Attention:

Director

Government Land and Social Projects

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

SUBMISSION IN OBJECTION TO:

Application Name:

Sydney Church of England Grammar School (Shore)

Extension of Shore School onto Graythwaite Site

Application Number: Concept Plan (MP10_0149) and Stage 1 Project Application (MP10_0150)

SUBMITTED BY:

North Sydney NSW 2060

Suppression of Name

I do not want my name to be made available to the Proponent, other interested public authorities or on the Department's website

I hereby declare that I have made no political donations in the past two years.



Dated: 07 March 2011



ameral desired

07 March 2011

The Director Government Land and Social Projects Department of Planning GPO Box 39 Sydney NSW 2011

RE: Concept Plan (MP10_0149) and Stage 1 Project Application (MP10_0150)

Dear Director

For the reasons set out in detail in this submission, including the following, this application should be refused or required to have substantial modification:-

- Lack of Consultation
- Failure to comply with the Director General's requirements
- Failure to respect neighbouring land uses
- Buildings too high
- Buildings too close
- No adequate noise attenuation to west side
- Possible damage to the environment and the sub-surface water table
- Damage to heritage structures
- Lack of public benefit

This site has been a matter of great public interest for many years and the application does not satisfy the Director-General's requirements.

I request that the Minister hold a public inquiry as permitted under the Environmental Planning and Assessment Act before making any decision and let the community voice be heard.

Yours sincerely



Details of Objections

Lack of Consultation

My submission in regard to this Concept Plan and Project Application is extremely lengthy and detailed as a result of the failure of the applicant to engage in consultation with the community including adjoining neighbours.

I am an adjoining resident and like my neighbours did not receive a letter of notification until Friday 18 February 2011 and given only until 28 February to make submissions in objection.

I refer to the Director-General's Requirements No 18 titled Consultation: "undertake an appropriate and justified level of consultation in accordance with the Depts Major Project Community Consultation Guidelines Oct 2007."

These guidelines stress the need to consult prior to, during and after the assessment of the application in the hope of achieving a better outcome and in order to "build important long term relationships in the local community" and to "enhance the proponent's reputation in the community".

These guidelines specifically states consultation should be with "neighbouring residents "and yet in this instance;-

- there has been no adequate notification to adjoining residents
- there has been no consultation with neighbouring residents
- there has been no inclusion of local residents in any of the surveys conducted eg traffic/congestion/transport/noise
- requests for a public meeting to explain the proposal were flatly refused by the applicant
- a direct offer was made to the architect to come to our home and look at the site from a neighbour's view corridor and this offer was totally dismissed
- · a request for site markings and height poles was disregarded
- an overlay map showing precisely which 100 trees are to be removed was not supplied
- no photo montage of the proposed new buildings has been supplied

A great number of the Director-General's requirements have not been satisfied, including:

- adequate consultation
- justification of all non compliance
- outline of public benefits
- development contributions under Council's s 94 plan
- contributions under voluntary Planning Agreement
- inclusion of an ADOPTED conservation management plan.

This site has been a matter of great public interest for many years and the application does not satisfy the Director-General's requirements.

I request that the Minister hold a public inquiry as permitted under the Environmental Planning and Assessment Act before making any decision and let the community voice be heard.

Site Description: Our Family Home

Our family home is 31-33 Bank St, North Sydney.

My husband and I purchased our first home, number 33 Bank St in1991, some 20 years ago. The house was originally a sandstone cottage built circa 1880s. We renovated the property in several stages, with great consideration to the integrity of the building's heritage and keeping the original sandstone cottage.

In 1998, we decided to start a family and as such required a slightly larger house and most importantly more outside area and a bigger backyard. We had enjoyed the friendly neighbourhood and the quiet sanctuary of the area immensely over the previous 8 years, particularly the wonderful bushland of the Graythwaite estate over our back fence and had established strong links with the local community.

When the opportunity arose we purchased the property next door, number 31, also a sandstone cottage circa 1880s which was in need of major repair. We restored the original cottage, decreased the footprint of the house and incorporated it with number 33 to achieve one of our major objectives of more backyard area, which backs onto Graythwaite.

During our 20 years in Bank St we have seen very little change in the ownership of the nearby houses with most of our neighbours being residents of the street for 25-40 years.

The amenity of the area has changed very little also. This residential neighbourhood is green and leafy, creating a park-like ambience in an area full of birdlife where children and family pets play in backyard swimming pools, on trampolines, in the tree houses and with their rip sticks and other toys around the backyards.

The front of our house, as with all the others on the high side of Bank St, faces west. Because of our west facing position our house has been especially designed to be orientated to the east with the west frontages used primarily for carparking. The rooms oriented at the front of the house are the least used rooms.

Due to the historic nature of the area and the Bank Street houses, the homes are situated quite close to each other. Therefore to protect each neighbour's privacy, most houses have very few windows on their southern or northern boundaries.

