

SUBMISSION IN OBJECTION TO:

**Application Name: Shore School Graythwaite Concept Plan
and Project Application**

**Application Number: Concept Plan (MP10_1049) and Stage 1
Project Application (MP10_0150)**

Summary

Shore school have revised the proposed development based on their acquisition of the Graythwaite site. However, it remains unacceptable in terms of its imposition on the surrounding community in two significant respects: the huge traffic problems it will create because of increased pick-up and drop-off of students, and the impact on immediate neighbours due to the size and proximity of a proposed building that breaches current height regulations by nearly 50%. There remains a serious issue about whether it is possible to increase the current campus population of Shore without very detrimental effect on the surrounding community. In its current form, the proposal should be rejected, and a proper master plan prepared for the site that is explicit about land and building use and sensible in relation to planning height controls, containment of Shore School-generated traffic on campus, and other impacts on the community.

Introduction

This latest proposal still appears to be based on the premise that a business is entitled to expand its activities and impact on the community, regardless of the consequences for the community; or, in the language of the financial sector, that it is all right to privatise its profits and socialise its losses. Because that is exactly what is being attempted by the suggestions being put forward. Shore have created a major problem for themselves by paying a large amount of money for the Graythwaite property; now they seek to fund this acquisition with a 50% increase in numbers of people on the campus, with a clear expectation that North Sydney Council and the local community will be prepared to accept the consequences of such a massive build-up.

Who is to decide what is a suitable maximum size for the campus population (with its attendant traffic implications), and to specify the assumptions or principles to be used in making this decision?

Here are two principles that I regard as reasonable:

1. The size of any development should not have a significantly detrimental effect on the properties adjoining the campus, or on the lifestyle of their owners – for example, on property values, privacy, noise levels,
2. Any problems created by increasing campus numbers should be managed by Shore school within the boundaries of the campus, and not exported for others (NS Council, residents, through traffic,, ...) to cope with.

In its current form, the proposal violates both.

The impact on traffic in the neighbourhood

The report provided by the traffic consultant to Shore School is grossly inadequate (see Appendix). There are several critical issues relating to the likely increase in traffic – private cars and coaches – picking up and dropping off students. (The number of coaches used by Shore School is planned to increase from 8 to 12, and this in the face of loss of coach parking space on Mount Street.)

1. The argument by Shore School to the effect that it is not their policy to have coaches on the school campus is not an argument at all, simply an expression of preference. Other schools (*e.g.* Pymble Ladies' College, or The King's School) do not have such policies yet manage to safeguard the welfare of their students without fuss.
2. Traffic solutions involving entry from or exit to Union Street are completely unmanageable.
 - a. Current traffic counts made by residents, and projected traffic flows by architects resident in the area¹ demonstrate that Union Street will rapidly become choked at peak drop-off and pick-up periods. Shore School's estimates of likely increases in traffic are so low as to be totally implausible.
 - b. Allowing right hand turns from west-bound traffic on Union Street is a terrible proposal. There is a major shortage of parking spaces on Union Street already.

¹ Information provided in submissions by others. Not reproduced here as it would simply be duplication.

Sacrificing some of these for a turning lane, while making only a minor difference to likely traffic snarls, is a major impost on the community.

- c. Allowing right hand turns from the campus into Union Street is also fraught with danger to traffic from both directions, and would again require sacrificing precious parking spaces.
 - d. Any entry to, or exit from, the school that uses Union Street will increase the hazard to pedestrians on the north side of Union Street.
 - e. A proposed exit east of the tennis courts on Union Street will create huge complexity at the traffic lights on Blues Point Road. A lot of the cars will want to turn left at these lights, but will be held up by pedestrians crossing at the lights, so creating a bottleneck for these cars, not to mention other traffic already eastbound in Union Street.
3. Traffic solutions requiring the reversal of the one-way system in William Street are also out of the question. This will result in a stream of traffic making essentially a U-turn up Blues Point Road as well as being hazardous to pedestrians walking up Blues Point Road.

