

Milson Precinct,
PO Box 704 ,
Milsons Point NSW 1565

28 May, 2018

The Minister,
Department of Planning & Environment,
Via web submission.

Dear Sir,

RE: SSD 8669 - 28.05.2018 - St. Aloysius College, Kirribilli, Master Plan - OBJECTION

Milson Precinct, a precinct of North Sydney Council, which has St. Aloysius & Loreto Schools within its community boundaries, makes the following submission, along with the relevant section of minutes of its meeting held on 3 May, 2018, (see below). The meeting was attended by St. Aloysius' principal, architect, planner, community consultation person, plus another, who gave a PowerPoint presentation, and responded to questions asked by the community members present.

The minutes of the meeting set out many of the concerns of residents. Based on those concerns, along with this overarching submission, OBJECTING to the proposal, we request that the proposal be rejected, as it fails to be a comprehensive Master Plan; has inaccurate information in the documentation provided, hence the results in reports are unable to be relied upon; the school has failed to communicate appropriately with the extended community; the application fails to comply with the North Sydney Council DCP & LEP with regards to minimum parking standards, setbacks, landscaping etc. especially for the two new buildings being proposed – Main School campus and Junior school campus.

Both St. Aloysius and Loreto schools have failed within their applications for Masterplans to address the cumulative effect of the traffic and parking within the local community. They have both failed to address their lack of open outdoor space and green space for students to recreate on.

Hence, it would be irresponsible for the department to accept the application in its present form, as it fails its own documentation; therefore it fails the wider community, to which it is supposed to be addressed and fails to be a comprehensive masterplan.

Regards,

Jillian Christie, Chair Milson Precinct

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.

The community **OBJECTS** to this series of Capital works being considered to be a MASTER PLAN for the whole school site on the following ground:

1. **Failed 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 an holistic way? **Therefore this is NOT a Master Plan.**
2. **Failed 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. **Failed 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" **The community disagrees 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. **Failed to work in with the other major school, Loreto**, who is doing 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. **Failed 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. **Failed 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”.

Community does 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 the **community requests an extension of time, for submission.**
11. **Community requests 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. **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 the community request an open site visit**, so that their concerns can be expressed to the Minister or his delegated persons, so that you have some real understanding of the issues and concerns that form this **OBJECTION.**

ADDITIONAL Comments :

- There is no contextual evaluation of the school operations to ascertain what is working what is not working. There is a presumption that the status quo is fine but this is not the case. Design principles cited in the PMDL Architectural Design Statement - do not reference the amenity of the adjacent residential area. They only relate to the internal teaching environment.

- As lighting plan was not submitted and there are no structural details for the 2.4 metre high perimeter glass wall as such the specialist reports that address visual impact and heritage impact are also misleading and not accurate.

- The visual impact montages are not certified as being true and accurate which should be required for a development of this magnitude. There should be night time montages too.

- The SSD Application form states that the project will give rise to 350 operational jobs. These jobs are not addressed in any of the documentation and when added to the existing 329 jobs result in an even greater non-compliance with onsite car parking standards. We note that stakeholder meetings with TfNSW and the RMS documented in Appendix 7 of the community consultation report are based on false numbers ie the number of staff is reported in the minutes as being 156 staff. Not 329 plus 350.

- While the application is based on a vision to improve the learning environment there is no analysis that illustrates how the proposed classrooms etc comply with current education standards. This goes to the issue of student numbers. How much space is required for 1244 students. Will the additional space bring the school environment into compliance as implied by the principal or deliver a surplus in space so that the school can freely increase student numbers.

- No digital Computer Generated Images have been prepared for any of the works to illustrate for residents what they will be looking at in the future. It is a reasonable requirement to expect photo quality montages to be submitted with a \$140 million application.

- No community benefit is provided. The school does not pay S94 contributions although this is implied in the EIS. The funding for these works is largely federal government funding. St Aloysius also does not pay Council rates. They are taking away residential amenity but not giving anything back to the Kirribilli community.

Milson Precinct Minutes 3 May 2018

Re: St. Aloysius College Master Plan

- Presentation by St. Aloysius College Redevelopment Master Plan over 3 sites – NSW Dept. Planning & Environment (SSD 8669) 47 Upper Pitt St. Kirribilli submissions till 28 May 2018 Dept. Website www.majorprojects.planning.nsw.gov.au/page/on-exhibition/ or phone: 1300 305 695 Plans can be viewed at NSC Customer Service.

