concerns were raised by Council and the public that the proposed built form is not compatible with the two storey character of the surrounding residential properties. In response, the department recommended the proponent review the appropriateness of the built form particularly toward Barker Road and sought a modification to the setback along the western boundary adjacent to Precinct 3.

The proponent modified the built form of the envelopes in its PPR and Response to Submissions. Of particular note, the modifications included increasing the setback between the western boundary and Precinct 3 and deletion of a fourth storey element on the north-western corner of Precinct 1.

Following exhibition of the PPR and Response to Submissions, Council and residents maintained concerns that:

- the built form of the new buildings is out of character with surrounding properties;
- the positioning and bulk of the buildings will impact upon streetscapes;
- the separation of the floor to floor levels is of a commercial scale that increases height; and
- there is no transition of built form to adjoining properties.

***Figure 13**: Built form of existing buildings looking north from the reception car park (Source: Proponent's EA)*

Department's consideration

The department's assessment of Precincts 1, 2 and 3 is provided below. No concerns have been raised regarding Precinct 4 and the department considers it to be acceptable as it complements the surrounding context and will not create any amenity impacts to the public domain or surrounding properties.

The building envelopes have been considered in the context of the surrounding development and the existing structures located on the site noting that it is unlikely that these envelopes will be developed in full as future buildings will be articulated and modulated to achieve desirable design outcomes.

Precinct 1 (south eastern corner of site adjacent to Mount Royal Reserve)

The southern side of Barker Road, opposite the site, is generally characterised by one and two storey dwellings with setbacks of approximately eight to ten metres. To the east of Mount Royal Reserve are one and two storey dwellings with frontage to Albert Road, Barker Road or the access road off Albert Road (**Figure 14**).

The two buildings within Precinct 1 provide a 3 to 4 storey presentation to Barker Road and a four storey elevation to Mount Royal Reserve. The fourth storey is provided given the downward slope of the land toward the Mount Royal Reserve boundary. The overall height of the two buildings is equivalent to the height of the existing tallest buildings on the site. A 12 metre setback is provided to Barker Road and a 10 metre setback to Mount Royal Reserve.

The department notes that the proposed building heights are higher than the 1 and 2 storey residential buildings that adjoin this precinct. The proposed buildings will be partly screened when viewed from Barker Road or Albert Road through the retention of trees (where possible) and planting of new trees between the proposed building facades and property boundaries.

