

8 December 2011

The Director-General
Department of Planning NSW
Metropolitan & Regional Projects North
Level 1, 23-33 Bridge Street
Sydney NSW 2000

Attn: Mr Ben Eveleigh
ben.eveleigh@planning.nsw.gov.au

**RE: GRAYTHWAITE PART 3 REVISED E.A APPLICATION
BY SYDNEY CHURCH OF ENGLAND GRAMMAR SCHOOL (SHORE)**

I write to register my objection to the Revised EA in respect of Graythwaite as submitted by the Sydney Church of England Grammar School (Shore).

I attended the Community Information Day held at the School on 12th November 2011. At that presentation I spoke to the architect for the proposal Mr Peter Mayo. In this conversation I pointed out to him that despite concern and objections from neighbouring properties particularly in Bank Street that the proposal for the Stage 3 western building was unchanged from the previous scheme submitted.

Mr Mayo replied that the objections had been discussed by the proponent and that a decision had been reached to ignore the submissions of objectors and to proceed with the proposal as originally submitted.

The proposal for the western building exceeds by 4m the height limit of 8.5m as scheduled in the North Sydney Draft LEP 2010 and as specifically endorsed by the Director General of the Dept of Planning.

The applicant has made no attempt to justify this major breach, and it seems indefensible given the extent of the landholding. This is not an area constrained site.

Other major concerns with the 'Revised EA' are the fact that the current application is **not** a mere **revision** of the original EA, but **extends** the site area to include the whole site and introduces aspects in relation to traffic that rely on other approvals, e.g. from Council.

Traffic Issues:

The revised EA on exhibition included 5 options for student pick up.

Since the Public exhibition there are now 3 further options 1A to 3A, but no indication as to which of the option is the subject of the application for which the school seeks approval.

The entire Traffic Study and Pick Up Zone Options, documents are deficient in many ways including:

- Internal contradictions
- Errors
- A total lack of consideration of the amenity of local residents
- A lack of proper consideration of impacts on queuing at traffic lights (in Union Street and Blues Point Road).

What the report does state is that the plans demonstrate horizontal alignment, vertical grades, typical sections, and concept drainage. These are all technical matters and entirely irrelevant to the design, traffic, amenity, functionality, noise and safety issues which should be the primary focus of concept master plans.

One would assume technical compliance would flow naturally from a single proposal, properly considered and following approval. What should more properly be considered are the effects of the proposed traffic on the local residential streets.

Consideration of the options:

I have not considered option 4 or 5 as they are listed by the applicant as 'not viable'.

Option 1:

2.1.2 states that Council **may** require a traffic study to assess safety issues. I submit that a proper traffic study **must** form part of any application so it can be properly assessed.

There is no proper consideration under 'Constraints' to the impact of a queue of over 200 cars over a one hour period waiting to turn right across oncoming traffic, from a single lane in Union Street. This queue would paralyse the East West traffic movement in Union Street for that period with cars backed up along Union Street to the traffic lights at Blues Point Road and up Blues Point Road waiting to turn right, in a Collector road operating at present close to capacity. Contrary to what Cardno state, this option is **NOT** viable.

Option 2:

Recognises, albeit briefly that the right turn from Union Street is a 'constraint'. The discussion also correctly points out that there are further access constraints in terms of boom gates and the like, and the passing lane does not meet Australian Standard AS/NZS 2890.1:2004.

A zig zag route through a staff carpark with 1.8m of clearance is clearly **NOT** a viable option.

Option 3:

This option sits considerably higher on the scale of absurdity.

The right hand turn (with associated traffic/queuing issues) previously listed as a 'constraint' is here listed as an '*opportunity*' (emphasis added).

In fact what is involved in this option is a U turn across oncoming traffic in Union Street from a single lane, with no turning or queuing lane. The U turn crosses traffic exiting gates which serve the school, boarding establishment and the staff carpark, a further point of clash and delay.

