

Introduction

This submission contains several reasons for objecting the “Alexandria Park Community School Redevelopment” SSD Application. The high level reasons for objecting are listed below. Detailed argumentation to support the objective is attached to this objection as PDF.

Objections – Detailed Below

1/ Inconsistencies within the application on important development aspects result in a significant degree of uncertainty on what is being proposed and potentially approved. This should be unacceptable for any development application but is especially relevant for this application since it concerns a structure of this magnitude and the inconsistencies are considerable (40% higher building) and involve an important aspect of the application (building size/height).

2/ Supporting documents used as appendix for the EIS are based on different parameters (building height, number of floors) than those stipulated in the EIS itself. The inconsistencies are considerable (Extra levels and 40% higher building) invalidating the conclusions of these documents. Any assessment of impacts based on these (and potentially other) documents becomes impossible.

3/ The proposed building does not comply with SLEP controls “Clause 4.3 - Height of Buildings” . The height non-compliance is very significant (21.1m proposed which is 40.666% higher than 15m control). The EIS argues that strict compliance is unreasonable and unnecessary but fails to provide convincing argumentation to support that conclusion. The main argument that there is public benefit of not complying with SLEP controls is arguable since there is no educational benefit in creating one huge neighbourhood school servicing several districts (Alexandria, Redfern, Green Square, Waterloo, Zetland) instead of creating several smaller schools closer to the residential hotspots. Research instead shows that smaller schools deliver better educational outcomes especially for disadvantaged students which is relevant for Alexandria Park School with its substantial Aboriginal and Torres Strait Islander student population.

4/ The application directly violates several Heritage recommendations for the direct neighbourhood. It is hard to imagine that a +-200 m long, 5 storey 21m+ tall building does not severely impact the aesthetic value of the Alexandria Park “heritage industrial neighbourhood focused around middle class terrace development”.

5/ The impact on traffic has been investigated using unrealistic assumptions and without taking WestConnex into account. These deficiencies imply that the conclusions drawn from the report are worthless and give the report the “ of being written with a view of giving the project a green light instead of being written as to correctly reflect the implications of additional use of the road infrastructure.

Conclusion

Together, the above should present sufficient reason for any reasonable independent assessment which is more than a rubber-stamping exercise, to if not outright reject, than at least significantly alter, the development application. There is a need for school expansion and redevelopment but if all parties make an effort, this could also be achieved with smaller schools and reasonable impacts to the neighbouring community.

