

Support – SSD5535 Wahroonga Adventist School – Modification 3

Introduction

I am writing to raise my support for SSD535 Wahroonga Adventist School – Modification 3. As a parent of a student who will be entering Yr 11 in 2021 and as a local resident living near the Wahroonga Estate for the past 17 yrs.

SSD5535 MOD 2, has capped the student numbers to 553, MOD 3 is seeking to increase this number by 94 places to 647 Students. I am in support of MOD 3, increasing the number of students to 647. However, there should be NO cap on the number of student numbers attending the Wahroonga Adventist School (WAS). The School should be allowed to progressively increase in size to 679 as approved by the department in SSD 5535 condition A12 for Stage 3. This will allow for the continuing education of students attending WAS from K to Yr 12.

If the 553 cap is not lifted, then a decision will need to be made by the school. Does it **NOT** enrol Kindergarten classes, Yr 7 or do the Yr 12 students need to enrol at another school in the local area. It is now December 2020, the enormous amount of stress and anxiety that would be placed on families and students, is literally unfathomable. This is an outcome, that would not be in the public interest for families and the local community.

There also needs to be an extension given to the building of the school intersection on Fox Valley Road (FVR). The school should definitely not be held to ransom by a long standing dispute between the Ku-ring-gai Municipal Council (KMC), the landowners of the Wahroonga Estate the South Pacific Division of the Seventh-day Adventist Church and the NSW Transport – Roads & Maritime Service over the road widening on Fox Valley Road. WAS must be able to operate as a continuing education institution, and provide the service to local families and staff members at the SAN Hospital and SAN Parkway Medical Suites.

It is also extremely important to note that the Wahroonga Adventist School has been on the Wahroonga Estate since 1905, for over 115 years it has been providing education to local residences and children of staff members at the SAN Hospital. And this will dramatically impact the amenity and operation of these key community institution in the foreseeable future. And disadvantage staff members at the SAN Hospital and Medical Suites located on FVR.

It is **not in the Public Interest to cap the school at all SSD5535 condition A12 MUST APPLY.**

My submission will now outline my support of SSD5535 MOD 3 and recommendations for conditions to be added to MOD 3.

(1) Support: It is not in the Public Interest.

The Wahroonga Adventist School, is an affordable Christian coeducational independent school from K-12 in the local area. To cap the school to 553 students, has the potential to disadvantage many families and students who will need to find an alternative school for 2021 school year. It is now December 2020, if the school is capped many families will need to find an alternative school for the 2021 school year. Even worse most families do not even know how the capping of the

school to 553 students, will actually affect them next year. This is an unnecessary stress on families, during the COVID 19 pandemic.

For the ongoing continuing education of students, the school can no longer be capped to 553 students. The school can not be placed in a position where it needs to make a choice on whether or not it does not have a Yr 12 grade in 2021, even though the students just finished Yr 11 in 2020. Or does the school advise local families that they are unable to enrol their child in Kindergarten or Yr 7 in January 2021. This can not happen, the disruption to the lives of vulnerable children and families simply can not occur.

(2) Support – Wahroonga Adventist School Affordable School Fees

The Wahroonga Adventist School does provide an affordable coeducational school in the local area in comparison to the other large private schools. This allows essential workers at the SAN Hospital to be able to afford a Christian education for their children. For example, for WAS Yr 11 Tuition Fee is \$12,780 compared to Barker College Yr 11 Tuition Fee of \$34,050. FIGURE 1 – lists the Wahroonga Adventist School 2020 Fee Structure and Figure 1 – lists Barker College, which is a coeducational Christian school as well.

Figure 1: WAS Website Tuition Fees

Tuition Fee		
Year	Tuition Fee (per term)	Tuition Fee (per year)
Prep	\$47 (per day)	\$47 (per day)
Kindy – Year 1	\$1,820	\$7,280
Year 2 - 6	\$1,820	\$7,280
Year 7 – 8	\$2,460	\$9,840
Year 9 – 10	\$2,800	\$11,200
Year 11 – 12	\$3,195	\$12,780

Consumable Fee		
Year	Consumable Fee (per term*)	Consumable Fee (per year)
Prep	\$170	\$510
Kindy – Year 1	\$285	\$855
Year 2 - 6	\$435	\$1,305
Year 7 – 8	\$470	\$1,410
Year 9 – 10	\$470	\$1,410
Year 11 – 12	\$470	\$1,410

* Per term for 3 terms a year.

