

23 June 2021

**SUBMISSION: EPPING SOUTH PRIMARY SCHOOL**

**86 Chelmsford Avenue, Epping**

Dear Sir/Madam

Please find attached my submission regarding the new Epping South Primary School (Concept and Stage 1), Application SSD-8873789.

I object to the State significant development application and request that a public hearing is held due to the serious detrimental impact of the proposed development on the immediate surrounding community. This process should enable a better design solution to come forward.

I have no reportable donations in the previous two years to make.

Yours sincerely

Mark Nutting

## **The Proposal**

Concept and Stage 1 application is for new Kindergarten to year 6 primary school, comprising demolition works and the construction of new buildings to cater for an enrolment capacity for up to 1,000 students has been submitted as a State Significant Development Application.

The Stage 1 works will provide a total of 25 home bases and associated facilities together with a hall and canteen, administration facilities and play spaces. Car parking for the Stage 1 development will also be provided.

## **Context**

The rationale for Epping South being established within 800 metres of Epping West is the serious overcrowding at Epping West Primary. Epping West currently has 1300 students and 29 demountable classrooms. The proposed development of Epping West will involve the removal of temporary demountable buildings and the construction of two (2) new buildings and the reinstatement the oval and play space and a reduction in students to 1,000. Due to demand the current facility is inadequate and in desperate need to be refurbished and further primary school capacity added to the area.

A comparison between Epping West Primary (despite being currently desperately overcrowded) and the proposed Epping South school highlights a range of critical shortcomings for the plans for Epping South including the under provisioning of playing fields and open space, parental carparking and school bus parking bays for the new school.

However, making the most of use of the site by building three storeys at Epping South Primary (with their smaller building footprint) will still not, and cannot, make up for these deficits. For example, Epping South will be almost one hectare (or a third) smaller than Epping West Primary catering for the same number of projected students. Moreover, Epping West has access to good parental parking provision and is next to great community sports facilities, while Epping South has none of these attributes. It is very good surrogate for understanding the parking and spatial needs of the proposed school.

## **Key Comments**

In its current form, I object to the proposal for the Epping South Primary school as it needs some serious amendments to provide an effective school campus with adequate amenity that fits well into its community. Accordingly, I urge that the development application for the concept and stage 1 be refused.

The proposed school facilities at Epping South will have very poor access from surrounding residential areas and public transport given the majority of students' dependence of private car for transport and the bisection of the surrounding area by busy secondary roads (Willoughby Street, Midson Road and Mobbs Lane) and the current lack of safe pedestrian crossings.

The overall project (the concept) for the new primary school in Epping of a core 35 school with 44 teaching spaces with the works to be completed over 3 stages, with up 1000 students is a significant overdevelopment of the site. The current design very poorly resolves overlooking of residences, playground noise and traffic impacts for hundreds of neighbouring households.

The proposed amount and intensity of use is not consistent with good practice in primary school planning, leading to student overcrowding that will be expressed in inadequate outdoor play space and dramatic and unwarranted traffic congestion and noise impacts. These impacts will be seriously detrimental for students, staff, and the surrounding local community.

The provision for parked buses taking children on school excursions has been seriously under supplied. Having sufficient well designed bus parking bays is absolutely critical to kindergarten and primary school student safety. Epping West has two bus spaces and this proposal for a similar school population has only one and no capacity for expansion. This is essential 'infrastructure' for the new facility and a major oversight and another flaw in the school's physical planning.

There is insufficient capacity for this number of students being dropped off and picked up. Resident parking and use of local streets will be seriously and negatively impacted with vehicle congestion and disruption due to bottle necks where most cars will have to queue to park and then to leave Second Avenue. The level of proposed carparking provision does not appreciate that all parents will need to park to collect children and sign in and out children in before and after school care. Overlooking this basic need gives very little confidence in the rigor of the proposed school's planning overall. There is no account of the parking requirements for major school events such as end of year concerts etc.

**A smaller development should only be considered for approval that provides greater street and rear boundary building setbacks, an altered school layout and design for active play, greater privacy, additional parking for parents and a more effective traffic management strategy.**

In terms of the concept, only stage 1 should be approved with stages 2 and 3 rejected. A new school would therefore provide 600 K-6 students and 38 staff (28 teaching staff and 10 support staff) as a maximum. Accordingly, the development should be located with a significantly greater setbacks to both Grimes Lane and the residential flats to the south. Additional landscaping on the northern and southern side of the buildings together with more permanent playground with good solar access in winter with less overshadowing (as will be experienced in the proposed western play areas) is required. The setbacks should also enable the provision of two school bus bays at Chelmsford Avenue end of the site.

