

Dear NSW Dept of Planning,

Tuesday, 17 December 2019

Re: **MORIAH COLLEGE REDEVELOPMENT – MAJOR PROJECT 14741**

Firstly we request an extension of the objection period (currently being December 18, 2019) as approximately 3 weeks is pitifully inadequate for local residents to review and analyse the DA application, as it is just under 1,600 pages, and respond.

The size and scale of this development is inappropriate for Moriah's Queens Park site. The impact it already has on the nearby neighbours as well as the traffic impact on the whole area will only increase dramatically if this is approved.

Every additional car coming into the area is far more likely to use the 'quiet', residential, side streets of Queens Park as 'rat runs' rather than the main thoroughfares as they are already congested in the mornings and afternoons.

Additional points of objection are below:

1. Traffic congestion is already a major problem particularly between 7:30am and 9:30am and later in the afternoons. There is an almost continuous flow of traffic blocking local streets at peak times generated by student drop-offs and pick-ups.
2. Moriah College has failed to manage its own Transport, Traffic & Parking Plan (TTPP) for a long time, evidenced by the number of students, parents and staff vehicles parking daily in local streets contrary to its own TTPP. I have sent at least 50 complaints to the school regarding students and parents breaches of the TTPP with little feedback or acknowledgement from the school. The school seems to be unwilling or unable to get their community to adhere to the TTPP. The TTPP document is a good document but it is pointless if it isn't enforced. I have asked the school to enforce it but they said they don't have the resources despite this being a undertaking they made in previous DA applications.
We note that the school heralds their TTPP document as evidence that it is on top of the traffic impact on the Queens Park and surrounding communities. This is definitely not so and an independent traffic needs to be done to show this. Unfortunately, the residents of Queens Park do not have the resources to do this. Also due to the timing of the objection period, we did not have the opportunity to conduct our own traffic survey as their Year 12 students had already left the school and the rest of the school is now on holidays.
3. Moriah College night-time events are frequent, attract large numbers of people and use local streets for parking. This will only worsen for residents if this proposal is approved.

The school is used for many non-school related activities such as a synagogue for non students, non-student sports activities (such as adult Maccabi basketball training and games in the recent past) and adult use of the swimming pool. They commenced these activities without council approval and, as far as I know, scaled back these activities only when objections were made.

Other activities which appear to be school related are held on weekends and on week nights, often late into the evenings. The participants in these activities often park in the residential streets of Queens Park. This means we are often disturbed late in the evenings by their returning to their cars and driving off. On occasions these parents, students and other community members are very loud.

4. Pedestrian safety risks and general road safety risks will escalate as a result of the increased traffic in local streets. I have seen parents drop their children off just before the pedestrian crossing on Queens Park Road (in the NO STOPPING zone) then let the children cross in front of them. Cars coming from behind have little if any warning of children crossing. A serious accident will happen here soon.

Also, many of the school's students and staff J-walk across Baronga Road, York Road and Queens Park Road away from the pedestrian crossings.

School staff do not appear to monitor this dangerous activity.

It is only a matter of time before there is a serious incident.

5. Noise and air pollution in our local streets will increase due to more traffic and people, and as a result, noise will increase and air quality will reduce.
6. The streets of Queens Park are becoming 'traffic sewers' which is impacting friendly interaction between neighbours, resulting in a decreased sense of well-being, community, connectedness and security.
7. The visual amenity of Queens Park and Centennial Park will be adversely impacted by the sheer size of the proposed new buildings. The planned 4 to 5 storey buildings will overlook and overshadow both Queens Park and Centennial Park. This will change the whole feel of the parks and set a dangerous precedent for future development around the parks.
It is a safe assumption that the school will use any approval for such imposing structures, so close to the public parklands as precedent for future developments.
Furthermore, other developers will use this construction as precedent for other development around the park. This is a dangerous precedent which should not be allowed.

