

**Re: St. Aloysius College Master Plan - OBJECTION**

**Re: SSD 17\_8669**

*We wish to lodge an objection to the Master Plan submitted by St. Aloysius College.*

*We are local residents living in **Carabella Street, Kirribilli.***

*We have detailed our objections below, which are consistent with the views of many residents.*

*We are particularly concerned by the following:*

- *The lack of attention paid to the need to address teacher parking and parent “kiss n ride” and temporary parking needs. These omissions represent not only a lack of commitment to the Community on behalf of St. Aloysius College but also a **significant safety issue for students, parents and relatives and residents.** As residents close to the school we have seen first-hand the daily threats to safety as parents and relatives jockey for position to obtain short term parking to allow for the pick-up and drop off of their child.*

*This is a very real threat which can be mitigated by implementing a range of solutions employed by many other schools.*

*This threat will be heightened by the complexity of traffic movement during the construction period, with very large trucks navigating through relatively narrow neighbourhood streets. This aspect needs a clear plan, and considerable attention to detail combined with appropriate consultation with the community, particularly, but not only, residents within the immediate vicinity of the school.*

- *The number of errors and omissions contained within the submission, represents a breach of trust in the ability of St. Aloysius College to deal with community concerns in an open and transparent manner. This is particularly important given the blanket approval St. Aloysius College is seeking now to cover the next 7-10 years.*
- *Re The Junior School the fact that approval is sought now for the Concept Plan for the Junior School, despite the fact the site is not going to be developed for 10 years is problematic.*

*Our detailed Objections are outlined below.*

### **OBJECTION Submission:**

**This is NOT a MASTER PLAN, but a SERIES of DA's for Capital Works, wanting to be approved, without detailed scrutiny by the community.**

We and the community **OBJECT** to this series of Capital works being considered to be a MASTER PLAN for the whole school site on the following grounds:

1. **Fails to consider all the land holdings of the school.** Should have included all the purchased **Jeffrey Street properties**, as well as their **Willoughby site**, consisting of oval, sports fields and grounds in **Tyneside Avenue, through to Eastern Valley Way, Willoughby**. When this was asked of the architect, he advised, that "they couldn't include Willoughby site, as in two different LGA's." **THIS is WRONG – as this is the main purpose of going to the Minister & DPE as a State Significant Development – to be able to deal with matters across different LGA's.** So why are they not looking at their land holdings in a holistic way? **Therefore, this is NOT a Master Plan.**
2. **Fails to look at alternative solutions**, considering they currently have three restrained sites, which a master plan would do. Suggestions could include removing the junior school to their Willoughby site, with appropriate Kiss & Drop facilities for the parents and children; only have the senior school students over the 3 Kirribilli campuses; purchase a high-rise building in North Sydney, similar to the Australian Catholic University (ACU) to house the senior boys.
3. **Fails to look holistically at the whole of the schools' operation within the CONTEXT of Kirribilli peninsular, with analysis of the traffic generation, pedestrian movements, the required bus movements** needed through the area due to the school, **the use of the public open space** by the school boys, with no contributions by the school for the maintenance and upkeep of the infrastructure or Bradfield park (which has to be top dressed more often than other parks in the LGA). Executive Summary at P.4 states that "The proposal does not have any unacceptable, long term, off-site impacts on adjoining or surrounding properties or the public domain, in terms of traffic, social and environmental impacts" We and the **community disagree with this statement**, as the studies have failed to look at the broader community, only looking at the school community's needs. **The Principal commented to community members, that it was a "Classroom Master Plan" - therefore this is not a true Master Plan under the SEPP.**
4. Fails to work in with the other major school, Loreto, which is doing a similar Master Plan estimated to be \$100m. Both schools have failed to address, how they will provide for the community in some way, with the traffic generation, not only during construction, but afterwards with their ongoing school operations.

