

25th May 2018

Mayor and All Councillors
North Sydney Council,
200 Miller Street,
North Sydney, 2060

council@northsydney.nsw.gov.au

Dear Mayor and All Councillors:

**SUPPORT NOTICE OF MOTION FOR THE REDEVELOPMENT OF ST ALOYSIUS COLLEGE AND LORETO
KIRRIBILLI - NORTH SYDNEY COUNCIL MEETING – 28TH MAY 2018**

We are writing on behalf of the Craiglea Strata Committee to support the Notice of Motion and to express concern over the proposed SSD application being advanced by St Aloysius College for its Junior, Middle and Senior School Campuses.

Craiglea is a heritage listed property that comprises 19 residential apartments and is located at 49 Upper Pitt Street and 88 Kirribilli Avenue, Kirribilli. The Craiglea development is adjacent to and runs parallel to the eastern boundary of the Middle School Campus.

The purpose of writing to you is to ask that you vote in support of the Notice of Motion at the Council meeting on Monday 28th May 2018 in respect of the St Aloysius College and Loreto Kirribilli State Significant Development (SSD) Applications that are currently before the NSW Minister for Planning awaiting determination.

While the Notice of Motion essentially relates to the traffic and parking implications of both developments Craiglea residents are concerned over many aspects of the St Aloysius development and the manner in which the school has progressed this application. Rather than repeat our concerns, we have attached our Consultation Pre Lodgement-Feedback Report which details our concerns.

We are equally concerned that the Community Consultation Report prepared by Willow Tree Planning Consultants and detailed at Appendix 29 of the EIS document fails to accurately account the concerns of the Craiglea Strata Committee and that the EIS documentation fails to address how Craiglea's concerns have been addressed in the final development proposal and supporting specialist investigations noting that it is a requirement specified in the Secretary's Environmental Assessment Requirements.

We fully appreciate that the land use fabric of the locality requires residents to coexist alongside the educational establishments. However, in this land use context both St Aloysius College and Loreto must also have regard to the amenity of local residents and the safe and efficient functioning of the locality on a day to day basis.

The 2016 census identifies that Kirribilli has a local population of 4,133 residents. From our review of the St Aloysius College and Loreto SSD Applications we understand that these schools bring around 2860 students and staff into the Kirribilli locality each school day. (St Aloysius College 1244 Students and 339 Staff and Loreto 1100 students and 180 staff).

Both SSD Applications are looking to guide development over the next 20-50 years however they fail to adequately address the issue of student growth. The St Aloysius Application states there will be no increase in student and staff numbers beyond natural growth while Loreto states it will limit student growth to 30 pupils. This is inconsistent with the population growth projections of the Draft North District Plan. These projections state *'that by 2036 significant growth in the primary and secondary school aged population is expected to result in an increase in school enrolments of around 29,000 or 21% based on current enrolments in government and non-government schools'*. Both applications rely on limited growth projectons as the basis of their environmental assessment arguing no increase in student and staff numbers means no increase in environmental impact.

The SSD applications and the capital investment both schools are making is significant having a combined value of \$232.5 million (Loreto \$100 million and St Aloysius \$132.5 million). However, the plans being advanced are not based on any robust analysis of how they operate, at the present time, within the broader Kirribilli community. An assessment of 'adequate baseline data' was a requirement of the Secretary's Environmental Assessment Requirements (SEARs) that were issued for both SSD applications. Analysing baseline data is essential to understanding what is working, what isn't working and what needs improvement. There is an underlying presumption across both applications that there are no issues with how these schools currently function as part of the broader Kirribilli community, they assume no projected increase in student or staff numbers and they conclude there will be no greater environmental impact resulting from the execution of their plans. This is a convenient yet unsupported proposition.

The starting point for any master planning and design process is to define the baseline operating condition. This includes strengths, constraints and opportunities. At the present time, the impact from how these schools operate extends well beyond their campus boundaries and these applications must evaluate this operating context-both internal from within the school campus and external outside of the school campus.

We believe an external assessment is required before a development plan can establish a 20 or 50 year framework for growth. Both SSD applications are being progressed based on a premise that there are no pre-existing issues with how their school campuses presently function within the Kirribilli locality and clearly this is not the case.

The SEARs issued for both SSD applications required an assessment to be made of cumulative impact. Both applications have failed to address cumulative impact. In accordance with the SEARs requirements cumulative impact should have been assessed having regard to the day to day operation of the school, traffic generation, parking demand, pedestrian movement, open space demand and importantly construction impact. In terms of construction impact, we understand that the first stage of construction work for the Main Campus of the St Aloysius College (which adjoins Craiglea) will have a 7 year construction timeframe and will generate around 100 construction jobs onsite. When this construction program is added to that of Loreto there will be a significant impact on street parking demand and traffic movement not to mention extensive amenity impacts having regard to noise, dust, visual privacy and view impact. It is essential that the cumulative impacts of construction are addressed now as part of these SSD applications.

By supporting the Notice of Motion on Monday night you will help to ensure that both schools progress applications that address not only their immediate internal leaning requirements but also their external operational issues. Taking the time now to critically review and refine these SSD applications will ensure that the final development plans being advanced by St Aloysius College and Loreto Kirribilli have fully considered and addressed the long term needs of the broader Kirribilli community.

If you would like to discuss any aspect of this submission please do not hesitate to contact the undersigned.



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