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Department of Planning & Environment
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Attn: Navdeep Singhshergill

Dear Sir/Madam

SSD 8574 Waitara Public School Redevelopment Application - objection

I have owned and resided at my property since 2008.

I object to the proposed development for the reasons set out below. My objection has been prepared following review of the DA plans and supporting documents, available on-line.

List of objection points

1. Detrimental traffic and parking effects on the surrounding residential areas and the local and regional road network. (see Attachment 1)
2. Building height non-compliance with Hornsby LEP 2013 (HLEP 2013) associated with poor site location of the main building.
3. Need for improved signage availability and control.

Objection points expanded

2. Building height non-compliance and alternate site layout

The proposed building height greatly exceeds the HLEP 2013 maximum building height limit of 8.5 metres. While this is addressed in the EIS and specifically in the clause 4.6 Exception, the clause 4.6 Exception is mistaken in this regard from two viewpoints. These are that:

There is "*no public benefit in maintaining the development standard given that the non-compliance has no discernible (effect) upon the public streetscape*" (EIS p. 63), and

The false belief that the low-density nature of the R2 zone, as per the zone objective in HLEP 2013, will not be affected. A four storey building is not characteristic of a low density residential environment, with its associated 8.5 metre height limit.

In regard to the first point above, there **will** be a discernible visual impact upon the public streetscape. The location of the 4 storey building close to both the Edgeworth David frontage and the Myra Street frontage will be readily visible from these two major public thoroughfares, notwithstanding the retention of the site's perimeter screening trees adjoining the location of the proposed building.

If the proposed building were repositioned to the eastern part of the site and somewhat further south of Edgeworth David Avenue (see Attachment 2), i.e. further within the site, but still at the same approximate height, this would allow for:

- Improved screening of the building from both the two subject street frontages and accordingly, less visual impact on the public domain;
- The retention of the same number of the site's trees or even possibly a slightly increased number; and
- The retention of the required maximisation of the school site's open space opportunities.

In other words, the application's proposed variation of the building height limit, is acceptable, but on the proviso that it could be better done, with less public domain impact. Yes, the proposed building would require some redesign as the stepped design may not be as easily accommodated in this alternate location. However, the alternate site location is located well away from the adjoining residential properties in Highland Avenue and Ingalara Avenue, thereby avoiding shadowing effects on these properties and secondly, also offering acoustic screening of the residential properties.

In this regard, the preliminary plans prepared by GHDWoodhead (all labelled Option 1 and also exhibited on the Department's website), together with the Site Analysis drawing (01001 revision D) are disappointing. They are intellectually shallow and unimaginative. Unfortunately, the EIS is also lacking in this regard and merely goes through the standard motions of superficially justifying the proposed building height variation. All these mentioned DA submission components fail to examine how the proposed height impact and related suburban character effect could be reduced, i.e., improved upon.

3. Signage

The sign clutter of the school site's splay corner at Edgeworth David Avenue and Myra Street (see photo at Attachment 3) has detracted from the area for many years.

This should be addressed as both a design (prevention) challenge and an environmental compliance issue.

Conclusion

I hope that the Department will seriously consider the objection points raised here and require the Department of Education to improve the proposed development.

Please feel free to contact me if there are any aspects of this submission you would like to discuss.

Yours faithfully



Leland Sanchez
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Attachment 1

1. Detrimental Effects on traffic in Edgeworth David Avenue and Myra Street

The proposal to increase the on-street parallel (kerbside) parking availability in Edgeworth David Avenue on both sides by removing the existing kerbside lanes from through traffic use is objected to for several reasons:

These kerbside lanes are currently heavily used by traffic travelling in both directions, other than when vehicles are parked on the northern side of Edgeworth David Avenue between No 87 Edgeworth David Avenue and Jubilee Street. This represents nothing more than a land grab. A land grab is “the seizing of *land* by a nation, state, or organization, especially illegally, underhandedly, or unfairly”. More accurately this is a road grab, motivated by the Department of Education’s refusal to use any part of their own site, i.e., the school site for parking and vehicle access, as any standard development would be required to do.

If the school site does not have sufficient room for its building and open space requirements, then it should acquire additional adjoining land, rather than make an ambit claim to use other publicly owned land, i.e., the kerbside lanes of Edgeworth David Avenue, for its own use.

The GHD Traffic Impact Assessment report dated August 2017 does not clearly explain that this is what the proposed development seeks to do, namely, appropriate land currently used for a needed public purpose – accommodating traffic volumes between Hornsby and areas to the east such as Wahroonga and St Ives, for its own parking use.

