

**CHANGE OF USE OF 211 PACIFIC HWY, ST LEONARDS  
GORE HILL MEMORIAL CEMETERY  
FROM OFFICE USE TO A SCHOOL  
PROJECT 10661**

**Substantiation of the summary points supporting rejection of this application**

**Whilst the desperate need for new schools in Sydney is acknowledged, this is NOT the site for one.**

I write to request that the change of use of 211 Pacific Hwy St Leonards from commercial offices to a school under Project 10661 be rejected. Although there is no objection to the site being used for commercial offices or medical purposes, this is not a suitable site for a school.

It is also asked that this rejection be considered with additional weight, in light of the fact that typical users of the public playground and those most impacted would not be on the DA notification list as they don't live in the surrounding office properties e.g. local families in 5 Greenwich Rd approx. 200m up the road, were not directly notified of the DA.

The site itself is far too small to accommodate a school as the school footprint cannot even cater for basic essential school facilities that a functioning school demands. The site area is approx. 1500m and is effectively the equivalent of 2 house blocks. The change of use proposal wants 2 house blocks to cater for a capacity of 210 children plus approx. 15 adults. This is impractical and unrealistic and the school on a postage stamp cannot provide for basic school operations as it is only 2 storeys, not a self-contained high-rise. The site is so small, there is no space anywhere on the proposed site where the entire school can gather together for regular school life such as for daily assemblies and school activities. There is no provision for a school hall, nor is there sufficient outdoor space around the school building that could hold all 210 students and 15+ adults, nor on-site space for students to participate in essential PE classes. The proposed site does not even have enough toilets for its 210 students as required by school standards.

The proposed school would need to permanently rely on use of the adjoining public parklands, toilets and facilities which are public amenities for all. The school's use of these facilities, particularly the public playground and toilets will prevent local families and businesses with young toddlers from using the playground on a daily basis. The students would dominate the playground near the start of the school day, every day during recess, every day during lunchtime and shortly after school ends, excluding others from using it. This is an inequitable restriction on the community. It must also be noted that the public playground is non-compliant for school use purposes as it contains equipment prohibited by Dept of Education playground rules. For this reason alone, the proposed site should not be used as a school. It will impose undue pressure and the real risk of unnecessary litigation on Willoughby Council when a child inevitably seriously injures themselves and the playground is non-compliant.

If the site used as a school, it would also dominate the limited local parking facilities during end of school and after school pick-up when the carpark is already filled by patrons from sports clubs, the local public and schools who have bookings for the newly upgraded sports oval facilities.

The traffic and parking statements in the report are somewhat inadequate as they do not cater for driver behaviour. The assumption that school drop off will take place over an hour's duration is erroneous, hence all related calculations and conclusions based on this must be disregarded. It will instead take place over 15 minutes as students are not able to attend school until a teacher can supervise them. Excluding 25 before-school places, supervision of the remaining 185 students begins at 8:45am with the bell going at 9am. The kiss & drop zone only caters for 10 cars. These students are from out of area and cannot walk to school. This will result in a backlog queue of cars blocking the Pacific Hwy T3 transitway and buses, and will impede traffic flow on a major road. For this reason alone, the proposed site should not be approved for use as a school.

This application should not be deemed a new school for the purposes of SSD, as it does not open up new enrolment placements for the local families in St Leonards/Greenwich as children of local families will not be able to enrol their children at this school because it is affiliated to a specific church with a very specific demographic with out of area students from 5kms away.

This site is suited to commercial type offices as there would be minimal additional traffic, and adult workers use local public transport options and have no significant impact on the very limited local parking. Commercial office users casually use the park facilities for exercise etc. but they would not be dominating public facilities it to the exclusion of others like hundreds of school kids will.

This attachment provides fuller substantiation of the summary points provided as reasons to reject this application.

**1. It's a nationally historic significant heritage site and a school is not appropriate for its solemn heritage**

The heritage impact is not so much related to the specific sexton's cottage heritage item on the site, but to the surrounding cemetery grounds. This cemetery has significant heritage value to the history of settlement in Australia, its many famous pioneering and cultural characters.

The Heritage Impact Statement (HIS) does not take into consideration the noise of a school. This is a cemetery site, not just an historical building a school is being added next to! Bells, screams and 100's of cars through it each day will destroy the serenity and peaceful ambience of the cemetery's current atmosphere and ruin what our community holds dear as respectful solemnness for reflection and history of our dead. Use of this site as office space does not result in this type of impact but use by a school does. It's currently tucked behind thick hedges and vegetation which provide a buffer from a constant hum off the Pacific Hwy, but children shrieking and bells are disruptive sounds. If this site is approved as a school, it makes a mockery of the community being able to peacefully reflect on our country's history and the lives of those buried there. Does Rookwood Cemetery have a teeming school of screams and bells going off in it? If we plonked a school building in Rookwood with children readily able to access and run through and around all the graves, is that appropriate and respectful use of a cemetery? Why is Gore Hill cemetery any different?

The HIS has addressed the physical features of the proposed change of use, but not the emotional impacts which a cemetery uniquely invokes. This is not a suitable site for a school.

**2. Kiss & drop zone use disrupts consistency of The Avenue and depletes the heritage experience**

Despite the comments in the report, adding a kiss and drop zone and formalised path such as is proposed into The Avenue will disrupt the far-reaching vista and be a very ugly blight of inconsistency on the site as a whole.