Figure 2: Barker College from Website

Barker

College

Fee Schedule 2020

Tuition Fees	Per Term (x4)	Per Annum
Pre-Kindergarten	\$5,625.00	\$22,500
Prep School - Kindergarten	\$6,100.00	\$24,400
Prep School - Year 1 & 2	\$6,425.00	\$25,700
Junior School - Year 3 & 4	\$7,112.50	\$28,450
Junior School - Year 5 & 6	\$7,362.50	\$29,450
Middle School - Year 7 to 9	\$8,037.50	\$32,150
Senior School - Year 10 & 11	\$8,512.50	\$34,050
Senior School - Year 12	\$11,350.00 (3 terms)	\$34,050

Boarding Fees	Per Term (x4)	Per Annum
Year 10 & 11	\$8,042.50	\$32,170
Year 12	\$10,723.33 (3 terms)	\$32,170

Yearly Tuition and Boarding Fees paid in full by 12 February 2020 will receive a 1.5% discount.

Educational Activities Charges

These are charges that cover excursions, school camps, visiting speakers, etc. Charges vary according to the Year group activities. These fees are billed per term in equal amounts to the total of the annual fee.

Year	Pre-K	K	Yr-1	Yr-2	Yr-3	Yr-4	Yr-5	Yr-6	Yr-7	Yr-8	Yr-9	Yr-10	Yr-11	Yr-12
Per Term	\$155	\$223	\$221	\$272	\$282	\$291	\$337	\$480	\$437	\$389	\$456	\$479	\$126	\$136
Per Annum	\$620	\$892	\$884	\$1,088	\$1,128	\$1,164	\$1,348	\$1,920	\$1,748	\$1,556	\$1,824	\$1,916	\$504	\$408

(3) Support – Wahroonga Adventist School to increase to 679, SSD5535 Condition A12.

WAS should not have its student population capped due to the access road to the school not being built or even agreed upon by the various agencies.

The Wahroonga Adventist School should not be capped to 553, but should be allowed to progressively increase in size to 679 as stated in SSD 5535 condition A12 for Stage 3.

Figure 3. SSD5535 – Condition A12 Student Population

Student Population

A12. This approval provides for the staged student population growth across the staged development of Wahroonga Adventist School, to a maximum of 800 students (inclusive of 90 Year 12 students), as follows:

	STAGE 1	STAGE 3	STAGE 6	TOTAL
STUDENTS	456	223	121	800

The student population is unable to go beyond 679 students under SSD5535 condition A12. Stage 6 is not yet under construction and is not envisaged to be completed until 2025 at the earliest.

Enrolments are expected to increase in 2021 to a total of 647 students which is within the originally approved capacity for Stage 3 (i.e. 679 students).

The Transport and Traffic Planning Associates report 30th November, has explained in detail that an additional 94 students with a sibling ratio of 1.5 will have a minimal impact on the traffic at the hospital entrance to the school on FVR.