8. 3 weeks, especially in the busy lead up to end of year for local residents, is grossly inadequate for informed responses to the proposal, which contains nearly 1600 pages of complicated text and diagrams – more time is needed. We demand an extension of a further 3 months.
I have been able to quickly skim perhaps a quarter of all the documents and even this has been an imposition on my family and family life.
Also, the time of year has worked against our objection ability. As mentioned before we are unable to conduct our own traffic survey to counter Moriah's study (which is flawed in many ways – such as the omission of the large number of students, parents and staff who park, drive through, pick up and drop off in the residential streets of Queens Park in direct contravention of their TTPP). This inability is because the school's year 12 students have finished for the year and now the school is on holidays.
Our Queens Park Resident's group plans to conduct our own survey at the start of the school's term 1 in 2020.
9. The ripple-on effect of the increase in traffic, congestion and pollution will extend to many residents who have not been notified of the proposal and who deserve the right to be informed and to comment.
We note that a small fraction of the Queens Park households has been notified of this development yet the impact of this development extends throughout Queens Park, Bondi Junction, Randwick and other suburbs further south. Any area who's residents need to drive through York Rd, Carrington Rd, Newland Street, Bourke St etc etc. The Department really needs to recognise the cynical nature of Moriah's information minimisation.
10. The 'Near Neighbour Letter Catchment' was inadequate and needs to be significantly expanded so that all impacted neighbours are aware of Moriah's intentions. As mentioned in point 9 above.
11. Queens Park residents would like Waverley Council to conduct their own independent and public traffic survey so that all stakeholders can better understand the impact.
Although the Queens Park Residents plan to conduct their own survey, it will not carry the weight of one done by Waverley Council. I am sure ours will be perceived as biased, as should be the one done by the school.
12. We note that the school is saying they will make the pool available for use by the local community. This, like the TTPP, is misleading. Again, the school has said this in previous DA applications but the situation is they make it extremely difficult, and effectively impossible for non-Moriah

people to use the pool. I contacted the school in the past to try to use the pool and they said I had to join one of their swimming squads and pay a quite high fee. The times for these squads is very limited as well. To make this offer so generously in their current application is very, very misleading if not deceptive.

13. The Engagement Outcomes Report shows only a very small number of neighbours have been notified of the DA application. This is ludicrous given the enormous impact on a very large area. The DA application should be disqualified for this reason alone and redone.

14. As mentioned above, the DA documents for this application are just under 1,600 pages. We have been given little more than 3 weeks to review this document without the assistance of a professional organisation like Urbis. We all have busy jobs and family lives and have found it extremely difficult to find the time to analyse these documents.

This is unjust in that it is extremely one-sided in favor of the Moriah who has the superior resources, plus the advantage of years to develop the DA documents and only allows us weeks. If the school was genuinely interested in fostering good relations with the local residents, their neighbours, they would have involved us earlier and allow us more realistic time to have our input.

We hope you agree that the size and scale of this development is inappropriate for Moriah's Queens Park site. The impact it already has on the nearby neighbours as well as the traffic impact on the whole area will only increase dramatically if this is approved.

Every additional car coming into the area is far more likely to use the 'quiet' side streets of Queens Park as 'rat runs' rather than the main thoroughfares as they are already congested in the mornings and afternoons.

Additional points of objection are below:

A moratorium on any future DAs from the school for 15 years. The school appears to be addicted to a rolling number of DA applications to continually grow the school's size. Just last year the school undertook to cap its student numbers, then less than 12 months later seek to greatly expand again. This is a cynical abuse of their already poor relationship with their neighbours.

Meaningful attempt to enforce their TTPP with consequences.

Meaningful access to the pool and other facilities as mentioned. Not just words.

An independent arbiter be appointed to monitor complaints against the school's breaches of the DA conditions (past and present). To date there have been no consequences for the school breaching DA conditions. This arbiter should have teeth to enforce meaningful consequences and resolve issues.

A Superficial Review of the Moriah College Transport and Accessibility Impact Assessment has been done by Andrew Stewart, Coordinator.

Comments are:

Page 7 states in Table 1.1 to provide 'accurate details of the current details and peak hour vehicle'

Yet their whole traffic report is based on just 4 hours survey on a day which cannot be established as they say it was conducted on Tuesday June 28 when that date is a Friday.

P16 states "Based on site observations, the existing drop-off/pick up arrangements generally operates satisfactory (sic)"

To the Queens Park Residents and commuters who are held up on Baronga Road, Queens Park Road and York Road every school day there is nothing satisfactory about the school's traffic operations. The residents who live in Queens Park who have to negotiate the large number of 'rat runners' through their suburb do not agree with this statement. And the many, many objections made to the school counter this statement.

Note: we strongly suspect the school has not kept an accurate log of all the complaints made. We ask to audit this log to ensure all complaints have been made as we are sure it is used as evidence of a system which is working when it is definitely not.

Page 17 states "On this basis, it is clear that there is some spare capacity to accommodate additional vehicles within the site, if required."

This is evidently not so. Otherwise, why would so many parents not participate in the go with the flow arrangement and drop their children off (and pick them up) in Queens Park Road and other neighbouring streets.

Page 18: An independent traffic survey is needed. In our strong opinion the survey conducted by ttpv must be flawed to provide such misrepresentation of the traffic situation we witness every school day.

