

**Development Application no. SSD 8574: Waitara Public School Redevelopment**

Dear Sir/ Madam,

We declare that we have not made any political donations in the past two years.

We object to the proposal in its current form due to the following reasons:

*Environmental Impact, Transport, Access, Pick-up Drop Off Facilities, Safety and Local Amenity:*

- The proposal does not address the safety in design elements for this development which are vitally important in considering the ongoing operations of the school and the implementation and delivery of a major construction project.
- The proposal Construction Plan has significant omissions for a development of this kind and there is no detail for the site access and safety plan and implementation plan.
- The proposal does not address the adequacy of the school on-site parking provisions and does not provide a detailed parking report. The EIS suggestion to retain (and not expand) the existing parking for twelve vehicles does not comply with the LEP requirement for one car space per full-time teacher, nor what should be provided for new school infrastructure. It does not address the impacts on the amenity and safety for the expanded school in the local streets.

The new development is intended to have 42 teachers (a 31% increase) and a total of 60 staff, which is an average of one car space per 5 staff members. Such provision for a substantially new piece of public infrastructure is inadequate and well short of what the LEP requires. The use of street parking by staff is a cause of inconvenience to local residents, mainly in Highlands Avenue. The street is relatively narrow, and with personnel from the school presently parking on both sides of the street it allows little space for local residents to safely access and egress their properties, little room to safely turn vehicles and in no way facilitates adequate and safe access for other vehicles serving the school via Highlands Avenue.

Vehicles parked in close proximity to the school on both sides of Highlands Avenue reduces visibility and results in an increased safety risk for residents accessing and egressing their properties, parents and children walking along the nature strip and/ or path and teachers entering/ leaving their vehicles and the school site. The proposal needs to address these issues and the extent of the increased safety risks and how these risks will be controlled with greater demands for parking in Highlands Avenue.

- The proposal needs to address in more detail the waste management requirements and the timing and frequency of the waste removal. Given that the proposal intends the continued use of Highlands Avenue for these service vehicles, as property owners we would like to understand precisely what plans will be in place and how the number and frequency of waste vehicles will be minimised.
- The proposal makes estimates of the increased traffic for vehicle pick-up/ drop-offs using a ratio derived from a historical survey at a point in time. Observations of the traffic in Myra Street at the morning drop-off time demonstrate that it is very congested and there is extensive queuing of traffic. With no segregated drop off/ pick up zones in place, the safety of parents and children entering and leaving their vehicles with the oncoming traffic next to their vehicles for both sides of Myra Street needs detailed risk assessment and consideration of appropriate and effective risk control strategies. The proposal does not address these risks, nor make any recommendations for improved safety and risk control measures, such as a dedicated widened area for pick up and set down.

- The proposal documentation plan has no detail on construction vehicle movements and access and how it will integrate with the operating school, school traffic and parking demands not to mention local traffic.
- The proposal has no detail for the building site logistics demands, the construction parking requirements and the storage of materials and management of waste. It is a concern that the EIS suggests that Highlands Avenue can be used as a thoroughfare. It is unsafe for heavy vehicles and any increase in traffic volume. Safety risks will increase significantly for all users of Highlands Avenue if construction traffic, particularly heavy and long vehicles are to use Highlands Avenue. It would be more appropriate to have a temporary driveway from the main roads for this purpose to avoid impacting existing requirements and usage of this street.
- The proposal does not include a risk assessment of the construction activities both within and outside the school grounds and how these will be controlled. Neither does the proposal contain a construction programme detailing the staging of the works, the major construction activities and milestones and how the construction challenges will be addressed.
- The proposal includes use of the school grounds out of hours up to 10pm for both school and non-school groups. This is unacceptable for local residents and the proposal does not provide any detail as to what kinds of activities will occur and how they will minimize the impact on the local amenity of the residential areas and the quiet enjoyment for the residents.

#### *School Buildings:*

- The impact of the excessive height and bulk of the proposed new building has not been addressed, with a significant change in scale (more than doubling the main building height) and the visibility of the building to the adjacent residences and the impact on the residential streetscape.

#### *Road and Traffic Changes:*

- The report states proposed traffic calming measures including single lanes on Edgeworth David Ave and no right turn into Jubilee Avenue. These measures will substantially increase congestion and result in an increased queuing and blocking of the Palmerston Road intersection. These measures will increase safety risks and the risks of accidents and reduce the amenity of the local area.

#### *Greenfield School Site:*

- The shortcomings of the proposal which include significant design and regulatory compromises demonstrate the need for an entirely new school campus. The report does not adequately consider nor address the feasibility and need for a new school campus. The opportunity and need for a state-of-the-art school which addresses the future needs of the increasing population in the area, with optimal transport and public transport access for all school users is not considered. Land acquisitions opportunities for new infrastructure should be given top priority with the substantial increases in population that have already occurred and will continue to occur for the foreseeable future.

End of Submission