

Personal Submission to NSW Department of Planning and Environment

Major Projects Assessments Planning Service
GPO Box 39
SYDNEY NSW 2001

BY: Quentin Goldfinch and Marlyn Sciberras
4 Varna Street
Clovelly
NSW 2031
3 December 2014

Re: SSD 6339 St Catherine's School Campus Master Plan

To whom it may concern,

We are writing to object strongly to the Masterplan DA and Stage 1 proposals currently before the Department of Planning & Environment as lodged by St Catherine's School, 26 Albion Street, Waverley.

As long-term residents of a once quiet street, we have seen the parking load and traffic congestion on Varna Street steadily increase over the years, particularly between Varna Park and the Fern Street end of the street. This increase is clearly associated with the expansion of the school as it closely correlates to the school terms, and we have come to recognise the teachers and licensed students that regularly park in it. The houses on the northern side of the street are all from an older period and do not have off-street parking. Parking in the street is saturated throughout the morning on most school days, and residents, visitors and tradespeople are forced to use both sides of the street for parking. Whilst legal, this turns the narrow street into a single through-traffic lane with ensuing gridlock at the Fern street intersection.

This situation is bad now, and will become much worse if the St Catherine's development proceeds. The increase in school population, the lack of adequate parking provisions for the 500 seat auditorium, and the operation of the Aquatic centre 7 days per week mean that chaotic conditions will become the norm in our local street.

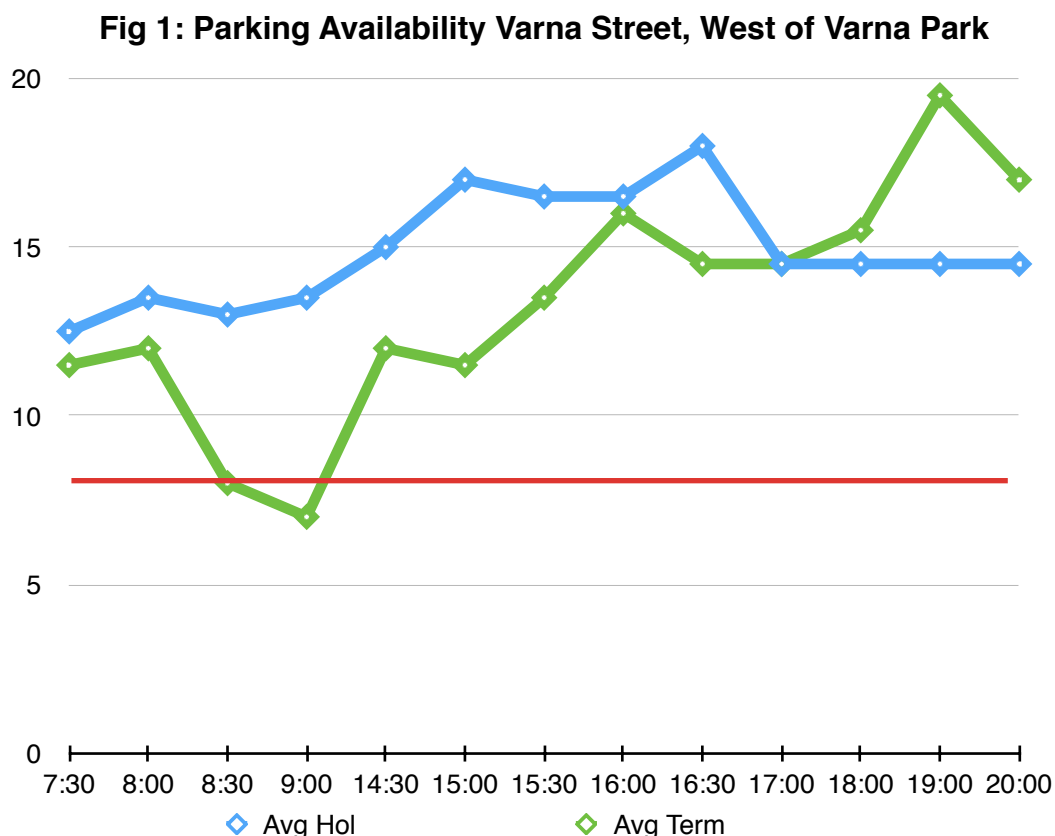
We further object to the DA on the grounds that the impact on surrounding residential streets is dramatically understated by the school's traffic report attached to the EIS. The premise of the report is that any parking within a 5-minute walk of the school may be appropriated by it for the school's purpose, without any regard to its impact on the amenity of local residents, leading to the statement in section 6.7.2 that "A car parking demand of up to 160 cars is anticipated for the large capacity events, with approximately 113 cars parking on street, well within the existing on street car parking availability of 200 car spaces (available within 5 minutes' walk of the School between 7.30 and 8.00pm)". This is not a satisfactory solution, when those car spaces are needed by residents returning from appointments in the morning, or home from work in the evening.

