

Willowtree Planning (p7) states "...Trinity Grammar School seeks to amend the Development Consent SSD-10371 to accommodate the existing student numbers currently enrolled at the School being 1,655..." This modification, entitled "regularising of student numbers" may seem like a simple matter of accommodating existing students, but this is not the reality.

Since lodging SSD-10371, Trinity Grammar School has had two Development Applications approved (by Inner West Council) to locate staff and students in nearby "ancillary facilities" that are not included in "the site as identified in Schedule 1".

DA/2021/0111: locating 12 staff at 109-111 Prospect Road, Summer Hill.

The DA stated "...there will be no impacts on the local road network and no demand for additional parking. Staff will continue to park on the main Trinity Grammar School Campus"

DA/2021/0484: locating 280 students/8 staff at 61-63 Prospect Road, Summer Hill.

The DA stated "...the proposed educational establishment is ancillary to Trinity Grammar School, and will be used by existing students and staff, where they can conveniently walk to the site from the main school campus."

Summary of the number of permitted students at Summer Hill campus

	2019 (SSD-10371 documentation)	2022 (current consents)	2022 (post approval of Mod 1)
Students at Summer Hill campus (as per consent)	1500	1500	1655
Allowance (11%) for those not on Campus (absent, on excursions, camps, at the Field Studies Centre)	165	165	182
Students located at nearby ancillary facilities	0	280	280
<i>Students enrolled</i>	<i>1665</i>	<i>1945</i>	<i>2117</i>
Students arriving/departing Summer Hill campus	1500	1780	1935

The traffic report provided with this Modification is based on an increase from "1500 to 1655 students", but, as shown above, this does not reflect the true increase in students that Mod 1 will permit. Further the traffic report has not assessed the new street-based drop off/pick up facility, mentioned staff and students attending ancillary facilities or updated travel modes, which have clearly changed since 2019.

The wording of the Independent Planning Commission (IPC) Condition B6 clearly states that the consent does **not permit an increase in students** until after conditions B6a-d are met, while condition B7 requires a-b to be met at **each staged increase** of students.

This modification appears to be seeking to circumvent the IPC Conditions, with enrolment of 2117 students permitted before SSD-10371 conditions B6 and B7 take effect. I have no doubt this was not what the Independent Planning Commission intended, and this is certainly inconsistent with their statement of reasons. The Modification to "*regularise student number to accommodate existing student population of 1655*" should be refused (in its current form) or reworded to state enrolments (which is consistent with the submitted documentation).