

Travyn and Alison Rhall
32 Fitzroy Street
Kirribilli NSW 2061
16 April 2021

St Aloysius College Redevelopment APPLICATION SSD-8667-MOD-1

We welcome the school's approach to promote more remote learning and this seems a very good initiative for the school to take. Abiding by the original conditions A8 and A9 would give flexibility to the school, to increase remote learning, and decrease local community impact via less students on campus. This would be an excellent outcome for all parties.

We **OBJECT** to the proposed changes and expect that both conditions A8 and A9 should stand as agreed. Our objection is for the following reasons:

- **Timing.** After a fairly arduous process a decision was made regarding the original development application for the school. Even though the decision is fairly recent, we now find that the school is pushing the boundaries further to increase potential attendance on campus. It is unreasonable to make changes so quickly after the conditions have just been set.
- **Manipulatable student counting process.** This process is easily manipulatable and doesn't seem to leave an audit trail. It is unreasonable to introduce a student counting mechanism that is easily manipulated by the school. This system, should it be implemented, will increase the impact on the local community.
 - Every day a number of on-site students will be away because of illness, excursions and other reasons. The absence of these on-site students would result in camera technology student numbers being lower. This allows the school to bump up the number of on-site students and this has nothing to do with remote learning.
 - Part B, Section 2.1, Paragraph 4 of the proposal - *No data on facial detection is to be kept, and the technology would not impact on any public that walk past the gated areas.* How will the Department evaluate proposed new Condition A8 is being met? It seems the school regulates itself with no audit trail to ensure compliance. Information is easily manipulated if this is the case.
 - There is no discussion on how the proposed camera technology works. We know technology has error bands around it. Police Radar, used for speed detection, has been shown to be inaccurate by up to 10%. If the same sort of error occurs on this system then it could easily allow a further 10% students to be on-site. Students walking in/out behind each other, etc can easily be used to lower numbers physically detected on-site.
 - There is no discussion on privacy impacts on local residents. While the school indicates no facial detection data is to be kept, there is no discussion about how local residents privacy is safeguarded when their images have been captured.
- **Additional staff impact on the community.** Whether staff work on, or offsite, there will be in-house staff days, special events and other occasions when all the staff will attend the school. Our local street parking is already heavily utilised by teachers and there should be no further encroachment, by teachers, into the limited available parking spaces that residents can use. It is unreasonable to have a greater impact on the community than that originally proposed.

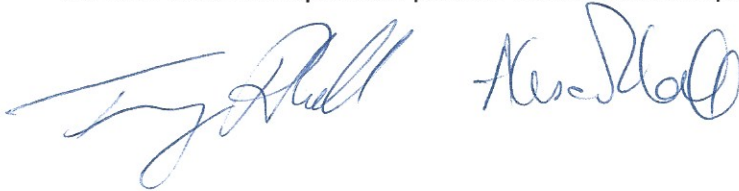
In summary, we feel there are substantive reasons not to allow this variation.

If the Department makes some variation allowing extra remote learning students, then any variation must be based on-site student number definitions agreed in the original approval. As an example, suppose the Department allows 50 students to do offsite learning. Then A8 would be varied to indicate the student population on-site must not exceed 1244 and the student population remote learning shall not exceed 50. There must be a clear audit trail on how student population remote learning are measured. The School must on an annual basis provide to the consent authority a list of the additional student population remote learning, together with such other details as may reasonably be required to demonstrate these students were off the Site at all times the education was conducted.

In relation to the staff numbers there should be no change to A8 if remote learning is allowed. The full time equivalent staff numbers must not exceed 176 as, per bullet point 3 on the previous page, this will have a big impact on the local community.

We also expect that there will not be continual modifications sought by the school to the original development application.

We have made no reportable political donations in the previous two years.

Two handwritten signatures in blue ink. The signature on the left is 'Travyn Rhall' and the signature on the right is 'Alison Rhall'. Both are written in a cursive, flowing style.

Travyn and Alison Rhall