

INTERNATIONAL CHINESE SCHOOL RESPONSE TO WILLOUGHBHY COUNCIL REGARDING PROPOSED DEVELOPMENT OF 211 PACIFIC HIGHWAY ST LEONARDS

This paper is produced in response to communications received from Willoughby City Council's Strategic Planner, Mr Craig O'Brien, via email on Tuesday 16th July, in relation to the International Chinese School's (ICS) proposed development of 211 Pacific Highway St Leonards.

Executive summary

Locating a suitable and permanent site for the School has proved a challenge for near on ten years. The School's present location on the site of St Paul's Anglican Church, View Street Chatswood, was only ever intended as a temporary Solution. St Paul's Anglican Church has informed the School that the present lease arrangement cannot be extended beyond the present year (2019), as they have a Childcare provider prepared to sign a long-term lease agreement commencing in 2020. Other short and long-term alternatives have been exhausted.

The only viable option is 211 Pacific Highway St Leonards. If approval for use as a school is not granted in time for the commencement of the 2020 school year, the International Chinese School will be forced to close.

This would be devastating to the families that already have their children enrolled at the School, and those for future years for which there has been a significant increase in enrolment interest. Further, closure of the School would prove a great loss for the local area as the ICS's unique bilingual program through a two-way immersion model with 50% of the curriculum delivered in Mandarin is providing a great service to the Lower North Shore, particularly to the huge number of families in the Willoughby Council area who have Chinese heritage.

Specific responses to concerns raised by Council

Following are the School's responses to specific concerns raised by Willoughby City Council.

1) There is continued concern regarding the appropriateness of a school on this site with the proposed student maximum number of 210. It is suggested that a more appropriate site should be considered for a school with this number of students.

ICS's search for an appropriate site dates back to 2010, some 5 years before the School opened. The School received approval from the then NSW Board of Studies in 2012. Difficulty in locating a suitable site saw the opening delayed 3 years, when in 2015 St Paul's Anglican Church, Chatswood, generously made their facilities available for school use as a temporary solution.

The originally favoured site was the decommissioned National Acoustic Laboratories on Delhi Road, Chatswood, which has since been developed as the Australasian Headquarters of the Church of Scientology.

In 2012, Willoughby Council rejected an application to establish the School at St Barnabas Anglican Church in East Roseville. Around this time a consultant specialising in property location was engaged and over subsequent years numerous other properties were given serious consideration. Locations included, but were not limited to, Chatswood, Pymble, Lane Cove, Macquarie Park.

The School received approval to develop temporary accommodation on the site of St Pau's Anglican Church, with a maximum enrolment of 49 students. Serious consideration was given to a purposebuilt vertical school to be built over the car park of the Church, however Roads and Maritime Services were opposed to this proposal.

Over the past 2 years an educational Consultant specialising in school development has broadened the search. Many sites have been considered in areas including Pymble, Chatswood, Artarmon, Lindfield, North Sydney, St Leonards, Macquarie Park and Lane Cove. Options for a vertical school have been explored, and other lateral options such as shared use of conference/retreat centres and local sporting facilities (golf and bowling clubs) that were closing. The most suitable facilities unfortunately have been located in Light Industrial Zones where schools are prohibited developments. In 2018 approaches were made to the NSW Department of Education for the School to be included within the newly developed Lindfield Learning Village. Although very positive discussion commenced with officers of the Department commenced in March, unfortunately in August the School received communication from the Department that such a partnership would not be possible.

After 9 years of searching the only viable remaining site is 211 Pacific Highway St Leonards. This site first came to the school's attention in late 2017 and was not pursued because of the Lindfield option. Negotiations commenced with the owner of the ground lease in late 2018, and an option on the property was signed in February 2019. The building is ample in size to cater for 8 classrooms, staff and study facilities. The location is well situated to serve the community of the Lower North Shore and the School was very pleased to remain within the bounds of the Willoughby City Council.

This following list provides a summary of specific properties considered/inspected by the International Chinese School over the past 2.5 years. This list is not exhaustive and does not include the many properties viewed online.