Consistency of experience is important for heritage value. Much of the ethereal beauty of The Avenue is its stillness, its long reaching path disappearing into the distance at one end or bordered by the grand curly metal gates at the other. Its beauty is also due to its naturalness with the weathered paving (although not heritage in isolation themselves) and gravel path. It reeks of oldness and of days gone by and is sympathetic and in keeping with an historical cemetery setting.

A kiss & drop zone will destroy the traditional look and be out of character with the immediate surrounds of the cemetery and The Avenue. The modifications are right at the front gate where the grand entrance gates are. The trees overhanging the pathway, the darkness and mood present there now will be destroyed by the adjacent school teeming with its own activity and noise, added to by the shrieking of children on the adjoining playground. They will be in juxtaposition to one another.

Again, the HIS has addressed this item as a physical feature but does not address the emotional impact the proposed development would have on the natural beauty of The Avenue. Having a school here and its heavy use impact would deplete the heritage experience is not acceptable for such a nationally significant heritage cemetery.

**3. It is not a new school, it is an existing school just relocating and does not provide new placements to local families**

Despite the applicant seeking advice that it's a new school under SSD "As the site has not been used for a school before that the above clause applies to any new school on the site regardless whether the school has an existing campus at Chatswood." This advice should be rejected. This is not a new school because it is not providing new enrolment places for local families. The proposed school has a very specific target demographic and is not a generic public school open to all local students of any religion or any language. The local area is already crammed with new families needing enrolment places. If there is a new school in this local area, it should be for the local families. Therefore, this cannot be deemed as a new school under SSD for the purposes as relieving pressure on the existing local schools is the intent of what building a 'new school' really means.

The submission refers to the proposal in that it "supports the strategic objective of providing school place to accommodate the growing population of the area". This is a completely untrue and false statement, as again evidenced by it not providing no new placements for the growing population of local St Leonards/Greenwich residents. It's simply about moving a bulk of students from one location 5km away to another.

As a side comment (acknowledging this application is for an infants/primary school) but by comparison, families in Greenwich are only 2km from a local public high school – Cammeraygal High, but are deemed out of area and our local children cannot enrol there. It could be argued that the families of students for the new proposed school might live locally and attend the Chatswood church but, there's no evidence any do. This is simply about relocating an existing school with the majority of students not being local. This is not a new school.

**4. The site is too small for a school – insufficient space for basic school operational facilities**

The proposed site is just too small to accommodate the basic operational facilities that are required for schooling in 2020. The site area is approx. 1500m and is effectively the equivalent of 2 house blocks. The change of use proposal wants 2 house blocks to cater for the capacity of 210 children plus staff and try to provide basic school operation facilities? This is not a planned medium-rise self-contained school like, say, Anzac Park.

There is no room on-site for a school hall/school assembly area

Where will the proposed school hold its daily school assemblies? Where will it hold school band practice? Strings ensemble practice? Choir practice? Hat parades and Christmas concert rehearsals? Classrooms containing all their desks, bags, storage and other chattels will not be big enough to provide for the basic functions of a school. When the school has guest speakers and external education programs being run, where can these be hosted? How about rehearsals for school plays, or school musicals? The footprint of the proposed school is so small, there IS nowhere these can be held. On sunny days, does mean the school will have to impede on the public park facilities to hols such occurrences?

The school can't be shipping up to 210 kids back and forth all day to the Church hall back at Chatswood for every assembly, rehearsal, practice or presentation. This would take way too much time out of the core school learning day and would require 4 public buses each time, or a higher volume of smaller hire buses. A school hall or a major assembly area is an essential part of school life and activities.

There is no space on-site to run school physical education programs

Where will the school run it PE related obligations? These include programs such as gymnastics, dance, ball games for catching/throwing for hand-eye co-ordination that have been observed as part of the program at other schools. On sunny days, does this mean the school will have to impede on the public park facilities again?

When it's raining, where will the school hold these? There is no room on-site for an undercover COLA or other such structure, like most other schools have as a backup. There is no roof-top playground. If students are not able to regularly perform such activities, they may be in breach of educational curriculum guidelines.

#### What will be the quality of the library?

The proposed shared resource area and library area is tiny. If there are 210 students at the school, this area is grossly undersized to handle this capacity of children, let alone be able to store books range in ages from K-6 in this limited space. Schools also have study desks for students to use laptops for researching assignments etc.

Looking at the plans, the shared space for up to 210 students is only about the size of 1 classroom. This will not be a functional school area to cater for the number of students at the school.

#### Staffroom unlikely to accommodate 12 staff

On the plan, the proposed staffroom looks way too small to accommodate an estimated 12 school staff. Does it meet OH&S requirements and school standards for staff?

These are just some of the basic functions of operating a school and these sorts of facilities cannot be provided on the site at 211 Pacific Hwy. If the site is not big enough to accommodate these basic school operational facilities, it is not a suitable site for use as a school.

### **5. The site is too small for a school – not enough toilets as per school standards for 210 children**

Viewing the architectural plans, there appear to be only 12 toilets for 210 children and 12 staff plus visitors, casuals, parent helpers. The proposed site does not meet the NSW school standards for toilets, washbasins & urinals. This site cannot be used as a school if there are not enough toilets!

The plan doesn't indicate if there are separate toilets dedicated to adults versus the children, but according to school standards, there must be separate toilets for adult and child use. Assuming 2 toilets are allocated to adult staff and visitors, that leaves 10 toilet cubicles (incl the accessible toilets) for 210 students.