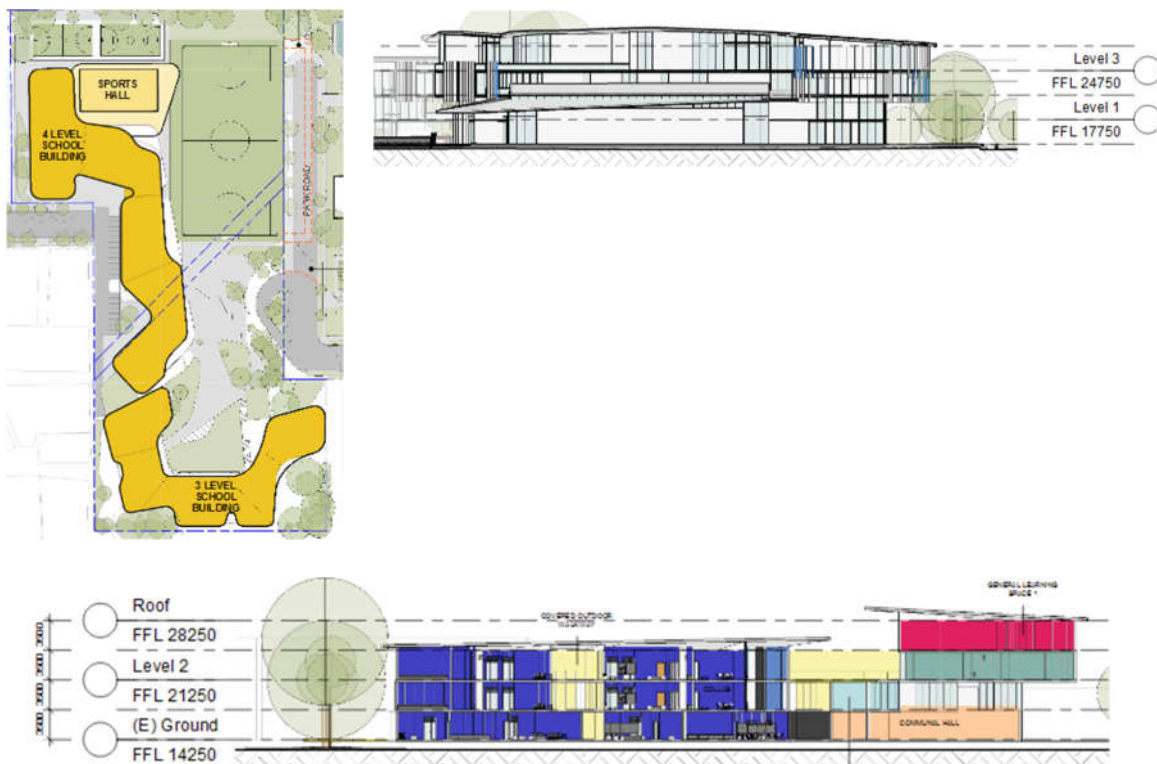
Objections – details

1/ Inconsistencies within the application on important development aspects result in a significant degree of uncertainty on what is being proposed and potentially approved. This should be unacceptable for any development application but is especially relevant for this application since it concerns a structure of this magnitude and the inconsistencies are considerable (40% higher building) and involve an important aspect of the application (building size/height).

From the concept plan;

<https://majorprojects.accelo.com/public/c6809d4257c726f1b28788b37f3c722b/Concept%20Plans.pdf>; the first document linked on the major project website

Reference is made to a 3 and 4 level school building. Diagrams in the same document support this view with a four level building of about 15m height



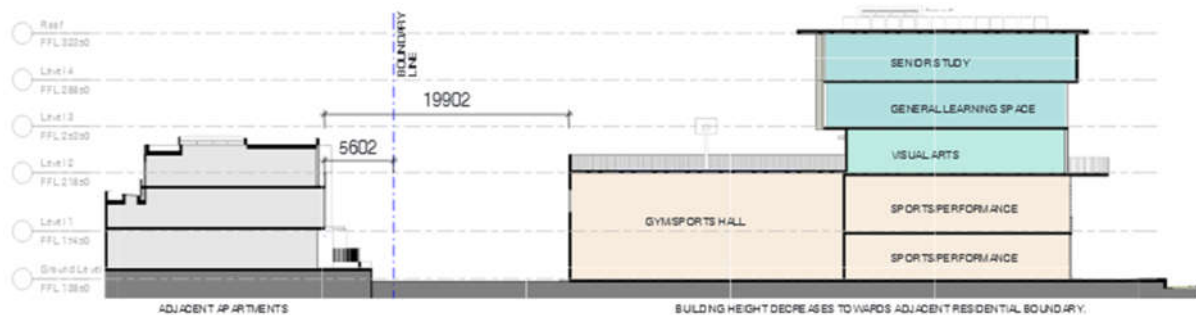
From the request for SAR;

<https://majorprojects.accelo.com/public/eae6a4ddc1a64954ec29a2dede42f4fd/Request%20for%20SEARs.pdf> ; the second document linked on the major project website contains the same concept site plan with the 3,4 level building but in the actual text refers to a building which is 17m tall.

Consideration	Control	Comment
Clause 4.3 - Height of Buildings	15m	The maximum height of the proposed building is approximately 16-17m. This height variation is less than a storey and considered acceptable in this instance. The variation will be addressed in the EIS by way of justification pursuant to Clause 4.6 – Exceptions to Development Standards.

The 4 level view is further contradicted in several of the architectural drawings in appendix where there are suddenly plans with 5 and 3 levels and diagrams with 5 levels without clear indication of height.

Examples:



https://majorprojects.accelo.com/public/3b8558c08d2c1c88a1366c58373a486a/Appendix%20K_%20Architectural%20Report_Part13.pdf



https://majorprojects.accelo.com/public/e7bfe5c0c5a5f366fe5a6797d99432fa/Appendix%20K_%20Architectural%20Report_Part14_low%20res.pdf

From the Environmental Impact Statement;

<https://majorprojects.accelo.com/public/18d5bb08e596f01f11ff5ec94412ded1/Environmental%20Impact%20Statement.pdf> ; the building suddenly has a height of 21.1m contradicting the request for SAR.