Note: All data in this report has been provided by Moriah or consultants paid for by Moriah. The information cannot be relied on when it so obviously is in contradiction with the daily experiences of so many Queens Park residents. An independent traffic study must be done.

At no point in this whole 'Assessment' does it mention the large number of breaches of the TTPV which the school agreed to enforce. This assessment is therefore dishonest and misleading.

Page 25: This section mentions that the footpaths of York Road, Queens Park Road etc are heavily used by pedestrians from the school. This acknowledges that the streets of Queens Park are used as pick up and drop off zones, in contravention of the TTPV.

Page 26: This page details the cycle paths around the school. This is misleading in that I have never seen a student or staff member on a bike anywhere near the school. To suggest it a common mode of transport is misleading in the extreme. Later on in this report a survey supports this assertion as currently NO students or staff cycle to the school.

Furthermore, their whole traffic plan is based on just a single day's survey (and only 4 hours) which they say was done on Tuesday the 28th of June. Unfortunately for them, the 28th of June was a Friday.

Page 27: This survey makes no mention of the many students dropped off and picked up outside the 4 hours surveyed. My experience is that students are dropped off in Queens Park Road and other residential streets as early as 6am and are picked up as late as 6.30pm. This is excluding special events.

Why haven't consistent, large volume breaches of the TTPP been mentioned in this report? This is not an honest report on which to base a sensible approach to future traffic management.

This report is based on a 4 hour survey on a Friday (28 June). Fridays are not representative for a Jewish school where the students depart the school early. Another reason an independent traffic survey is required.

Page 30: Final paragraph is difficult to understand but if it is suggesting that the traffic around the school operates satisfactorily then this is a huge furphy. Any resident of Queens Park and the many drivers who pass through the area in the mornings and afternoons will attest to the contrary.

Page 31: This table does not indicate where the students park. It also indicates that none of the students have a passenger. This is incorrect. A large number of the students have passengers in their cars. I imagine they don't mention this as it is a breach of their license conditions. As a local resident who doesn't like additional cars, I don't mind car sharing but it does indicate a willingness by the school and ttp to fudge the facts.

Page 34: Note there are no cyclists and half of the Yr 12 students drive to school.

Page 38: Re York Road Pedestrian Survey. The request by the school to install a Children's or Pedestrian Crossing on York Road will have massive impacts on local traffic. It will further impede traffic using York Road pushing even more traffic into the residential streets of Queens Park and surrounds. The only students I have seen cross York Road from and to Centennial Park are those who have parked their cars in Centennial Park (I assume these are Year 12 students). York Road is not a drop off zone (especially on the western side) and no students walk to the school via the park so this is a safe assumption. So, this is a case of using a sledgehammer to crack a walnut. A much better solution would be to ban Year 12 students from driving to school, as is the case with many other schools. This would solve this problem as well as many others.

This proposal needs to be brought to the attention of Randwick Council. Many of their residents will be affected by this and other proposed changes.

What impact will this have on traffic. No study has been done. This is irresponsible to propose this without any thought to its consequences.

Page 46: The school proposes to increase the ELC students from 80 (only approved last year) to 130. These are very young children who need to be driven or walked right into the school. That the school was able to convert a large component of their student population from older students to younger ones has significantly increased traffic in the area.

Page 48: There is a fundamental problem with the traffic study conducted in this report. That is it only addresses and considers the traffic in the immediate vicinity of the school. Yet

the affect of this significant increase in student population, increase in staff population and consequential increase in traffic conjection will be felt in a much larger area. That is throughout Queens Park, in much of Bondi Junction and along many major roads in the area.

This is not a satisfactory study.

Page 49: What does the first paragraph mean? We can't understand this.

Paragraph 4 states: "as well as promote non-car travel (e.g. walking and public transport)" This is for 3 and 4 year olds. How many of these students will be walking very far or catching public transport? At best they will be driven and their parents will park in Queens Park Road or other residential streets. This shows how shoddy this study and report is. It should not be treated as a credible source of information.

Page 50: This states that there will be an additional 29 staff for the school but only 15 car spaces. These other spaces will need to be found in the streets of Queens Park which is already filled with Moriah related vehicles during the school days.

6.3 Bicycle Parking Requirements

This section is really laughable. As stated earlier currently no students or staff cycle to the school. Yet the school is suggesting 108 spaces will be needed. This really is a ridiculous misrepresentation designed to misrepresent the traffic intentions of the school.