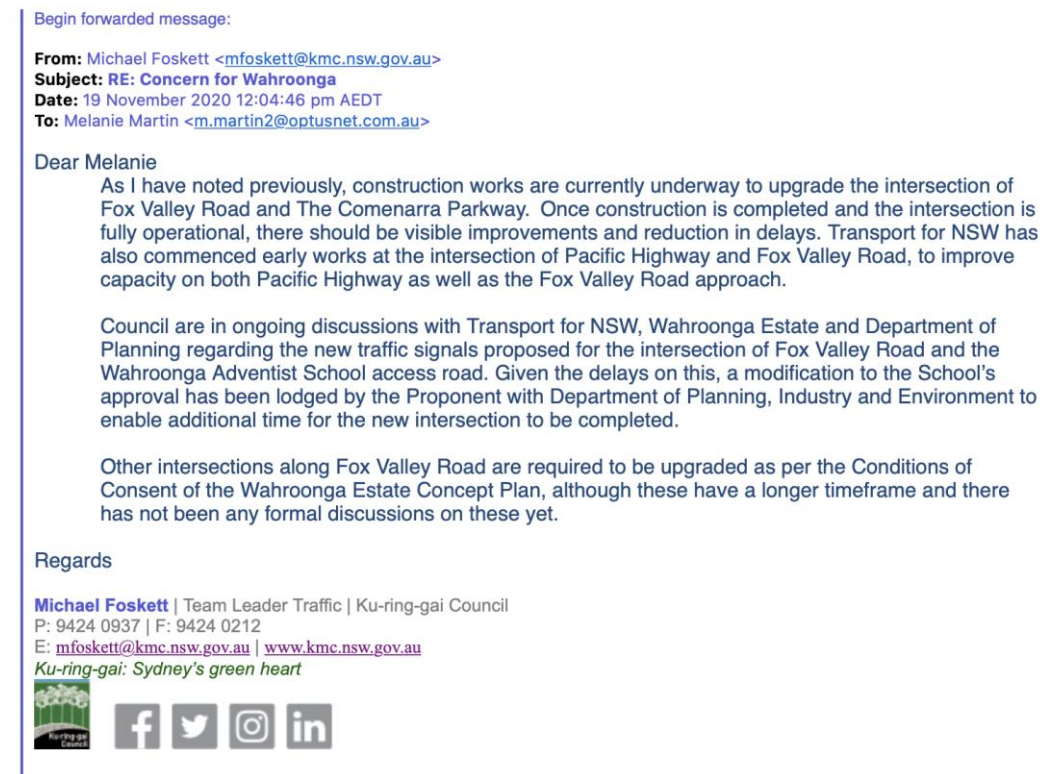
(4) Objection to KMC Submission to Increase the Number of Students

The KMC submission has objected to increasing the number of students due to traffic concerns. These concerns have been disputed by the The Transport and Traffic Planning Associates report 30th November. And I support this report.

KMC have used photo's sent by Ms Melanie Martin on the 16th November 2020. A copy of this email has been attached. In response, to Mrs concerns regarding the traffic congestion Wayne Coster Team Leader of Traffic at KMC, in an email dated 19th November 2020 (Appendix A), has clarified with the completion of the Fox Valley Road and Comenarra Parkway intersection and Pacific Highway upgrades at the corner of Fox Valley Road and the Pacific Highway, the traffic congestion at the hospital intersection will have "visible improvements and reduction in delays."

Also KMC approved 127 place child care centre on the corner of Comenarra Parkway and FVR, on the 18th June 2018, DA027/17 which is currently being built.. So I am not sure why they are objecting to the WAS student population numbers when the school was approved in 2015. Also a 89 place child care centre was approved at 44 FVR, on 29th July 2019 by KMC.

Figure 4: Email from Wayne Coster to Melanie Martin 19th November 2020.



(5) Recommendation: Removal of Parking on Fox Valley Road

To accommodate any additional concerns regarding the hospital intersection that is used by the WAS parents and staff. It is recommended that all parking be removed on Fox Valley Rd from the SAN Hospital intersection with Fox Valley Road up to Strone Avenue (on the school side of FVR). This would allow two lanes of traffic from the FVR and Comenarra Parkway intersection to Strone Avenue. Currently, there is all day parking in front of the school except for 3 no parking bays adjacent to the bus stop in front of the school. By removing parking on FVR to Strone Avenue, this will stop staff and patients visiting the hospital attempting to park on FVR blocking the traffic when attempting to park or to turn right.

The residential houses on FVR that would be impacted are on the Wahoonga Estate and currently owned by the same land owner as the school. A number of houses are vacant as they are located on the site where Residential Block E is proposed to be built as part of the Concept Plan – Wahoonga Estate.