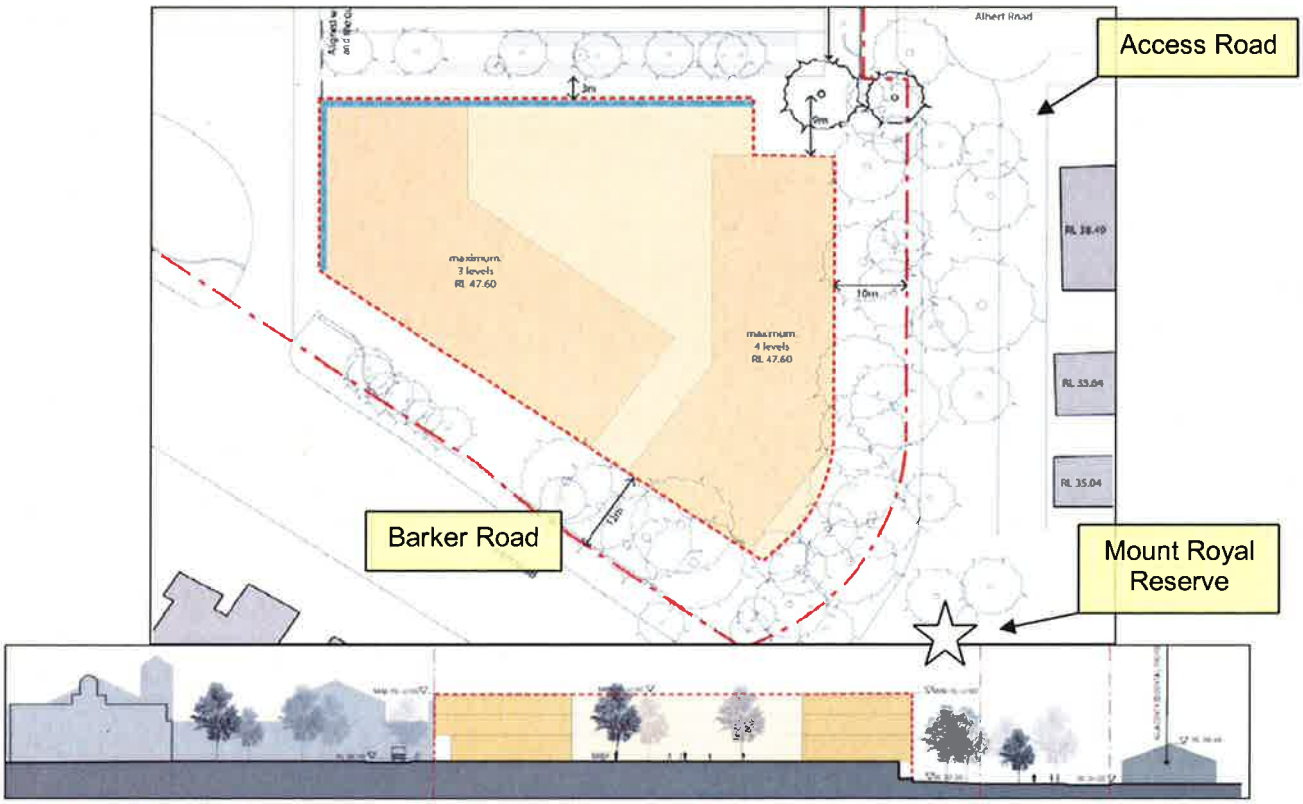

Figure 14: *Built form of Precinct 1 (Source: Proponent's PPR / RtS)*

The department considers that the proposed three and four storey built form of Precinct 1 is appropriate for the following reasons:

- the proposed envelopes are setback 12 metres from Barker Road allowing the retention of screening by the existing vegetation, which minimises any visual impacts associated with the height and bulk of the buildings;
- the presentation of two separate buildings along the Barker Road façade, reduces the visual bulk of the facades as seen from the street (this can also be further considered during the detailed design phase as part of the assessment of any Development Application to construct the buildings);
- the combination of the eastern setback and adjoining Mount Royal Reserve provides a separation of approximately 35 metres between the proposed envelopes and residential properties; and
- the scale of the proposed envelopes are in line with that expected within an educational institution, in particular as the site contains buildings of a similar bulk and scale.

Notwithstanding, the department recommends that a future assessment requirement be imposed requiring further design reviews of the building facades along the Barker Road frontage to ensure that this elevation is suitably articulated and that the interface between the site and Mount Royal Reserve is adequately considered.

Precinct 2 (eastern side of site adjacent to eastern boundary and sports fields)

The adjoining properties to the east of the site are generally characterised by single and two storey dwellings with buildings generally built within five metres of the boundary apart from buildings used by St Patrick's College. The existing buildings to the east of the boundary are partly screened by vegetation, with the exception of the rear of 175A Albert Road that is orientated to the north-west towards the proposed building.

The proposed building envelope within Precinct 2 consists of a four storey built form that is setback between 10 to 30 metres from the eastern boundary (**Figure 15**). The new building replaces existing buildings, particularly the Biomechanics Building and Gleeson Auditorium and

Lecture Rooms, which are of between one and three storeys in height. The overall height of the building is equivalent to the adjoining Mullens Wing and St Edmunds Building.

Minimal screening of the new building is currently provided, however the proposed landscaping plan includes the provision of new trees along this section that will assist in reducing the visual impact of the new building.

