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35 Ashton Street
Queens Park
NSW 2022

The Director
Social and Infrastructure Assessments

SSDA - 10352

LETTER OF OBJECTION

The purpose of this letter is to object to SSDA 10352 for the reasons summarised below. This letter follows and supports a recent survey of Ashton Street residents who overwhelmingly support the need for action to address significant road safety issues associated with through traffic on local streets adjoining the proposed expansion of the Moriah College (the College). This survey has been submitted separately by a fellow Ashton Street resident (Paul Glasson).

COMMUNITY ENGAGEMENT

The proponent considers that it has informed “near neighbours” of the development through a letter box drop of some 500 houses. This is inadequate and does not comply with the SEARs which requires consultation with “*affected landowners*”. The letter box drop fails to recognise the spatial extent of people who are concerned with, and object to the progressive expansion of the College. The proponent must engage with all households located in the area bounded by Birrell Street, York Road, Queens Park Road, and Bourke Street. It is the people living in these streets who are directly impacted on the through traffic associated with the College.

SCALE

The proposed development seeks to expand its student population by some 17% to 1,965 students making it one of the largest schools in Eastern Sydney. Given the quantum of investment (\$90+m) it is considered that the assessment underestimates the likely increase in the number of people using the school and doesn't accurately consider the associated increase in teaching staff, administrative support staff, as well as the other increases in vehicles for people visiting the school (maintenance personnel, specialist advisors, parents attending meetings etc).

As the scale of the proposal has been underestimated, the related assessments are considered inadequate. Additional assessment on the key impacts associated with traffic and transport is required and should be based on demands greater than those expected with an increase in student numbers of 17% (ie: scenario analyses must be undertaken). Such scenario analysis is a standard activity for the assessment of major projects.

TRAFFIC IMPACTS

The proponent's transport and accessibility impact assessments are totally inadequate and fail to comply with the SEARs. Specifically, the assessments fail to address the Secretary's requirements for the "*assessment of road and pedestrian safety adjacent to the proposed development*" and the "*identification of infrastructure required to address any impacts on traffic efficiency and road safety*".

The proponent's transport and accessibility impact assessment fail to consider or address the impacts of existing and future traffic on the adjacent local streets running between Birrell Street and Queens Park Road. To address the SEARs adequately, the proponent must be required to assess the impacts from the proposed development on the local streets bounded by Birrell Street, York Road, Queens Park Road, and Bourke Street. These local streets are already heavily impacted by through traffic associated with the College on a daily basis.

During the am peak week day period from about 7:15 onwards, the intersection of Birrell and York Streets can become congested for short periods resulting in minor traffic queues of 5 to 10 vehicles in length) along the west bound lanes of Birrell Street. These queues can result in vehicle delays of up to 20+ seconds. In response to these delays, drivers use Ashton Street and other local streets as through routes to avoid the delay.

The am weekday through traffic in Ashton Street occurs concurrently with the loading of cars with toddlers going to child care and school kids going to before school activities. Given that the through traffic is generally travelling at 50kmph+ there is a significant, dangerous, and unnecessary conflict occurring in Ashton Street daily.

It is also common for older students attending the College who are learning to drive to stop in Ashton Street (often in a double-parking arrangement) to swap over with their parents before arriving at school. This significantly compounds the safety issue as it obscures Ashton Street parents and children who are accessing their vehicles or crossing the street from the through traffic. It is not just the volume of traffic using Ashton Street in morning peak hour that is the issue, it is also the speed and recklessness of the drivers that compounds the issue. While the College has developed a Transport, Traffic and Parking Plan, this is not being followed or enforced by the College and has been ineffective in managing traffic impacts.

The use of Ashton Street as a through route puts the safety of our young children at risk as they do not always behave predictably and will from time to time run into the roadway and or in between parked cars. In this respect the risk of collision and injury is fundamentally increased with the ongoing use of Ashton Street as a through route.

We are all aware of the tragic and fatal consequences associated with collisions between cars and kids at comparatively low traffic speeds. It is this conflict between children and through traffic that must be removed from Ashton Street. As it stands, the proposed expansion of the College will, if approved, make an existing unsafe arrangement considerably worse. This cannot be allowed to happen.

While Ashton Street already has several "speed management" arrangements in place (speed humps at either end of the street and a traffic chicane), these do not deter through traffic nor satisfactorily control traffic speeds and hence more effective traffic safety solutions are required. There is clear evidence that dangerous and careless driving is a feature of vehicles using Ashton Street as a through route and this must be addressed as part of the assessment of the proposed development.

The “Transport, Traffic, and Parking Plan” prepared by the College is not being followed by the students and parents of the College nor is it being implemented actively by the College. Such ‘soft’ initiatives aimed at controlling driver behaviour are ineffective and cannot be relied upon to control the impacts of traffic on local streets. Accordingly, prior to completing the assessment of the application, the Department must require the proponent to undertake a comprehensive assessment of road safety and traffic impact for at least the area bounded by Birrell Street, York Road, Queens Park Road, and Bourke Street.

If consideration is to be given to approving the proposed development then specific road works and or road signage must be undertaken in local streets (like Ashton Street) to limit the ongoing, adverse, and unacceptable impacts from through traffic associated with the College.

ACCESS

As indicated above, the impacts on local streets from traffic accessing the College is unacceptable and the expected increase in traffic has not been adequately assessed. The traffic impacts are a function of the volume of traffic accessing the College as well as the number and location of access points to the College. If consideration is to be given to approving the proposed development, then vehicular access to the College must be changed. Vehicular access, for parents and teachers must be provided (entry and exit) on York Road east, York Road South, Baronga Avenue, and Queens Park Road. Increasing the number of access points to a minimum of four would, to some extent, help spread out the flow of traffic and “even out” the impacts of the increase in traffic on adjoining roads.

BUILDING HEIGHT AND DESIGN

While the proposed development does not need to comply with the Waverley LEP and DCP (height limit of 8.5m), the height of the proposed buildings along Baronga Avenue (20.7m) are excessive given the parkland setting. The existing development adjoining Queens Park is predominantly characterised by residential dwellings of a maximum height of two storeys. This development type enhances the existing parkland setting.

If the College wishes to maintain the proposed building heights to 20.7m then the buildings must be set back from the eastern site boundary by a minimum of 15m. This set back would allow for adequate landscaping buffer to soften the proposed built form and ameliorate the impact of the built form on Queens Park.

Both Centennial Park and Queens Park are open spaces of regional significance and should not be compromised by future adjoining development unless the development is appropriately set back and screened with landscaping that is sympathetic to that existing within Centennial Park and Queens Park.

PUBLIC INTEREST

The proposed expansion of the College is NOT in the Public Interest because:

1. It would significantly increase the development intensity of the College precinct which is already of a commercial/industrial scale and inappropriate for a low density residential area;
2. It would add to the already unacceptable levels of local road congestion experienced along both collector and local roads;
3. It would increase the likelihood of collisions between through traffic and local residents; and
4. It would further increase the significant, dangerous and unnecessary conflict of through traffic with local residential activities and movements.

CONCLUSION

As indicated the above, the Environmental Impact Statement undertaken in support of SSDA 10352 has failed to adequately address key matters included in the SEARs and has failed to adequately assess the impacts on local streets from the proposed development. Consequently, the Development should be refused.

If consideration is to be given to approving the expansion of the College, the Department must require the proponent to undertake additional and comprehensive assessments of road safety and traffic impacts for at least the area bounded by Birrell Street, York Road, Queens Park Road, and Bourke Street and identify controls to manage the impacts of through traffic on residents.

Yours sincerely

Tom Gellibrand