(6) Additional Conditions to be Place in the Determination for MOD 3

In order, to ensure that the Wahoonga Adventist School complies with condition C15 – Bus Facilities, condition C14 Road and Footpath Infrastructure and E14 Protection of Trees. These conditions are outlined in SSD535 determination and are outlined below. There needs to be careful consideration to these conditions when it comes to resolving the long standing dispute/negotiations regarding the new access road to the WAS school from Fox Valley Road.

The relevant conditions to SSD535, that need to be considered when any road plans for the access intersection to the WAS school need to be considered.

- There needs to be a bus stop and bus shelter for students of the WAS school as per condition C15
- There needs to be a shared footpath designed to AUSROAD standards should be provided along the FVR frontage of the school as per SSD535 condition C14.

Figure 5: SSD535 Determination

Road and Footpath Infrastructure

C14.

- c) To ensure that satisfactory access is provided to Wahroonga Adventist School, a shared footpath designed to AUSROADS standards shall be provided along the Fox Valley Road frontage of the school property. The design of the footpath shall ensure that it is capable of use as a shared pedestrian and cyclist path. Any encroachments onto private property are to be dedicated as "Road Widening" at no cost to Council.

The design of the footpath is to address the connectivity with existing footpath infrastructure adjoining the site, fencing and night time visibility and lighting in accordance with AS/NZ1158.3.

- d) To ensure that appropriate pedestrian safety measures are provided, pedestrian fencing is required along the site's Fox Valley Road frontage at the pedestrian access points to ensure pedestrians remain on the footpath and do not cross Fox Valley Road, including allowance for necessary openings. Details are to be submitted to the satisfaction of the Certifying Authority prior to the issue of the relevant Construction Certificate. Further information regarding pedestrian fencing can be obtained from the Roads and Maritime Services Network and Safety Section (Speed Management) on 02 8849 2681.

Note: RMS fees for administration, plan checking, civil works inspections and project management shall be paid by the applicant prior to the commencement of works.

Bus Facilities

- C15. To ensure that suitable arrangements are made for alternative modes of transport, the applicant shall provide bus facilities (i.e. bus stop, shelter and pedestrian access) in consultation with Council and service providers. Details regarding the design, location and operation shall be provided to the satisfaction of the Certifying Authority prior to the issue of a Construction Certificate for stage 3.

(7) Recommendation – MOD 3 Trees on the WAS Frontage Verge to be Protected.

MOD 3 – needs to include a complying condition where the trees on the school frontage are specified and protected. This will end the long standing dispute over the road widening on FVR.

SSD535 – Condition E14 a) does provide that "no street trees are to be trimmed or removed unless it forms part of the development consent."

The street trees on FVR in front of WAS, where not approved to be removed by the departments development consent SSD535.

Since the FVR street trees were not approved to be removed, nearly ALL of the school classrooms overlook the FVR street trees. **See Photo 1.**

These street trees can not be removed, as the students will have ABSOLUTELY no views of large deep soil planted trees. Students also will not have views of the the 31 ha of Conservation Bushland on the Wahroonga Estate which covers 60 hectares.

The front of the school has classroom windows which over look the trees on the verge of the school. Deep soil planting of trees cannot be grown in front of the school as there is a basement carpark to the school boundary. Also at the rear of the school, deep soil planting of trees cannot occur as there is the basement carpark and access ramps. There are 3 large residential unit blocks approved at the rear of the school approved by MOD 5 Concept Plan MP_0166 Wahroonga Estate which will block all views of the 31 ha of Conservation Bushland.

To be brutally honest it is actually totally beyond all belief, that WAS is a GREENFIELD site and the 800 students will have absolutely NO VIEWS of the 31 ha of Conservation Bushland from their classrooms. The 800 students will be hemmed in by 200 residential units, that will be taller and larger than the school itself. This is what future generations of children will have to suffer with, because of such utterly poor planning decisions by the department.

Protection of Trees

E14.

- a) No street trees are to be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property.
- b) All street trees shall be protected at all times during construction. Any tree on the footpath, which is damaged or removed during construction due to an emergency, shall be replaced, to the satisfaction of Council.

