

**Charing Cross Village Precinct
St Catherine's Master Plan DA Subcommittee**

Megan Fu
Planner
NSW Department of Planning and Environment
23-33 Bridge Street, Sydney NSW 2000

10 July 2015

Dear Ms Fu,

This letter is written on behalf of the Charing Cross Village Precinct to express grave concerns about the ongoing St. Catherine's School development application SSD 6339, and in particular, the Response to Submissions document that has been provided by the School following the exhibition period. Charing Cross Precinct finds St Catherine's Submission Report in response to community concerns to be inadequate as follows.

1. Proposed Transport Management Plan

1.1. Several of the major objections raised by organisations including Waverley and Randwick Councils, NSW Police, Transport for NSW, as well as this Precinct and individual residents, have been dismissed on the grounds of a new projection of traffic volumes by the School's consultant Arup. This analysis claims there will be *fewer* private vehicles used to access the School following the development. This claimed reduction is in no way inherent to the design of the development, but assumes the success of a set of mode shift initiatives that are *proposed* by Arup to be adopted by the School, as well as operational undertakings that have only been proposed, not committed to. The only commitment stated in the Submission Report is for the School to *prepare* an Operational Transport Management Plan. That plan may or may not include the proposed initiatives, and may or may not be realised.

1.2. We have no confidence that those initiatives will be realised and/or be sufficiently effective for the following reasons:

- The School can only enable and encourage such mode shifts. It is the school population of staff, students and parents that must actually change their behaviour at the behest of the School. We might have expected that during the period of consideration of the DA, parents would have changed their unsafe drop off and pick up practices to put the school in its the best light. However, despite written requests from the School to the parents for better traffic behaviour, and the occasional attendance of Police and Council Parking Rangers, it has actually worsened in recent months, as evidenced by the photos (attached).
- The assumed take-up of the mode shift initiatives is claimed to be conservative, on the basis of results from an online survey of the School population which asked a question, for each initiative, in the form of "Would you consider taking this service to school instead of your current mode of travel?". Consideration of a matter does not mean commitment, nor does it rule out rejection. 55% of staff and 80% of students and parents responded to the survey. The proportions of those who expressed willingness to mode-shift were then applied to the whole school population to arrive at the potential mode-shift numbers stated in Tables 19 and 20 of Appendix C of the Submissions Report. This extrapolation is unjustified and

inflates the numbers, since staff and students who already use alternative transport are quite likely the ones that did not respond to the survey on transport options. Whether the initiatives are actually adopted in the numbers projected will depend on factors such as whether the proposed minibus routes are convenient enough for students, the effectiveness of the proposed cloud services and apps for car-pooling, and whether the attitudinal and practical barriers to public transport usage are overcome. No details on minibus routes were provided - they are yet to be planned; no details on how carpooling would work were provided - the consultant has merely quoted some example systems. The School has historically failed to improve public transport usage for its students despite 500 free bus passes issued annually to St Catherine's students by STA. There is no evidence to date that the School has been able/willing to effect changes in the behaviour of its community in terms of safe use of public streets for ingress and egress to their site.

- The mode shift initiatives and demand reductions will incur significant costs to the School, most of them recurrent:
 - At least one new bus to be purchased or leased
 - Three bus drivers in the mornings and afternoons
 - Staff subsidies for public transport
 - Foregone revenue from external users of the Performing Arts Centre.

There is no indication that these schemes have been costed, nor that the School is committed to implementing them. Subsequent to any approval the School might argue that these measures are cost prohibitive.

- Were the proposed mode shift initiatives to be stated as conditions of consent for the approval, there would still be no certainty for residents that they would be implemented. St Catherine's has a long history of ignoring conditions of consent such as caps on student numbers, building heights, and FSRs. It has sustained an attitude that impacts on resident amenity "are a community problem", as the Principal has stated in the press during the exhibition period. Recommendations in a consultant's report are no indication of a change in that attitude.

