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Our reference: Ltr01D-1302023
Your reference:
Enquiries: [redacted]

29 November 2023

Town of Victoria Park
99 Shepperton Road
VICTORIA PARK WA 6100

[redacted]

Dear [redacted]

RE: APPLICATION TO AMEND A DEVELOPMENT APPROVAL – 5.2020.704.1 – VICTORIA PARK CHRISTIAN SCHOOL – 27 COLOMBO STREET, VICTORIA PARK – ADDITIONAL CAR PARKING AND STUDENT CAPACITY

On behalf of Victoria Park Christian School, Rise Urban is pleased to lodge this application to amend the development approval granted by the Town of Victoria Park Council on 20 July 2021, to include an additional car park in the approval and increase the approved maximum student capacity of the school from 150 to 250 students.

This submission sets out justification demonstrating that the proposal satisfies the planning requirements for the site, and is supported by the following documentation:

- Attachment 1 – Completed Application for Development Approval, Amendment or Cancellation of Development Approval and MRS forms;
- Attachment 2 – Current certificates of title;
- Attachment 3 – Site plan of the car park;
- Attachment 4 – Transport Impact Assessment (Stantec, September 2023);
- Attachment 5 – Noise Assessment (Herring Storer Acoustics, November 2023);
- Attachment 6 – Town of Victoria Park approval dated 20 July 2021; and
- Attachment 7 – Victoria Park Christian School bus service form.

Background

On 20 December 2021 a development application for additions to an existing school was lodged with the Town of Victoria Park (Ref: 5.2020.704.1). As part of that application, an increase in the capacity for the school from 100 to 180 students was proposed. The Town of Victoria Park subsequently advertised the development application and received 14 objections from nearby residents regarding the proposed increased capacity of the school, made on the basis of concerns that the increased capacity had potential to exacerbate an existing parking problem in the area. We understand that the parking problem is primarily generated by on-site parking for other nearby land uses being insufficient to cater for the demand generated by those uses, resulting in cars regularly parking on surrounding streets.

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The proponent responded to these concerns during the initial development application process by proposing to increase the capacity of the existing car park adjacent to Colombo Street by an additional 10 bays. The Town subsequently approved the application, albeit with a maximum capacity of 150 students instead of 180. It is understood that this limit was based on a Traffic Impact Statement and subsequent Technical Memorandums provided in support of the development application, which confirmed that sufficient car parking and 'kiss and drive' facilities, as well as a bus service, would be provided to service the school. The bus service is now operational and is described in greater detail later in this submission.

The approved classroom addition has now been constructed and will open for the 2024 school year. The school currently has 149 students attending and therefore the 150 student capacity limit is now too restrictive based on the School's enrolment projections and the increased capacity resulting from the new classrooms.

Site Context

The site is located between Oswald Street and Colombo Street in Victoria Park, and is in close proximity to the Victoria Park commercial strip and Canning Hwy – Shepperton Road interchange. The school is spread across five lots (lots 137, 138, 160, 161 and 700 Oswald and Colombo Streets) and is 8,104m^2 in size.

A local context map depicting the site and its immediate surrounds is shown at Figure 1.