To better manage the flow and volume of traffic, it is recommended that Grimes Lane be one way Eastbound (reversing the current proposal) enabling traffic to disperse more readily leaving the school using both Chelmsford and First Avenue thereby doubling the capacity to limit the problems of vehicular queuing. Such a measure would need to be undertaken conjunction with additional parking spaces provided elsewhere.

Even with a restriction to a maximum of 600 students, there has been a serious miscalculation of the parking needs and provision for the new school.

**Without substantially more carparking provided on site, the new school will assuredly wreak havoc on the surrounding neighbourhoods of quiet streets introducing and inflicting traffic congestion and permanent parking problems.**

The Education SEPP<sup>1</sup> notes the consent authority must take into consideration—

- (a) any submission that RMS provides in response to that notice within 21 days after the notice was given (unless, before the 21 days have passed, RMS advises that it will not be making a submission), and
- (b) the accessibility of the site concerned, including--
  - (i) the efficiency of movement of people and freight to and from the site and the extent of multi-purpose trips, and
  - (ii) the potential to minimise the need for travel by car, and
- (c) any potential traffic safety, road congestion or parking implications of the development.

A quick comparison with Epping West Primary's parking provision which still struggles to meet demand underlines this problem. It has over 100 plus car spaces directly adjacent to the school without the need for children to cross a road. See the comparative table below with Epping South.

At attachment 1 is a photo of the carparking in the shared zone at Dent Street being used at 3.15pm on 21 June 2021. All 110 car spaces were being used for pick-ups from school, in addition to car pickups using the spaces in Ward Street.

For many parents will Kiss and drop offs will not be appropriate. Many parents will need to park for appointments and to sign in and out children attending before and after school care. The SCT report suggestion that 65% kiss and drop off demand can be met by 10 spaces is patently false and an overoptimistic assumption, when a simple comparison is made with Epping West that recognises the extent parents use both Ward Street and Dent Street and data during the normal school year is more accurately recorded.

The SCT Consulting Transport and Accessibility Impact Assessment Report states that pick up and drop off of pupils will require a total of 54 parking spaces based on the consultant's predictions of modal share<sup>2</sup>.

However, it is not appropriate for the report to suggest this number is not practical nor is it appropriate that the development not adequately provide for this ongoing need.

It is not appropriate to reduce or ignore parking standards just because the standards cannot be met by a development proposal. Nor is this a minor variation. Clearly it is not reasonable to make more favourable assumptions just to mitigate the inevitable problems that will result from the development.

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<sup>1</sup> [http://classic.austlii.edu.au/au/legis/nsw/consol\\_reg/seppeaccf2017761/s57.html](http://classic.austlii.edu.au/au/legis/nsw/consol_reg/seppeaccf2017761/s57.html)

<sup>2</sup> Transport and Accessibility Impact Assessment Report April 2021, Page 37

The Epping South site has multiple parking constraints: a very limited school frontage; no shared carparking facilities such as at Eastwood Public or Epping West Public), that mean that this transport constraint must not (and cannot) be overlooked and disregarded in the planning approval process. Currently pedestrian access is severely limited to half the school catchment on the southern side of the site.

It requires a clear and more effective strategy to solve this problem along with appropriate investment rather than a transfer of this cost to local residents in a half km diameter radius and for parents routinely dropping off and picking up children every day. This cost will be experienced through permanent and regular traffic chaos, delays and much irritation and frustration experienced over the school year. Double parking of cars and related reduced visibility will be particularly unsafe for children and other local resident drivers needing to get to work.

Accordingly, substantially more on-site parental parking is required given the lack of school frontage for parking. Epping West has 26 spaces in Ward Street that is fully occupied on a school day. Improved parking will need to be achieved as a prerequisite for any project to gain approval. It may need to be accommodated either on the existing site or by acquiring additional surrounding property.

Part of using this higher density school option in an existing built-up area situated away from dual use shared carparking options requires additional government investment in new parking alternatives such as underground parking on premises and/or the acquisition of another site for carparking provision as an essential part of the development. This investment option should be considered as part of the trade-off for the Government selecting a relatively small quite suburban site with so many parking constraints that will generate a greatly intensified car usage.