For light and ventilation we are mostly reliant on openings on our east boundary (adjoining the Graythwaite site) and skylights. To maximise natural light flow and ventilation we have a glass atrium which runs the full depth of the house from east to west. This is a glass roof section approx 1.2 metres wide and approx 8 metres in length which joins a bank of glass louvre windows on the east side which is approx 2.8 metres high.

The following rooms and areas of our house face and open onto the eastside and onto our backyard and swimming pool which directly adjoins the proposed development stage known as the West Building:

- dining room
- kitchen
- family room
- bathroom
- guest toilet
- upstairs laundry
- upstairs bedroom
- upstairs home office/study

- upstairs ensuite bathroom
- upstairs walkway
- indoor-outdoor entertaining area

Our backyard, which occupies approx one third of our total land area is a large part of our family 'living' and recreation space and we spend a considerable amount of time in these areas of the house facing onto the proposed development and in our outdoor and backyard area.

In our backyard we have -

- solar heated swimming pool and spa with associated seating area with sun lounges and table/chair seating. This is used constantly throughout the summer months by all family members and visitors.
- a trampoline, used all year round by our 11 year old daughter and her friends
- outdoor eating area and paved courtyard area. This area is accessed via
 glass bifold doors and fixed glass door from the kitchen and family rooms by
 and as such it is really an extension of our family indoor area with effectively a
 wall of glass
- the outdoor area is regularly used for dining and entertaining and for activities such as rip sticking, hand ball, elastics and as a work area for outdoor projects or messy craft activities such as painting by my daughter and her friends and to play with our family puppy.
- garden areas which include native plantings, herb and vegetable gardens, lemon tree, apple tree, worm farm and compost area.
- grass areas for play for children, pets, the odd stray blue fongue lizard and no backyard Australian home would be complete without the totem tennis set and BBQ.

If this proposed development in particular the building of the new West Building proceeds my family including my 11 year old daughter, will have to carry out our normal daily activities with up to 400 young boys and teenage boys looking directly into our home and watching our every move.

Site Analysis in Context with the Proposed Development

Our home directly adjoins the land of the proposed development.

From our back door the land slopes up in the east direction and due to this topographical feature, we are visually impacted more than if the land was flat or sloping in the opposite direction.

The proposed foundations and ground floor of the proposed. West building are 16 metres off our back fence but start at a level higher than the roof of our 2 storey house which is approx 5 metres higher than our back door.

The building is 14 metres tall and finishes approx 20 metres in height above our back door and backyard.

This means that the entire building height may be seen from our house.

The width of this building is approx 35 metres which spans the equivalent of at least 6 backyards and covers the entire width of our property boundary.

Due the sloping nature of the topography and the large scale of the proposed development I also query the effect this will have on the sub-surface water table.

Visual Impact, Privacy and Views

The report states – "The visual impact of the proposed West building as viewed from adjoining residences in Bank St, will be acceptable for the following reasons;

- 1. The proposed west building envelope is set back 16.8-18.6 metres from the western side boundary
- 2. The distance is comparable to the rear dwelling setbacks of many of the adjoining Bank St dwellings
- 3. The proposed west building envelope steps down the Graythwaite site to follow the topography
- Existing planting along the western boundary is to be retained and substantial new planting is proposed.

COMMENTS.

The proposed West building is 14 metres tall and spans approx 35 metres of the Bank St boundary (5 backyards) and is approx 35 metres in depth. Previously the

Dept of Planning has supported North Sydney Council's request for a height limit on the Graythwaite Site of 8.5 metres – this application has totally disregarded DOP and North Sydney Council requirements.

- 1. The proposed West building is set back 16.8 metres, however, because the land slopes up from the Bank St boundary the level of the foundations is approx 8 metres higher than the back door level of these homes, which takes the real height of the building to over 20 metres higher than the back door of the homes. Therefore, the entire building is in full view of the Bank St properties and further, the west building takes over the entire view from these Bank St homes and overlooks directly into these homes even through roof skylights and glass atriums.
- 2. The setback distance is comparable to the rear dwelling setbacks. How is this relevant? Our 16 m setback is our backyard which is an integral part of our house. The houses in Bank St face west so our main areas for living/light/fresh air flow come from our east facing backyards. This proposed building is 16m up hill from my swimming pool at a height of over 20 m. This will totally block our air flow and much of our natural light flow.
- The proposed building steps down the Graythwaite site. From our homes it steps up the hill making it more highly visible and the visual impact greater than if the site was sloping the other way. This makes the building even less acceptable to us.
- 4. Existing planting to be retained and new planting proposed. The existing plantings include large Fig trees on average 12 m high. These trees are a protected species and historical in value to the Graythwaite site and to the greater North Sydney, Sydney and NSW community who place great value on protecting and preserving the natural environment. It is well known that the root structure of these trees goes further than the canopy. Any major development will have a great impact on these trees the water supply and the root system and overshadowing. There is a real prospect that these historic fig trees will not survive the construction process. Any new plantings will also have a detrimental effect as they will be competing for space both in the air and ground roots and water and sunlight. It also cannot be guaranteed

that the proposed removal of some 80 -100 trees on the site will not have a detrimental effect on the 100 remaining trees.