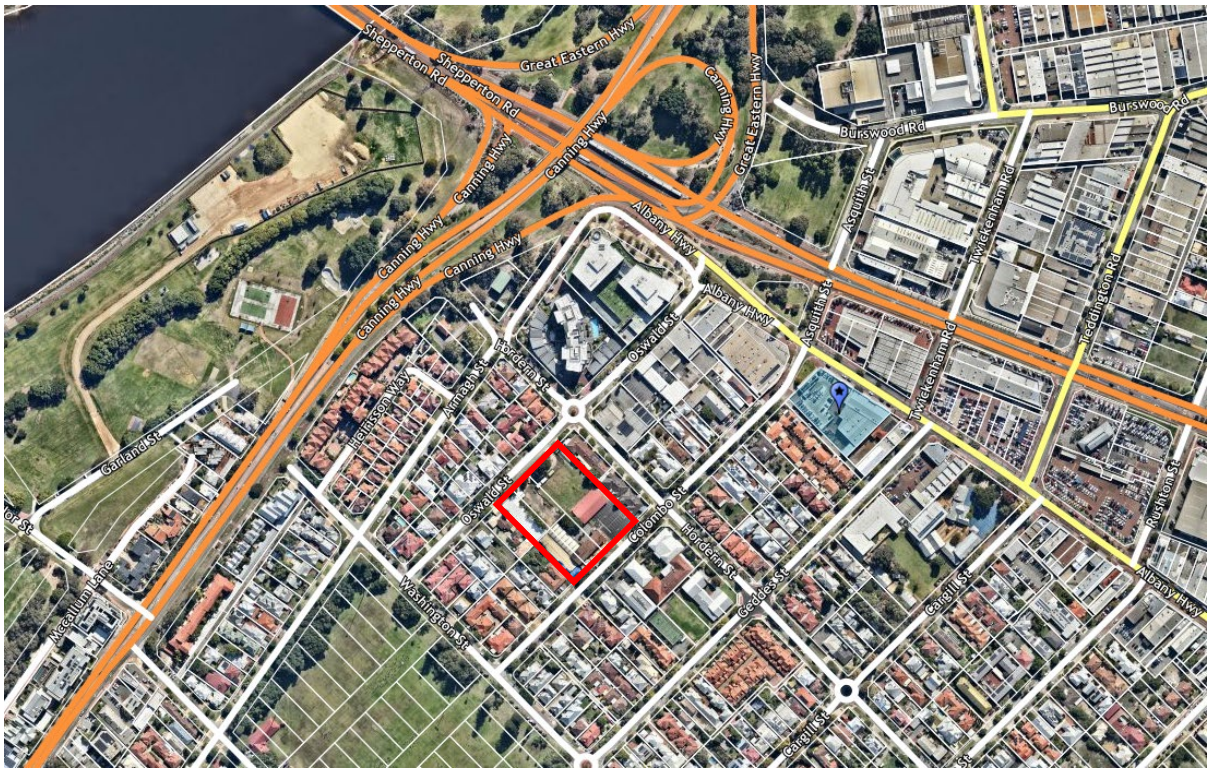

Figure 1 – Local Context Map – Victoria Park Christian School (source: MNG Access, 2023)

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A car park comprising 31 bays and serviced by two crossovers to Colombo Street is located in the south-eastern corner of the site. Seven additional on-street parallel bays are located on Oswald Street with 15 minute time limits during drop off (7:30am-9am) and pick up (2:30pm-4pm) hours.

Regent College, a second faith-based primary school, is located opposite Victoria Park Christian School at 22 Colombo Street. The site is otherwise surrounded by single and grouped residential dwellings.

Proposal

This application to amend development approval 5.2020.704.1, initially approved by the Town on 20 July 2021, is made pursuant to clause 77(1)(b) and (c) of the Deemed Provisions, and is necessary given the proposal to construct car parking and increase the capacity of Victoria Park Christian School that is currently limited by Conditions 1 and 2 of the approval.

Victoria Park Christian School is experiencing increased demand from parents to educate their children, which is the reason that the classroom block was proposed and has now been constructed. As a result, the school is now projecting demand to increase beyond 150 students in the short term. To enable the school to meet this projected demand, this application proposes an increased capacity of 250 students and an additional car park and associated circulation aisle to cater for the associated parking demand from parents. This additional car parking will ensure that the school continues to meet the Town's car parking requirements, while also addressing the long-standing community concerns about availability of car parking in the area.

The new car park is proposed to function as a one-way circulation system, to be entered at the existing Oswald Street crossover. Cars will then filter down a circulation aisle set back 1m from the eastern site boundary, from which 12 new car bays angled at 60 degrees will be accessible. The circulation aisle will then pass through the setback between the existing classroom block and east site boundary before connecting to the north-east corner of the existing car park. Three car bays in the existing car park will be removed to enable vehicles to travel straight to the existing east crossover to Colombo Street to exit. As a result, a net increase of 9 car bays is proposed.

