Dear Sir/Madam

I am writing to object to the SSD planning application for 211 Pacific Highway St Leonards.

My objections to the application are as follows:

Context and Footprint – The proposed SSD makes no attempt to integrate well with the site, the dominant setting and surrounding vicinity. The SSD is out of context with the nearby vicinity and the nature of single dwellings in the nearby streets. The SSD (as well as the precursor DA) has considerable bearing on the whole area and will have a large adverse footprint and impact that would be felt across a greater area than acknowledged.

There is also a big contrast with the historic surrounding and setting of Gore Hill Historical Cemetery which is a State heritage listed and historically significant site for the St Leonards community.

Design and purpose – The proposed design and operating rhythm of the school is entirely inappropriate and insensitive to the site and surrounding neighbourhood. The SSD will not be sympathetic to the historic character of the site. The surrounding area is all of heritage and historical prominence including the 'Avenue' due to the local historical architectural importance. Any impingement on the site cannot be dismissed as it will have a multiplier effect and will deteriorate the site.

Also the proposed SSD structure, form and features will not be of a world class standard for a school in the area but more like a patchy, spread out and ill organised facility. Ultimately the school on this site will not work well and place students under sub-optimal standard of education. Providing a high level of education standard and facilities should be the main aim of the school. If the site is not conducive to this level of educational standard, then the SSD should not proceed.

Unwarranted Sate Significance - The development should not be considered as a state significant development as it is NOT significant in size, economic value or impact; especially to the area. The development does not meet the description of any of the classes of significance. The development significance is unwarranted and not accurately reflective of such significance. The only significance seems to be from the inflated depiction by the developer. This is especially so when you consider the very narrow list of consumers who will be attracted to this school – not the general community. The only assurance of significance is that it has significant negative environment effects and significant negative consequences to the area. It should be kept in mind that this school is relocating from Chatswood and is not a new school in the LGA and accordingly should not be given the benefit of the SSD label.

Erroneous Survey – The survey undertaken by "Ethos Urban staff" to assess "the use of the car park and the open space at Gore Hill Oval" is totally inappropriate, uses a very small sample size and as such gives the wrong data for this development. This fact is especially concerning as the data from this survey has been used to assess the impact of this development on the car park and oval that will be shared with the community. The methodology for this type of survey should not be used for this type of development.

The methodology for this survey (refer Appendix X_Gore Hill Oval and Car Park Data Collection document # 218421 dated 24 May 2019) was wrong. It was conducted over only 5 days (in one month only) in early April 2019, which clearly is not a representative sample for the use of facilities of an outdoor oval. Especially when the survey was conducted a month after the oval was closed for over 18 months for an upgrade and only opened in March – clearly by any standard the results of the survey are not representative and should not be relied on to any extent. Also, during that particular week to the survey as the report notes - there were "scattered showers", which would dissuade the use of the oval during that time period. It is alarming that the results of this survey were used as a basis for this long-term development that will impact local residents and other users of the oval.

Density and Community – The development does not comply with the Council's Local Plan or with the community expectation of this site or the SEPPs. The density in St Leonards is already at such a level so that any increase in scale to a development will deteriorate the standard of living for the community. In other words, the effect of increasing cars, foot traffic, noise and congestion will need to be scrutinised, with more assessment studies prepared in order to avoid the chaos and bad outcomes in the area, at the expense of the long-term residents. This development will bring a rapid increase of people (students, teachers, admin staff, visitors, parents) to this area. There will also be a year on year increase with school kids intake and all this is not factored in properly in the SSD.

It is vital to note that this school is already operating in Chatswood and approving this SSD will bring about a big shift of population from Chatswood (already geared for this type of development) to another area in the LGA, St Leonards which is already experiencing traffic congestion, trains and busses that are already at over capacity. This shift in location is not increasing the number of schools in the LGA but merely a relocation of the school. As such, after close examination it becomes obvious that this SSD does not fit in this site or the locality and does not meet the aspirations of the community.

Assessment of impact - There has not been a proper assessment of the impact of the school, students and admin staff and visitors on the community, locality, services and infrastructure. In assessing the degree of concentration of students/staff in one site it is clear that this type of development should not be allowed. The site is too confined for a school of this size. This development will further drastically affect the social makeup of the 'urban village' in Greenwich locality on the other side in the nearby streets; which the community reveres.

More than declared -The proposed student buildings would contain a much higher number of people in the one area and one site than declared in the SSD. The result would be a reduction in amenity of the quiet streets with the existing low number of pedestrians and vehicles. The massive increase in students is also likely to lead to unacceptable levels of both noise and pollution. The SSD moves the main pedestrian entrance more centrally into the busiest part of Pacific Highway which will cause further disturbance to the traffic and existing residents. This will also negatively impact the traffic flow and the speed of Ambulance vehicles on their way to RNS Hospital, possibly leading to fatalities. This point is

also particularly pertinent when the school speed zone of 40KM will be in force with in close proximity and on the main road leading to RNS Hospital.

Open space – There is insufficient open space in the development site to cater for the students and to provide good level of amenities for the school. The design is sub-optimal and does not provide sufficient areas for the students, teachers, admin staff to enjoy on school grounds - housed within the proper school zone. As such the school is not on the right site but will be better served at a different site.

