

Ben Eveleigh - SSD 5314 Attention Director, Metropolitan and Regional Projects North

From: "Chris Edye" <cedye@bigpond.net.au>
To: <plan_comment@planning.nsw.gov.au>
Date: 3/13/2013 11:50 PM
Subject: SSD 5314 Attention Director, Metropolitan and Regional Projects North
CC: <ben.eveleigh@planning.nsw.gov.au>
Attachments: PLC Staged Development Proposal submission 20130313.docx

Re: Pymble Ladies College - SSD 5314 New indoor Aquatic and Fitness Centre, new Health and Well Being Centre, new synthetic hockey field with carpark under and a new Boarders' Dining and Function Centre

I attach a submission in relation to the above project.

I have made no donations to any political party.

Chris Edye
35 Avon Road
Pymble NSW 2073

Submission on SSD 5314 – Pymble Ladies College, Staged Development Proposal

By –

Chris Edye
35 Avon Road
Pymble NSW 2073

Need for new function centre

In relation to Stage 3, the new dining and function centre, the EIS states that –

The new facility is intended to replace existing facilities within the College. The function centre will provide for functions which are currently held in the College hall... The new facilities will replace existing facilities on Campus.

These statements are seriously misleading. If the function centre, for example, were to replace the College Hall, then there would be a proposal to demolish the Hall. There isn't. The fact is, clearly, that the function centre is a new facility to enable the College to cater (literally and metaphorically) for more people at more events. There is no justification given for this, no business plan summary, nothing. There is also no reason given as to why the existing facilities need to be replaced.

There is also nothing in the proposal to require that the events held in the function centre have a connection with the School. So, under this proposal, the school could hire its function centre to a completely unrelated body in a purely commercial arrangement, and there would be no protection for the residents from the intrusions of traffic and noise into an otherwise quiet cul de sac.

Size of new function centre

The statements are also misleading because the dining and function centre is to cater for 600 seat functions. According to its website, the School has only 120 boarders¹ - why do they need to cater for 600? The extra 480 seats will enable functions that will generate 600 traffic movements (one movement in and one out, 2 people per car) in Avon Road (a cul de sac) and other surrounding streets.

Hours of operation of the function centre

According to the EIS², the school's security arrangements ensure that the gates are locked by 8.30pm most nights, and an hour later if there is a function. So the gates will all be locked and functions guests gone by 9.30pm. Will this be made a condition of approval of the

¹See <http://www.pymblelc.nsw.edu.au/en/The-College/Boarding-Houses.aspx>, accessed 13 March 2013

² Page 63

proposal? If not, local residents will suffer the extensive noise of 600 guests departing late at night.

Zoning

The Ku-ring-gai Local Environmental Plan (Local Centres) 2012 map shows the applicant's site zoned as SP2 Educational establishment, which is defined in the Ku-ring-gai Planning Scheme Ordinance as follows -

"Educational establishment" means a building used or intended for use as a school, college, technical college, academy, lecture hall, gallery or museum

No mention of a function centre for 600 people.

The EIS continues³ –

The proposal is permissible with consent and meets the objectives of the subject zone.

This statement does two things –

1. It indicates that the proposed use is inappropriate for the current zoning and the zoning must be changed to enable the proposed use to be lawful
2. Gives no indication of how the proposal for an oversized function centre 'meets the objectives of the subject zone' which, as we have seen, is for an 'educational establishment'.

So, if the zoning were not changed, the proposal could not be approved. There is no justification put forward in the EIS for a change to the zoning.

Section 5.5.5 reads in part –

The proposed commercial/community uses are ancillary to the principal purpose as an Education Establishment and therefore permissible with consent.

What a lovely positive spin. Perhaps better, and more accurately put –

The proposed commercial uses are contrary to the principal purpose as an Education Establishment and therefore not permissible without specific consent.

Purpose of the development

The purpose of Stage 3 of the development, as advised by NSW Planning and Infrastructure in its letter of 8 February 2013 to local residents, is 'to cater for 600 seat functions for college and community events'. These terms occur in the Executive Summary of the EIS, but

³ Page 9, *Planning context*.

according to section 1.6 of the EIS the new function centre 'will also cater for 600 seat functions for College events'. Whoops, the community got left out.

Parking

It may well be true that '[t]he proposal will not generate additional need for parking as there is no increase in student or teacher numbers'⁴ but there will be a significant increase in visitor numbers to attend functions at the 600 seat function centre. Typically, visitors to the College for Speech Day and the annual Garden Party park anywhere they can, clogging roads throughout the area.

'The proposed access and on site parking provisions for the new development proposed will satisfy the Council's controls and provide more than adequate levels of on site parking, to the extent that no kerb side parking by either staff, students or visitors will be required.'⁵ You don't seriously expect us to believe this stuff, do you? The proposal will accommodate ALL student parking requirements? What steps will the Department take to enforce this?

My current experience is that student vehicle parking slowly creeps up Avon Road from entrance 3 each year as more and more year 11 and 12 girls get their driving licences, so that, by the end of the year there is little parking left on the school side of Avon Road below Arilla Road. This narrows the road and makes traffic circulation more difficult.

Access to the site, and Traffic

The EIS points out that the school is located within 5 minutes' walk of Pymble Railway station, and that the school is served by Shorelink buses.

Trouble is, no-one told the parents, and they drive their daughters to school in their hundreds. That's why the school had to apply for permission to carry out roadworks to 'improve traffic circulation and to better manage traffic flows during peak periods'⁶. Let's get this sorted –

1. the school generates the traffic because it takes no steps to convince its parents that they should send their daughters to school by public transport
2. the traffic generated by parents dropping their daughters off snarls up Avon Road, Everton Road and Pymble Avenue so as to render them impassable, not only for local residents, but also for emergency vehicles such as ambulance and fire and rescue service vehicles, for considerable periods of the early morning and mid-afternoon; furthermore, the right-turn lane on the Pacific Highway into Livingstone Road had to be extended to cater for the impact of this traffic on the traffic on the Pacific Highway
3. the school wants credit for spending a few dollars to re-align roadway edges and footpaths to 'improve traffic circulation and to better manage traffic flows during peak periods'

⁴ Page 33

⁵ Page 38

⁶ Page 19

Let's get real – the school generates the traffic. This proposed function centre will only generate more traffic. There is nothing in the proposal to further 'improve traffic circulation and to better manage traffic flows during peak periods'.

The EIS says⁷ that 'the proposed works... will provide for 470 car parking spaces over the college campus', hoping to impress us with the College's generosity in exceeding the Council's requirement for parking spaces. They just don't get it – 470 car parking places will be filled by 470 cars, each of which will move in and out of its space, giving almost 1000 vehicle movements a day – for parking alone.

And there is no mention of the other major development in Avon Road, that of several hundred apartments close to the railway line, generating more traffic.

Development fatigue

When will this all stop? Since 1998 there have been 23 development applications and the like made by the School for various projects, large and small. The School's 2120 students and 300 staff are amongst the best accommodated and provided for in Australia.

And the residents suffer the building traffic and the noise, the dust, and so on.

⁷ At page 23