The Oswald Street crossover that the car park is proposed to utilise is currently gated. This gate will be opened before drop off and pick up times on school days and closed at the end of these times. This will ensure that there is no conflict between vehicles moving through the car park and school children using the adjacent oval, and means that the new car park will only be available for use for pick up and drop off purposes only.

Due to this limitation, the school intends to implement management provisions to designate the new car park and Oswald Street parallel bays as its 'kiss and drive' areas, and the existing car park at the front of the site and Colombo Street verge for staff and parents who wish to park and walk their children to the classroom in the school grounds.

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This submission is supported by a Transport Impact Assessment (TIA) prepared by professional accredited traffic engineers Stantec, which confirms that the proposed parking arrangement for the school meets the Town of Victoria Park's parking requirements and will not impact the functionality of the surrounding road network.

The TIA notes that the school bus service substantially reduced car parking demand for the school. The service is operated by Buswest via a charter arrangement with Victoria Park Christian School. The school enters into an agreement with parents who wish for their children to use the bus service, the template of which is attached to this application. Parents are required to pay a $2,300 fee upfront at the beginning of the school year, which incentivises them to ensure that their children use the service as much as possible during the year.

32 students currently use the service each day, which represents 21% of the current student population. More parents are expressing interest in utilising the bus service for the 2024 school year, and the school expects the 21% utilisation ratio to be maintained or even increase in the future.

The new car park will necessitate removal of the existing cricket nets and reduction of the size of the school oval by approximately 320m^2. While the one-way circulation aisle will be paved, kerbed and drained, the car bays themselves will be marked on grass so they can be used as an extension of the oval outside pick up and drop off hours.

Amendments to Conditions of Approval

To reflect the increased capacity and additional car park, this application seeks to delete condition 2 from the approval and amend conditions 1, 3, 6, 7 and 8 to read as follows. The intent behind each modification is detailed below each condition.

1. *The total number of students on site at any given time shall not exceed 250. Further approval will be required from the Town for any future increase in students on site.*

Condition 1 is proposed to be modified to enable the proposed increase to 250 students, and also applies the 250 student limit with respect to students on site, rather than enrolled students as per the current condition. This is because kindergarten students attend on alternative rosters and are not at the school at the same time, so a capacity limit of 250 enrolled students would result in less than 250 students on site at any given time. All justification in this submission assumes that this condition refers to students on site rather than enrolled students.

Condition 2 is proposed to be deleted as a new Transport Impact Assessment is appended to this submission and supersedes the previous Traffic Impact Statement. Therefore, the condition is now redundant.

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3. *The traffic management measures outlined in section 6.5.1 of the Stantec Transport Impact Assessment dated 3 October 2023 and the following traffic management measures are to be implemented to the satisfaction of the Town at all times:*

    - *Staggered start and finish times for year groups;*
    - *Further encouragement of the private bus use;*
    - *Further encouragement of the use of public and active transport modes.*

Condition 3 is proposed to be updated to reflect the TIA lodged as part of this application and deletes reference to the kiss and drop arrangement along Oswald Street, on account of the change in operation of the partial car bays on Oswald Street proposed by this application.

6. *No school bus drop off/collection is to occur within the car parks and is to be restricted to the kerbside bays on Oswald Street only. Kiss and drop/ collection may only occur within the car park adjacent to the school oval or in the kerbside bays on Oswald Street.*

Condition 6 is proposed to be updated to reflect the proposed operation of the car parks and kerbside bays along Oswald Street detailed by this application.

7. *A minimum of 40 car parking bays, including an ACROD bay, shall be provided on site in accordance with the approved plans. These bays shall be marked and allocated in accordance with the approved plans.*

Condition 7 is proposed to be updated to reflect 40 bays now being proposed on site.

8. *Prior to the first occupation of the development hereby approved, all approved car parking spaces together with their access aisles shall be clearly paved, sealed, marked and drained in accordance with Australian Standards AS2890.1 (except for the angled grassed car parking spaces) and arranged so that all vehicles may at all times leave or enter the street in a forward gear. All parking bays and access aisles shall thereafter be maintained to the satisfaction of the Town.*

Condition 8 is proposed to be updated to exclude the grassed car bays from the paving, sealing and draining requirement. Condition 7 will still require them to be marked.