Also the SSD relies on open space in the Gore Hill Oval and the Gore Hill Cemetery as a substitute for play grounds for the school on its site. This cannot be an acceptable solution. Schools should rely on their space not someone else's. This open space is already exhausted by a large number of existing residents and will also be used by the high-density residential units built in St Leonards across the 3 LGAs in Lane Cove, North Sydney and Willoughby. So it is not clear how this SSD can claim the use of these locations when there is no more capacity for the school to use. No other school or association can rely on using public parks and areas as their own over a consistent and permanent bases, so why are we allowing this school to do this. This would set an usual and worrying precedent!

Vehicle parking - Parking within this SSD is insufficient which will result in further pressure on existing limited numbers of car parking spaces in adjoining streets. The SSD reports do not factor in that the new units springing up in St Leonards from other developments that will also be competing for the same parking spots. Also, the school will be competing with parking spot with the residents in surrounding streets. This means that the parking provided that can be accessed by the teachers/staff will be limited. Additionally, it is not clear from the plans whether there is sufficient bicycle parking which would be required too.

Transport, Traffic congestion, Movement - There is no adequate traffic assessment for this new development particularly for the vastly increased vehicle usage created when entering and exiting. It would also create road safety dangers for existing residents and also for vehicles and pedestrians exiting and entering the school as the Pacific Highway is already very busy and chaotic. The only vehicle access for the development is inappropriate as it is based on taking away existing and much needed private parking spots.

There is no transport assessment of the needs of the students and their parents travelling to the nearest St Leonards station (which is a distance away) or the buses that are already over capacity. Trains in St Leonards currently are reported at 160% capacity and buses at 120%. The resultant increase in pedestrian traffic will also affect the timing of traffic lights in the area. As mentioned above, increased traffic (cars & pedestrians) will add to the congestion for ambulances causing delays in emergency vehicles reaching RNS hospital, which amongst other things might lead to more fatalities.

Cumulative impact – The cumulative impacts in the SSD for the St Leonards area is not properly considered nor is it at the correct levels of capacity that are currently increasing exponentially. The

assessment reports in the SSD are silent and ignore this restriction for the site. In order to get a clear picture of the impact from this development a cumulative study of traffic, parking, amenity, infrastructure, public transport, services, pedestrians and cars should be investigated at a cumulative basis from the innumerable developments in the area including effect on RNS Hospital.

Public land - It is important to note that the site is public land and belongs to the community. The site should not be offered to private interest in this manner. The community is not happy with this decision to offer it to an SSD. As a minimum the community should have a total input into the use of the site.

Waste disposal/Utilities – the SSD shows insufficient space and methods for waste disposal and management. The utilities will also be at a disadvantage. There are only a few bin spaces and waste space for the students. There is no mention of recycling facilities for the increase in population on the site.

Size of the land/area – the size of the land or area of use is clearly not sufficient for a school that caters for that many students and that age group. The play areas are not large enough and do not provide the necessary space for children to play freely and safely.

Use of open space and public oval – a private organisation should not be able to permanently and solely rely on and benefit from the use of a public oval and open space that rate payers and community organisations use. Especially a place that is of cultural and heritage significance. No other school or organistion is able to do that on a permanent and very long term basis. This sets a bad precedent and is unfair to the community and rate payers. Even the use of an old road that is of cultural significance that we should preserve not increase traffic on – is highly questionable to say the least. How could this have even been considered?

Reputation – The Trustee of the Anglo Australian Christian and Charitable Fund, Mr Vanda Gould, has been involved in a tax evasion case that was before the High Court. Mr Gould faced fraud charges for a tax bill of \$300M. The Anglo Australian Christian and Charitable Fund provided significant finances to renovate the current premises of the school. This Included the 3 classrooms, administration and office facilities. This is rather alarming. The Department of Planning should be careful with offering the SSD status (and the befit that comes with it) and with supporting a school were a trustee who has been before the court for tax evasion of that quantum.

Consultation – Minimal and inadequate effort has been made to consult with the local community that will be impacted by each and every student. Residents were not notified regarding this SSD, the real impacts and even the school/number of students that will be attracted to the area. I live very close to this development and I was not notified. The inclusion of the student numbers and potential future

increase and capacity is integral to this SSD as it defines the requirements of the development. To have almost no public consultation shows how inadequate the actual consultation process was. The planning system highlights the importance of holding a meaningful consultation process from an early stage but this has been ignored for this development. The SSD should emerge from a design process that includes an appraisal of the local context and of public views and aspirations.

In summary, the development is a gross overdevelopment of a relatively small site, in an architectural style and manner completely inappropriate to the heritage surrounding which is held in the highest esteem by the residents. This site cannot cope with a school. There is insufficient consideration for transport, open space, amenity, children play ground, open space, good quality playground, traffic, parking and noise. The <u>reliance and expected **long term use** of public areas</u> (park and cemetery) as usable space for the school is abhorrent and will set an unacceptable precedent.

It would help the SSD to go through each of the concerns stated above and provide comprehensive details in order for the community to welcome such an ill fitted development on this site. In totality this SSD does not work and should be rejected.

Yours faithfully