Consideration	Control	Comment	Compliance
Clause 4.3 - Height of Buildings	15m	The proposal has a maximum height of 21.1m. However, as per Clause 42 of the Education SEPP, development consent may still be granted without a Clause 4.6 Variation.	NO

The result of this inconsistency is that many stakeholder will, from the first documents in the application assume this will be a max 15m, max 4 level building while in reality it might as well become a significantly higher 5 level building.

Notice that conveniently, the Environmental Impact Statement document which seems to be the only document that stipulates the 21.1m height, is the last document after all 124!! appendix documents. While the SEAR indicating +-15m is the first document on the website. It can be assumed that most people investigating this proposal would draw wrong conclusion on building height.

2/ Supporting documents used as appendix for the EIS are based on different parameters (building height, number of floors) than those stipulated in the EIS itself. The inconsistencies are considerable (Extra levels and 40% higher building) invalidating the conclusions of these documents. Any assessment of impacts based on these (and potentially other) documents becomes impossible.

Following the building size confusion detailed in 1/ there is further inconsistency in the documents supporting the application. This should render the conclusions of these documents unreliable given they are often strongly dependant on building size, height impacts.

2.1 From the **Heritage Impact Statement** ;

https://majorprojects.accelo.com/public/7b3111f204259c8824f100c4ca9a1d77/Appendix%20H_%20Heritage%20Impact%20Statement_low%20res.pdf ;

“the **four storey** section of the proposed school is set well back from the street, thus assisting in minimising any impact on the Alexandria Park Heritage Conservation Area”. “

“It is comparable in height to recent apartment development in the locality, which has little appreciable impact on the heritage item or the conservation area; “

Both statements are not in line with the application.

2.2 From the **Social Impact Assessment** - Visual Amenit;

https://majorprojects.accelo.com/public/45af2c6916ea41d6aaf713c69b19227a/Appendix%20LL_%20SIA.pdf ;

“The architectural design has considered the scale and height of the surrounding residential area. The proposed development includes a **four-storey building** at the western boundary of the site and a four-storey building in the southern section of the site.” “The proposed school buildings are **of a**

comparable height and scale to recently completed residential apartment development in the local area.”

Both statements are not in line with the application.

2.3 From the **Acoustic Report** ;

https://majorprojects.accelo.com/public/51df6f34dd14786d9c67d02bb0bb80cd/Appendix%20T_%20Acoustic%20Report_Part1.pdf ;

“The secondary campus will essentially be **contained over three levels with a future fourth level proposed.**”

Some documents, where conclusions should reasonably depend on building height, do not stipulate the building height/number of floors used for analysis. Given the uncertainty around the building plans used throughout the application the conclusions can thus not be trusted:

Solar Reflectivity Report;

https://majorprojects.accelo.com/public/f03d7ce2e11fc0c14978b88fbedb0607/Appendix%20EE_%20Solar%20Reflectivity%20Report_Part1.pdf

Geotechnical report;

https://majorprojects.accelo.com/public/4ee03db2aee6a7d4ed0a8b4f7aa1c513/Appendix%20M_%20Geotechnical%20Report_Part1.pdf

Consultation outcome report;

https://majorprojects.accelo.com/public/35e508e0751cc4e40bd5917fda0eed15/Appendix%20MM_%20Consultation%20Report_Part1.pdf ;

It is unclear whether consultations have used the correct building height/number of floors for obtaining community feedback

3/ The proposed building does not comply with SLEP controls “Clause 4.3 - Height of Buildings” . The height non-compliance is very significant (21.1m proposed which is 40.666% higher than 15m control). The EIS argues that strict compliance is unreasonable and unnecessary but fails to provide convincing argumentation to support that conclusion. The main argument that there is public benefit of not complying with SLEP controls is arguable since there is no educational benefit in creating one huge neighbourhood school servicing several districts (Alexandria, Redfern, Green Square, Waterloo, Zetland) instead of creating several smaller schools closer to the residential hotspots. Research instead shows that smaller schools deliver better educational outcomes especially for disadvantages students which is relevant for Alexandria Park School with its substantial Aboriginal and Torres Strait Islander student population.