(8) Recommendation - MOD 3 – Streetr Trees on FVR to be Listed in a Condition E14

KMC needs to conduct an audit of the trees that need protecting. Listed below is the Tree Report by Stanton Dahl Architects Pty Ltd submitted with the WAS application itemising the trees on FVR. So that all trees on FVR in front of the school can be itemised in E14.

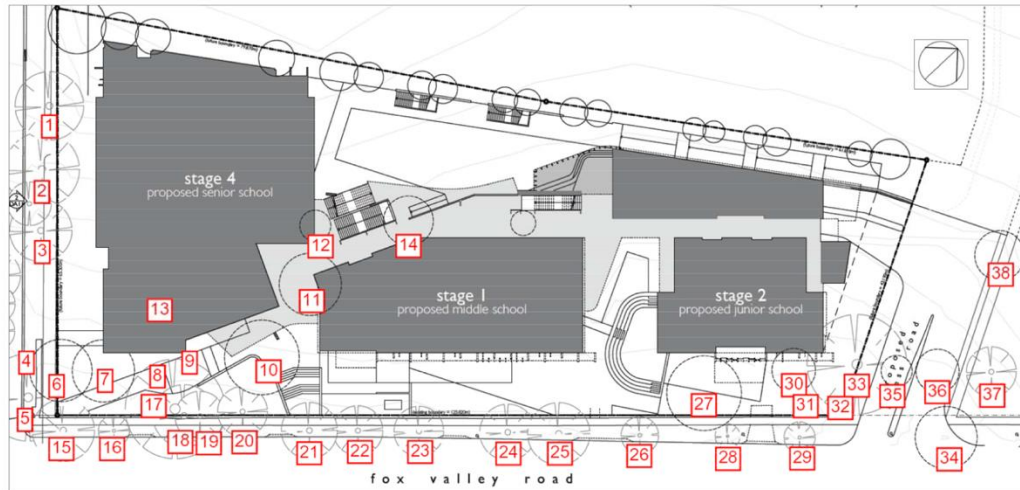
Condition E14 needs to list each individual tree on FVR – 21, 22, 23,24,25, 26, 28 and 29 and that they are not to be removed and must be protected at all times.

Figure 6: SSD535 Condition E14 Protection of Trees**Protection of Trees****E14.**

- a) No street trees are to be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property.
- b) All street trees shall be protected at all times during construction. Any tree on the footpath, which is damaged or removed during construction due to an emergency, shall be replaced, to the satisfaction of Council.

Figure 7: Tree Report by Stanton Dahl Architects Pty Ltd March 2013

Tree location plan: school site



Tree no	Species	Approx trunk dbh mm	Approx height m	Approx crown spread m	Health	Condition	SULE	Comment	Effect of proposed development
11	<i>Jacaranda mimosifolia</i> (Jacaranda)	400	10	12	Good	Fair	2D	Leaning codominant crown	Removal
12	<i>Acer palmatum</i> (Japanese Maple)	300	6	6	Fair	Fair	3A	Sparse crown Stressed	Removal
13	<i>Brachychiton acerifolius</i> (Illawarra Flame Tree)	300	7	4	Good	Fair	2D	Leaning lower trunk	Removal
14	<i>Lagerstroemia indica</i> (Crape Myrtle)	Multi	6	8	Good	Fair	2D	On bank	Removal
15	<i>Callistemon viminalis</i> (Weeping Bottlebrush)	400 bf	8	6	Fair	Fair	4A	Sparse crown declining	Retention
16	<i>Callistemon viminalis</i> (Weeping Bottlebrush)	250	6	4	Fair	Fair	3D	Sparse crown	Retention
17	<i>Corymbia citriodora</i> (Lemon Scented Gum)	900	25	22	Good	Fair	2D	Branch failures Root system confined by footpath and retaining wall	Retention
18	<i>Corymbia citriodora</i> (Lemon Scented Gum)	450	18	15	Fair	Poor	3B	Leaning over road Suppressed	Retention
19	<i>Corymbia citriodora</i> (Lemon Scented Gum)	300	10	6	Poor	Poor	3B	Suppressed Broken leader	Retention
20	<i>Acer buergerianum</i> (Trident Maple)	250 x 3	6	6	Good	Fair	3C	Root system confined by footpath	Retention