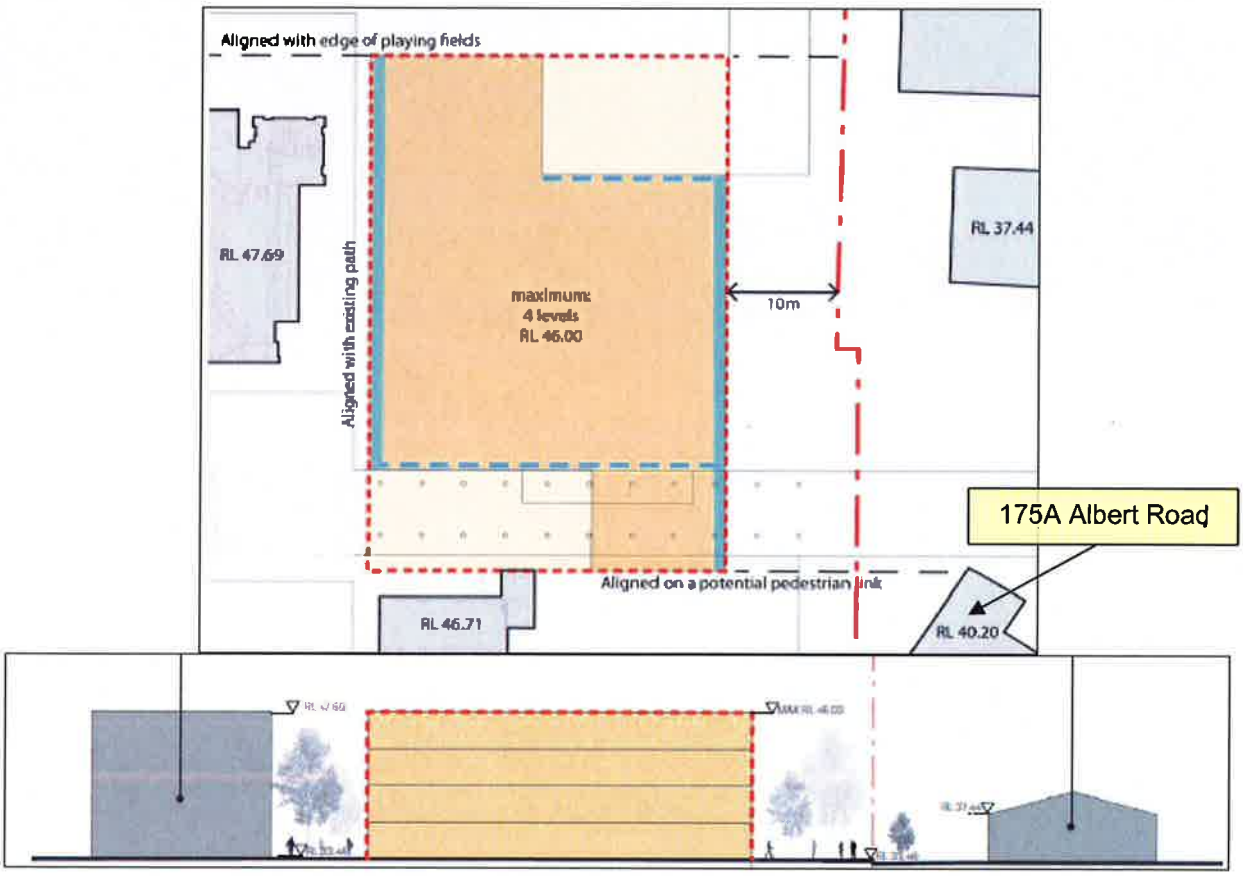

***Figure 15**: Built form of Precinct 2 (Source: Proponent's PPR / RtS)*

The department considers that the proposed four storey built form of Precinct 2 is acceptable for the following reasons:

- the proposed envelope is setback a minimum of 10 metres from the boundary, offering opportunities to landscape the setback to assist in screening the building from adjoining properties;
- the proposed envelope would not cause unreasonable amenity impacts as a result of the height and setbacks of the envelope, i.e. the adjoining properties will maintain solar access to their properties between the hours of 9.00am and 3.00pm on 21 June and potential privacy and overlooking impacts from the building is likely to be acceptable given the generous setbacks and landscaping area provided. Privacy impacts will be considered further during the detailed design phase with the lodgement of an application to construct the building. A future assessment requirement is also recommended to address this issue; and
- the proposed envelope is of an institutional scale consistent with the height and scale of other buildings on the site.

Precinct 3 (western side of site adjacent to the western boundary, fronting Barker Road)

The southern side of Barker Road opposite the site is generally characterised by one and two storey dwellings with setbacks of approximately 8 to 10 metres. Adjoining the site to the west is

a single storey dwelling with frontage to Barker Road. The site slopes up from the boundary with the adjoining residence to the western car parking area by approximately 2 to 3 metres.

The proposed building envelope within Precinct 3 is 3 storeys in height when viewed from Barker Road (**Figure 16**). A 15 metre setback is provided to the western boundary, with a varying setback to Barker Road ranging between 12 metres to approximately 30 metres due to the proposed design of the envelope. As a result of the slope of the land, when viewed from the adjoining property to the west, the building will be approximately ten metres above the existing ground level.