A calculation based on school standards indicates that if this site was used as a school, it must have:

- Boys: 5 cubicles, 1 urinal and 7 washbasins
- Girls: 7 cubicles and 7 washbasins

Approval cannot be provided for use of this site as a school when it doesn't meet school standards for child toileting facilities.

What this otherwise means is that the school children will need to use the adjacent public toilets at Gore Oval. This again impedes on public amenity limiting use of the oval toilets by the public before, during and after school. It will also put more onus and pressure on Council and its wider ratepayers to fund excessive toilet paper, soap supplies and additional cleaning fees. It also raises unacceptable risks to children from certain types of adults who hang around public toilets, with many hours' opportunity when children are using them across sustained periods daily.

### **6. The park playground is not compliant with school playground rules and cannot not be used**

This playground is not fit for purpose for school children and should not be permanently used for school purposes. There is a very high risk of litigation against Council and/or the school.

Playground and equipment standards for schools are more restrictive than for public playgrounds, and different guidelines apply.

There are at least 6 pieces of non-compliant equipment present:

- School playgrounds are not allowed to have swings
  - o there are 4 swings
  - o there is a large swinging birds nest
- School playgrounds are not allowed to have merry-go-rounds
  - o there is a merry-go-round in the public playground

Schools are not also permitted to have see-saws or flying foxes.

There are also school standards for the type of mulch used as softfall which must be certified and for the minimum thickness of mulch, depending on the fall height. Does the current mulch comply or not?

There is also a maximum fall height for school equipment which is lower than that for public playgrounds in NSW. It is believed the maximum fall height is 2.4m (TBC). The top cross bars of the walkway between the 2 huts look very close to this height. If Willoughby Council fails to constantly maintain the minimum thickness of mulch as required by the school playground guidelines (which is yet another cost to be incurred by Council if this proposal is approved) this would provide an avenue for parents or the school to sue the Council if a child falls and is seriously injured requiring medical care.

Fall heights for the younger students 4-6yr should ideally be even lower than the 2.4m limit due to higher risk of injury. This is usually why schools have different sets of play equipment for infants versus primary aged children.

With the proposed arrangement much younger and much older students will be competing for the play space and this will be unsafe for younger students. Even if the proposed school tried to split up access according to school groups, as there is insufficient on-site outdoor space for the remaining students to play outdoors, they'd be cooped up in classrooms instead. Further evidence that this site is not suited for use as a school.

There are many other questions that use of the adjoining playground raises. Does the playground meet school playground minimum shade requirements? Who will pay for the periodic inspections required for school playground equipment? How many teachers are going to be required to supervise 210 children at once in the playground? Supervision planning for the safety of students does not appear to form part of this application.

Lastly, the playground is owned by Council, not the school, but would presumably be used by the school with permission from the Council. However, if a child incurred a serious injury on such equipment, who will be held liable? If the State approves this application, will the State be held liable for damages for allowing the change of use to a school? Will Willoughby Council be held liable and be sued for damages? Will the school accept legal liability and pay any claims and litigation costs?

Unfortunately, parents are far more litigious these days and as the public playground is non-compliant for school purposes, it is reasonable to expect they would have a solid case to sue for damages.

## **7. School children will dominate the park to the unfair exclusion of others**

It is not acceptable that the school permanently utilises the adjoining park to play on its equipment and its toilets. This will exclude other members of the local community from using their local facilities. This is inequitable. With the park being recently renovated, this park is used by many local families with toddlers & pre-schoolers, local kindergartens and children visiting the hospital. School students would dominate the play areas to the full exclusion of others.

Supporting this is a key finding in the traffic report that the playground "proved to be consistently busy between the hours of 10:00 and 14:00", the same hours that the proposed school would want to have up to 210 students use the playground during recess and lunch breaks. The report also stated "The use of the playground may be more difficult considering the consistently high number of people using it each hour." This conflict of interest where the public lose use of their local facilities because a proposed school's site is too small to provide a playground of its own for 210 students is unacceptable.

A demonstrable example of how a school dominates the use of the park to the exclusions of the community is Greenwich Public School (GPS) using Henningham Reserve in Kingslangley Rd. Whilst construction is going on at the school, students temporarily use the adjoining Council park as a playground before school, at recess and lunchtime and after school. The image below shows a group of children swarming through and dominating the park area and its play equipment:





GPS's usage is already split by different year groups, for different periods, so the image above only represents a small sub-set of the approx. 280 students. The main difference between GPS's use of a public park is that the school has its own school grounds for the remaining students who are not assigned to the park, and the remaining students can still play and run outdoors. The proposed school site at 211 Pacific Hwy has so little outdoor play space, that most of the students will have to play in the public playground area, or else remain cooped up indoors on the school site.

Local mums & dads that used to take their children there for a morning tea/play in the park or mother's groups that used to use the park have stopped going there. There is no way local people can use the park at the same time as an army of ant-like school students are. In the image above can you see young toddlers or pre-schoolers getting onto the play equipment at the same time as all the other bigger children? No. It will result, unfairly, in degraded accessibility for local families and businesses.

The images below are an example of Gore Hill park users on 18<sup>th</sup> October. These are mums & dads with prams and very young children who would be excluded from using the park simultaneously with up to 210 school children before, during and after school. These observations support the key findings in the traffic report:



Lastly, over-utilisation of equipment and an army of children running through it at recess and lunch is going to prematurely wear out the equipment and cause Council additional cost to maintain and upgrade. There is a cost for this. If the proposed school cannot house its own playground/play area for its own students, then the site is too small and is unsuitable for school use.