Condition 4 requires the traffic management measures required by condition 3 to be implemented and condition 10 limits the capacity of the Early Teaching Block. It is intended that those conditions will remain unchanged and therefore continue to apply.

The remainder of the conditions are not relevant to this application to amend the development approval.

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Amendment to Development Approval

The proposed amendments (being the increased student capacity and additional car park) do not substantially change the development approval for the purposes of clause 77c of the Deemed Provisions, for the following reasons:

a) The increased capacity proposed by this amendment is necessary to enable full use of the approved development (being the new classrooms);
b) The new car park is a minor alteration to the site in the context of the approved classroom block and the broader school grounds;
c) The car park is a direct consequence of the increased capacity, given its purpose is to accommodate vehicles picking up and dropping off the additional students;
d) The additional car park will not substantially change the functionality of the site or the approved land use;
e) The additional car park will not substantially affect the Oswald or Colombo Street streetscapes or impact the amenity of local residents; and
f) The changes to the site circulation and access arrangements will improve the efficiency of the traffic flow through the site and will not affect traffic flow on the public roads and intersections around the site.

On this basis the proposal is a minor amendment and can be assessed as an amendment to the existing approval under clause 77 of the Deemed Provisions.

Planning Assessment

The key planning instruments relevant to the site and the proposal are detailed in the following subsections, which demonstrate that this proposal responds to the requirements of these planning instruments.

Town of Victoria Park Local Planning Scheme No. 1

The site is located in the Residential zone, with an applicable R-Code of R30. The site is also located within the Raphael Precinct (Precinct 5), although there are no Scheme requirements for non-residential development in the Residential zone or Precinct 5.

Local Planning Policy No. 3 – Non-Residential Uses In or Adjacent to Residential Areas

Table 1 overleaf confirms that this proposal meets the relevant development standards in Local Planning Policy 3 (LPP 3).

Table 1 – LPP 3 Requirements

Requirement		Rise Urban Response
2a	Non-residential development should only be permitted where it does not negatively impact the function or safety of the adjacent roads or cause undue conflict through the generation of traffic or demand for parking.	Stantec's Transport Impact Assessment (TIA) confirms that the proposed increased capacity will not cause vehicles to park off site (except for 3 bays on Oswald St and space for 10 vehicles on the Colombo St verge, which are already used by the school). The Oswald Street entrance will disperse traffic on multiple roads around the school, thereby reducing congestion at peak times, and the bus service will also substantially reduce traffic and parking demand. As such, this proposal will not affect the function or safety of the adjacent or nearby roads beyond the current situation.
2b	In assessing an application for non-residential development, in addition to considering matters such as traffic volumes, road capacity and road safety from a technical engineering perspective, Council will have also regard to these matters from a residential amenity perspective.	The car park will not impact residential amenity beyond the current situation in terms of noise generated by the school, and as mentioned above the TIA confirms that traffic impacts on local streets will be reduced by the car park.
2c	A Transport Impact Statement (TIS) or Transport Impact Assessment (TIA) prepared by a suitably qualified independent traffic consultant may be required to be submitted as part of a development application, which assesses the likely traffic impacts associated with the proposed development.	A TIA prepared by professional accredited traffic engineers Stantec is appended to this development application submission.
2d	The appropriate level of traffic assessment required to be undertaken for the proposed development will be determined by Council having regard to the requirements of the Western Australian Planning Commission's (WAPC) (2016) Transport Impact Assessment Guidelines.	A TIA has been provided in accordance with the WAPC's Transport Impact Assessment Guidelines (2016) as the capacity of the school is proposed to be over 100 students.
3	Non-residential development shall only be permitted where the nature of the non-residential use will not cause undue conflict or adversely affect the amenity of the neighbourhood through the emission of light, noise, fumes, odours, dust, vibration, electrical	The car park will not impact the amenity of the residences directly adjoining the school site as although noise will be generated in the car park for up to 1-2 hours on school days, this will be offset by the car park reducing noise