Arguments put forward in the Environmental Impact Statement

(<https://majorprojects.accelo.com/public/18d5bb08e596f01f11ff5ec94412ded1/Environmental%20Impact%20Statement.pdf>) about height non-compliance are outlined below (*italics*) with

comments as to why they are deemed unsupported:

Strict Compliance is Unreasonable and Unnecessary

Strict compliance with the control is unreasonable and unnecessary as:

- To achieve the floor space requirements necessary for the projected population growth and the future school's operations it has been necessary to exceed the development standard. A compliant development would never achieve the student capacity requirements projected by The Department.*

The above statement is made without any further supporting evidence. The "SEAR" used the same number of students but suggested a 3/4 level, 15m building as sufficient. Why is a 3/5 level, 21m building now suddenly "necessary".

Why is it not possible to consider other locations for a new school where the size/height can be accommodated within SLEP controls? Has acquiring some neighbouring warehouse buildings been considered so that the building can be constructed within SLEP controls.

- The State Government has announced that enrolment numbers at government schools will grow by 21 per cent over the next 15 years. New schools and bigger enrolment capacities are needed to accommodate the growth. Inner Sydney school sites are constrained so multi-storey buildings are required to meet the demand. The proposal is one of five multi-storey schools in inner Sydney needed to ensure there are enrolments spaces for students soon.*

This in itself should not be a reason to ignore SLEP controls. Surely schools can be constructed within SLEP controls. Why is it not reasonable to do this in this particular case? Why is it necessary to grow Alexandria park school from 600 to 2200 students if there is only a planned 21 per cent growth over 15 years. Even if we consider a 100 per cent growth in enrolment, a 1200 student school should suffice.

- The intention of the development standard is for building height to be contextual. The site is surrounded by multi storey development so the proposed four and five storey built form is contextual.*

The building height is strictly enforced for any development in the area that has occurred within recent years. The maximum height of directly surrounding buildings is 15m. The 21m proposed building neighbours an area where the SLEP max height is 12 and 9m. The fact that the building proposed is of substantial length as well (+200m) further adds to the view that it is not "contextual".

- The site can accommodate the scale without having significant unreasonable impacts on the amenity of the park and surrounding properties.*

It is hard to grasp that adding 1600 students + students/teachers and a building of this scale to a residential focussed neighbourhood adjacent to townhouses does not "significantly impact". No further information is given as to how this statement is supported.

- The site can accommodate the proposed density as it will have negligible impacts on traffic and parking impacts. The school will cater for a local catchment. The site is well serviced by public transport to cater for any students and staff beyond the local catchment area. The increase in density will therefore not result in unreasonable traffic and parking impacts as walking to public transport will be the primary way of accessing site*

Again the difficult to understand argument is made that adding 1600 students as well as teachers/parents, users of out-of-hour activities etc. will "have negligible impacts" on this area with limited population density (24.87 persons per hectare compared to 135.24 persons per hectare for Waterloo/Zetland).

See our objection part 5/ for detailed assessment of the Transport Assessment which seems based on very optimistic assumptions without providing a reasonable supporting case. Further to that that assessment leaves out near term impacts of WestConnex which will already heavily influence the surrounding streets.

Further to this, the document argues that there is “no public benefit by maintaining the development standards”. This statement is made without much supporting evidence as to why one huge school would be beneficial for the community. Research instead supports that smaller schools deliver better results, especially for disadvantaged students which is particularly relevant for Alexandria Park School with its substantial Aboriginal and Torres Strait Islander student population.

See for example:

- School Size and Student Achievement: A Longitudinal Analysis; Egalite, Anna J.; Kisida, Brian *We find evidence that students' academic achievement in math and reading declines as school size increases. The negative effects of large schools appear to matter most in higher grades, which is also when schools tend to be the largest.*
- The Effect of Primary School Size on Academic Achievement; Seth Gershenson, Laura Langbein *two subgroups of interest are significantly harmed by (bigger) school size: socioeconomically disadvantaged students and students with learning disabilities*

4/ The application directly violates several Heritage recommendations for the direct neighbourhood. It is hard to imagine that a +-200 m long, 5 storey 21m+ tall building does not severely impact the aesthetic value of the Alexandria Park “heritage industrial neighbourhood focused around middle class terrace development”.