We further object to the DA on the grounds that even the conclusion quoted above was drawn from inadequate observation of parking usage. Appendix I Traffic Report by Arup, Sec 3.6.4 pg. 15 states current utilisation of on-street parking during the day is 80-90%, without acknowledging that this is on the basis of single-day samples and that there would be substantial daily variation. 90% utilisation on one day can mean complete saturation on a different day. Furthermore, the 80-90% quote is itself an understatement of the data that was actually reported in the subordinate Lyle Marshall Associates report of up to 92.8%, and remaining above 90% utilisation throughout 8am - 1pm.

The two reports are both deficient in different ways. Both rely on single day samples as stated above. The Lyle Marshall report omits some heavily utilised streets, notably Hooper St. which according to the Charing Cross Village's own traffic and parking survey is the most heavily impacted of all. The Arup report shows better street coverage, but only measures parking availability on a single Saturday evening, a Sunday afternoon, and a Tuesday evening. This is quite inadequate.

Notwithstanding this inadequate sampling, the report goes on to understate its implications in the detailed narrative, relying on the school-centric premise of simply requiring adequate parking within a 5-minute radius. The assertion that adequate parking is available for the school's purposes (though not to residents) is generalised in the report's executive summary. Then in the EIS, on-street parking is not even stated as a concern. To appropriately inform the consent authority's officers, the EIS should honestly assess the amenity impacts on residents local to the school and propose serious mitigation options such as building adequate onsite parking. Instead, the EIS mounts an argument that there is no problem, supporting this with inadequate data, glibly summarised from the school's perspective only.

The real situation as experienced by our street is shown in Figure 1, from the Charing Cross Precinct's own parking survey. The full day profiles of mean parking availability on two days in term time (green line) compared to the means of two days in holiday time (blue line) shows the school's current impact as the gap between the two lines. On one of those randomly selected term days, parking was forced on both sides of the street, creating the gridlock hazard described above. The mean values understate the actual impact: the minimum availability on 15 July was only 3 spaces, meaning 5 of the 8 hazardous spaces (indicated by the red line) were used. The variability between the pairs of days in term and holiday time was 35% and 17% respectively, demonstrating the weakness of conclusions drawn in the schools's report based on single day sampling. Similar patterns were observed in the other streets studied by the Precinct. Expansion of the school without adequate on-site parking provision will continue to make this situation worse.



We further object to the DA on the grounds that this additional impost of traffic and parking load on surrounding streets is caused not only by the expansion of the school's own population, but also its operation of the RPAC as a commercial activity in renting the facilities out to other schools. As St Catherine's seeks to justify its physical expansion based on its commercial utility to the education sector, so it should be expected to behave like any other commercial entity and provide adequate parking for its users.

Finally, we further object to the DA on the grounds that the increasing intensity of use of the school site correlates with increasing traffic and parking load because the school has made no effort to change the transport behaviour of its users. It is nonsensical that 60% of students are delivered to school by private vehicle when (not the same) 60% live within 1.5km, and when the school is ideally located on a public transport hub. Schools should take the lead in demonstrating to their students the value of sustainable development, including promoting mode-shift to rational transport options.

We strongly urge the Department to reject St. Catherine's development application with a message that the desire for school growth must be balanced with residential amenity and sustainability.

Yours sincerely,



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3 Dec. 2014