Presenting : Andrew Pender – Design; Ashleigh Smith – Planner; Jody Connor – Community Consultant; Mark Tannock – Principal

NUMBERS ON SITE:

The Principal assured the community that there are NO PLANS for increasing student numbers on the existing footprint, as it is already at maximum capacity with 1250 students and up to 329 staff, of which over 180 are teaching and support staff, rest coaches, music, drama teachers.

The community liaison person advised that there would be ‘natural growth’ in numbers of students.

Precinct pointed out that the Lower North Shore study predicts a 21% increase in student population over the same time period as this 20 year development – to be taken up by all schools, public and independent. **Hence the numbers will have to increase. Several community members pushed to have a CAP on numbers, similar to any hall or restaurant for maximum seating capacity. The school are not willing to put any cap on numbers for the three sites.**

SENIOR SCHOOL SITE – Whyalla Building:

Proposed to extend out the ground floor library section into the courtyard, which is not actually on ground level, but elevated, by some height, it is currently 4.7 m from the boundary, but that will be halved; along with internal fit out and a reconfiguration of the learning space. The intention is for this to begin after the HSC in 2018, and take about 4-5 months.

JUNIOR SCHOOL SITE:

The Junior School site is being proposed as ‘concept plans’ and may be completed anywhere over a 10 year time frame, BUT school is seeking BUILDING ENVELOPE APPROVAL now, in this State Significant Development (SSD 8669), without the full set of detailed plans, so that the community can understand the future impact.

IT IS IMPORTANT To NOTE: If approval is given now for these Building Envelopes, with no appreciation of the level of excavation, building heights, solar loss, tree losses etc. the Community does not get to have any objection to this at the time of Stage 2, when the school will provide a full set of detailed plans sometime in the future. You can only OBJECT now. **The School should erect height poles, which are certified to be true and accurate, so that community can appreciate the impacts. All trees that are ear marked to be removed or severely pruned, should have a yellow ribbon**

around their trunk, again so that community can know the extent. All of this should be before the close of submissions.

EXCAVATION of PLAYGROUND SPACE: Advised the plan is for excavation of approximately between 7 meters depth from Bligh St. to about 4 meters down the site, towards Burton St.. The plans show that it will be up to 10 meters depth of excavation, with further foundation excavations, close to the boundary adjacent to Crescent Place, **without 4m set back**, to accommodate a new all-purpose indoor space, to include indoor hall & sports facilities, which need a minimum of 7-8m height /volume for the playing of basketball etc., with a court also being placed on the top of the newly created space. This new court will effectively be running close to 90 degrees to the existing court, and will be elevated by a metre or more (5 - 6 steps) above the existing court as shown on the plans. It will be level with the current forecourt from the building in which the local elections take place. This Court may then have an elevated grandstand seating, as currently exists along Bligh St, but it will be along the Crescent Place roadway, which will increase the height impact onto Crescent Place street by a further 2-3 extra meters, above the height of the new building. **THE EIS state that this new indoor sports centre, will be used by the WHOLE SCHOOL, not just the junior school children**, which will increase the noise and extended use of this playing space, in amongst residential houses.

We were assured at the meeting, that the **Trees along Bligh Street & Crescent Place** 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.

VIBRATION and Noise of this level of excavation, along with the traffic movement of B-Double trucks to remove the spoil will be excessive, especially if there is no compliance with the required 4 m setbacks from the boundary. Neighbour opposite, who backs onto Crescent Place, when proposing a plunge pool, of less depth excavation than this, were knocked back by council, due to the **water table below**.

[Since the meeting neighbour has advised that when only two geotech bore holes were done near the existing court, it caused damage to her property, with walls shuddering and things falling in her kitchen.]

ADDITIONAL CLASS ROOMS: There are also plans for an additional storey over all of the western buildings along Humphrey Place – along the Western roadway, although set in from the existing building's external walls; height of these new buildings to remain below the Heritage Building of the Milsons Point Public School building on Burton Street. No more detail was given.

MIDDLE SCHOOL SITE – Upper Pitt Street site, bounded by Jeffrey St & Kirribilli Avenue. Current student numbers on this site are 156 students per year x 4 years (7-10) = 624 students.

We were informed that the plan for this site is to be conducted over a 7 year construction timeframe, commencing in 2019/20, using the existing structures and footprint, while increasing the outdoor play area for the boys, by lifting it three storeys higher, elevating it to cover the area of three rooftops spaces – Kirribilli Ave Building, the current open quadrangle, and the newly built Upper Pitt Street building in the Eastern corner of the site..