Heritage Area's:

1. Alexandria Park Including Entrance Gates, Landscaping and Grounds

<http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=2420539>

“No large buildings or structures should be added except for utility services facilitating the use of the park.”

2. Alexandria Park Heritage Conservation Area

<http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=2421456>

“Retain intact Interwar industrial development - Do not exceed scale - Limit redevelopment to existing volume”

“Respect scale and form of significant development - Respect building line of significant development - Encourage rendered and painted finishes”

The Heritage impact statement;

https://majorprojects.accelo.com/public/7b3111f204259c8824f100c4ca9a1d77/Appendix%20H_%20Heritage%20Impact%20Statement_low%20res.pdf ; indicates:

“It is comparable in height to recent apartment development in the locality, which has little appreciable impact on the heritage item or the conservation area“

“Dense and mature trees in Buckland Street will screen the development from buildings on the periphery of the conservation area. Trees along the western edge of Alexandria Park will also provide some screening.”

“However, the scale and architectural form of the proposed development, which is in the vicinity of recently completed residential apartment blocks and will have a similar height and scale to them,”

It is unclear how the author came to these statements (maybe he was using the wrong building plans? See 1/ And 2/). If we consider that the new building is planned to be 21m high while surrounding buildings are 15m at most, with most of them being <10m we do not see how it is “comparable in height”. Furthermore the building will be an uninterrupted structure of about 200m width which is hardly of similar scale than surrounding residential development. A building of this magnitude will certainly impact the look and feel of this heritage neighbourhood and is unlikely to be shielded properly by the couple of trees on the edge.

5/ The impact on traffic has been investigated using unrealistic assumptions and without taking WestConnex into account. These deficiencies imply that the conclusions drawn from the report are worthless and give the report the “ of being written with a view of giving the project a green light instead of being written as to correctly reflect the implications of additional use of the road infrastructure.

The transport assessment;

https://majorprojects.accelo.com/public/8b1d2f784af0c67436f6870a40383206/Appendix%20E_%20Transport%20Assessment_low%20res.pdf ;

bases itself on following assumptions:

- The levels of active transport (i.e. walking and cycling) are relatively low, however, given the anticipated future increase in residential population in the Erskineville and Alexandria area, this would be expected to improve
- Travel by private car is high, however, given the limited amount of parking available in the area, this would be expected to reduce.
- The levels of active transport (i.e. walking and cycling) are relatively low, however, given the anticipated future increase in residential population in the Erskineville and Alexandria area, this would be expected to improve
- Only impact on traffic from 3pm to 3.10pm is assumed. No assessment of the PM peak period is undertaken.

has severe restrictions in its investigation:

- Investigation based mostly on evidence from a single day
- It allows for all the benefits of future upgrades (Sydney Metro, Green square, Alexandria to Moore Park Connectivity upgrade) but fails to consider negative future impacts (Growth of residential development in the direct surrounds requiring road infrastructure, WestConnex impact on McEvoy, Fountain street etc).

- No indication of impact of weather elements (rain, storms, heat etc.) on method of transport and impact on road infrastructure
- No impact considered of after school activities and after school care which will add additional traffic in PM peak.

The document further argues that

Current “Travel by private car is high, however, given the limited amount of parking available in the area, this would be expected to reduce.”

So the document itself agrees that there is not enough parking. This means residents (and their visitors) will be unable to find off-street parking which can have a major impact on people’s day-to-day life.

Conclusion on the transport assessment

It is admirable that the city focusses on public transport, walking and cycling but given the concerns of some parents for child safety it is reasonable to assume that the uptake of this will be limited and only gradual for this specific development. Parents might prefer to drop off their children by car given the distance and busy roads between green square and Alexandria park which will only get worse once WestConnex is fully operational.

The assumptions and limitations of the traffic study detailed above leave an impression of cherry picking where the author considers only positive future developments and makes select assumptions to support a positive outcome. In how far these assumptions and future upgrade outcomes hold true is speculation and any conclusion based on that should be presented with the necessary caveats.