	interference, waste water, or any other form of pollution which may be undesirable in residential areas. Development applications for a non-residential use should be accompanied by a statement and/or specialist reports outlining if and how any impacts arising from the activities proposed to be conducted on the site will be prevented or appropriately managed to ensure that the amenity of surrounding residential properties is maintained (e.g. Acoustic Report).	impacts at the other times of day by preventing children from playing directly adjacent to the fence. We have obtained preliminary advice from an acoustic expert that this proposal is likely to decrease noise received. As recommended by the TIA, the car parking area will be managed by a staff member during pick up and drop off. If the car park is full, staff will direct parents to drive around the block to mitigate queuing on the adjacent streets. An Acoustic Report has also been provided confirming that the amenity of surrounding residential properties will be maintained, with a worst case scenario increase of 2dB for some properties only, which is barely perceivable.
8a	Where car parking or vehicular access ways are already provided in the vicinity of adjacent residential properties or cannot be (re)located elsewhere, suitable barriers shall be provided to protect boundary fencing, which may be required to be upgraded to protect the amenity and/or privacy of adjoining residents.	The width of the proposed 1m landscaping strip, the vegetation within the strip and the kerb separating the car park and boundary fences will all prevent vehicles from hitting and/or causing damage to this fencing. There is no need to upgrade any boundary fencing as it is unlikely that there would be any net increase in noise received by these dwellings as confirmed above.
8b	New or upgraded boundary fencing should be a minimum of 1.8 metres high and be of masonry construction in a colour/finish that complements the development as well as being of compatible colours and materials to any neighbouring residential properties.	N/A – this is not proposed.
8c	It is recommended that the applicant obtain agreement with neighbouring properties regarding the height, materials and finish of any new/upgraded boundary fencing.	N/A – this is not proposed.
8d	The provision of new/upgraded boundary fencing may be applied as a condition of development approval where it is deemed necessary by the Council to reduce the potential impacts of the non-residential development on adjoining residential properties.	N/A – this is not necessary as detailed above.

11a	A high quality of landscaping should be provided to soften the appearance of the development, screen car parking areas and provide for a pleasing aspect that is compatible with the streetscape and amenity of surrounding residential properties.	Low-level landscaping is proposed in the setback between the car park and lot boundary. The car park will also be partially visually shielded by the existing electrical infrastructure.
11b	For non-residential development on Residential zoned land, a minimum of twenty five per cent (25%) of the site area is to be landscaped, and a minimum of fifty per cent (50%) of the front setback area is to be soft landscaping.	Well over 25% of the school site and well over 50% of the Oswald Street setback area will remain as soft landscaping after the car park is constructed.
11c	For non-residential development adjacent to Residential zoned land or land used for residential purposes, on-site landscaping is to be provided in accordance with any standards applicable under the Precinct Plan and/or Council Policies.	Local Planning Policy No. 39 – Tree Planting and Retention applies as it is likely that one of the trees that is proposed to be removed is classified as a 'tree worthy of retention'. Two replacement 'large trees' are proposed to meet the requirements of the Policy.
11d	Car parking areas located within the front setback area are to be setback from the front property boundary behind a soft landscaping strip of at least 1.5 metres in width.	The 1.5m strip inside the property boundary comprises electrical infrastructure and an existing row of mature trees that will not be impacted by this proposal.
11e	The development to be designed to retain and conserve existing mature trees on the site as well as existing Council verge trees, wherever possible.	Following a site inspection, it has been determined that the 'tree worthy of retention' along the north site boundary will need to be removed as its leading branch would encroach over the hardstand. There is not enough room to direct vehicles a safe distance around the tree due to the existing building. On this basis it is not possible to retain the tree.
11f	Where a vehicular access way or car parking area is located adjacent to any residential property and is unable to be (re)located elsewhere, it shall be setback behind a barrier to protect neighbouring boundary fencing that incorporates a planted perimeter strip of at least 1.0 metre in width between the car park/vehicular access way and any adjoining residential property.	It is not possible to achieve effective vehicular circulation and additional car parking anywhere else on the school grounds, and therefore the car parking is unable to be located elsewhere. A 1.0m landscaped setback is proposed to protect the boundary fence.