Property	Comments	Date
Uniting Venues Naamaroo, Lady Game Dr,	Serious negotiations took place over 6	Apr-Oct 2017
Chatswood NSW 2067	month period	
25 Sirius Road Lane Cove West	Inspected	July 2017
34 Waterloo Rod Macquarie Park	Serious negotiations took place	Sept 2017
23 Ryde Road Pymble	Inspected	Sept 2017
25 Ryde Road Pymble	Inspected	Sept 2017
1 Julius Ave Macquarie Park	Inspected	Sept 2017
3 Thomas Holt Drive Macquarie Park	Inspected	Sept 2017
16 Giffnock Ave Macquarie Park	Inspected	Sept 2017
40 Talavera Road Macquarie Park	Inspected	Sept 2017
112 Talavera Road Macquarie Park	Inspected	Sept 2017
12 Waterloo Road Macquarie Park	Inspected	Sept 2017
6 Eden Park Road Macquarie Park	Inspected	Oct 2017
14-16 Chandos St, St Leonards	Inspected-	Oct 2017
211 Pacific Highway St Leonards	Proposed site - serious negotiations Nov 2017 and late 2018	Oct 2017
754 Pacific Highway Chatswood	Inspected	Oct 2017
Morling College 122 Herring Rd, Macquarie Park	Discussions took place	Dec 2017
123 Epping Rd, Macquarie Park	Inspected	Jan 2018
117 Wicks Road Macquarie Park	Inspected – initial negotiations	Jan 2018
27 Sirius Road Lane Cove West	Inspected	Feb 2018
706 Mowbray Road Lane Cove	Inspected	Feb 2018
Lindfield Learning Village 100 Eton Rd, Lindfield	Serious negotiations	Mar-Aug 2018
586-590 Pacific Highway, Chatswood	Inspected	July 2018
41 -43 Dickson Ave, Artarmon	Inspected – preschool that seemed perfect – zoning issues	July 2018
178 Pacific Highway St Leonards	Inspected	Sept 2018

Further, the following organisations were approached on the off chance that may have the capacity to accommodate the school onsite.

Site	Address		
National Measurement Institute	36 Bradfield Road, West Lindfield		
Ryde TAFE	250 Blaxland Road Ryde		
Excelsior College	69 Waterloo Road Macquarie Park		
Morling Baptist Theological College	122 Herring Rd, Macquarie Park		
Macquarie Hospital	Wicks Road, North Ryde		
Chatswood Golf Club	128 Beaconsfield Rd, Chatswood		
Gordon Golf Club	2 Lynn Ridge Avenue, Gordon		
Gordon Bowling Club	4 Pennant Ave, Gordon		
Castle Cove Golf Club	68 Deepwater Road, Castle Cove		
Roseville Golf Club	4 Links Avenue, Roseville		
Lane Cove Country Club	180 River Rd, Lane Cove		
North Ryde Golf Course	Twin Road, North Ryde		

ICS would like to remind Council that the site is located in an area identified in the Greater Sydney Region plan, North District Plan and Draft St Leonards Crows Nest 2036 Plan as a 'Health and

Education Precinct', with direct actions under the plan that encourage provision of new school infrastructure. Therefore there is strong strategic alignment between the proposed location and the highest order Strategic plans for Sydney.

Further Council needs to appreciate the impact of the underlying zoning and land values in locating appropriate sites. Where land is zoned for residential or commercial uses with significant density, these uses will typically represent the highest and best use on a site and prevent a school from locating there. Therefore the unique nature of the subject site which limits the kind of development that would otherwise make it unviable for a school to locate in the area make it the most appropriate location for a new school.

2) Your response in regards the proposed recreation use of Gore Hill Park is noted.

There is concern on the sole reliance on Gore Hill Oval and surrounds for recreational purposes involving the proposed school. The recreational value of the on-site triangular shaped open space adjacent the Pacific Highway is questioned due to its size, shape and location next to the Pacific Highway (for example air and noise pollution).

It is understood that the times you specify for school use of Gore Hill Park are intended to have minimal impact on other users.

Gore Hill Park represents valuable regional open space that is intended to be available to the public at all times and only available to groups on a limited basis by a controlled booking process – intended to be fair and open to all users.

It is to be expected that a number of existing and potential schools, as well as other groups, will seek to utilise this recreational infrastructure particularly considering that St Leonards has been identified as a new Health and Education Precinct as part of the St Leonards Crows Nest Planned Precinct work.