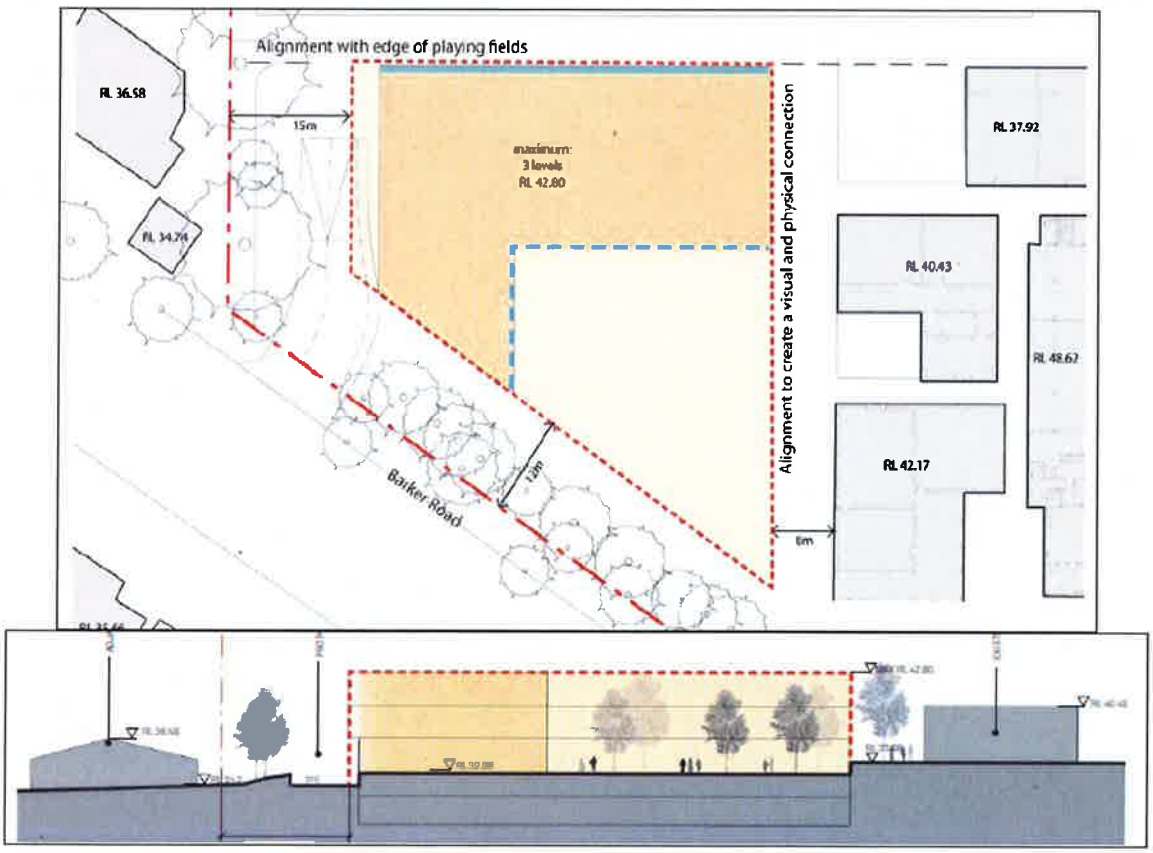

Figure 16: *Built form of Precinct 3 (Source: Proponent's PPR / RtS)*

The department considers the proposed 3 storey height of the proposed building envelope in Precinct 3 to be acceptable for the following reasons:

- the small portion of the building envelope that is setback a minimum of 12 metres from Barker Road is provided with a greater setback than those provided on the western adjoining residential sites of between 8 and 10 metres. This additional setback provides a sufficient distance from the street to enable the planting of landscaping to soften this facade;
- the building envelope is setback 15 metres from the western boundary and the ground floor level partly located beneath the existing ground level, reducing the overall visual bulk;
- the 3 storey scale of the building envelope is consistent with other buildings on the site that form a cluster of institutional buildings in a campus setting; and
- potential privacy and overlooking from the building is likely to be acceptable subject to further consideration during the detailed design phase with the lodgement of an application to construct the building. A future assessment requirement is proposed to address this issue.

Conclusion

Overall, the department considers that the proposed addition of six building envelopes is capable of being accommodated on the site and is supported. It is noted that the design of these buildings will be subject to further detailed assessment of built form, articulation, materials and finishes and landscaping during subsequent applications to construct the buildings.

The envelopes will not adversely impact the streetscape or the amenity of adjoining properties and the scale of the buildings is consistent with those expected within a campus setting. The inclusion of additional landscaping to the site around the proposed building envelopes will also assist in the enhancement of the landscape setting of the existing campus.

It is recommended that future assessment requirements be imposed that require consideration of:

- built form issues including articulation and modulation within the envelopes and also materials and finishes; and
- amenity issues including privacy and overlooking into adjoining properties.