#### **8. Environmental impact to over-utilisation of Gore Oval around the carpark areas closest to the school**

Over-utilisation of a grass area kills it off. For Gore Oval, this is not referring to the oval surface itself as that's now artificial, but the grassed areas around the carpark and the proposed school site, and particularly the grass next to the hard court which is already dry.

As evidenced by use of Henningham Reserve by GPS, grass can't handle excessive foot traffic. Up to 210 children every day is excessive foot traffic. It won't be any different for Gore Oval. This will result in Council having to incur additional costs to maintain the grass, use up more water or else re-surface these areas to artificial turf too.

The actual impact of GPS using a public park regularly (Henningham Reserve). It is becoming a barren dust bowl:



The proposed change of use from office to school for this site keeps incrementally increasing rates for all Council ratepayers for a very small number of families. The cost/benefits for Willoughby council are becoming increasingly unjustified.

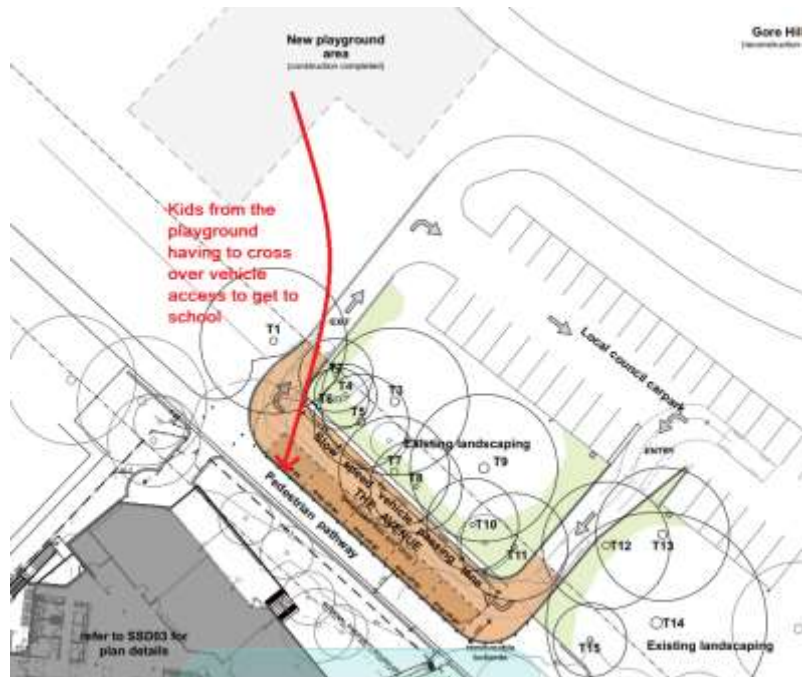
#### **9. Safety risk to students accessing the school from the playground as it crosses a traffic thoroughfare**

If children are playing in the playground before or after school unsupervised, this also represents a significant safety risk to students. The playground is adjacent to the car park with moving cars and children seemingly have to cross in front of where the cars go to get to and from the school building.

Parents are stressed out and don't always look where they're driving. Young children aged 4 and up are not road aware. There will be other users of the carpark facilities who do not have children and are even less child-aware of the risk of young children running in front of moving cars and/or chasing balls.

Kids and moving cars don't mix. This is an accident waiting to happen, and an unacceptable known risk.

(see diagram on the following page)



#### 10. School traffic through the carpark hinders disabled users

Having a constant traffic flow through the carpark at drop-off and pick-up times will also discourage and hinder disabled people from utilising the park, further excluding others. They may not be able to safely get in and out from vehicles during the parent rush. This park is access friendly and has wide paths and a disability swing.

The image below taken at drop-off time shows how the roadway space is needed for disabled users requiring safe access at the rear of their vehicle:



#### 11. Traffic issues – school drop-off and pick-up congestion overview & comparison

This section provides background understanding of specifically how the traffic generated and traffic flows for schools operate and how traffic issues related specifically to schools is significantly different than general traffic patterns. This is based on observation and actual experience with Greenwich Public School as a comparison.

The proposal seeks to include an additional access driveway through Council's carpark to the facilitate drop-off and pick-up of students to and from the school. There is only one lane in and one lane out. It is not particularly wide. The traffic report does not account for the practical time and motion use of such a small space that will perhaps need to accommodate more 100 cars.

This is a proposed K-6 school site. Parents of 4-9 year old children (children in K-4) do not drop their children 'somewhere nearby up the road and let their children walk into school'. They are too young, and parents are over-protective these days. Instead, parents of the majority of 210 children will need to park and walk them



into school, especially on such a busy road. If they don't or can't park, they will need to queue up in a line to get into the carpark.

If you are assessing this application and live outside the local area, it is recommended you come and visit the traffic flow and congestion of parents queueing, dropping off and picking up children at Greenwich Public School in Kingslangley Rd, Greenwich. A stone's throw from the proposed site. This respondent can organise a guide.

If you will, please take a minute to understand a comparable circumstance:

Greenwich Public School (GPS) has approx. 280 children at the primary site, not that many more than the proposed school at 211 Pacific Hwy. Kingslangley Rd is a two-way street with pick-up and drop-off zones on both sides of the street. Parents start queueing in the surrounding streets about 10+ mins before the and pick-up times. There is also a third access point for drop-off and pick-up on River Rd citybound.