Continued permanent bookings for one user at a specific time of the day may not be able to be guaranteed long term.

Council's response is surprising given that at a meeting with Council officers on March 20, 2018, the Open Space Coordinator of Willoughby Council, Ms Julie Whitfield, stated that she saw no issue with the School's proposed use of the oval and surrounds for lunch play, as other schools do the same within the local area. She suggested the School avoid peak usage time, and we have committed to altering our school timetable accordingly.

It should be noted that the School's request to use public space for lunchtime play is not unique. A phone survey conducted on Thursday 1st August revealed that local schools use public open space for breaktime play as illustrated in the tables below:

Enrolment	Туре	Public space used for breaktime play
1175	K-6	Thompson Park, Cnr Reserve Road and Barton Road
		Artarmon
463	K-6	Castle Cove Park, Holly Street, Castle Cove
	1175	1175 K-6

Independent (Private) Schools				
School	Enrol-	Туре	Public space used for breaktime play	
	ment			
Our Lady of Delours	310	K-6	Fridays. Beauchamp Park, Beauchamp Ave Chatswood	
St Pius X College	1131	K-12	Occasional use of Beauchamp Park, Beauchamp Ave	
			Chatswood	
Mercy Catholic College	641	7-12	Beauchamp Park, Beauchamp Ave Chatswood	

The School is happy to be flexible should other community/school groups wish to use the oval. We are happy to move our students to a less busy portion, or even stay on site at the School when needed.

In relation to concern regarding noise and air pollution related to the use of the triangular recreation zone adjacent to the Pacific Highway, the School notes that the proposed time of lunchtime student play would be from 11:20-11:50am. This is not a peak time for traffic, when impact of air and noise pollution would be at a minimum. Further, it should be noted there are nine schools between Wahroonga and Chatswood located on or in very close proximity to the Pacific Highway including: Chatswood PS, International Chinese School, Lindfield PS, Highfields Prep and Kindergarten School, Roseville College, Holy Family Catholic Primary School, Ravenswood School for Girls, Sacred Heart Catholic Primary School.

If the use of Gore Hill Oval and surrounds continues as a significant issue the School would simply remain on site at 211 Pacific Highway with a play area restricted to the grassed portion of the

property, noting there is no requirement for any school to have access to open space in order to operate.

3) Your response involving proposed changes to the car park to facilitate school drop off is noted.

It is understood that the works proposed in the Council car park are intended to limit adverse impacts within the Council car park.

There is concern with:

- Reliance on the Council car park (which primarily serves Gore Hill Park) to access the proposed drop off arrangement in The Avenue, which serves the Gore Hill Cemetery.
- The loss of regular use car spaces, easily accessible and visible as part of the car park, to provide a second access point to serve the proposed school.
- The replacement of the two valuable public assets (car spaces) with a less valuable public outcome being restricted use, less accessible and visible car spaces the subject of a lease agreement.
- The impact on vegetation by the provision of a second access to The Avenue.

The purpose of the Council car park is to support the use of recreational infrastructure, and not for any one particular use. In addition Council may consider other recreational uses, or a reorganization of this land in the future to support recreational uses in the City of Willoughby and the region, and would want to maintain flexibility in that objective.

The School recognises the priority of the Council car park is to support the use of recreational infrastructure. In support of this, school hours will be adjusted to minimise impact on public use. The number of cars utilising the car park between school drop off and pick up times is typically low, and the car park has an exceptional amount of capacity at these times. According to data provided by Ethos Urban, average parking space availability at morning drop off time (8:00-9:00am) is 89.2%. In the afternoon between 2pm-3pm is 81.6%, and the subsequent hour 78.9%.