Pedestrian access to and from the school on the southern side should be considered through to Ferntree Place, potentially through the public reserve, at the eastern end of the Meriton development to facilitate and increase the level of active transport, i.e., children walking to school. This will also help to substantially reduce the amount of car traffic generated by the proposed school.

### **Impact on the local road network**

It is most unlikely the proposed traffic flows will work satisfactorily. As children and parents will cross these roads too, long delays at intersections will provide a long-term source of frustration, traffic noise, and further congestion. The example of Epping West Primary with a similar proposed student population and parental modal behaviours helps under-score this conclusion.

That said, traffic exiting Epping West Primary school has at least eight exit options with traffic turning left and right from Ward Street to Carlingford Road, Lilli Pilli Street left and right to Midson Road and Dent Street turning left and right to Downing Street or straight ahead and Dent Street/Mountain Street turning left and right into Ray Road. This is in addition to pick-ups from cars parked in Ryde St and George Street. A typical afternoon will routinely see extended queuing from Lilli Pilli Street with school traffic, delaying through traffic.

Assuming the vast majority of the kiss'n ride traffic from Epping South is funnelled into Second Avenue with just a right and left priority-controlled exits will lead to extended queuing and bottle necks and at times, and result in delays to drop offs and pick-ups. Other traffic arrangements alternatives must be considered as this planned option would provide just 25% (or less when Ward Street is included) of the exiting car capacity of that available to Epping West Public.

An alternative arrangement with a one-way eastbound connection along Grimes Lane taking the kiss' n drop would double the exit options and through capacity from 2 (left and right from Second Avenue) to 4 (left and right from Forts Avenue and left and right to Eden Lee Street). Some traffic is also still likely to exit from Second Avenue left and right. The resultant level of queuing should be therefore considerably reduced. Angle parking to the school would provide additional time limited parking spaces while care could be taken to avoid the removal significant trees. That said, additional carparking capacity for school parents will also be required as noted.

### **Noise and overlooking related residential flats and homes**

Impacts to be further considered include overshadowing (in stages 2 and 3), privacy, and acoustic amenity to the local community.

Given the high likelihood of detrimental noise impacts from playgrounds, measures to minimise the potential for adverse acoustic impact need to be demonstrated at this stage of approval to ensure the quite amenity of the locality with hundreds of residents is not compromised. Managing acoustic noise problems will potentially become more important with the planned shift to more flexible school opening hours.

Similarly, the close proximity of the three-storey school to houses abutting Grimes Lane and the many high-density apartments in Ferntree Place requires privacy impacts to be resolved at the concept/siting stage, as they are substantial issues.

Consideration needs to be given to the design of permanent sunny play spaces at the Chelmsford end of the school site and be more fully considered given the overshadowing of large significant gums in the school's primary playground area.

### **Built Form of the School**

The scale and bulk of development anticipated under the planning proposal concept plan (stages 2 and 3) is not in proportion to the current (nor committed) level of accessibility, and parking amenity of the surrounding area. An eventual school of 1,000 pupils will be an over development and result in much less site area for each student to use when compared to the 'overcrowded' Epping West Public.

## PRIMARY SCHOOL COMPARATIVE TABLE

	Epping South (Proposed)	Epping West	Difference
School Area	2.076 hectares	2.9785 hectares <sup>3</sup>	.9025h
Student numbers	1,000	1,000 <sup>4</sup> (1,300 in 2021)	43% more area per student by 2028
Staff		72	
On site carparking		56	
Street carparking adjacent to the school	16	<b>156 available spaces</b> 26 Ward Street 110 Dent Street 20 Tennis Courts	
Bus bays adjacent to school	1	2	200%
Streets to exit to road system for kiss 'n ride	1	3	
Adjoining public sports fields	Nil	2 plus tennis courts	

<sup>3</sup> Lot 1 DP161495; Lot 1 DP122509; and Lot 11 DP1099882.

<sup>4</sup> 'It is noted that the application states that there will be a future decrease in enrolments and the school will accommodate a reduced number of students on site from 1300 to 1000 by the year 2028.'

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=PAE-19790803%2120210614T231146.086%20GMT>





Photos 1 and 2: Carparking in the shared zone at Dent Street being used for school pick up at 3.15pm on 21 June 2021. There were no concurrent sporting events.