The Department of Planning and Environment should be aware that a considerable volume of traffic uses Edgeworth David Avenue (and Junction Road, Eastern Road, Burns Road, Killeaton Street, Mona Vale Road) as part of the major route between the upper North Shore and the Northern Beaches and the areas north of Hornsby (Berowra and the Central Coast). This is due partly to the fact that there are no exit ramps on the southern end of the M1 Motorway for traffic to proceed to the Northern Beaches. As a result, a considerable volume of traffic proceeds through Hornsby and Waitara using Edgeworth David Avenue.

The current SSD application effectively proposes to ignore this traffic volume and restrict the ability of the traffic to get through. The result will be that the volume of through traffic will not decrease, but will simply take longer to get from A to B. The recent installation of traffic lights at the intersection of Edgeworth David Avenue and Balmoral Street has also delayed traffic (particularly eastbound traffic) on Edgeworth David Avenue. While these lights were badly needed for pedestrian safety for the pedestrian route, generally between Waitara train station and Hornsby Ku-ring-Gai Hospital, the effect of the Edgeworth David Avenue/Balmoral Street traffic lights is that eastbound vehicles in Edgeworth David Avenue in the AM and PM peak periods are often backed-up as far as Wentworth Avenue and three changes of the lights are often needed to get through to the Edgeworth David Avenue/Jubilee Street section.

A traffic blister or other landscaping measure in the kerbside lane of Edgeworth David Avenue in the vicinity of the former Uniting Church site (corner with Palmerston Road) (now a Tibetan Buddhist facility) will have the further detrimental effect of slowing the movement of vehicles through the two sets of lights (Palmerston Road/Edgeworth David Avenue and Edgeworth David Avenue/Myra Street).

This matter needs to be re-thought and discussed in detail with the RMS.

The Traffic report’s proposal to install a set of pedestrian-activated lights in Myra Street, generally in the vicinity of the school’s south-west corner, will also slow the movement of traffic on Myra Street. During the PM peak, northbound traffic in Myra Street can often take more than two changes of the lights to get through the Edgeworth David Avenue/Myra Street lights.

Section 2.2 of the Traffic Impact Assessment Report (Existing Road Network Characteristics) fails to state which RMS road classification and function level applies to either Edgeworth David Avenue or Myra Street. This is a considerable omission and represents intellectual sloppiness.

To remove the proposed development's reliance on appropriating the two kerbside traffic lanes of Edgeworth David Avenue, the Department should require traffic engineers to design and assess the feasibility of providing the following facility:

A one-way access laneway located inside the site's northern boundary, involving minimal tree removal and the provision of safety fencing, for a narrow roadway providing a drop-off and collection opportunity, returning either to Edgeworth David Avenue near, but well before the traffic lights, or proceeding around to the Myra Street frontage. If extending along the Myra Street frontage, the roadway should be located so as to minimise tree removal and land area use, to conserve land for school open space requirements. Pedestrian movements between the footpath and the school site should also be planned in this option. The roadway would only be available during school commencement and finishing periods and not available for public use at any other times.

2. Unresolved conflict between Department of Education Guideline and Hornsby DCP regarding parking provision

Neither the Traffic Impact Assessment Report nor the SEE contains any discussion regarding the conflict between the Department of Education's Guideline for no additional parking within school sites and the Hornsby DCP requirement for full-time teacher parking of one space per teacher.

One is tempted to conclude that as the Traffic Impact Assessment Report and the SEE were written by consultants engaged by the Department of Education, their inclination is to merely take to side of their client. This is not and never has been how EISs are intended to work.

3. Information on parking requirement

I have not been able to find any information in either the Traffic Impact Assessment Report or the EIS where the parking demand for the school (either the present demand or the future demand as the school grows) based on the Hornsby DCP requirement is provided. Furthermore, I am unable to find any assessment of whether the existing and retained 12 on-site parking spaces meet or fall short of this DCP control.

Finally, the comment is made on page 6 of the Traffic Impact Assessment Report (SEARS Transport and Accessibility) that *a Travel Plan may be required ... including allocating parking spaces to teachers that* (sic – should be who) *car share*. Without any information regarding the adequacy or otherwise of the on-site parking and teacher numbers (present and future), there can be no certainty that the preparation of a Travel Plan in this regard would have any relevance.

4. Pennant Hills Road and Marsden Road intersection (section 4.5.1, page 37)

The relevance of this to the Waitara School site is not clear. Unfortunately, this reflects the superficiality of the approach to the exercise.