Tree no	Species	Approx trunk dbh mm	Approx height m	Approx crown spread m	Health	Condition	SULE	Comment	Effect of proposed development
21	<i>Liquidambar styraciflua</i> (Liquidambar)	450	10	8	Good	Fair	2B	Root system confined by footpath and road Pruning cuts on trunk	Retention
22	<i>Liquidambar styraciflua</i> (Liquidambar)	400	10	8	Good	Fair	2B	Root system confined by footpath and road	Retention
23	<i>Liquidambar styraciflua</i> (Liquidambar)	500	10	8	Good	Fair	2B	Root system confined by footpath and road	Retention
24	<i>Liquidambar styraciflua</i> (Liquidambar)	400	10	8	Good	Fair	2B	Root system confined by footpath and road	Retention
25	<i>Liquidambar styraciflua</i> (Liquidambar)	450	10	8	Good	Fair	2B	Root system confined by footpath and road Root system damage to footpath	Retention
26	<i>Liquidambar styraciflua</i> (Liquidambar)	300	10	8	Good	Fair	2B	Root system confined by footpath and road Root system damage to footpath	Retention
27	<i>Liquidambar styraciflua</i> (Liquidambar)	500	14	12	Good	Fair	2D	Carpark fill over root system	Removal
28	<i>Liquidambar styraciflua</i> (Liquidambar)	250	6	6	Good	Fair	3D	Root system confined on 3 sides by roadways	Retention
29	<i>Liquidambar styraciflua</i> (Liquidambar)	250 x 2	6	5	Good	Poor	3D	Stem in basal junction	Retention
30	<i>Liquidambar styraciflua</i> (Liquidambar)	300	8	6	Good	Fair	2D	Carpark fill in root zone	Removal

SSD5535 – Approved DA021/1 Access Road to School and Street Trees Not To Be Removed