5. **Misleading documentation** provided by the school, so we cannot trust what they are saying to the community. The Executive Summary of the EIS, states on Page 2, para 2, under **St. Aloysius Middle School (Main Campus)** – **fails to mention the demolition of a 4-story building and building a new building on the same footprint**, it states: “The proposed development at the Main Campus also includes major refurbishment of the lobby, Great Hall and Chapel. The Lobby is to be connected from the forum to a new multi-storey building to be constructed in the central courtyard of the site, with a rooftop terrace, providing passive and active recreation details for the students.” **THIS FAILURE TO MENTION THE DEMOLITION and REBUILD of a BUILDING on UPPER PITT ST. is MISLEADING the COMMUNITY! The way it is written, gives the impression that ALL WORKS are INTERNAL WORKS ONLY – which is not the case. This was expressed to the community at the Information session last November 2017, as if it was all just ‘internal works’.**
6. St. Aloysius College **fails to provide any additional parking** (currently max. 15 car spaces for 329 staff over 3 campuses), therefore failing to meet the minimum parking standards for schools, under NSC LEP & DCP controls. EIS States at bottom of Page 3, Executive Summary, as a reason why the Minister should support the proposal: “It has been prepared having regard to Council’s planning policies and generally complies with the aim and objectives of the planning controls for the Site including NSLEP 2013 and North Sydney Development Control Plan 2013 (NSDCP2013)” Clearly, this is also a FALSE statement, as they are planning to demolish a building, with a re-build on exactly the same footprint. Hence, with a new building, they would have the ability to provide off street parking to the minimum standards required (at least 60 for current staff levels, double that for the proposed future jobs stated in their EIS), set-backs are zero (instead of 4 m), and landscaping is zero, instead of as per the NSC controls. **Hence, they have failed to comply with any of these three essential controls – on-site parking, setbacks and landscaping! So, this proposal cannot be thought to “generally complies” with NSLEP & DCP! The proposal should be rejected on these grounds, failing to address any of these three crucial areas of controls.**
7. **Fails to analyse the pedestrian and car movements for the sites**, nor look at the need for footpath treatments to allow ease of movement of students to transport hubs, without them taking out the local residents, especially the aged and less mobile, with students walking 4-5 abreast with back packs on that make them nearly a meter deep, when they turn to talk to each other, swiping innocent people off the footpath.
8. **Fails to adequately communicate with the community** concerning this major development, with insufficient information on story boards over an afternoon. No further communication, after this initial concepts and feedback session, showing how the school had listened to the community and altered their plans accordingly. Nearest neighbours asked for a meeting, and it was

refused. Next the plans are on exhibition with the DPE, and the community has only 28 days to make submissions without accurate detailed plans for the whole Master Plan including all sites, especially including the proposed major works for the Junior School site – they state plans available at Stage 2, but school is seeking building envelope approval now – with the community not fully aware of the level and detail of the issues, that may impact upon them. Executive summary P.4 states that “Community consultation has been completed in accordance with the Department of Planning & Environment Consultation Guidelines”. **We and the Community do not agree with this statement.**

9. This **Master Plan should be REJECTED** and sent back to the College, to start again, taking into consideration all of the matters raised here.
10. If not rejected in its current form, then we and the **community request an extension of time, for submission.**
11. **We and the community request site poles with tape** from one to another be erected on all three sites, showing the extent, height and bulk of the proposed buildings, so that all residents can appreciate the three-dimensional elements of the 2D plans, as no models were made available for consideration.
12. **We and the community requests that the trees that are to be removed, be identified with a bright, thick ribbon** being placed around the trees, at a height and space, that can be seen by the community, so that they can assess the extent of the impact on the sites. Any **trees belonging to neighbour’s** properties, that are also nominated to be ‘pruned’ to enable the build to take place, **the points at which limbs would need to be lopped, should also be clearly identified with bright coloured tape**, so an independent arborist could be engaged, to ensure that the level of canopy being proposed to be removed, would not de-stabilise the tree and its root structure.
13. **Additionally, we and the community request an open site visit**, so that concerns can be expressed to the Minister or delegated persons, so that you have some real understanding of the issues and concerns that form this **OBJECTION.**

### **Specific Objections Re the Junior School Component of Aloysius Redevelopment**

1. **We object to approval of the Concept Plan for the Junior School** at this time as the site is not going to be developed for 10 years.

At a North Sydney Council Kirribilli Precinct Committee meeting held on 3 May the School indicated that the development at the Junior School would not be taking place for at least 10 years. It is understood that development approvals expire after 5 years. It therefore seems unreasonable to encumber neighbours' properties, our property, with a concept plan approval for development which will significantly affect their properties which will then not be acted on for 10 years.

- 2. We object to approval of the Concept Plan for the Junior School as the EIS does not contain sufficient detail to allow appropriate comment.** The concept plan for the Junior School appears to be designed as a school masterplan, marketing and financial planning document, rather than an application for a statutory land use/built form approval for the site.

There is little detail in the Concept Plan to understand the scope and nature of the project, how it will affect neighbouring properties, including our property, and what the school proposes to do to mitigate any effects during construction and operation.

In approving the Junior School Concept Plan the School will be given an automatic future right to build an extra level on the school building, excavate and construct a basement level multi-purpose hall and create a new basketball court and stands, without showing and considering the impact on residents.