These future assessment requirements will ensure that a desirable design outcome for the buildings can be achieved at the future Development Application stage.

5.4. Hours of Operation

The proponent seeks to increase the hours of operation of the university, as outlined in **Table 6** below. An additional hour in the morning is proposed to enable security staff to open the campus for the arrival of teaching staff and other staff that arrive at approximately 7.30am for the start of classes at 8.00am. An additional hour is also proposed in the evening between 9.00pm and 10.00pm to allow students time to exit the campus at the closure of the library at 9:30pm, then to allow security staff to lock up the campus prior to 10.00pm. The Concept Plan seeks approval for (postgraduate) classes to be held and library use on both Saturday and Sunday.

The department notes that presently classes and library operations are only permitted to be held between Monday and Friday on the Albert Road campus (known by the department as the main campus), with the library only permitted to be open on Saturday (i.e. no classes are presently held on weekends).

	Existing Albert Road Site	**Existing Clancy Site**	**Proposed**
Monday	8.00am-9.00pm	8.00am – 9.00pm	7.00am – 10.00pm
Tuesday	8.00am-9.00pm	8.00am – 9.00pm	7.00am – 10.00pm
Wednesday	8.00am-9.00pm	8.00am – 9.00pm	7.00am – 10.00pm
Thursday	8.00am-9.00pm	8.00am – 9.00pm	7.00am – 10.00pm
Friday	8.00am-9.00pm	8.00am – 9.00pm	7.00am – 10.00pm
Saturday	8.00am-5.00pm		8.00am – 5.00pm
Sunday			8.00am – 5.00pm

***Table 6**: Comparison between existing and proposed hours of operation (Source: Proponent's PPR / RtS)*

In relation to the use of the campus on the weekends, the proponent advises that most activity would be for the use of the library, with the campus also open for study purposes for other students and the community. The proposed weekend class sessions are for postgraduate students.

Concerns were raised in submissions that the proposed hours of operation will further reduce the amenity experienced by the surrounding residential locality. It was suggested that the proponent does not appear to comply with existing operational requirements and that additional

use of the site on weekends would conflict with the use of the sports fields resulting in adverse parking impacts.

The submissions state that the increase to the hours of operation is not justified simply to enable security staff to open the campus and that the proposed weekend use will impact the local residents.

Department's consideration

Monday to Friday

Initially, the department raised concerns with proposed hours of operation of the university as any increase has the potential to impact upon the amenity of residents due to vehicle and pedestrian movements to and from the site. The proposed indicative student timetable, as outlined in **Section 5.1**, indicates that first classes would start at 8.00am (one hour after the campus opens) and the last class would end at 8.00pm. The library closes at 9.30pm, therefore enabling students, teachers and other staff time to leave the site before the campus is closed by security at 10.00pm.

The department notes that Strathfield Council's Consolidated DCP 2005 provides that educational establishments in residential areas are permitted to have hours of operation limited to 7.00am to 9.30pm Monday to Sunday. The DCP also enables extended hours beyond these times, if the amenity of the locality is not adversely impacted.

The proposed hours of operation are largely consistent with Council's standard hours as stated above. The exception to this is the half hour between 9.30pm and 10.00pm.

Potential impacts as a result of increasing the hours need to be considered in conjunction with the proposed timetabling, which is being introduced to reduce the peak traffic generation. This additional half an hour is considered to be acceptable; given that with the cessation of classes at 8.00pm the majority of students and staff will steadily leave the campus, resulting in a reduced number of students and staff on the university in the library or in common areas. The potential impact upon the amenity of the residents as a result of the additional half an hour is considered to be negligible.

The proposed hours of operation are largely consistent with Council's DCP requirements and the proposed measures to reduce on-street parking and increase shuttle bus usage are supported. The department supports the proposed hours of operation for weekdays.

Saturday and Sunday

The carrying out of classes during the weekend is an additional use of the site along with the opening of the library on Sunday. Residents that surround the site advise that on-street parking by the university on weekends is minimal compared to weekdays, which would indicate that a small number of students and staff currently utilise the site on the weekends.

To permit the library to be open on both days of the weekend is considered reasonable as this may result in a reduction to the total number of students attending the site at any given time (i.e. spreading the number of students attending the site over two days instead of one).

