

Mr Tim Scott  
15 Cuthbert Street  
QUEENS PARK NSW 2022

**RE: Moriah College War Memorial Association State Significant Development Application  
(SSD\_10352)**

Dear Sir/Madam,

I am writing on behalf of my family in relation to the State Significant Development application (SSD 10352) made by Moriah College.

We object in the strongest possible terms to this development on the following grounds:

1. **Misuse of process** – this development proposal has been deliberately formulated to bypass the need for a development application and assessment by local government. It should be assessed by our local council as it will have significant, long-term adverse effects on our community.

The proposal has been deliberately presented to exceed \$20m in order for it to qualify for SSD status, notwithstanding the financial capacity of the proponent to actually finance the proposal.

- a. *Financial capacity* – analysis of Moriah College's 2018 Annual Report shows that the school reported a \$2m loss in that financial year. It has Net Assets of approximately \$40m, yet it is claiming that the proposed works will cost more than \$80m. There is a genuine question over the financial capacity of the proponent to sustainably fund such a development. One could argue, that they have simply bundled together 20 years of 'wish-lists' in order to bypass the appropriate community scrutiny and approvals process.
- b. *Timeframe for development* – the application has deliberately 'bundled' together a series of developments that are proposed to be undertaken over an almost 20 year period. One could argue, that such developments, in their own right, should form the basis of individual assessments given the long timeframes over which they would be undertaken. Again, one could argue that such developments have been bundled together in order to qualify for SSD, with no real intention, nor financial capacity to undertake such works.

It is for these reasons, that we believe this development should not be assessed under the SSD framework, rather it be referred to the appropriate local government assessment process. Assessment under the SSD process represents a misuse of such a process and undermines the community confidence in our overall planning consents system.

2. **Loss of public amenity** – Queens Park is a community with a distinct character. Moriah, is consistent with this character and if approved, the proposed development will further detract from the public amenity.

The Moriah site is a visual abomination (high walls, razor wire fences, flood lights etc) and more akin to a correctional facility than a school. Furthermore, the school is a primary source of massive vehicular disruption, arising from both traffic and parking. This will only become worse, given the scale of the proposed development and the almost 20% increase in school population.

- a. *Vehicular disruption* – with the successive development of Moriah over the past 20 odd years, there has been a correlation with the deterioration in traffic and parking throughout Queens Park. The Moriah precinct impacts the two key traffic arteries for all north-south bound traffic – those being York Road and Baronga Avenue. On reviewing the Transport, Traffic and Parking Plan (TTPP), the residents have ZERO confidence in this plan being enforced by either the school or the consent authorities. There is no history of compliance, nor enforcement over the past 20 years.
- b. *Visual* – as mentioned, Moriah currently resembles a maximum- security correctional facility, something which is clearly out of character with the parklands and tree-scape that is Queens Park. The proposal will see this amplified via the bulk and the proposed buildings. From Queens Park, looking west, people will be confronted with a 4-6 storey building dominating the western skyline.

3. **Density of development** – this proposal would result in Moriah being the largest school in the eastern suburbs and one with the highest density of students to land ratios.

This is the underlying source of the social disruption and loss of public amenity. A further 20% increase in student numbers can not be sustained from a traffic, parking and visual perspective without a significant adverse impact on the Queens Park community.

Back in the early 2000s, Moriah gave undertakings to Council that the student population would not increase beyond a prescribed level. This has been breached on successive occasions and they are now seeking a further 20% increase via this proposal.

4. **Community** – it is disappointing to reflect, but Moriah has not been a good neighbour or corporate citizen to Queens Park over the past 20+ years.

In short, the community does not trust Moriah. The successive developments over the past 20 years have been accompanied by many commitments and undertakings by Moriah – none of which have ever been met or enforced. Whether it be the capping of student numbers or their TTPPs – none of these commitments have been honoured or enforced by the consent authorities.

Consultation – the manner in which Moriah has approached this latest development is an insult to the Queens Park community. There has been virtually no community consultation on this development and the SSD process for lodging submissions has been expedited to a point which discredits the overall process.

What recourse will the community have to this phased development over the next 20 years should Moriah continue to fail to honour their commitments. The destruction to our lifestyle and public amenity would have already occurred with no ability to hold the proponent to account.

## **Conclusion**

In short, we cannot object more strenuously to this proposal. The density, bulk and scale of the development is totally inconsistent with the character of Queens Park. The by-products in terms of vehicular (traffic and parking) and visual impacts will be long-lasting upon the community with no recourse to rectification over what is a proposed 20 year development period.

Finally, the community has lost all trust and confidence in Moriah to be a good neighbour. Its failure to honour previous commitments in terms of the capping of student numbers and TTPP has destroyed their credibility. The fact that they have concocted an application that enables them to bypass local government planning consents (via the SSD process) is testament to their correct belief that the community does not support their planned further expansions.

Queens Park has been a patient, accepting neighbour to Moriah over the past 25+ years – unfortunately, this has not been reciprocated and we therefore oppose this inappropriate development, or any further development on this site.

Yours sincerely,

Tim Scott on behalf of the Scott Family.