Issues which need consideration are:

- Excavation (e.g. vibrations, stability, need for stability ties into neighbouring properties, excavation noise, dust)
- Construction management (e.g. truck movements, staging of construction, pedestrian management, impact on Crescent Place laneway operation which is the only access to our garages, landscape, retention of significant trees such as the large Lemon Scented Gum - Tree 55)
- Operation of new facilities and impact on neighbourhood (e.g. noise, special events, parking for school staff and visitors, loss of parking for maintenance workers during school holidays, traffic movements, pedestrian movements, overshadowing, landscaping)

- 3. We object to the Concept Plan for the Junior School as there is a significant increase in use of the site without discussion of it in the EIS.** The following quote from the PMDL Architectural Design Statement (page 9) indicates that **the basketball court will be used by the whole school not just the Junior School**. This is not covered in the EIS.

'The 2016 Masterplan prepared by PMDL identified the need to reinstate the Great Hall at Upper Pitt Street - Main Campus, from a hall cum basketball

court as the community and cultural hub for the College, which was its original purpose. The reinstatement thus *created the need for a second sports court in the Kirribilli precinct* to complement Dalton Hall situated on the Wyalla site. *The Masterplan identified that the Burton Street Junior School Campus provides the most suitable location.*' - italics added.

It would seem that there will now be two basketball courts - one under in the multi-purpose hall and one on top of the multi-purpose hall. The current ground level court used by the 320 Junior School boys (Years 3-6) already generates significant noise. If the two new courts are to be used by the whole school population as the replacement second basketball court for the Senior and Main schools (Years 7-12) the site will be more intensively used for before and after school practise, Saturday morning sport, special school house competitions etc. This will generate significantly more noise from the site and at longer times. It is likely to create much larger movements of school students between the campuses, traffic and parking demand.

- 4. We object to the excavation proposed in the Junior School Concept Plan as there is no detail about impact on neighbouring properties and plans for construction.** Long standing residents report that past excavation of sandstone and building work at the Junior School and in the neighbouring area has resulted in significant vibrations and cracking to houses.

The streets surrounding the Junior School (Carabella, Fitzroy Street, Bligh and Burton Streets) have 1880 – 1920's houses with the foundations and structural engineering of those eras. Our house is one of these houses. These houses are part of the Careening Cove Heritage Conservation Area and several buildings are items specially listed on Council's North Sydney Local Environmental Plan. Care needs to be taken to ensure that these buildings are protected from vibrations.

The following extracts from the EIS' accompanying Geotechnical Interpretive Report

Part 1 indicates some of the issues associated with the proposed excavation:

'It is understood that excavation for the basement may extend to around 10 m deep, although localised deeper excavations may be required for footings and trenches.' Page 17.

'The more competent sandstone (i.e. Class III to Class II rock) will be more difficult to excavate and is likely to present hard or heavy ripping or "very hard rock" excavation conditions'. Page 17. Comment: this sandstone appears to start about 3 m below the surface.

'It will be necessary to obtain permission from neighbouring landowners prior to installing anchors that will extend beyond the perimeter of the site. In addition, care should be taken to avoid damaging buried services, pipes, adjacent basements and other subsurface structures during anchor installation.' Page 17. Comment: The sewer line for several houses backing on to Crescent Place runs down the middle of Crescent Place laneway.

'Maintaining stability of the sides of the deep excavation and of neighbouring properties will be critical for this site.' Page 18.

'Major excavation works will inevitably cause lateral and vertical ground displacements outside of the excavation.' Page 19.

Prior to approval being given to the concept of excavating for a multi-purpose hall, the feasibility of undertaking a successful excavation should be assessed.

At the DA stage any excavation should involve preparation of dilapidation reports for each house prior to any work being approved, establishment of monitoring regimes, creation of and 'unexpected damage hot-line' and agreement by the school to rectify any damage.

- 5. We object to the Junior School Concept Plan as consultation has been inadequate.** It is difficult for us and the community to consider within 4 weeks the impact of upgrading school facilities on three separate sites.

Detailed information has not been made available until the EIS. The school's consultation ran for 3 days in November. The restricted period meant that if people were not available at that time, they were not given the opportunity to comment.

We agree with the suggested that the school defer the Junior School Concept Plan from the SSD application at this time and enter into discussions with the neighbours about the proposals and how to best meet the needs of the school and take into account neighbours' issues.

- 6. We object to the Junior School Concept Plan as the landscape plans are inconsistent.** It is not clear on the plans where the tree along Bligh Street & Crescent Place are staying or being removed. We were assured by the school at the Precinct meeting on May 3, that they were staying, and yet on close inspection of the plans, they are marked for removal, and would be difficult to retain due to the level of excavation and destruction of the roots, with the new building / excavation being so close to the road boundaries.