Due to the elevated position of the site, the visual impact of this 'sanctuary' of trees and natural bushland is appreciated by people far away from Bank Street and the local precinct. These trees create a wonderful green space not just for local residents and visitors but on the horizon for thousands of people beyond the precinct.

In an era of global concern for protecting, conserving and developing the natural environment, it is unacceptable that any group or organisation, especially an educational institution, would even contemplate the removal of up to 100 trees in such a wonderful urban environment. Including the removal of a Lone Pine planted in remembrance by the RSL. This tree has been given no special consideration and has been simply dismissed and scheduled for removal because it is in the way of the proposed building and it is small in size.

DEFICIENCIES IN THE APPLICATION IN RELATION TO -

VISUAL IMPACT

The application does not include any information on the impact from the 'west to east' direction ie from our backyard looking at the new building or the potential for the proposed building to overlook the Bank St houses. It's as if we don't exist!

The DG requirements call for an assessment based on

- the surrounding environment. Surely adjoining properties should be considered.
- Design quality with consideration of scale/façade/massing etc. None of this has been addressed from the West to East perspective.
- View loss. The report states "there are no private views over the site."
 What about our east facing view over our backyard and directly looking at the site. Why is that not considered a view? This view corridor has not been addressed.
- View analysis. DG requirement states "visual aids such as a photo montage must be used to demonstrate visual impacts "This is not

supplied. We require a photo montage from our house looking at the proposed building and the application and design reviewed based on these details.

 the survey of our house does not show our swimming pool (it has been there 20 years) the bank of opening glass louvre windows 1.2 m x 5 m height on our east side and our glass roof section 1.2 x 8 m in length.

The north Sydney Development Control Plan also says the following must be addressed.

- views to and from the site
- adjoining private open spaces
- location of any facing doors and windows
- views enjoyed by neighbouring properties
- built form and character of adjacent development

These issues have not been addressed in this application and as such the entire application must be withdrawn in its current state.

Overshadowing

The proposed west building casts additional shadow on Bank St properties.

The report states that "most of the additional shadow falls within shadows cast by existing trees".

Surely the shadow cast by leaves and branches of a tree is not a solid shadow like one cast from a building. If these trees suffer damage or die due to the impact of construction or some other reason then they no longer exist.

The applicant should provide details of the shadow cast by the building alone and also through some additional months than 21 June and 21 September. In particular during the summer months and from 21 March which along with 21 September are the dates of the equinoxes.

There is no mention of the effect of the overshadowing by the proposed building on the existing trees.

These trees are heritage items, over 100 years old and must be protected. The impact on the trees needs to be adequately addressed.

The report states that "the new shadows fall on areas that are already in shadow from dense vegetation".

A lot of this dense vegetation is weeds which the current owners have let grow over the past few years. Before they purchased the land, the weeds were kept at a minimum by the community garden group and less shadow was cast on properties.

The report states that the building is well below the building height plane.

The West building in places is 14 metres high, the max height limit for buildings adjoining residential area is 8 metres. I also refer to my previous comment that states that DOP and North Sydney Council have agreed to a height limit of 8.5 metres on this site. 14 metres is a lot higher than 8.

Therefore the West building does NOT comply in regard to height.

This building is of an extremely large size, too large in mass and volume and out of character with adjacent properties and if allowed to be built will cause great detrimental effect on the neighbouring properties.

With all the land available why are they building so close to residential homes and backyards?

At a minimum, the development should be scaled back in overall size, have a max height of 8 metres and sited further up the slope starting on the eastern line of the headmasters house at the very least.

<u>Noise</u>

Impact on Residential Amenity.

PLAY SPACE

Stage 1 proposes "use of the Graythwaite site middle and lower terraces as a play and educational space."

The applicant agrees that this may have noise impacts on the neighbouring properties

The Acoustic Impact Assessment is based on -

- 100 children on the middle terraces
- 100 children on the lower terrace
- distance from middle terrace to nearest affected residential receiver is 70 metres
- distance from lower terrace to nearest affected residential receiver is 50 metres (not including Kialoa, reason not explained)

Using this basis they exceed the established noise criteria and justify this by saying this "should be tolerated due to the wider community benefit"

What are the benefits to the wider community? Not explained

Comments on Noise Assessment

Current school numbers are 1430 and the proposed increase of 500 takes the total school number to 1930, 400 of the proposed increase are to be accommodated in classrooms adjacent to this site.