The department notes that previous approvals did not permit classes on the weekend. In this regard the proponent has advised that the proposed weekend classes typically involve in the order to 250-300 postgraduate students in session. The department notes the postgraduate classes are a much smaller portion of the larger undergraduate function of the university. This smaller scale use of the campus is expected to be carried out with negligible impacts to the surrounding area. In addition, it is also noted that Council's DCP enables educational establishments to operate between the hours of 7am to 9.30pm on Saturday and Sunday. On this basis, the department considers this aspect of the proposal to be acceptable.

5.5. Heritage

Concerns were received by the public and by Council's heritage consultant in relation to the proposed built form of the new buildings and the associated impact this has on the heritage significance of the site.

Mount St Mary College (the main campus) is listed as a locally significant heritage item under the SPSO 1969 and Draft Strathfield LEP 2011. The Edward Clancy Building campus does not contain any heritage listing. No items are listed on the State Heritage Register.

Significant view corridors of the site and associated buildings are available from Albert Road and Barker Road (as shown in **Figure 17**), with some of the vegetation located on the site also of importance. The Heritage Council of NSW and Strathfield Council raised concerns with the proposed built form and its impact upon the heritage significance of the site as exhibited in the EA.

Figure 17: *Site plan indicating view corridors from the public domain (red arrows) and view corridors within the site (yellow arrows) (Source: Proponent's EA)*

The most significant view corridor to the site is from Barker Road and through the gates from Albert Road. Other views of the main campus are gained as the site is approached from either corner of the Barker Road frontage. These views of the buildings are partly screened by the existing vegetation or the fencing and car parking provided on the boundary of the site.

Amendments to the building envelopes as a result of the PPR and Response to Submissions are considered to have addressed issues raised by Council and the Heritage Council through increased setbacks along the view corridor along Albert Road and modification of the building envelope heights in Precinct 1. The Heritage Council of NSW did not raise any further comment on the PPR and Response to Submissions. The Heritage Council has however requested that each application to construct the buildings be forwarded for its consideration.

Future assessment requirements are also recommended that requires new buildings to be designed and have regard to the heritage significance of the site and the architectural style of the existing buildings.

6. CONCLUSION

The department has assessed the merits of the proposal taking into consideration the issues raised in public and agency submissions. The key issues raised in submissions and addressed by the department relate to:

- the increase to student numbers;
- transport management and parking impacts on and off the site;
- suitability of the built form;
- hours of operation; and
- impact upon the heritage significance of the site.

The department obtained independent advice from a traffic consultant to inform its assessment of the key traffic related issues with the existing and proposed expanded university. It is considered that the subject site is capable of accommodating additional students subject to the successful implementation of the proposed transport management measures including a new timetable, adherence to the mode share targets in the Green Travel Plan, and increased on-site car parking.

In order to ensure the mode share targets are achieved and to manage impacts associated with the expansion of the University, the department has recommended a staged increase of student numbers as follows:

- no increase in student numbers until the construction of the basement car parking area beneath the existing sports fields is complete and operational;
- an increase to 1,600 students (at any one time) once the basement car parking area is constructed and is operational; and
- an increase to 2,000 students (at any one time) and 2,800 per day when it has been demonstrated that the mode share targets and reduced on-street parking associated with the university operation are being consistently achieved.

Notwithstanding the above, student travel behaviour and the staged increase of student numbers will need to be closely monitored. Subsequently, the department recommends prior to any further applications being submitted consistent with the Concept Plan approval, that the proponent prepares a Student Travel and Campus Monitoring Plan (STCM) to the satisfaction of the Director-General in consultation with Strathfield Council.

The key objective of the STCM will be to monitor the travel behaviour of students consistent with the objectives and mode share targets identified within the Green Travel Plan and secondly to monitor the number of students on campus at any one time consistent with the staged increase in student numbers.

The department considers that the proposed built form is appropriate having regard to the campus scale of a university and future assessment of the built form and articulation during future applications.

Subject to the above, the department is satisfied that the site is suitable for the proposed development and will improve the level of educational facilities on the site, providing a significant public benefit for current and future students.

7. RECOMMENDATION

It is recommended that the Planning Assessment Commission, as delegate for the Minister for Planning and Infrastructure:

(a) **consider** the recommendations of this report;
(b) **approve** the Concept Plan Application under Section 75O of Part 3A of the *Environmental Planning and Assessment Act 1979*; and
(c) **sign** the attached Instrument of Approval (**Appendix E**).

Prepared by: Mark Brown
Senior Planner, Metropolitan & Regional Projects South

Endorsed by:

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Metropolitan &
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16.1.13
Chris Wilson
A/Deputy Director-General
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