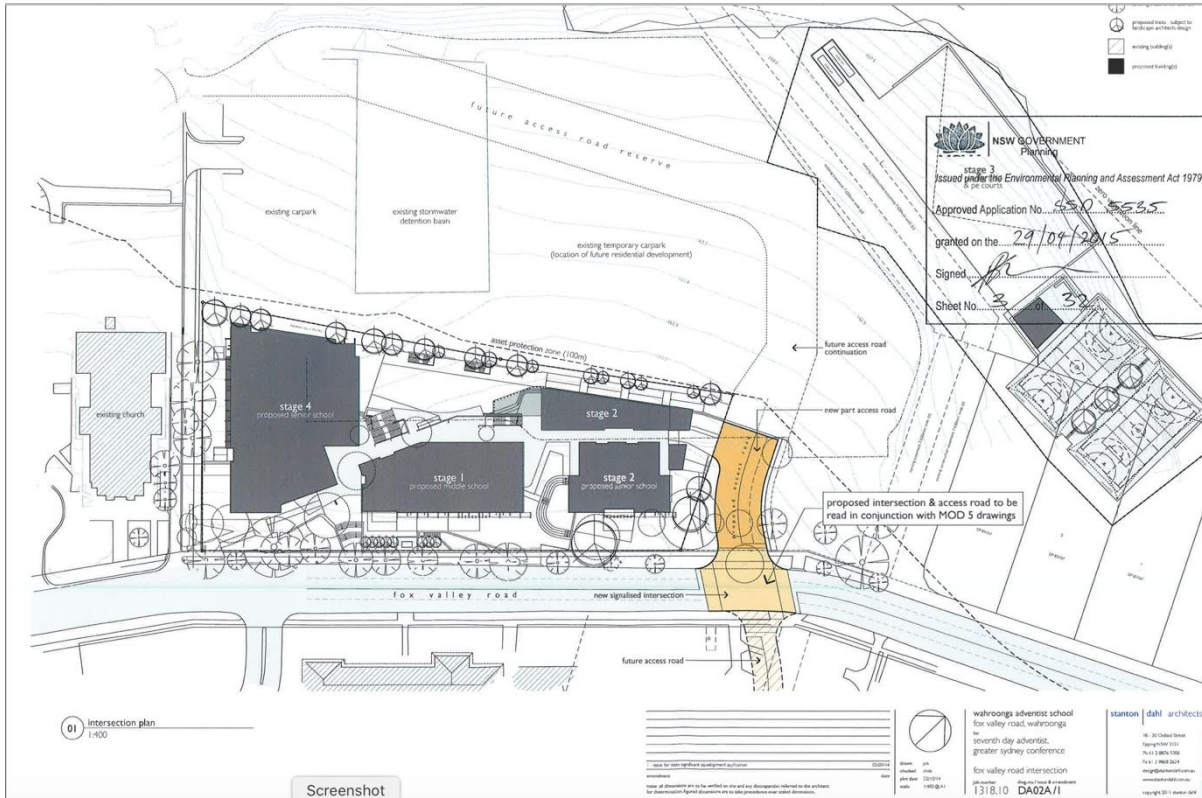


Photo 1 – WAS Rear view of Conservation Land will be blocked by 200 residential units. This photo is taken from the 1st floor of the school.



(9) Recommendation – No Road Widening on School Frontage

The pedestrian footpath in front of the WAS is the major pedestrian pathway to the SAN Hospital, Wahroonga Adventist School, 80 place child care centre at the Hospital, and the 127 place child care centre on the corner of FVR and Comenarra Parkway, the internal bus stop at the hospital, the Wahroonga Adventist Church, the Fox Valley Community Hall. This verge can not be reduced at all. It must comply with Ausroad guidelines, which requires 2 m for 2 wheel chairs to pass.

Furthermore, adjacent to the WAS is the SAN Hospital. The SAN hospital currently has approximately 2,400 staff, 500 volunteers and 1,100 accredited medical practitioners care for more than 60,000 inpatients and 120,000 outpatients Emergency Care admits more than 18,000 patients. The SAN Hospital has projected it will have 400,000 patients in the next 20 years, all requiring access to the hospital by car, walking, bicycle or bus. So a huge amount of pedestrian traffic on the WAS side of FVR.

There should be NO road widening in front of the WAS, all road widening should take place in front of the administration buildings of the South Pacific Division of the Seventh-day Adventist Church.

In comparison, to the WAS and SAN Hospital side of FVR there are only administration buildings of South Pacific Division of the Seventh-day Adventist Church. The staff access these buildings from the rear, as the car park is located behind these buildings. Only a max of 200 people work in these administration buildings.

The width of the frontage of the school varies from 3 M to 5 M and to comply with AUSROAD shared pathways. The verge on the school side of FVR can not be reduced.

Figure 8: Width of the Footpath on WAS side of FVR.

Location	Measurement from fence to edge of curb or gutter
North- end of school. In front of junior school play area.	5000 mm
Fence near school mailbox near the Schools Main Gate.	3760 mm
South-end of school near side gate close to demountable.	3860 mm

Photo 2: Street Frontage of WAS on Fox Valley Road



Figure 9: AUSROAD – Standards the at must be complied with.

Link to widths on pedestrian crossings -https://austroads.com.au/publications/road-design/agrd06a/design-criteria/width-of-paths/pedestrian-paths#_Ref182798945

5.1.4 Shared Paths

 [Table of Contents](#)

Table 5.3 shows suggested widths and acceptable ranges of width for shared paths. The upper limit of the acceptable range in the table should not discourage designers from providing a greater width where it is needed (e.g. very high volumes that may also result in overtaking in both directions).

Alternatively, where there is an emphasis on the capacity of the shared path, it is suggested that the path widths shown in Figure 5.4 and Figure 5.5 can be used.