- How did the applicant come up with the numbers 100 and 100 for the Acoustic Impact Assessment?
- 200 students is approx 10% of total student numbers.
- All students have recess and lunch at the same time.
- I suggest that much higher numbers should be used to assess the noise impact and hence the entire application be reworked.
- No measures to reduce noise impact are even considered

I cannot find this play area clearly set out in the application nor can I find any information as to how this area will be screened/fenced from adjoining neighbours and how this will be enforced.

I query the distances used to the nearest residential receiver.
Residential properties are well within the distances specified

It does not take into account the approved town house development on the southern side of the site next to 'Kialoa'

Using the low numbers and long distances the Acoustic Impact already exceeds established noise criteria. I suggest that using more realistic numbers and distances the impact will GREATLY exceed the already exceeded criteria

As such, the application is not acceptable under established planning codes.

NOISE IN REGARD TO STUDENT USE OF NEW BUILDINGS PROPOSED IN STAGE 3.

The application states that:

- The building design will be an important aspect of acoustic management with limited windows on the Bank St ends. The "design of west building atrium incorporates fixed horizontal louvres to eliminate views into private residences but maintain outdoor views."
- All corridors (open galleries) are naturally ventilated.
- Internal noise levels within the classrooms aligning the south and west façade are predicted to exceed the relevant criteria with windows open. "It will be prudent, however, to undertake further specific detailed noise and vibration analyses."
- In light of this it is recommended that alternative means of ventilation be provided to allow THESE rooms to close windows during noisier periods.
- The application does not take into account noise from mechanical plant

Comments on the above points .:-

These buildings not only have windows but approx one third of the west and east facades is a breezeway/atrium which I assume is open. Doors to all classrooms in this building, open onto this breezeway/atrium.

Have they taken into account -

- The noise levels associated when all 400 students change classrooms for 3 minutes every 47 minutes, 6 times a day between 8.26am-2.53pm. All students will be congregating in this breezeway at the same time.
- Wet weather arrangements when 400 students are kept in classrooms or the breezeway for recess and lunch. The noise level for this should be calculated at 400 students at play level noise within 16 metres of residences.
- What about the noise level of the bell system. The Shore website states
 that "all these times are signalled by time set bells throughout the school"
- It is unrealistic to assume that windows will be closed during noster periods.
- Mechanical plant noise has not been taken into account.

In Appendix A of the Heggies report on the assessment of noise impact it states amongst other points some factors that may influence the response of the individual to noise.

They include: loss of property value, whether the noise was present before the receiver moved to the area, -whether the noise source can be seen, is readily identifiable and a visual reminder that reinforces acoustic perception, whether the noise has information content that captures the attention of the receiver eg. Voices

The appendix states that the position of the reasonable person should be adopted.

I have been living in my house for 20 years.

The five neighbours on either side bar one have been living in their houses for longer than 20 years, some as long as 40 years.

When we moved into Bank St, the Graythwaite site was a nursing home with the intention that the land remain in this purpose, in perpetuity.

On that basis, should a reasonable person, living in a residential zone and neighbourhood have had assumed at any time in recent history, that 2 buildings, 5 storeys in height, 35 metres wide, 16 metre off their boundary, 14 metre tall and at least 20 metres higher than their back door to accommodate 400 students and 40 teachers would be built? I think not.

Should a reasonable person assume that this would not result in a loss of property value? I think not.

Should a reasonable person not be bothered by noise that is above established noise criteria levels with the added visual reminder? I think not.

This application completely disregards the wellbeing, the privacy, the quality of life in their homes, the value of their personal home property of many well-meaning residents and members of the North Sydney community who have been extremely considerate of their own neighbours when they have carried out development on their properties.

There has been no attempt to provide measures to lessen the noise impact.

Construction Noise

The report/application states that -

"the noise predictions indicate that both the proposed demolition and construction activities are likely to exceed the construction noise goals by clear margins for the stage 2 and 3 works, resulting in anticipated moderate noise impacts at the nearest noise affected residential receivers and high noise impact at the adjoining school "

Comments

The construction noise is well above acceptable established levels.

It is likely, as with other school building projects, the Shore school will schedule high noise construction after school hours and during school holidays which is when families are spending more time at home and in their gardens which will add to the impact on neighbours. There needs to be some measures to keep construction noise at a minimum.

Parking During Construction

The report states -

"street parking will be restricted to essential vehicles only. Contractors will be encouraged to car pool and catch public transport."

Comments

This should be completely disregarded as nonsensical and irrational.

I have never had a tradesperson arrive at my house to do work by means of public transport or car pool.

Tradespeople require their vehicles for their equipment and supplies and while some labourers who have little to bring to work other than their lunch box can catch public transport, I would anticipate this would be a very small percentage of the overall number of workers who will be required to travel to/from the site over the construction period.

TRANSPORT AND ACCESSIBILITY IMPACTS.

The current situation of access to and from the school and parking is already creating problems for residents and their visitors and the school has been advised of these complaints on numerous occasions in the past. The school responded by letter to residents saying if residents had any further complaints regarding to the parking of students they could address to a particular person.