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Local Planning Policy No. 23 – Parking

Local Planning Policy 23 (LPP 23) requires car parking for private schools to be provided at a minimum rate of 14 bays per 100 students, plus staff car parking at a rate of 0.07 bays per student. This equates to a total rate of 21 bays per 100 students. Based on a maximum capacity of 250 students, 53 bays would be required.

This development application proposes a total of 40 bays on site, which is 13 bays less than the 53 bay requirement. LPP 23 enables parking space available within the road reserves immediately adjacent to the site to be used to make up the 13 bay shortfall, as detailed below.

Section 6.1c) of LPP 23 is as follows:

> "*Where the number of bays proposed for a non-residential or residential development is less than the number required, the Council may approve the development, if it can be demonstrated that nearby off-street parking facilities are available to cater for the parking requirements, or a portion of the parking requirement of the use proposed, and that, if necessary, satisfactory agreements have been made to enable those facilities to be used for that purpose.*"

The Colombo Street verge adjacent to the school is regularly used for parking, with capacity for 10 vehicles. This application seeks for the Town to treat these bays as 'nearby off-street parking facilities' pursuant to section 6.1c) as they are not located on the school site or carriageway, and therefore include them in the car parking calculation for the school.

Section 7.4a) of LPP 23 is as follows:

> "*Kerbside parking cannot be use to satisfy the parking requirements of a commercial or a residential development unless the Council is satisfied that parking demand can be met. The Council may also consider the parking requirement to be satisfied by kerbside parking bays where the provision of off-street parking would be detrimental to the amenity of the area or incompatible with the character or built form of the area.*"

There are 7 kerbside car bays marked on Oswald Street adjacent to the school, time limited to 15 minutes during drop off and pick up hours on school days. As four of these bays will be used by the school buses during pick up and drop off periods, this application seeks for the Town to include the remaining three bays in the car parking calculation for the school given their time limitation limits their use to the school during pick up and drop off hours. As 3 bays is quite minor in the context of the availability of 50 bays elsewhere for use by the school, and as they are necessary to meet the 53 bay parking requirement, they will ensure that "parking demand can be met" for the purposes of section 7.4a).

As detailed above, the Colombo Street verge and Oswald Street kerbside bays can be included in the car parking calculation for the school in addition to the 40 on-site bays. On this basis the available car parking meets the 53 bay requirement of LPP 23.

[redacted]

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While this proposal complies with LPP 23 assuming that all students are picked up and dropped off individually, in reality some students do not generate parking demand. Table 2 below projects the proportion of the student population (with an assumed total of 250 students) that could be deducted from the car parking calculation as they would not generate parking demand for the reasons listed in section 6.3 of the TIA.

Table 2 – Projections of students that would and would not generate car trips

	Students (%)	Students (no.)
Proposed number of students	100	250
Deductions (Students not generating an individual car trip)		
School bus projection (based on current 21% ratio)	21	54
Walk/cycle projection (based on current 7% ratio)	7	17
Multiple-child families (based on current 16% ratio)	16	40
Totals		
Students that would not generate parking demand	44	111
Students that would generate parking demand	56	139

Table 2 confirms that nearly half of the student population will not generate car trips individually. If these students were deducted from the LPP 23 parking calculation, the capacity of the school could be expanded well beyond 250 without causing parking demand to increase beyond the limits of LPP 23. However, this is not proposed as the school does not currently plan to expand beyond 250 students.

Table 3 below confirms that if the Colombo Street and Oswald Street car bays were not counted as part of the parking provision for the site and there was a 13 bay parking shortfall as a result, as 111 students are projected to not generate demand for parking, there would be contingency for 18 students that typically do not generate parking demand (and are included as part of this projection) to do so on any given day without causing the overall demand to exceed the Town's car parking requirements.