Table 5.3: Shared path widths

	Suggested path width (m)		
	Local access path	Regional path ⁽³⁾	Recreational path
Desirable minimum width	2.5	3.0	3.5
Minimum width – typical maximum	2.0 ⁽¹⁾ – 3.0 ⁽²⁾	2.5 ⁽¹⁾ – 4.0 ⁽²⁾	3.0 ⁽¹⁾ – 4.0 ⁽²⁾

1. A lesser width should only be adopted where cyclist volumes and operational speeds will remain low.
2. A greater width may be required where the numbers of cyclists and pedestrians are very high or there is a high probability of conflict between users (e.g. people walking dogs, in-line skaters etc.).
3. May be part of a principal bicycle network in some jurisdictions.

Table 5.1: Width requirements for pedestrian paths

Situation	Suggested minimum width (m)	Comments
General low volume	1.2 ⁽¹⁾	<ul style="list-style-type: none"> General minimum is 1.2 m for most roads and streets. Clear width required for one wheelchair. Not adequate for commercial or shopping environments.
High pedestrian volumes	2.4 (or higher based on volume)	<ul style="list-style-type: none"> Generally commercial and shopping areas.
For wheelchairs to pass	1.8	<ul style="list-style-type: none"> Refer also to AS 1428.1:2009.
For people with other disabilities	1.0	–

1. In constrained locations an absolute minimum of 1.0 m should be provided. In these situations, path users should be able to detect other path users with sufficient time to respond and take appropriate actions.

Notes:

While the minimum width may be used where volume is low it is generally desirable to provide a path that will accommodate two pedestrians side by side.

Wider than the minimum width (e.g. up to 5 m) may also be necessary at locations where pedestrian flows are high or where pedestrians gather such as in the vicinity of schools and associated road crossings, at recreation facilities and at important bus stops.

Where volume is significant it may be necessary to provide adequate congregation areas clear of the path required for through movement of pedestrians.

Where a path is < 1500 mm wide, the path should be widened at regular intervals to provide opportunities for wheelchair users to pass. Refer also to the Pedestrian Planning and Design Guide (NZ Transport Agency 2009).

In some instances pedestrian volumes will be very high and a path width corresponding to or greater than those suggested in Table 5.1 for high pedestrian volumes will be required. This may depend on the level of service the path is to provide and designers should also refer to any local planning requirements. Refer to *Level of Service Metrics (for Network Operations Planning)* (Austroads 2015f) for guidance on levels of service.

Screenshot



Photo 3: SPD Administration Buildings and Verge on FVR



Figure 10: SPD Administration Buildings - Width of the Footpath

Location	Measurement from fence to edge of curb or gutter (Metres)
North- end of SPD Administration Building	20.5 M
Middle of SPD Building near Main Seventh-day Adventist sign.	14. 5 M
South-end of SPD Building adjacent to driveway access and boom gate	13.08 M

(10) Information - South- Pacific Division of the Seventh-day Adventist Church (SPD)

- The SPD can not be allowed to widen FVR on the WAS and SAN Hospital side.
- MP07_0166 Wahroonga Estate Concept Plan required the SPD to pay for the upgrade of the FVR and Pacific Highway upgrade. The Australian Federal Government is paying the \$70 million dollars for this upgrade, so the SPD has not had to pay for this upgrade as was required by the original consent of MP07_0166. They were required to pay the \$30

million for the Comenarra Parkway and FVR upgrade as required by the consent in MP07_0166.

- There are mains water supply and power under the road on the WAS side of FVR and SPD administration building side of FVR has mains water supply and above ground power`.
- The SPD do not want to widen the road on the SPD Administration side, as this will REDUCE THE NUMBER OF RESIDENTIAL UNITS ON this side of the road. It has absolutely nothing to do with cost. There is fire prone land zoned on this side of FVR, so any reduction of land on this side of the road will SIGNIFICANTLY reduce the number of residential units that they can build. SO nothing to do with the cost of the road widening. They are able to build approximately 150 to 200 residential units on this side of FVR as well.
- The SPD manages the Wahroonga Estate (60 hectares)
- Austrlasian Conference Association Limited (ACA)owns the Wahroonga Estate and the Seventh-day Adventist Church wholly owns ACA.