However, this has not alleviated the problem and as such, the school as shown its inability to control this issue.

The streets surrounding the current junior school ie Edward/Lord/Mount Sts are severely congested with school traffic during drop off and pick up times with both private cars as well as school buses.

The Shore School acknowledges that the current situation is past capacity and is dangerous, these are quotes from the Shore School's weekly newsletters to parents.

Prep Peek 18 Feb 2011

..." Please be mindful of neighbours who often have to negotiate heavy traffic simply to come and go from their premises. "

Prep Peek 4 March 2011

Traffic Management for Pick-Up

"Parents are requested to approach the school via Edward St rather than coming up Mount St as congestion in Mount St is unsafe and an impediment to the buses attempting to transport senior school students to Northbridge."

(the entrance/exit to Edward St is right across from the local primary school, North Sydney Dem . This puts the local primary students in

greater danger but this is not addressed by Shore , they are just concerned that their senior students get to sport on time !)

Pick-Up - After School Clubs

"If you are early please park in nearby streets and walk to the school "

The Shore Weekly Record 25th Feb 2011.

"Parents are requested not to park across the Blue St gate or park illegally while dropping off their sons in the area. These practices pose a significant safety risk to our students, as well as inconveniencing other motorists using the area."

(This area is used by the local primary school "walking bus". As far as I know Shore is suppose to provide a walking path through their grounds so the local children from McMahon's Point can reach the local school by a safer route but this has not been made available.)

The streets surrounding the school are already parked out by senior school students by day and school visitors by night as well as residents and other workers in North Sydney and students from the ACU and other business people requiring visits to conduct their business in the area.

I live in Bank St, which is a dead end street with direct foot access to the school via the steps up to Lord Street, so Bank St is used for both access and parking by many members of the Shore school community.

Bank St is largely only 2 hour parking but the senior students still use these spaces (when they can get one in the morning) and swap places with each other several times during the day. This is observed by many residents on a daily basis.

The "search" for car parking starts from 7.30am and usually involves the same car circulating the surrounding streets several times. The use of 2 hour spaces by students for all day parking already makes it extremely difficult for tradespeople carrying out work on Bank St properties, visitors to residences, medical practitioners making house calls other persons to find somewhere to park their vehicle while carrying out the purpose of their visit to the area.

It has been reported that Senior Shore students have been told "not to park in Bank St ".

I wonder if this has any relation to these proposed plans and our submission time?

In addition, it is easily observed that many Shore parents use Bank St as an alternative place to drop off and pick up their children so they to can avoid the already highly congested traffic in the designated areas in Edward/Lord/Mount Sts around the school.

Being a dead end street each trip by a parent or student has a double effect making our quiet residential street busy and dangerous.

In the application Bank St along with most of the streets off Union St has been ignored in the surveys done in regard to parking/traffic and access to the school.

With increase in school numbers of 500 students and 50 teachers and the construction planned the current situation will only get worse.

The area is quite old, the streets quite narrow in modern terms and in some places it is difficult for two cars to pass each other. This area is already at capacity in relation to parking and access and is not equipped to cope with a major development or the impact of another 500 students in the area.

COMMENTS ON THE TRAFFIC SURVEY

As stated earlier, the analysis ignores surrounding streets eg Bank St, Bank Lane, Thomas St.

- traffic and pedestrian counts were done on "a typical school day "what
 is a typical school day ?
- should we not compare data from a typical school day and a typical school holiday day for some measure of school traffic to be able to assess impact of increased school numbers?
- does the data relate to traffic in one direction or in both directions?
- the 24 hour daily profile seems to be a 7 day average including Saturday and Sunday.
- the travel questionnaire does not offer a good guide of the actual situation, though there was a 47% survey response many of them skipped questions.

- Only 20% of students who did the survey answered the question of whether they arrived at school as a driver or passenger.
- Only 14% answered the question of how many other people in the car were dropped off also.
- Only 6% answered the question about how many people in total were dropped off from the car they travelled in.
- Only 14% answered the question about where they got out of the car.
- Only 6% answered the question about where they parked.

The survey does indicate a high level of car usage by staff and students – about 46% to school and 33% from school. This suggests that any increase in school numbers will result in a substantial increase in school traffic.

SITE ACCESS ARRANGEMENT

It is planned to use Union St as the main site access.

Union St is the only way out of Bank St, it is the major road used by local traffic to access the Harbour Bridge and other schools in the Kirribilli area. It also services the main bus route 265 and the local primary school bus. Union St already has a tendency to block up in the mornings with the current traffic flow, from the 4 way intersection at Blues Pt Rd.

This is further complicated at the intersection of Blues Point Road/Miller Street and Blue Street with Shore traffic heading into the school.

Union St also has a reasonable amount of pedestrian traffic including school children.

