

St Aloysius Redevelopment – Submission Modification 1

9/4/2021

Thank you for the opportunity to consider the current Modification to SSD-8669-Mod-1.

I have appended a copy of my submission made 8 August 2019 to the NSW Planning (excluding attachments). I believe that the 'theme' of that submission remains relevant and fundamental to the ongoing issue as to the scale and impact of both Loreto and St Aloysius Schools in respect of the local community.

I suspect this proposal is just the thin edge of the wedge of the school's endeavours to find ways to further leverage its student roles, and by default revenues, with little or no consideration for the local community.

Firstly, lets revisit the conditions where modifications have been sought: -

A8 The student population and associated full time equivalent staff numbers of the site must not exceed 1244 and 176 respectively

A9 Notwithstanding condition A8, the maximum student population may exceed 1244 by up to a maximum 20 additional students from time to time, to allow for unanticipated fluctuations on a temporary basis.

This means that the school has already in effect lifted the 'numbers' by 20. There in essence is nothing to say these incremental numbers could not become an everyday occurrence. As an aside, adopting average Student Fees as per my submission of 8/8/19 of \$18,000, that in simplistic terms equates to additional revenue of \$360,000pa. In my opinion, increases in the student population numbers/revenue significantly drive of the school's decision-making leaving community considerations in its wake. I have continued to highlight 'revenue potential' throughout this submission to emphasise this point. I understand the school is a commercial enterprise but it exists in an environment where the school has an overwhelming impact on the Kirribilli neighbourhood and contributes very little, if anything, to the community. Of course, the school provides a great education benefit to the wider community ie Mosman, Cremorne, Neutral Bay etc but they do not have to suffer the implications of two large schools dominating what is a very tiny and densely populated community.

Moreover, a shift in the methodology relating to population limitations from Enrolment's and FTE could have a considerable impact on the community. For example, let's just assume that on average, 4% of the school population is absent / sick on any one day.

*Note: The ACARA website shows that average Student Attendance levels for 2019 across Australia was 91.4%
<https://www.acara.edu.au/reporting/national-report-on-schooling-in->*

australia/national-report-on-schooling-in-australia-data-portal/student-attendance

The ACARA My School Website shows that St Aloysius attendance rate was 96% for the 2019 year.

A 4% nonattendance level, is equivalent to 50 Students and 7 teacher FTE. If the potential for increased student numbers were monetised, the incremental revenue would equate to \$900,000pa. The school could in turn increase enrolments under the revised provisions sought. They may argue that the population on site at any one time would not be greater than as is currently the case. That would be erroneous, as the non-attendance levels are already factored into the current caps. This is akin to Airline overbooking flights! They work on the probability that a certain number of passengers will either cancel or be a 'no show'.

Moreover, the proposal to have circa 100 Year 11/12 students operating from home everyday allows the school to further increase student numbers with a consequential increase in revenues of circa \$1,800,000. In turn this will allow the school to reduce its onsite Teacher FTE by 7 that they in turn could convert into increased student numbers with an economic value of \$126,000.

Let's further theorise around other possible scenarios. Let's say the School adopts a change in physical attendance for all students where they spend half their school time on site and the remaining half at home or some other location i.e., extracurricular activities. They could then run two school shifts much like what occurs in some other countries. The School would argue that there is no change in physical onsite numbers but from the Communities perspective, instead of 1244 students 'movements' in and out of Kirribilli each day, the numbers would balloon to 2488 with all the negative consequences such as traffic flows, crowding on foot paths and noise etc. I acknowledge this may seem a little implausible at this juncture. However, it is shown to demonstrate the potential for the population caps to be abused and manipulated.

School hours of operation are indicated as follows: -

School Hours: 8am – 3:15pm

School Reception: 7.30am – 5:00pm

Note: extracurricular activities occur outside core hours on weekdays, weekends and public holidays.

SPORTS FACILITY ▪ Hours will vary depending on the requirements from term to term, and year to year.

SWIMMING FACILITY ▪ Hours will vary depending on the requirements from term to term, and year to year.

MISCELLANEOUS ACTIVITIES/EVENTS ▪ Performing Arts, Creative Area, and community events currently operate throughout the year on weekdays and weekend, and can operate till 10.30pm. ▪ All students are on campus for core school hours, with many students also participating in a range of extracurricular programs before

and after school. ▪ The School will issue letters to immediate residents to advise of the proposed yearly activities.

What this suggests is that while school hours are currently limited to 8am to 3:15pm it is worthy to note the comment “many students also participating in a range of extracurricular programs before and after school” that could extend until 10:30pm.