Table 3 – Parking demand analysis if Colombo and Oswald Street car bays excluded

	Bays	Students
Total on-site car bays	40	
On-site car bays required for teachers (at 0.07 bays/student)	18	
Car bays remaining to serve 250 students	22	
Students served by remaining 22 car bays (at 14 bays/100 students)		157
Students not served by remaining 22 car bays		93
Students that would not generate parking demand		111
Student contingency (difference between the above two rows)		18

On this basis there is sufficient parking to cater for the demand generated by 250 students, even if the Oswald Street and Colombo Street parking is excluded, or even if the students that are projected not to generate car parking demand as listed in Table 2 did generate demand. Alternatively, if only the Colombo Street verge parking was excluded, the student contingency in Table 3 would increase to 39 students.

[redacted]

Table 4 below includes an assessment of the proposal against the other applicable requirements of LPP 23.

Table 4 – LPP 23 Requirements

Requirement		Rise Urban Response
6.9a	Vehicular access points to parking areas shall be located and designed so that: i. entry/exit points minimise traffic or pedestrian hazards, conflict with pedestrian/cyclist pathways, the impact on nearby residential uses, traffic congestion and interference with public transport facilities; ii. the number of entry/exit points is kept to a minimum. Where possible, new parking areas and vehicular access points shall be linked to existing parking facilities; and iii. access is obtained away from major traffic streets where possible, but not if this necessitates access from a residential street where undue disturbance to residential amenity would result.	The exit point is existing and the entry point is an existing crossover set back sufficiently from the Hordern St roundabout to maintain the best possible level of service ('A'), as confirmed by the TIA. No new crossovers are proposed, and although the entrance point to the site will become more frequently used it is linked to the existing parking facility, from which vehicles will exit. This keeps the number of entry/exit points to a minimum. As detailed above, access has been obtained from Oswald St in a location that will not impact the Hordern St roundabout and will minimise impacts on nearby residential properties.
6.10a	The Council will require traffic circulation and manoeuvring spaces within parking areas to be designed so that: i. adequate provision should be made to enable all vehicles to enter and leave the land in a forward direction where the Council believes that the nature of a development, its relation to adjoining streets or the nature of those streets makes it necessary to do so, and an access point from parking spaces to the street serves more than two spaces; ii. vehicles are able to queue, if necessary, within the parking area and not on the street; and iii. parking areas are not used as traffic thoroughfares to facilities that they do not serve.	The car park and circulation aisle is one-way only and therefore all vehicles must leave the site in a forward direction to Colombo Street. The car park maximises space to queue within the circulation aisle. The parking area serves the school only.

6.11a	The Council will expect pedestrian, cyclist and motorist safety to be a priority in the design and operation of parking facilities, ensuring that:	
	i. pedestrian pathways through a parking area are clearly defined, well lit and signposted, where required, with direct access to the street or facilities served; ii. traffic access to, and circulation within parking areas, is separated, where practicable, pedestrian and cyclist paths or pedestrian access points to or through a parking area; and	No pedestrian pathways are required given the car park will be used for 'kiss and drive' only and the students will access their parents' vehicles directly via the grassed oval. The oval will be used by students to access the car park.
	iii. driver sight lines are not obstructed by signs, fencing or any other obstacle.	No site features will block visibility.
6.12.1a	Innovative approaches to the design of parking areas is expected in order to maintain amenity and encourage the use of parking areas for community activities in addition to parking, such as weekend markets, fairs, sporting activities and other entertainment activities.	The car bays are proposed to be grassed and line marked to maximise the size of the school oval while the car park is not in use.
6.12.1c	Private off-street parking should generally be located at the rear of developments, and in some precincts beneath. All parking areas must be paved and landscaped to a high standard, and in particular, surface (open-air) parking areas fronting a street should be landscaped or treated in other suitable ways to maintain to a high visual standard of development.	The parking area is located adjacent to the side boundary of the site, which is the optimal location given the site's dual frontage and the constraints posed by the existing built form on the site. Landscaping is provided between the car park and side boundary, and the car park will be partially screened from Oswald St by the existing electricity infrastructure.
6.12.2a 6.12.2b	All non-residential parking areas should contain shade trees (species to be approved by the Council) generally at a rate of one tree for every four bays. In residential areas any continuous row of parking or length of driveway shall be provided with planting areas, including shade trees, at the rate of one per eight bays or otherwise required by the Council.	No new shade trees are proposed or necessary adjacent to the car park given it will only be used for 'kiss and drive', and therefore no car will be parked for more than a few minutes a day. The car bays will be grassed to improve amenity, minimise hardstand and enable use by the school outside of pick up and drop off times.