Despite the school having the best intentions with an Operational Management Plan in place which organises groups by year/class with support from Council rangers and the police (yes!), there is always a significant queue of cars. And, if a child is not ready out the front when the parent gets to the pick-up point, the parent has to 'move on' and loop around the block and then line up again at the end of the queue. They can't just sit there waiting holding up all the other parents behind them.

Appreciate this sounds ridiculous if you are not a parent that drops kids at school, but this is just how it is.

Now, compare the access to the proposed school having 210 children:

<b>Proposed School at 211 Pacific Hwy</b>	<b>Greenwich Public School</b>
Has a single pick-up/drop-off point.	Has 3 pick-up/drop-off point but GPS is still congested and cars queue.
Only has one way in and only one way out.	Has 3 ways in and out (two-way street in Kingslangley Rd and citybound on River Rd) but GPS is still congested and cars queue.
Any queue would block a major road.	Queues only hold up local traffic on minor roads
To 'loop around' for the proposed site means going through several sets of traffic lights, and creating more congestion on already busy roads over two concentrated periods.	To 'loop around' means congestion on locas, minor two concentrated periods. Locals know this and avoid the area. Pacific Hwy is not a local road to be avoided.
Students live out of area, cannot walk to school making more children reliant on having to be driven to school.	Students live locally and many walk to school. There is less reliance on parents having to drop students off in cars.
Children at this school are from 4-12 yrs. Children in K-4 are too young to be put on public transport without parental supervision, generating a higher than normal rate of parents doing pick-up/drop-off by car.	Some children catch the school bus but as it's only a short, local trip, the risks to young children travelling on public transport are minimised.

There are going to be problems with the Pacific Hwy being blocked. This is covered in the following point.

It is estimated that at least 110 cars will be doing drop-off. The anticipated ratio of the regular 1 car/20 students is not realistic for this individual school's situation as outlined above. A much higher than average number of cars will need to drop-off between 8:45am and 9:00am. The rough estimate of 110 cars is based on 60% of the remaining 185 children being dropped to school (i.e. where parents couldn't accompany their child on public transport, or they don't or cannot park and walk).

This further validates that this particular site is not suitable for use by a school.

## 12. Queueing on the Pacific Hwy blocking a T3 transit lane and the public buses

There will be so many cars dropping children off within a short timeframe that cars will likely be queued up on the Pacific Hwy waiting to get into the carpark.

The assertion in the traffic report that parents dropping their children off can do it, staggered, over an hour and that it will not occur within a single concentrated period has to be rejected.

Only 25 children can be on-site in before school care. All remaining 185 children not at other organised on-site before school activities, need to be dropped off at the school within a 15 minute period. School standards dictate that parents are not allowed to drop their children off at a school before they are supervised. Supervision at the school will commence at 8:45am. The bell goes at 9:00am. Therefore, the set-down activity WILL occur within a single concentrated period, contrary to the report. Hence the calculations and the conclusions in the report should not be relied upon.

If parents did drop their children earlier, it would mean young children were being left unsupervised and probably playing in the park next door. This is not a safe option, and possibly illegal.

With an estimated 110 cars used for dropping children off in the morning within that 15 minute period, all the cars who don't or can't park in the surrounding streets or in the public carpark will be left to queue up for the kiss & drop zone.

The kiss & drop zone has a queue capacity of a mere 10 cars. With the short-term demand concentrated demand these will backup past the carpark entrance and out onto the Pacific Hwy. This is a T3 transit lane in the mornings. If there are more than 10 cars dropping children off simultaneously (which is what will actually happen if you do the maths) they will block the T3 transit lane, and the public buses. This is an unacceptable consequence inconveniencing the wider public on a major road.

This is also a potentially deadly situation because there is a blind bend before the carpark. Buses hurtling around that blind corner may crash into the back of the queued cars. This stretch only needs approx. 15-20 cars queued to affect such a tragic risk. This will not occur if the use of the site remains as an office block.



The traffic report refers to an Operational Management Plan (OMP). Greenwich Public School has an OMP, but despite the best of intentions parents still have to queue up beforehand and endure the chaotic daily flurry. Even the best plan will not circumvent the volume of cars needing to get through the kiss & drop zone in 15 minutes for the proposed school. There will be multiple instances there will be more than 10 cars queued up blocking the Pacific Hwy.

None of this will occur if the use of the site remains as an office block.

In the afternoons at pick-up time, the problem may get worse. In the afternoons, cars are able to park along the northern side of the Pacific Hwy before the carpark entrance. Again, a large volume of cars trying to get into the carpark in a short space of time will again cause them to queue up blocking the Pacific Hwy. In the afternoon, this would block the centre lane of traffic too. The blocked times are likely to be shorter but more frequent as the pick-up period is somewhat staggered and any more than 10 cars will block it.

Sometimes the right-hand turn lane citybound into Greenwich also gets backed up and will block the right-hand lane between Greenwich Rd & Bellevue Ave. At worst or on rainy days, this could leave just a single lane available for all cars and buses to flow through at peak times during drop-off, and/or all lanes temporarily blocked during afternoon pick-ups. It is much harder to turn right in the afternoons due to westbound traffic so this is when the lane backs up most frequently.

