



PCU028788

I OBJECT TO THIS APPLICATION

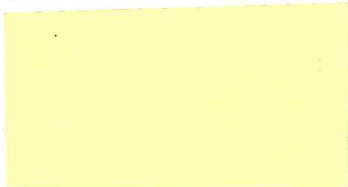
Submission in relation to:

Revised Application
Concept Plan (MP 10_0149) and
Stage 1 Project Application (MP10-0150)
Graythwaite, 20 Edward Street, North Sydney 2060
Lot 2 in DP 539853 and part 1 in DP 120268
Proponent: Sydney Church of England Grammar School
(Shore)
Council Area: North Sydney Council



To: The Director
Government Land and Social Projects
Department of Planning
plan_comment@planning.nsw.gov.au

Submitted by:



Department of Planning
Received
7 DEC 2011
Scanning Room

Suppression of name:

I do not give permission for my name or address to be made available to the proponent, other interested public authorities, nor for it to appear on the Department's website.

I hereby declare that I have made no political donations during the past two years.

- Sydney Church of England Grammar School's (Shore) Concept Plan for Graythwaite.

THE MINISTER AND THE DEPARTMENT SHOULD REFUSE THIS APPLICATION AS IT IS COMPLETELY DEVOID OF ANY PUBLIC BENEFITS.

WHAT SHORE HAVE PROPOSED HAS CHANGED LITTLE FROM THE ORIGINAL APPLICATION AND REMAINS AN OVERDEVELOPMENT OF THE SITE.

THE PROPOSED DEVELOPMENT WOULD MEAN A SIGNIFICANT AND ADVERSE IMPACT ON NOT ONLY THE HERITAGE SIGNIFICANCE OF THIS PRECIOUS SITE BUT ALSO IMPACTS ADVERSELY ON THE COMMUNITY AT LARGE, THE ENVIRONMENTAL AMENITY OF THE LOCALITY AND THE SURROUNDING AND NEARBY RESIDENCES.

As one of many concerned residents who live within close proximity to the site I ask that The Director General's requirements for Community Consultation be fulfilled. The proposal expects the general community to bear the environmental costs yet the general community has not been properly consulted.

There is no substance to Shore's statement "the wider community will have been provided with substantial opportunity to review and express their views in relation to this development..." (report dated Sept 2011). The importance of community consultation appears to have been dismissed by the applicant as to date there has been little change from their original proposal. The residents proposed an alternative envelope for the west building, for example, and this was totally disregarded by Shore.

Only one general consultation to which the general community have been invited has taken place. Called an 'Open Day' by the applicant, Shore, this two-an half hour presentation on 30th July 2011 took place from 10am to 12.30pm after the original application, but before the lodgement of the Revision, had been submitted to the Department of Planning. One short opportunity to view the proposal and discuss them with the applicants consultants presupposes the general community were able to attend at that time. Clearly this is not one of life's realities and far from suffices as the appropriate open and transparent requirement under the general Community Consultation process.

Another 'Open Day' was held on 12th November 2011. This time for two hours, 10am – 12pm, after Shore had lodged their revised submission and the Department of Planning had put the revised application on exhibition (9th November) so surely this presentation clearly cannot be included as part of any correct consultative process.

Without proper community consultation the applicant has not satisfied the Director-General's requirements in this regard. Therefore neither the community nor the Minister can rely on the application as submitted.

A Master Plan for the entire campus should be prepared before any development can be considered or approved. The current proposal before the Department of Planning covers only approximately half of the School's proposed campus yet it affects what takes place

elsewhere within the school grounds and surrounding areas, including potentially direct impacts on different streets like Hunter Crescent.

Shore's proposal is a serious overdevelopment of the Graythwaite site.

It cannot in any way be described as a development of "state or regional significance". The works contained within this proposal are on a State Heritage registered site that is also recognized for its National significance. It is also within and adjoining Heritage Conservation areas yet it appears the proposal is all about the betterment of the proposer, Shore.