All school children living south of Union St must cross it to get to the local public school. There is no pedestrian crossing west of the lights at Blues Pt Rd.

The design of the current Shore driveway in Union Street restricts the view of pedestrians crossing the driveway safely due to fence planting. le when exiting, drivers do not have a good view of the footpath/pedestrians until they are actually on the footpath itself.

The proposed use of the Graythwaite driveway, which is only about 3 metres further along will make it even more dangerous. I don't think the report addresses the "double driveway" issue.

Currently, many drivers are doing an illegal turn by crossing the double yellow lines to make a right hand turn into the Shore driveway on Union Street. This is located on the crest of hill which makes it both dangerous and illegal. And particularly dangerous in the afternoon with the westerly sun in your eyes.

The report states that the current transport/access arrangements works "satisfactorily". I dispute this completely

With Stage 2 and 3 and increased student numbers the report acknowledges that strategies to address the actual additional traffic load will have to be looked at. This needs to be looked at before the plans are approved not after.

The report says that the "proposed parking provision will not accommodate all existing and proposed parking demand on site".

The plans need further planning with the aim to take the current and future congestion and parking problems off the local streets and onto the site of the school. That planning should be done now before these plans are considered or approved.

With all this added land now available to them Shore has the opportunity and needs to address their traffic issues within their own site and provide facilities internally for the safety of their own students but also for the safety of the general community.

SCHOOL BUS OPERATIONS.

Page 97 – Stage 2 says that school buses will increase from 8-9.

Page 99 – stage 3 says school buses will increase from 8-11. Should read 9-12?

Which facts are accurate?

SITE ACCESS ARRANGEMENT DURING CONSTRUCTION.

The report states that "street parking will be restricted to essential vehicles only. Contractors will be encouraged to car pool or catch public transport." This suggestion is nonsense and should be disregarded.

Parking for construction contractors will have to be supplied on site as there is simply no available street parking for contractors.

Concluding Statement

The application fails to satisfy the Director-General's requirements in terms of public benefits and development contributions under Council's 94 plan or by a Voluntary Planning Agreement

The original Conservation Management Plan prepared by the NSW Government associated with the sale of the land to Shore in 2009, clearly stated that no development was to occur on the western side of the site. This application does not give mention to the original CMP.

From the points raised in this submission, the application is unacceptable and in many cases directly contravenes planning codes and laws.

This complete plan has been prepared without any regard to an ADOPTED conservation management plan, as one does not exist. It seems to be a scenario of cart before the horse. Surely any plans need to be prepared after an adopted conservation management plan exists thus these plans are totally irrelevant and a waste of time and money to all concerned.

In conclusion let me quote the words of the Shore School headmaster, Dr. TIMOTHY WRIGHT on Generosity. The Shore Weekly Record 25 Feb 2011.

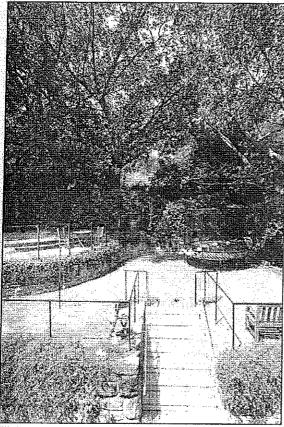
"We can all be generous as we live. We can unreservedly commit ourselves to our friends and those around us. We can engage in our relationships here in our School family and at home with a sense of what can we do to enrich the lives of our mates, our family and our friends. How do I behave in a way which shows that I care more about them than I care about me?"

Please Shore, show your local community how you care about them and their children and at the very least engage in community consultation.

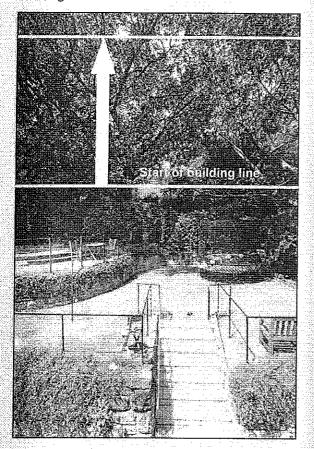
Photograph Gallery

The following pages include photographs and images to illustrate key points in this proposal

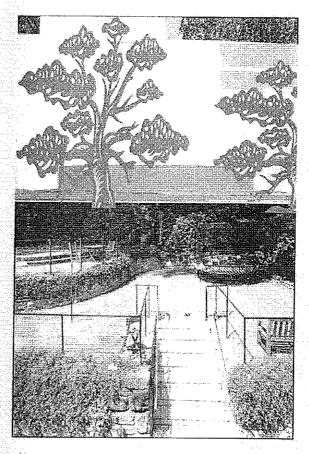
Current view from Bank St residence to Gray-thwaite site