Page 51: Under Proposed Drop-Off/Pick-Up Facilities there is no mention of measures to prevent staff, students and parents parking, dropping off and picking up in the streets of Queens Park (in contravention of their aforementioned TTPP document). The TTPP doesn't work now and will not work in the future because the school is unwilling or incapable of enforcing it. There is no incentive for the school to enforce it. There are no meaningful consequences for the school not enforcing it except the loss of goodwill of their neighbours which they don't seem to be worried about.

Page 54: A very large amount of information has been derived from a very small, sketchy survey of current traffic levels (done on an indetermined date). Surely this report can't be taken seriously.

Page 62: Potential Mitigation Measures.

Many of these mitigation measures just push the problem elsewhere. It's like building an expressway with a capacity for 100,000 cars and to just drop this volume onto residential streets incapable of handling this volume.

Page 69: Travel Demand Measures

This section is a total fantasy. It cannot be taken seriously.

To suggest that traffic can be reduced by 10% by these untried and fanciful measures is misleading nonsense.

Page 70: The survey used to create these pie charts indicates that 'Convenience' is the main driver of the mode of transport. The Travel Demand Measures mentioned on page 69 will not work.

Page 71: Green Travel Plan Initiatives

This really is Pie in the Sky stuff. The report doesn't even attempt to explain how they hope to motivate students and staff, of whom none currently cycle, to start riding to and from school. The very large amount of traffic in the area (as the report shows) and the school culture prevents this from changing. Nothing mentioned in this report convinces the reader how this could change.

10% reduction in traffic by these methods is ridiculous. If this was an possibility then why hasn't the school done it already?

Page 72: To reduce convenience Year 12 students should be banned from driving to school.

Street parking in Queens Park and Centennial Park should be changed to maximum of 2 hours.

My review of the Environmental Impact Statement document.

As time is short we have not had the opportunity to fully review this document. The points we would like to make are:

Page i: Urbis make the statement "The information contained in this report is true in all material particulars and is not misleading."

We find this statement interesting as the ttp people above did not make a similar statement and I feel in many areas their report is misleading as I wrote above.

Page 19: Re. "The project seeks to: Re-orient the High School Main Entrance away from the residential area." As per previous DA applications over the years the main school entrance was never to have been on Queens Park Road. This is misleading that this is a major concession by the school. Further, the school has gone back on the undertakings in the past. What assurances, guarantees will there be to enforce this activity. I envisage (in my cynical view of the school's intentions – a result of dealing with them for many years) the school making lots of promises to get this DA through and the reneging on this down the track. A comment of "That was then, this is now" has been made many times by the school.

"Creation of a new student and visitor pedestrian entrance on Baronga Avenue:" Where will these pedestrians come from? We suspect they will come from the same place many of them currently come from. That is, parking in Queens Park Road and surrounding residential streets and walking. This does not fix the situation for the residents. There has been no further commitment to enforce their TTPP any better than they currently do. This does not help us.

Many other measures which time does not allow, sorry.

Finally, it must be mentioned that Urbis and the other consultants used by Moriah to prepare this report are not independent. The school has access to substantial funds to pay these consultants for their biased work. Unfortunately the residents of Queens Park don't have the time or resources required to fully assess the DA application and counter it. Although as I have shown in this objection document, it is easy to poke holes in the documentation because it has not been considered properly.

Also, no serious consideration has been given to alternative solutions such as:

1. Another campus to accommodate the population increase. Where do the students come from? This option may reduce the amount of driving by a whole sector of our community if a second campus can be located closer to the students homes.
2. Use the Emmanuel School which is very close by
3. Not grow at all

If the DA is approved it must be approved with substantial conditions to protect the local residents from the affects of the rapid growth of the school's population and impact. Our group would welcome being part of a committee representing the community to create these conditions.

Examples would be:

Elaborating on the current TTPP. As mentioned above, this is a good document but can be added to. It lacks a critical component which is a way to enforce it. You can't have the school self-monitoring. Dracula in charge of the blood bank! An independent body needs to be involved. A Queens Park Residents Committee was in place for many years but this has all but been abandoned and has no effect anymore.

The school has not adhered to previous undertakings in many, many areas. They have also revelled in the ambiguity of previous DA conditions and undertakings. This is why an independent arbiter is needed to make rulings which can be enforced rather than having the school duck and weave issues where they have been clever enough to word commitments in an ambiguous way.

The school has previously committed to the following things which we would still like them to follow through with:

- Establish a vegetation buffer at the front of the school along Queens Park Road to soften the visual impact of their buildings.
- Tighten and include an enforcement ability in the TTPP document.
- Provide meaningful access to residents to the swimming pool, gymnasium and auditorium.
- Realistic community consultation.

Thank you for your time to consider my objections.

Kind regards,

Andrew Stewart
Group Coordinator,
Queens Park Residents

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