Lastly, if cars who cannot get into the carpark driveway are forced to 'move on' they will need to loop around and try again. This will increase traffic through the hospital or at Greenwich Rd lights. It would also increase the risk of dangerous u-turns on Greenwich Rd cnr Pacific Hwy (refer point 15 below).

Having lived in the immediate vicinity of the proposed site for nearly 20 years and having 3 school age children the objections stated are based on observed driver behaviours and actual experience.

If for no other reason than regularly blocking the Pacific Hwy, this change of use application should be rejected.

### **13. Cars queuing up block left-hand lane into Herbert St to return to Chatswood**

Having dropped off or picked up their children from the school, parents will need to return home towards Chatswood. Although the report indicates the most popular route might be to return via the Pacific Hwy, local people know it's very difficult to turn right off Pacific Hwy towards Chatswood at Mowbray Rd, but worse at Albert Ave and Victoria Ave.

The best route is the last option listed – exit the carpark citybound along the Pacific Hwy and turn left into Herbert St to go the backway.

Car movement citybound along the Pacific Hwy is commonly blocked by buses stopping before Reserve Rd and traffic turning into Reserve Rd when the lights first change, then further held up by the left hand turn lane at Herbert St heading north.

The left-hand turn lane at Herbert St is short and narrow. In the mornings, at peak times it is not uncommon to wait 2 and sometimes 3 sets of lights to turn left into Herbert St. This results in the lane overflowing into the T3 transit lane, blocking it and forcing buses and cars to merge into the centre lane.

This is evidenced by photos taken at 9:05am 16<sup>th</sup> October, where a bus had to swerve around the last car that didn't fit into the left-hand turn lane, and then pushed the car on the middle lane over, towards a motorcyclist:



Contributing factors include:

- The turning lane into Herbert St is too short. Not enough space for cars to queue without blocking the adjoining lane.
- The turning lane into Herbert St is too narrow – sometimes buses and trucks don't 'fit' into it and obstruct part of the adjoining T3 lane.
- Current phasing of the pedestrian lights at this intersection (RMS 770 control box number) means that pedestrians have the right of way to cross for most of the duration of the green light, and only limited numbers of cars/buses can get through per phase.
- Cars heading westbound turn right off the Pacific Hwy into Herbert St and block the intersection. Even when the lights change citybound with a dedicated left-hand arrow, cars can't turn anyway! (The traffic is held up by the relatively new pedestrian crossing located further along Herbert St for the hospital/medical centre.)

Interestingly, none of this was picked up in the traffic report.



I often drop my husband or children to the train station and drive this route regularly and observe this. Funny that I went to view the proposed site to make an assessment and saw this happen again and was able to photograph it.

The high concentration of parents dropping off/picking up children in a short timeframe is going to block this left lane for even longer, potentially interfering with bus timetables and reducing flowthrough capacity on the Pacific Hwy.

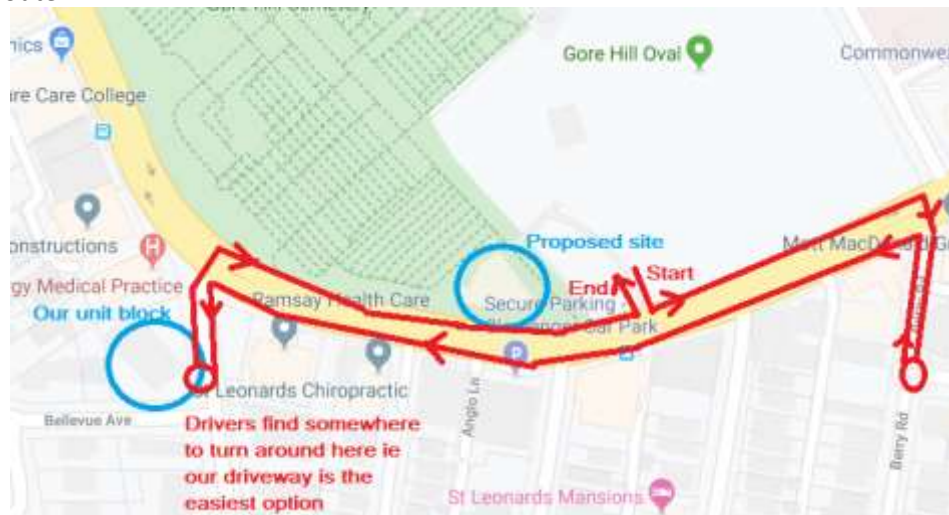
#### 14. Increase in dangerous U-turns on Greenwich Rd, near cnr Pacific Hwy

The traffic report states the obvious of what roads and access points are around the proposed school, and counts cars, but it does not address driver behaviours.

If parents are near the front of the queue and their child is not ready, they will need to loop around and line up again (else stay queued up and cause more of a backlog).

If they need to do a loop around, one of the quickest options is to turn right into Berry St, to turn around at the Marshall St roundabout, and turn left back onto the Pacific Hwy westbound. Next is to turn left into Greenwich Rd, do a u-turn somewhere, and head back to the lights to turn right onto the Pacific Hwy and return to the carpark.

See map of route:



The frequency of U-turners from the Pacific Hwy heading westbound wanting to head back towards the city are already a problem for the unit block at 5 Greenwich Rd and is unsafe.