The existing Eastern wing building on Upper Pitt St., being highest up the hill, is not suitable for re-furbishing, as it has 3.5m column spacing. Therefore this building will have to be demolished and rebuilt along with the new three storey building proposed to fill-in the current courtyard space, linking the Kirribilli Avenue Building with the Upper Pitt St. building as one mass of building, while opening up a different internal space where the current bridge goes over to the Kirribilli Ave building to library and chapel. But this new 'open space will be open on the sides to air flow, but will have a series of closed rooftop structures for weather protection, so no sun penetration into this space.

There will be a glass lift at the Southern corner of the Kirribilli Avenue building that will allow access to all levels of the school, from the Great Hall at Kirribilli Avenue, thru to Chapel, current rooftop entertainment spaces, as well as to the newly proposed rooftop open play space being provided in place of the current courtyard, which will extend over the three buildings' floor plates.

The school has done view analysis from some Upper Pitt Street properties, claiming that there will be an increase in views to those properties, due to the removal of plant equipment on the top of the existing Upper Pitt St building and removing the existing lift, although the proposed lift further to the south on the property is not shown on these view analysis diagrams, nor are the proposed plantings with trees on this rooftop space shown, as proposed on their landscape plans.

So the **plans are not accurate**, nor being consistently shown, with all elements that would have impacts on the neighbours.

The outdoor elevated play space, consists of about 400 seats for the lunchtime / recess boys use by the over 600 boys on this campus; there is a proposed outdoor amphitheatre, bar-be-ques, outdoor teaching spaces, as well as sports play areas. The plans show that there was to be 'soft fall' treatment on this rooftop, with consequential decrease in acoustic levels, but neighbours were informed that it will now just be painted concrete. **THUS the acoustic reports will NOT be accurate**, due to the changed surfaces. **AGAIN this is MISLEADING the Community during this public exhibition time.**

The architect initially said it was a 2.1m **glass barrier**, but elsewhere it is said to be 2.4m acoustic glazing around the top of this outdoor play area. **AGAIN – What is the true finish and height? There is insufficient and misleading information within the documents.**

The question was asked about a **lighting plan** for this rooftop space, and **none has been provided, as they had not thought about that**. Community was advised that this space will be used for events and viewing of major activities on the harbour, as is currently the case with the existing rooftop terrace, on the Jeffrey St. building.

USE of the SITE, OUTSIDE SCHOOL Hours - They have not yet considered where the **Cadets & their Parade** would take place – probably not in this space, as has been in the quadrangle. Their current functions were stated to be two major fundraising (300+ people) and the welcome cocktail party of 700+ people, with about 4 weddings in the chapel last year.

They have not been forthcoming with all the additional activities of the school that take place in **OUT of School Hours** – Debating, drama, music, basketball & other sports, parent teacher interviews, information nights, all the other activities of a school community. **Please Note: Schools are able to ‘lease’ out their buildings to any ‘community activity’, outside of school hours, without needing permission** to do so from council, nor the community being informed.

PARKING – The school currently only provides, 19 spaces for cars, motorcycles and bikes over all three site. The minimum requirement under NSC controls should be at least 60 parking spaces for the number of teachers currently on site. So there is a marked shortfall by 70% on what should already be provided.

It was asked of the school if they had considered additional parking, as they say in their submission that they “generally comply” with the NSC provision, but clearly not with regards the limited parking on site.

The response was NO – they did not wish to “incentivise” the use of cars by teachers. They were informed by residents, who often watch the teachers leave the school at two hourly intervals, to swap car parking spaces with each other, to avoid parking fines.

Milson Chair pointed out that if they were not demolishing any buildings, and only doing internal works, then not addressing the parking short fall could be understandable. But given that the Upper Pitt St. building is to be demolished, it then allows the school to address the current and future shortfall for parking requirements within this building project. They just need to dig deeper to put in a few levels of parking under the current quadrangle’s space and Upper Pitt St. building’s footprint.

This would then alleviate the traffic generation & parking in the local streets for all the out of school hours activities, the events, the fundraisers, for the coaches, music teachers, debating teachers & parents, the weekend sporting activities, as well as for the high quality teachers that they wish to attract to teach at the school during term time, parent teacher nights, information nights, drama nights, Ignatius Spirituality formation nights, to name just a few.

MOTION: Milson Precinct thanks St. Aloysius for their time to present to the community. Milson Precinct to make a submission to the Minister and Dept. of

Planning and Environment, suggests all residents who have concerns about the Master Plan and its impacts on the community do the same, by 28 May, 2018

Moved: JC Seconded: JN Carried