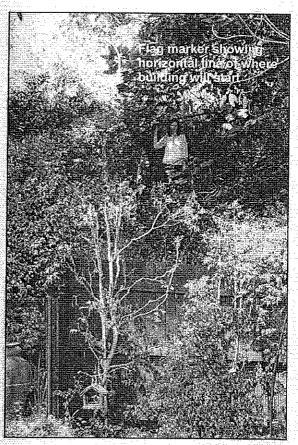
View from Bank St residence to Graythwaite site with lines showing proposed location of West building



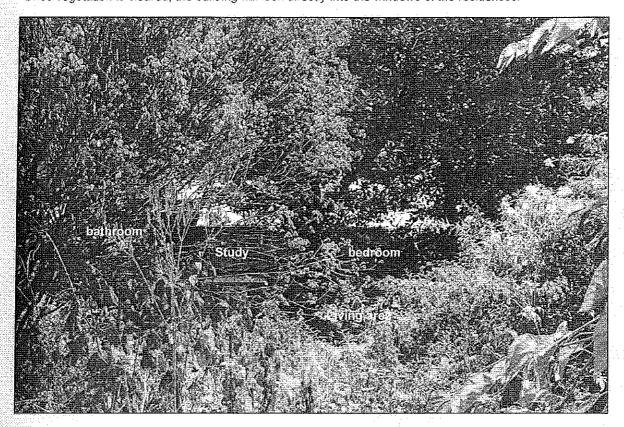
View from Bank St residence to Graythwaite site showing the artist impression of West building.



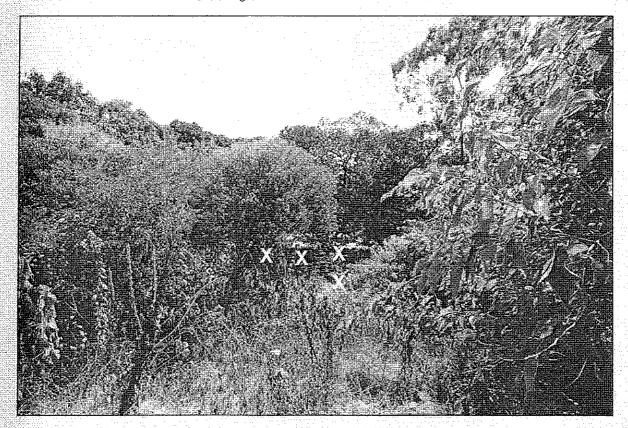
Closer view showing location of proposed West building in proximity to rear of Bank St residence



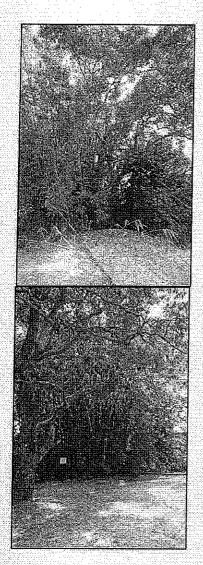
Current view from Graythwaite site towards Bank Street Residence, taken from the proposed building line. Once vegetation is cleared, the building will look directly into the windows of the residences.

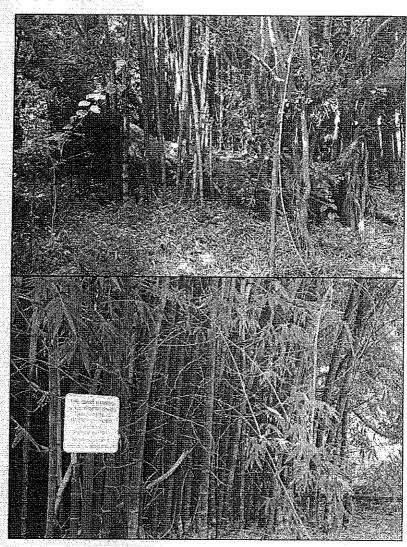


Wider view of above, once vegetation is cleared, the building will look directly into the windows of the residences. Areas marked with a cross are glass windows.

