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13 March 2011

Major Projects Assessment
Department of Planning
GPO Box 39
Sydney NSW 2001

Attention: Director, Government Land and Special Projects

Email: plan_comment@planning.nsw.gov.au

Dear Sir/Madam

**Re: Concept Plan MP10_0149 and Stage 1 Application MP10_0150
Extension and Development of Graythwaite site by SHORE School**

I have inspected the Part 3A Concept Plans submitted to the Department of Planning and considered them in the context of reasonable planning principles and local development controls. I confirm that I have not made any reportable political donations at any time and provide the following submission.

Preamble:

The applicant seeks to construct new buildings and reuse existing buildings on the Graythwaite site to substantially expand the existing SHORE School campus and accommodate up to approximately 550 additional students and staff. The concept plan allows for this to be done in 3 stages.

Submission on various parts of the concept plan:

1. Appropriateness of Part 3A - While Part 3A may be needed on occasions to secure approvals for developments of state or regional significance, it would appear to be an abuse of the process to be utilised in this instance. The proposed development is purely a commercial venture and could only be considered for Part 3A on the basis of the combined development value over the 3 stages. The applicant would seem to have utilised Part 3A to avoid local planning controls and community views in an effort to steamroll the applicant's plans over local council and community concerns. The Part 3A application should be refused and the applicant requested to submit a reasonable and balanced development application for each of the various stages through the local council and adhere to local controls.

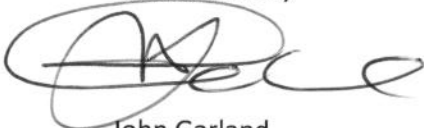
Failing refusal of the part 3A application in its entirety, I make the following further comments for consideration by the Department of Planning:

2. Height Bulk and Scale of Proposed West Building – The proposed west building dwarfs the local residential buildings and is completely inconsistent with the character of the adjoining conservation area located in Bank Street and surrounding development. The proposed building is over 14 metres in height which substantially exceeds the North Sydney Draft LEP which specifies a height limit of 8.5 metres for the site and this has been endorsed by the Director General, Department of Planning on 29 October 2010 and certified for exhibition. As a bare minimum this building should be reduced in height to not exceed 8.5 metres from ground level at any point. The building also has a footprint in excess of 1,000 square metres and consideration should be given to two or three smaller buildings being more consistent with surrounding development.
3. Noise and impact on residential community - The proposed location of the west building is likely to create substantial noise, overshadowing and privacy issues for adjoining residents on Bank Street. A wide curtilage of natural vegetation should be maintained and the setback of the proposed west building from the western boundary should be increased to at least 35 metres to minimise the impact on adjoining residential dwellings.
4. Lack of community consultation - A substantive part of the requirements for a part 3A application is adequate community consultation as the part 3A approval route often seeks to avoid local planning controls. This has not been forthcoming from the applicant and they have specifically sought to avoid public consultation and scrutiny. If the Department does not reject their application outright, it should ensure the applicant fully engages the local and wider community and order a public enquiry into the proposed development.
5. Traffic and Parking - The volume of students located on the site is set to increase under the plans that SHORE has for the site (by in excess of 30%). Already, traffic volumes specifically associated with Shore create an unsafe environment and inconvenience local residents. SHORE acknowledges this problem in internal notices to students regarding the safety of their prep students (although apparently no concern for nearby public school students). Extensive queues of cars and buses are created, particularly at school drop off and pick up times, blocking streets and intersections. Further, SHORE students park their cars in surrounding local streets restricting street parking for local residents who often have no off street parking. The proposal should allow for greater bus and car facilities onsite so that parking and traffic issues that are generated by SHORE are not simply pushed out onto public streets.
6. Through site link and public access - The combined SHORE/Graythwaite site covers a large area and there is no provision for public access. This creates a substantial impediment to pedestrian traffic as local residents in McMahons Point and Waverton travel to North Sydney Demonstration School and the North Sydney CBD. A through site link and public access should be required, particularly as the site was originally given to the state and they have sold it from public ownership to private hands for commercial gain.

7. Trees and site hydrology – A substantial number of significant trees are intended to be removed from the site including 100+ year old figs. Further investigation needs to be undertaken, covering the trees, natural springs and water cistern to ensure the damage caused to the local environment and site hydrology is being minimised.

I trust the above submission clearly sets out my concerns, however, if you have any queries I may be contacted on the phone number or email in the header of this letter.

Yours faithfully

A handwritten signature in black ink, appearing to be 'John Garland', written over a horizontal line.

John Garland