6.12.2c	The perimeter of all parking areas should be landscaped by a planting strip of at least 1.5 metres in width. In some circumstances a greater area of landscaping may be required, particularly where a parking area adjoins a residential property, an area of parkland or an open air recreation area.	A 1m landscaped setback is proposed in lieu of 1.5m. The 1m setback is sufficient in this instance as the car park will only be used for approximately one hour per day on school days and is sufficiently sized to accommodate viable landscaping.
6.12.4a	When considering the development of parking facilities the Council will take into consideration: i. the location of parking spaces and structures, lights and signs on the site and their affect on the amenities of adjoining development, including the potential affect if parking spaces should later be roofed or covered; and ii. the extent to which parking spaces are located within required building setback areas and the resulting visual impact on adjoining properties.	Refer to the previous comments regarding reduction of noise to adjacent dwellings over a greater proportion of the day due to children no longer playing near the fence. No lights or signs are proposed. The car park is not proposed to be located within required building setback areas.
6.12.5a	Generally car parking spaces shall be in accordance with the dimensions and layout outlined in Appendix A and B.	The car bays accommodate the relevant design vehicle, as confirmed by the swept path plan in the TIA.
6.12.5b	The owner and occupier of parking facilities shall ensure that parking areas are operated, laid out, constructed and maintained in accordance with the development approval for the site, and are clearly marked at all times to the satisfaction of the Council. Landscaping, in particular, should be maintained to a high standard. This may include the marking of bays exclusively for residential dwellings, staff, visitors, service vehicles, etc.	Condition 8 of the approval requires this and will continue to apply to this car park and associated landscaping, subject to the proposed minor amendment to enable the car bays to be grassed.
6.12.5c	Enter and exit points and vehicle circulation patterns should be clearly indicated.	These are shown on the plans.
7.1a)	The Council may support the use of land or buildings for occasional parking facilities in the case of special events or circumstances relating to a particular or regular use of a site. Council approval, however, will be required and special conditions of approval may apply.	As detailed previously, the entrance gate to the car park will only be opened during drop off and pick up times, and otherwise the car bays will be able to be used as part of the school oval given they are grassed. There is no need to regulate use of this area as both a car park and oval through conditions of approval.

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Conclusion

As demonstrated by this letter, the proposed increased capacity limit of 250 students and additional car park at Victoria Park Christian School are required to meet current and projected demand from parents, while ensuring that the site continues to function effectively and with due consideration for nearby and adjoining residents. The capacity limit and parking satisfy the relevant planning requirements of the Town of Victoria Park Local Planning Policies 3 and 23.

Sufficient car parking is proposed on the site as well as in locations within the road reserves directly adjacent to the site that can be exclusively used by the school to cater for the proportion of the 250 students that will be dropped off and picked up by parents. If either the parking within the adjacent road reserves was ignored or in the very unlikely scenario that all 250 students generated parking demand individually, there would still be sufficient parking available to meet demand.

This application is supported by a Transport Impact Assessment (TIA) prepared by professional accredited traffic engineers Stantec, which demonstrates that the proposed parking arrangement will sufficiently cater for the projected car parking demand in greater detail. The TIA also confirms that the changes to traffic circulation through the site resulting from the additional car park, and the traffic associated with the proportion of the 250 students that are dropped off and picked up by parents, will not cause any impacts on the functionality of nearby streets and intersections.

This application is also supported by a Noise Assessment prepared by professional accredited acoustic consultants Herring Storer Acoustics, which confirms that some nearby properties will be exposed to less noise as a result of this proposal and others will be exposed to a maximum of 2dB of additional noise, which is barely perceptible.

We look forward to working with the Town of Victoria Park to progress this application to a favourable determination.

Should you require any further advice or information in relation to this matter, please contact Nick Grindrod of this office on 0424 365 276 or via email at Nick@riseurban.com.au.

Yours sincerely

[redacted]

Rise Urban Pty Ltd

[redacted]

[redacted]