Now they ask the Community to allow the school to conduct partial offsite learning for Year 11/12 students thereby seeking to modify the Consent so that the ‘population limitations’ apply only to physical onsite teacher / student numbers.

The Modification claims as follows: -

The number of students entering and exiting the Site will be monitored through a controlled technology solution that uses specialised cameras to count in and out student and staff numbers at various locations around the College. These count numbers would be aggregated up to a single dashboard displaying the total count of individuals across the three campuses at any one time.

I am sorry, but this is like getting the ‘fox to guard the henhouse’ My concerns in this regard are as follows: -

1. What if they have breaches of the maximum ‘people’ number/s. Does the School run around and tell ‘Johnny and Mary’ to go home or wait down the road until someone leaves? I suspect this is all rather theoretical without any consideration of the practical implications.
2. Would the breaches be reportable and what are the consequences of non-compliance?
3. There is no external ‘policing’ rather it is all self-managed with no punitive outcomes.
4. It is not clear whether the population count technology discriminates from non-students / teachers etc? If not, how will it monitor the situation?

My Submission of 8/8/19 raised the concerns of parking wherein I indicated St Aloysius had a staff parking ratio of 6.74:1 whereas Loretto had a ratio 1.84:1. St Aloysius points out that “*Most staff and students who use public transport use buses and trains, which run frequently during peak periods*” If I recall correctly, the school came to this conclusion by surveying the Student/Teacher population in 2019. Again, this is again just like leaving the fox in charge of the henhouse! As a resident for over 23 years, it is very clear parking has become increasingly more difficult to locate a car park during school days. The best way to test this is to walk around Kirribilli during the school holidays. There are many car parks available but when school returns, there are virtually none! The common denominator seems to be the school holidays. Also, if you walk around the streets, you can see from time-to-time Teachers / Students monitoring their vehicles for ‘chalk’ marks on tyres and on many occasions it is not just one vehicle, it is a number. Seems, that the Teachers / Students take turns to go on car checking runs! Moreover, as the surrounding community has become more affluent and cars become cheaper, more and more students are driving as opposed to utilising public transport.

As for traffic, we have many instances of traffic lined up in Carabella St that extends up Willoughby St to Broughton St and on occasions almost back to the roundabout at McDougall St. I acknowledge this issue relates to Loretto, but it is synonymous with what is occurring throughout Kirribilli. Imagine if the school/s introduce school shifts – this swarm of arrivals and departures is going to occur 4 times a day instead of two times.

Whilst this Modification solely relates to St Aloysius, it must be remembered that any such consent will offer a precedent for Loretto to similarly seek a comparable consent modification.

St Aloysius argues: -

In accordance with the legal advice prepared by Addisons (Appendix 3), Condition A8 and A9 were only intended to operate to restrict the number of students and staff physically on the School Site at any one time, not the number of students that can be enrolled at St Aloysius' College. As such, the DPIE can be comfortable that an amendment to Conditions A8 and A9 of the Consent which makes it clear that those conditions do not intend to restrict overall enrolment at the School, but rather only intend to restrict the number of students physically attending the School, would not undermine or wind back the intention of those conditions as currently imposed.

I believe allowing the school to utilise total physical population (Students / Teachers) as opposed to Students (1244 enrolments and 176 Teacher FTE) is fraught with danger and open to abuse/manipulation. To simply highlight this and reinforce earlier comments, I have tried to summarise below some of possible Scenarios: -

St Aloysuis Population Scenarios				
		Scenario 1	Scenario 2	Scenario 3
		Current Consent	Year 11/12 Study at home 3 days per week	School runs 2 shifts
Student Onsite / Enrollment Cap		1244	1244	1244
Teacher FTE		156	156	156
Allowable Variance		20	20	20
Total Allowed		1420	1420	1420
Plus				
Students @ Home		0	100	0
Teachers at home		0	8	0
Students - 2 x School Shifts		0		1244
Teachers = 2 x School Shifts		0		156
Gross Population		1420	1528	2820
Enrollments / Potential		1264	1372	2664

Whilst in each instance, St Aloysius could contain its 'onsite' population within the sought caps. However, the schools Gross Population and Enrolment Potential increases 99.6% and 110.7% respectively. There would undoubtedly be a considerable detrimental impact on the community if this were to occur. St Aloysius and its Legal Advisors appear silent on the downstream implications of their proposed Modification.

I therefore ask that the Schools request for consent to Modification - SSD-8669-Mod-1 be declined.

Wayne Rees