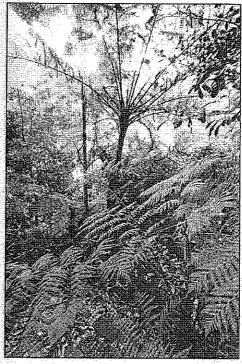


Photos of historic bamboo which will be impacted on by the development

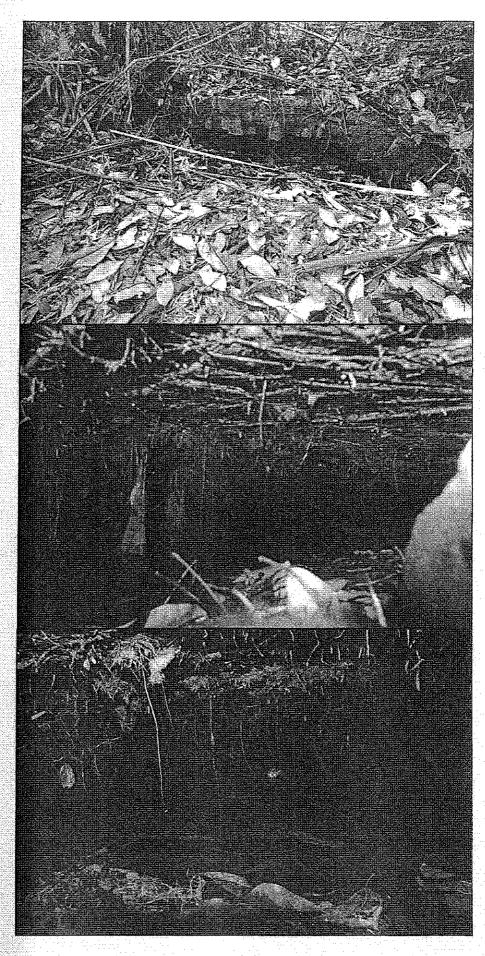




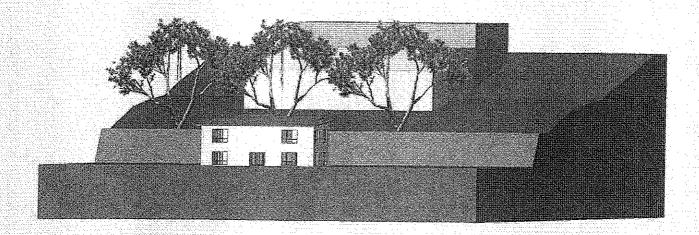
Photos of rainforest area which will be impacted on by the development

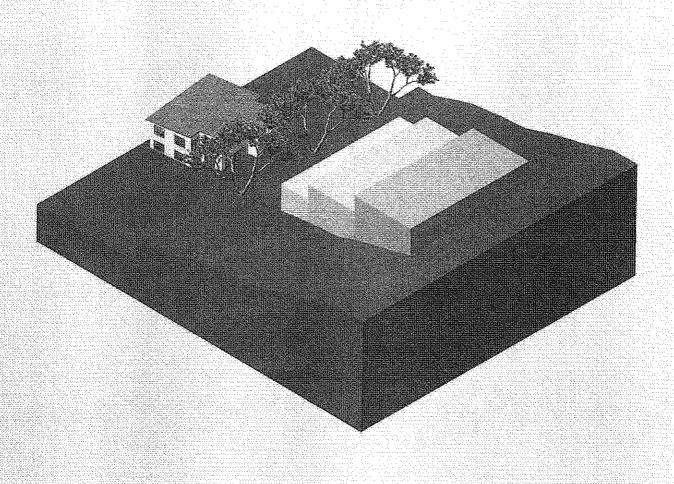


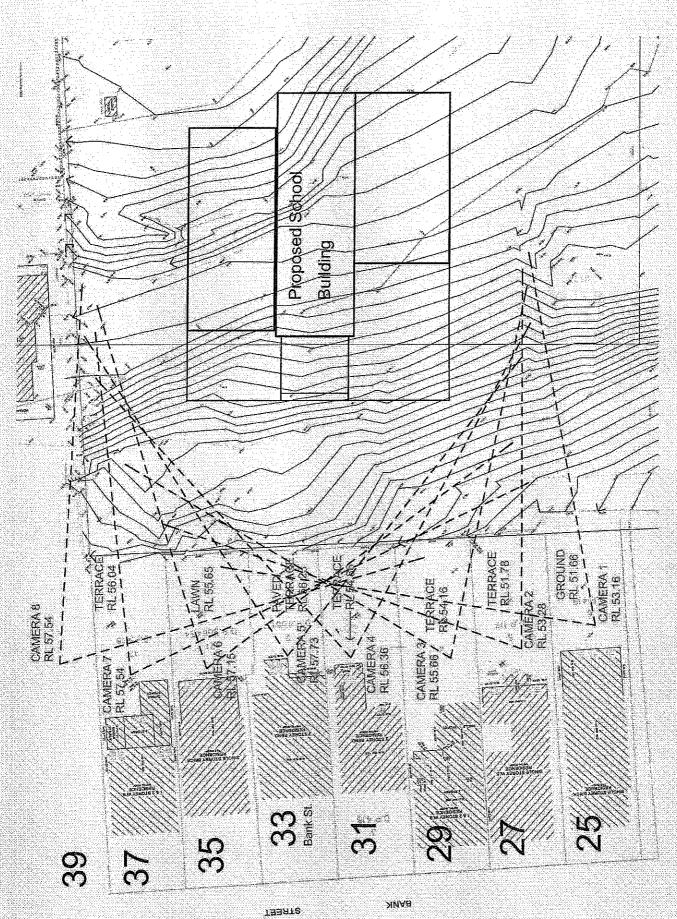
Photos of historic cistern structure which will be impacted on by the proposed development



Artists Impression showing proposed West Building and its impact on 31-33 Bank Street residence







PART PLAN Showing Camera 1 & Camera 2 location