With 450 additional students, at least 100 of whom are to be Primary School, and 45 additional staff the community will be affected by traffic, noise and the loss of a seriously valuable, and all too rare, open green space.

The conservation of Graythwaite's heritage building is supported in principle. However the impact of the new buildings and a major expansion in the size of the school's operation is unacceptable. Graythwaite is an item of State and National Heritage Significance and thus must be properly protected for future generations.

The A2 zoning limits the height to 8.5 metres.

This height limit is a fundamental control that is essential to help protect the character of the area and contain the scale and impact of buildings. It has been carefully and consistently applied by the Council over many years. These plans do not comply. When granting a s.65 certificate for the public exhibition of the North Sydney draft LEP 2010 The Director-General of the Department of Planning endorsed a 8.5 metre height limit specifically for the Graythwaite site, clearly the intended height limits for this land. This limit must be upheld.

The Stage 3 West Building envelope is unacceptable in its proposed form:

- The proposed building is excessive in terms of height, bulk, and scale (approx. 30 metres x 35 metres in area over 4 levels)
- The proposed reduction of 400 square metres or about 8% is negligible
- Further reduction is required to the floor area
- The visual impact needs to be reduced
- The bulk of the building remains too large
- The noise impact does not satisfy the relevant noise standards
- Privacy issues need to be comprehensively addressed in any conditions or commitments
- The proposed building still has a maximum height of 12 metres. This amounts to one whole storey and does not comply with the 8.5 metre maximum height limit for the site, nor the height limit for the adjoining residential area
- Site poles should have been to be erected to the specifications of the revised plans
- The proposed building needs to be set back from the western boundary and away from the heritage fig trees and residential housing. It is possible to achieve this while considering heritage restrictions

The public interest and integrity of the planning system are not served by an application that is fundamentally at odds with statutory instruments including those only recently supported by the Director General of the Department of Planning (in the draft LEP).

Traffic flow, capacity and parking.

- The proposer, Shore, has not fully addressed or provided an acceptable solution to the parking problems and additional traffic their proposal would generate due to the intensive increase in activity on the Graythwaite land

- Shore's revised application shows no solution to the traffic chaos that would ensue should the proposal be approved. Several "options" for on-site drop-off/pick-up are canvassed without proper queuing analysis. No workable solution has yet been proposed
- Pick-up and drop-off and associated car lines must be accommodated within the school campus i.e. on Shore's land
- Traffic wise Union St is now near capacity without including the extra traffic that will flow from the approved townhouse development on Union Street
- Union Street should not be considered or approved as an entry and/or exit point for student pickup/drop off traffic
- Shore relentlessly resists coach loading and un-loading within their boundary and instead insists on using the nearby narrow public streets. The impact of this is unacceptable. All coach activity should take place on Shore's land. There's plenty of space available for this

A publicly accessible through site link for pedestrians and cyclists must be included from Edward St to Union St to improve connectivity between neighbourhoods. This can be achieved without compromising the safety of students and is an essential public benefit that would help redeem this poorly thought through proposal with its serious environmental (including traffic impact) costs to the community and complete lack of public benefits,

The proposed removal of 43%, or 99 out of 230, trees is far from justified. Overshadowing caused by the proposed new buildings would impact on existing trees and other vegetation and has not been addressed in the submission. The proposed removal of other smaller trees and undergrowth along the sloping areas means a loss of habitat for birds and other fauna, reduction in screening and hence less privacy for neighbouring properties, and would have an undesirable visual and noise impact.

I object to this application. I request the Minister refuse the application based on it being an overdevelopment of a valuable heritage site, lack of and loss of public amenity, loss of open green space and because the general community consultation process has not followed due process.

Any future applications for a lesser, more reasonable and sympathetic development can and should be after a Master Plan for the entire school grounds has been ratified, parking and traffic problems have been given due consideration and been solved to the satisfaction of North Sydney Council, the local residents and ratepayers, and due public consultation has taken place and been taken into consideration

Signed _____

Dated 4th December 2011