On the corner of Greenwich Rd & Bellevue Ave, a pedestrian island was put in to stop drivers doing u-turns there. This made more drivers use the driveway at 5 Greenwich Rd for u-turns. Council then put additional traffic controls in place to deter u-turners on the corner of Bellevue Ave & Sarnar Rd. This also made more drivers use the driveway at 5 Greenwich Rd for u-turns. The Owners Corporation then installed a larger, taller bollard a couple of years ago to counter the increase, but this has only mainly stopped the larger trucks from doing u-turns, not the cars.

With potentially 110 cars, there is likely going to be additional, unsafe u-turns done by parents turning back towards the school.

The map below shows u-turn points and traffic controls:



The image below shows how inviting it is to do a quick u-turn in the driveway of 5 Greenwich Rd (and many people do):



## 15. Carpark capacity & usage

I appreciate the carpark figures in the traffic report indicates the maximum number of spots taken up between 8am-9am was 6. A resident was in the carpark 8am-9am on the morning of 16<sup>th</sup> October and there were 11 cars parked. On the morning of 18<sup>th</sup> October, there were 15 cars parked.

The patronage of this great new facility is likely to still increase now that word is getting around about the new oval and playground facilities, and more and more people are trying it out.

The traffic report figures also indicate that at between 4pm and 6pm there were 31 & 32 spaces occupied. Remembering the DA removes 3 spaces, plus disabled spaces are not for general use, leaving 32 parking spaces. Parents picking up from after school care will take up spaces denying sports clubs and schools who book and use the upgraded oval facilities for a wide range of sports and training sessions, and the general public use of their facilities and parking spaces. 10 cars picking up at 5:55pm is going to risk starting another queue on the Pacific Hwy along with the general park users.

Keeping the existing commercial use would not significantly impact the local residents' and sports clubs' use of these public facilities, whereas if the proposed school is approved it will.

Interestingly, it doesn't indicate what time the photo was taken, but Figure 2 of the traffic report indicates that the carpark gets pretty full.

#### **16. Parents parking in visitor parking at 5 Greenwich Rd, Greenwich**

As there is such limited local street parking, the Owner's Corporation of 5 Greenwich Rd already have an issue with people parking in their visitor parking spots when visiting the hospital, doctor's appointments and local offices. Add to that approx. 110 stressed out parents dropping off or picking up their children every day who struggle to find a parking spot on the streets and are running late.

There's a very high likelihood that the residents of 5 Greenwich Rd are going to suffer an additional problem with parents parking in their visitor parking to drop off and pick up children, as well as attending school events during the day or evenings. The Gore Oval carpark will only cater for 32 cars. For a school of 210 children, the public carpark and street parking restrictions mean there will be even less street parking available.

The visitor car spots are easily visible from the Pacific Hwy as well as from when parents are using Greenwich Rd to turn around in. Refer to the image on the previous page; it looks very inviting just to drive in and 'quickly park' to get their children to school.

Despite the Owner's Corporation installing coded, locked bollards in individual spaces to prevent unwanted parkers, people are that desperate for car parking in this area that they nudge forward and drive over them! Yes, seriously. The Owner's Corporation has had to keep paying to install new locks and repair the broken bollards and order and install replacement parts.

As a condition of any approval, if a resident has witnessed a school parent driving over a bollard, who will pay us for the repairs? The school?

In the past, people are so desperate for parking they have made menacing threats to the residents (including an 80 year old lady on multiple occasions), and have actually turned violent with malicious damage done to residents' cars. Will it be included as a condition of any consent that Willoughby Council or the school will reimburse the Owner's Corporation for costs?

As a condition of any approval, will the State, Willoughby Council or the school agree to pay the Owner's Corporation costs to capture information (photos, times and dates of people parking there), lodgement costs for NCAT, plus the time and effort to appear at the Tribunal hearings to have people fined for parking on their private property? The Owner's Corporation may incur costs of up to \$3,000 per car to have then fined through NCAT for parking on their private property.

If you've never lived in a unit, you may not know that the police cannot legally remove these unauthorised parkers, nor book them, and it is illegal for the Owner's Corporation to use wheel clamps hence, the onus is on the residents of the unit block to argue with individual people to get them to move their cars.

The Owner's Corporation faces the issue of non-residents trying to use their private property as a public carpark each and every week. This may only increase with the parents of 210 students trying to find street parking in a commercial zone within a concentrated time period for carrying out drop-offs and pick-ups.

#### **17. Vehicles parked in The Avenue drop-off/pick-up area may block service vehicles & buses**

The traffic report discusses the creation off-set of 5 formalised parking spaces on The Avenue, with No Parking signs. This may need to be limited to 3 cars because if you refer to appendix diagram A4, a service vehicle requires more turning space at the entrance and looks like it would overlap the No Parking area. A large service vehicle may get stuck and not be able to back out of the entrance.

There is also a real risk that a car is parked in The Avenue but the owner doesn't come back in time to remove it during the set down and pick-up process. This may occur especially in the afternoons – where people are attending local doctor's appointments or business meetings which commonly run late. This would impact the pick-up efficiency and reduce flowthrough rates as there is no alternative path available for a car to go around the pickup spots if their child is not ready/in the toilet. A tow-truck will take time to come and move the car, whilst the parents' cars queue back up on the Pacific Hwy. . .

#### **18. School excursions – where will buses park and wait to pick-up and drop-off?**

Students go on school excursions and use buses. School excursions typically involve multiple buses at a time. For 210 students and staff, the school would require 5 public buses (each seat 43 people) or even more smaller private buses. Where will excursion buses park and wait before the students can get on and off?