The only sensible way to handle pick-ups and drop-offs, if indeed any sensible solution exists, is for Shore School to solve the problem on their own campus: *i.e.* **Shore School needs to own this problem.** They propose to create it, so they should solve it. They have a lot of land available to find a solution, including their land on the corner of Edward and Blue Streets, and their own parking garage that is entered from William Street.

The impact of the proposed West building

1. Despite the objections in numerous submissions relating to Shore School's previous proposal, the current proposal massively exceeds the local planning height controls. It has been modified to have the height reduced by 2m, but is still nearly 50% greater than the 8.5m allowable. **These restrictions exist for good reason**, not least, to protect the appearance of the area and the lifestyle of its residents.
2. The resident's own architect-designed recommendations about how to move the building back to 30m from the boundary, and reduce its height and noise impact, have been effectively dismissed for no valid reason.
3. The current proposal represents a huge eyesore for residents, with no hard evidence being provided about the real effect of noise.
4. At the "Open Day" on 12 November, **the Shore architect himself admitted to at least one resident that there was considerable scope for the proposed building to be moved further back and reduced in height to conform with the planning requirements.**
5. Since there is no publicly-declared purpose for the building, there is no reason at all for not moving it back and reducing its height.

Appendix: Comments on Shore School's Transport & Accessibility Impact Assessment

One of my qualifications is that I have been professionally accredited by both the Statistical Society of Australia and the American Statistical Association. These comments are based on my expertise as a professional statistician, with a lot of experience in designing and running surveys. I do not claim particular expertise in traffic assessments. However, there are a number of general statistical issues of significant concern about this Transport & Accessibility Impact Assessment.

Road Network operation

I am not able to judge whether the *framework* used to estimate traffic flows is acceptable, although I do have a few queries in Section 2.3:

- Traffic and pedestrian counts were made "on a typical school day". "Typical" in what sense? Middle of week? Middle of term? Sports day? Non-sports day? Non-examination? There is no way to assess whether it really is typical in terms of such counts. Was there construction going on? Further, there is no comparison with a "typical" school holiday, which might provide some basis for predicting the impact of increases in student and staff numbers.
- The analysis ignores some surrounding streets that are affected, *e.g.* Bank Street, Bank Lane, Thomas Street.
- Table 2.4 (Existing intersection operation) doesn't indicate whether the data relate to traffic in one, or in both directions. For example, did the measurements for Union Street - Blues Point Road relate to turning into BPR from Union Street, or turning into Union Street when travelling South on BPR, or what?

Travel questionnaire

It is evident that the results of this survey are of poor quality, and do not offer a reliable guide to the actual situation. In Section 2.4.1, page 14, the report states:

"About 830 people responded to the survey (i.e. 667 students and 163 staffs), which is about a 46% survey response. While the data set is not perfect, it does provide a very definite picture of typical travel patterns."

Actually, the picture is a lot less clear than claimed. The problem is that even though 830 people responded, many of them skipped some or most of the important questions. For example:

- Only about 20% of students answered the question of whether they arrived at school as a driver or passenger
- Only 14% answered the question about how many other people were dropped off from the car they travelled in.
- Only 6% answered the question about how many people in total were dropped off from the car they travelled in.
- Only 14% answered the question about where they got out of the car.
- Only 6% answered the question about how many other people were in the car.
- Only 6% answered the question about where they parked.

Furthermore, there has been no attempt to determine whether the differential response rates for different categories of respondent have a material effect on the interpretation of the responses.

One other interesting comment appears on page 19, in relation to Preparatory School Drop-off and Pick-up Facility:

"Observations indicate that some congestion occurs at peak PM pick up period. **This suggests that the facility is approaching capacity under its current operation management.**" (my emphasis)

In summary, on the basis of what has been reported, it is difficult to regard the results of the travel questionnaire as representative of the actual situation.