1.3 Several submissions suggested the school make more use of STA school special buses.

The response of the School was that an Operational Traffic Management Plan will be prepared *considering* school bus access amongst other things. The only specific comments about bus transport refer to proposed minibus services. STA school special buses would allow efficient, transparent and safe transport of 800 day students to and from the site compared to the use three 25 seater minibuses. The staggering of departures, proposed to spread the load on car drop offs and pickups, would actually work against timely and efficient pickup by school special buses and would increase the portion of the day the School occupies parking in public streets.

1.4 Many submissions called for an onsite dropoff/pickup lane with capacity of 20 cars but this was rejected by the School on grounds of unacceptable "impact on built forms".

In their submission NSW Police stated "approval should not be given without an onsite dropoff/pickup" yet this was blithely dismissed by the School. The School's priorities should be called into question when they will not solve an issue of safety for their own students as

well as amenity to local residents, yet they can find space for more swimming pools for external LTS customers as well as an expanded school population, and a doubling of their performance facilities.

1.5 Local and State government agencies as well local residents called for onsite parking provision of at least 200 car spaces. The School has proposed 75.

1.6 In terms of parking impacts on local streets, our concern remains that usage of available car spaces is distributed radially, not evenly, across the 5-minute walking distance zone and therefore streets closest to the School are continually overloaded.

The consultant's finding that there are sufficient total vacant parking spaces within a 5 minute walk of the School reflects the School's view of the surrounding streets as a car park available for their use. Changes to the timing of LTS classes and other Aquatic Centre users will serve to spread this load around the clock, reducing the peak impact but still heavily impacting the closest streets and doing so over more hours of the day.

1.7 Student parking on surrounding streets has not been assessed by the School - it was not an available option in the online survey. Licensed students do park in residential streets near the School. This already impacts on residential parking, is increasing despite claimed discouragement, and will get worse if the School is permitted to expand to 1200 students.

1.8 The School's assessment of parking load continues to depend on the August 2014 Arup and December 2013 Lyle Marshall parking surveys which were single day surveys within each studied time slot.

As measured by this Precinct and reported in our submission, there is significant variability from day to day meaning that a single measurement of 90% occupancy can easily become 100% occupancy on another day - as experienced by many residents. The School did not respond to our request and that of Waverley Council to perform more extended surveys and to properly account for the natural variability of parking load in their projections. Therefore Arup's comparison of projected parking demand vs. availability continues to lack credibility.

2. Community Considerations Dismissed

2.1. The School fails to consider walking as a fundamental transport mode. Some 60% of the students live within 1.5 km of the school. No plans facilitate walking to school.

2.2. Criticisms of the Urbis Population Report, which provided the basis of the justification for the school's growth, were not adequately responded to.

2.3. The School's response on its breach of the school population cap is simply arrogant. There is nothing ambiguous about the caps in the former DA. What is really ambiguous is the actual current population of students.

2.4. The School's dismissal of objections to the proposed heights of buildings and FSRs, some of which are already in breach of former approvals and planning controls, is breathtaking in its audacity.

2.5. Likewise the School's dismissal of requests for on-site drop off and pick up zones on the basis of their physically constrained site is arrogant in the context of their proposals for massive new buildings on site.

2.6. The intersection of Macpherson and Albion Streets is ranked No.2 in a NSW Police list of black spots in NSW. The School's unwillingness to prioritise the safety of their students and the residents over their drive for larger built form on their site, for income from the lease of some of their buildings and for growth of students numbers is deplorable.

Conclusion

In a climate of population growth and increasing densities, there is an urgent need for public policy at local and state levels that controls further unnecessary pressure on community resources, roads, and residential amenity. In the case of Waverley Municipality, the most densely populated LGA, pressure is already at peak. Plans to expand existing facilities or build new ones that draw people into the area on a daily basis need to be very carefully assessed to ensure that building controls, residential amenity, safety (especially of children), and traffic flow are not further compromised, and to ensure that current pressure does not become even more intolerable. Schools in particular, which have historically existed within residential communities and wish to expand should be required to absorb ALL the impacts of proposed expansion, not just some of them, and to find convincing ways of achieving their goals without negatively impacting on their communities.