Traffic then passes along between the existing tennis courts and the Union Street boundary, which involves the removal of all the trees and landscaping currently masking the above ground carpark from the residential properties opposite. The proposed road and associated traffic queue will run parallel to the street for over 45 meters in front of numerous residential properties. The report states that this landscaping will be replaced by a retaining wall "to an approximate maximum height of 1.7m", and "a safety guardrail atop this wall is suggested". Aside from traffic considerations this is complete anathema from a streetscape point of view.

Options 1A, 2A and 3A:

Are essentially the same as the Options discussed above but with the reversal of traffic direction in William Street. From the purely selfish perspective of the residents of Union Street this is a preferable option as it involves left turn only in Union Street and will eliminate the obvious queuing issues in Union Street, however it has numerous issues which make it either unviable or difficult to achieve approval.

I suggest that student queuing on the right-hand drivers side of vehicles, is less than optimal and the egress left in Blues Point Road of over 200 vehicles in a period of 1 hour, via an acute angle intersection is not a viable traffic solution.

If I am correct in these assumptions, it would seem as though the options 1, 2 & 3 will come back into play with all their attendant issues.

The applicant has not presented a properly and cogently argued traffic solution to the additional 450 student and 50 staff numbers supported by a traffic report addressing the congestion and queuing issues.

The school has manifestly failed to properly manage the existing traffic issues as evidenced by the shambles in Edward and Mount Streets.

The Department would be derelict in its duties if a masterplan were approved which allowed an ad hoc later 'solution' to traffic issues on a stage which incorporates 450 additional students and 50 staff.

The Department should **require** Shore School to internalise the traffic in exactly the same as any other major development would be required to do, rather than to 'export' the problems to public road.

The D.O.P should require the applicant to present **one** properly engineered solution with considerable of all the issues, rather than an ill considered list of options, and failing such a solution, Stage 3 should be struck from the application and be the subject of a separate application with all the issues attendant properly considered.

On Site Bus Facility:

Finally, the documents include 4 options for On Site Bus Facility.

Three of the options indicate a large bus turning circle built on the lower grass terrace in absolute contravention of the provisions of the Conservation Management Plan.

The options include again a right-hand turn through the proposed heritage replacement fence off Union Street directly adjacent to the heritage building known as 'Kialoa', and these proposals, unargued, unexplained, and not dealt with in any way either numerical or qualitative, are an act of the crudest environmental vandalism and must be rejected out of hand.

The application includes brief discussion regarding On Site Bus pick up and parking, and includes diagrams of bus turning circles on the lower terrace to Union Street.

Obviously these rather pathetic attempts at a bus solution are done 'tongue in cheek' and probably are included only as a demonstration that buses have been considered, and that the problem is too difficult so that the existing very poor and compromised arrangement in Edward and Mount Streets can continue.

As a resident, I support the Stage 1 restoration of Graythwaite, and I have no issue with Stage 2, which while there are aspects which could be better handled, does not suffer from any apparent fatal flaws.

Stage 3, however, fails on numerous grounds:

- Height
- Privacy & Overlooking
- Noise
- Traffic
- Student pick up
- Bus traffic
- Confusion and uncertainty in respect of what is proposed and what will be included
- Failure to resolve significant issues in relation to traffic, without which the true impact of Stage 3 cannot properly be assessed.

Accordingly, we ask that the Department/P.A.C refuse this part of the application and require the applicant to resubmit a separate application with **all** the required studies and issues properly considered and argued.

One would then expect that such an application would then more properly be required to be submitted, not as an abuse of the now defunct Part 3A process, but, as is more proper, to the North Sydney Council for consideration.

Yours faithfully

A handwritten signature in black ink, appearing to read 'V. Poole', with a long horizontal flourish extending to the right.

VERA POOLE

(Registered Owner No. 93 Union Street, McMahon's Point 2060)