In the morning, the Pacific Hwy is a T3 transit lane. Around the corner in Reserve Rd the parking is restricted. In Westbourne St, it is used for timed parking. The kiss & drop zone can only fit 1 bus in it, and that is only when there are no cars parked in the No Parking zone.

Use of excursion buses to park and wait to onload/offload is a standard part of an operating school. If there isn't a suitable place for buses to park, the site should not be approved for use as a school.

#### **19. School users take away parking accessibility from ill & elderly patients**

Street parking is already at a premium in the area with the offices, the hospital, the surrounding associated medical centres, and private practice specialist medical offices. These are relied upon by elderly and ill patients, who require local parking to visit such specialists. If the street parking is taken up by parents dropping off and picking up children, plus throughout the day for parent helpers attending the school for daily reading groups & maths groups, and parents attending school events, this will prevent medical patients from being able to park and/or result in ill people having to walk further and further away.

Parents of 210 children are going to use up the carpark pretty quickly. This is unfair to local businesses and rate payers whose patrons need these car spaces. It is a medical zone with an increasingly aging population.

#### **20. Further lack of street parking and strain due to simultaneous residential developments**

Street parking and parking within the Gore Oval will be put under further strain with even less parking spots available for residents and visitors when the hundreds of new units in the St Leonards precinct are completed. These are already approved developments so have to be taken into consideration. Add to that, the future approved St Leonards south plan which will add many thousands of new units/occupiers and visitors looking for somewhere to park. Council approvals for these new buildings have excessively inadequate on-site and visitor parking. The people have to park somewhere.

A school generates a huge volume of cars needing parking. This is not a suitable site for a school due to other competing over population and over development in its immediate surrounds.

#### **21. Vegetation plan – risk to health of historic tree**

The vegetation plan claims there is an estimated 300m<sup>2</sup> of on-site play space, however, as much of that space is not usable as it is covered in hedges and garden beds. From the diagram, the overall usable area is estimated at about half of that, and totally inadequate to cater for 210 students.



What is of more concern is the old and massive tree covering the site. The vegetation plan involves removing much of the existing underplanting of what look like cliveas which are well established and protect the tree's exposed and non-exposed root system.

The vegetation plan indicates that this area will instead be grassed. This area is in extreme shade under the tree and no shade master style turf will survive with kids running over it. It looks pretty in a design picture but is not practical. The surface will probably end up becoming hard and may result in significant compaction of the soil and risk the long-term health of that magnificent tree that frames the entrance to The Avenue and has significant heritage value for the site. If the proposed site is so small and limited, that even the only open space it does have may risk the health of a heritage tree, this is just another reason why this site is not suited for school use.

Lastly, other than to follow a 'process' it appears to be a foregone conclusion that the school is relocating to this site in St Leonards. Despite this DA process, the school is advertising on their website that they are moving to this site in 2020: *"The International Chinese School will move to a new and permanent site in St Leonard's in 2020. This will allow for the continued expansion of the School."* Is there some pre-arranged agreement in place that this will go through, and that any community consultation is just a box ticking exercise? This does not bode well nor pass the sniff test.

#### **In summary:**

This is not a new school as it does not deliver additional school enrolment places to local residents. This site is far too small to sustain a self-contained, functioning school. The proposed site cannot provide for a school hall/major assembly area, or rehearsal spaces for bands, choirs or string ensembles. There is insufficient on-site amenity to properly cater for 210 children with a proper school library or break out spaces. It cannot provide safe traffic management where children in the playground have to cross traffic zones to enter the school. It degrades the emotional experience of a very widely important, nationally significant cemetery – the noise of bells and shrieks from children will ruin what our community holds dear as respectful solemnness for reflection and history of our dead. It's not just a school being located to an historic heritage building. It's a cemetery.

There is no on-site space for the students to all play outside. If approved for school use, it permanently relies a non-school compliant public playground, and puts the local Council at high litigation risk. Local residents will be restricted from utilising their local facilities as the playground and toilets would be dominated by the school's daily use. If the school doesn't use it daily, they will be cooped up like sardines in classrooms during playtimes.

The concentration and volume of traffic at drop-off and pick-up times for the proposed school will block traffic and buses in the Pacific Hwy T3 transit lane, risk accidents for buses coming around the blind corner at speed, is likely to cause additional dangerous u-turns in Greenwich Rd, and will unnecessarily impede on an already strained public parking situation increasing the likelihood of parents using the visitor parking at 5 Greenwich Rd.

The location is unique in that it borders 3 LGAs (Willoughby, Lane Cove, North Sydney) but only serves to benefit existing students of a school 5kms away.

I fully support the establishment of new schools for local residents, but the negative impacts of the proposed school being shifted from Chatswood to this particular site far outweigh any merit it could deliver to our local community. How do local residents and business benefit from this proposal? In every way, they don't. In fact there are no demonstrated merits, only domination and over-utilisation of local public facilities. The change of use proposal to a school for this site not enhance the local community, it just serves to exclude it.

What makes a school? Creating a school from an office block design involves more than just refitting the insides of the building. A school has very different needs, amenities and learning facilities to an office block! There is no practical "fit out conversion" solution to make a small 2 storey office block on a postage stamp into a school for 210 students.

No on-site playground, non-school compliant off-site playground, no on-site school assembly area, not enough toilets, blocked traffic on Pacific Hwy? No school.

I request that this proposal be fully rejected, and the site remains as per the current commercial office use.