Further, a phone survey of local schools conducted Thursday August 1st revealed none have onsite parking for parents, especially at peak flow times. Parent dropping/picking up their children or visiting the school use public parking in the surrounding streets. These schools are all larger than the proposed size of ICS on the St Leonards site (210) by up to 7x. Summary of this survey follows:

Public Schools				
School	Enrolme nt	Туре	On-site parent parking	Where do parents park?
Chatswood PS	1291	K-6	No	Public parking in surrounding vicinity
Artarmon PS	1175	K-6	No	Public parking in surrounding vicinity
Willoughby PS	1046	K-6	No	Public parking in surrounding vicinity
Roseville PS	646	K-6	No	Public parking in surrounding vicinity
Lindfield PS	837	K-6	No	Public parking in surrounding vicinity
Castle Cove PS	463	K-6	No	Public parking in surrounding vicinity
Lindfield East PS	732	K-6	No	Public parking in surrounding vicinity
Cammeray PS	920	K-6	No	Public parking in surrounding vicinity
Anzac Park	569	K-6	No	Public parking in surrounding vicinity
Chatswood High	1513	7-12	No	Public parking in surrounding vicinity
Willoughby Girls High	951	7-12	No	Public parking in surrounding vicinity

Independent (Private) Schools				
School	Enrolme nts	Туре	On-site parent parking	
St Thomas' Catholic School	335	K-6	No	Public parking in surrounding vicinity
Our Lady of Delours	310	K-6	No	Public parking in surrounding vicinity
St Pius X College	1131	K-12	No	Public parking in surrounding vicinity
Mercy Catholic College	641	7-12	No	Public parking in surrounding vicinity
Roseville College	965	K-12	No	Public parking in surrounding vicinity

In relation to concern surrounding loss of 2 public parking spaces to facilitate the construction of the School drop off/pick up zone it should be noted that the drop off/pick up zone will provide five spaces (an additional three spaces) which the public can use outside of the start and end of the School day. While it has been argued that these spaces will present "a less valuable public outcome", being "less accessible and visible", conversations with the Northern Cemeteries Trust revealed that during weekend sport when parking is at a premium, families already use the Gore Hill Cemetery's carriageway (The Avenue) as an unofficial parking reserve. As such the five spaces in question will likely become well known to locals. The School would be supportive of additional signage to assist visitors to the car park in finding the spaces if requested by Council.

We do note that there has been significant growth in enrolments at all schools in the local area, by up to 25%, which has been permitted without requirement for onsite parent parking to accommodate the expansion in numbers.

Regarding impact on vegetation there are remnants of an old gateway that assumedly provided vehicular access between the previous Council owned carpark and The Avenue on the Cemetery Trust's land. There is a corresponding opening between the trees in that line. Therefore, we believe that a single width drive could be accommodated with minimal impact on vegetation. Given the proximity to the carpark there would be little likelihood that Council would expand child play areas to the area in question. If Council was to landscape the area the School would be prepared to make a considerable financial contribution. Similarly, if the Council was to add additional carparking.

4) Concerns remain with the impact of the proposed school on the Pacific Highway – in particular accessing the Council car park to drop off and pick up students - with regard to the proximity to the traffic lights at Reserve Road, and the emergency vehicle entrance to the Royal North Shore Hospital.

The School does not believe these issues to be insurmountable, and the Town Planner engaged by the School, Ethos Urban, is presently in communication with Department of Roads and Maritime regarding broader traffic items.

School size

210 students represents a single stream K-6 school (7 classes) with a class size of 30 students. This size is necessary to cater for the increasing demand for the education provided by the School.

Further, ICS aims for affordability of fees with tuition costing around \$8,000 per student annually. The School is not marketing itself as an elite school as is the case with many other independent schools on the Lower North Shore whose fees are up to 3x that of ICS. The School recognises that although the North Shore is viewed as an affluent district, many families have tight budgets due to the high cost of living in the area. Families choose to live in the area to maintain their cultural connections due to the high proportion of Chinese that live on the Lower North Shore. To reduce class sizes, and the overall size of the school, would put significant upward pressure on school fees.

This site is ideal as although the investment is significant, it is less than would be required to develop a green field site in the area. This also maintains affordability in fees for families of the School.

We trust that the above information will assist Council in providing its land owners consent and a supportive submission to the EIS for the School when it is publicly exhibited. Whilst we acknowledge Council's concerns in relation to some of the minor impacts associated with the proposal and have adopted a well-considered approach to mitigate those impacts, Council needs to recognise the public benefit and strategic alignment of the School strongly outweigh the minor localised impacts.

Peter Jamieson Principal 2nd August 2019