

St Aloysius College Redevelopment

Submission: Wayne Rees

Dated: 8 August 2019

I have been a resident of Kirribilli for the past 20 years during the course of which I have observed an ever-increasing impact arising from the two large schools domiciled in this small community. I recognise that St Aloysius and Loreto have existed in the area for over 100 years. However, in my opinion, the scale and social impact have considerably changed for the worse during my residency in the area.

During this period, the Schools have been constantly renovated and expanded. For example, St Aloysius substantially redeveloped the Senior School in 1995 which involved major ground and building works. In 2010, Loreto acquired and redeveloped the adjacent Tremayne Private Hotel. Loreto is also currently seeking approval from the IPC for a 50-year Master Plan for works amounting to circa \$100M. It seems redevelopment and expansion of these schools are never ending and we are now confronted with a 10-year Master Plan for St Aloysius encompassing works costing around \$140M.

In my view it seems the schools have in the main been looked at in isolation. However, it is worthwhile putting the schools in context relative to the scale of the local Community.

In this regard I would like to submit the following important facts: -

- Kirribilli Population 3824 as per *2016 Census*
- Kirribilli encompasses an area of 0.44 square kilometres
- Kirribilli derived population density per square Kilometres = 8691
- Kirribilli population density ranking across Greater Sydney = 8 as per *Microburbs Website*
- St Aloysius and Loreto combined Student / Staff population was 2770 in 2018. *Source: ACARA My School Website*. This is akin to adding an incremental population of 6295 per square Kilometre
- The combined school population is the equivalent to a 72% increase in resident population. I suspect there are very few suburban areas in Australia that see such a population swelling related to schools.
- The combined Residents / School Population density would equate to circa 15,000 ranking Kirribilli second behind Elizabeth Bay.

- Of further interest is the fact that there are 168 School Aged Children resident in Kirribilli (111 Primary Schoolers and 57 Secondary Schoolers) as per 2016 Census
- Assuming all children resident in Kirribilli attend either Loreto or St Aloysius, they represent a mere 7% of the 2350 combined student population. This means that 93% of the combined school population or 2182 students commute from outside the area. Again, it would be surprising if there are many similar instances of this occurring.
- To further evidence density levels, Kirribilli dwellings are dominated by Flats and Apartments. This is evidenced by the fact that: -

Kirribilli Dwelling Composition Source: ABS Home>Census> Quickstats				
(Rounded to nearest decimal)	Kirribilli	Greater Sydney	NSW	Australia
Houses	4.7%	56.9%	66.4%	72.9%
Semi Detached / Terrace	7.9%	14.0%	12.2%	12.7%
Flat / Apartment	86.6%	28.1%	19.9%	13.1%
Other	0.2%	0.6%	0.9%	0.8%

St Aloysius has been keen to point out that the current development will not increase school numbers. This may or may not be the case, however, only time will tell. An analysis of St Aloysius and Loretto Student / Teacher numbers over the past 10 years indicate a steady increase in population. This slow ramp up in numbers is akin to 'boiling a frog' - you do not feel the heat until it is too late! This is demonstrated by the following School Population analysis over the past 10 years: -

Kirribilli School Population Stats - Source: ACARA My School Website				
	2009	2018	Difference	%Change
St Aloysius College				
Students	1191	1251	60	4.80%
Teaching Staff	103	127	24	18.90%
Non-Teaching Staff	50	109	59	54.13%
Total Population St Aloysius	1344	1487	143	9.62%
Loretto				
Students	1046	1099	53	4.82%
Teaching Staff	98	113	15	13.27%
Non-Teaching Staff	53	71	18	25.35%
Total Population Loretto	1197	1283	86	6.70%
Grand Total School Population	2541	2770	229	8.27%

I suspect part of the rationale for the current development is to relieve crowding caused by historic increases in Student / Staff numbers.

Other Matters

There are a number of other aspects of the St Aloysius Redevelopment that I either object to or find disconcerting, namely: -

- The School/s add little or no value to the local community. I believe they do not pay tax nor rates but it quite happily consumes the local facilities ie Roading, Transport, Parking, Footpaths and Parks etc. In this latter respect, the St Aloysuis unofficially utilises Bradfield Park as a quasi-school ground. Moreover, I understand the School does not provide any S94 payments. Loreto is on record

as saying 'We do have an excellent reputation with the local community and we have – we know that our school supports the local community, as well, in a number of ways. Not just by accessing their local community shops, etcetera, but by being a school in the local area and being part of the community. It's a really important aspect to our school and we've been doing that for over 110 years now. I" Source: IPC Planning Meeting 11/9/2018. I am sorry but I am at a loss to see, apart from support to local shops, any described specific benefits to the community particularly given 93% of the students reside outside the local community.

Moreover, whilst these Schools are Non-Profit entities, make no mistake, these are highly profitable and wealthy business operations. School Fees for St Aloysuis range between \$16k to \$20k per annum. Loreto's Fees range from \$15k to \$22k. Adopting say an average School Fee of \$18,000, the respective revenue School Fee Revenue would amount to: -

- St Aloysuis \$22.5M
- Loreto \$19.8M

The current Master plans for both Schools indicate a capital spend per student of:

- St Aloysuis \$111910
- Loreto \$90,992
- At a recent Milson Point Resident Precinct meeting there was strong views expressed that the school has treated the residents almost with contempt and community engagement has been poor and almost nonexistent.
- The Master Plan makes reference to the school hosting after hours entertainment / activities which is going to further exacerbate traffic and parking congestion particularly given that almost all Students / Parents are non-residents
- The proposed Heavy Vehicle Route indicates Trucks will enter Kirribilli via Fitzroy, and circle through Carabella, Parkes, Upper Pitt and exit via Fitzroy. These streets are very narrow and the disruption to residents as well as the associated risks, make this a very undesirable aspect of the Plan. The stated volume of Truck movements ranges from 15 - 50 a day which is quite significant given the already congested and narrow Streets.
- EIS 014 informs that there will be no parking available for Tradesmen and Contractors but rationalises this by stating "*The availability of public transport and lack of on-site parking will encourage the use of public transport and minimise traffic and parking impacts as a consequence*". I find this rather naive and self-serving. I venture to suggest that Tradesmen and Contractors will need to bring tools and supplies which would generally not be conducive to a public train / bus / ferry network

- The SSD Application states the project will give rise to 329 Operational jobs. Again, a significant impost on the local community by way of traffic, parking and associated debris and impact on the ascetics of the area.
- The St Aloysius Redevelopment which I understand will cost circa \$140M in essence coincides with the Loreto Redevelopment costing circa \$100M. Each one is significant for a community our size but combined, it will have a severe and demoralising impact on the local residents.
- I understand the Master Plan spans 10 years. This is a long time period for a community to have to suffer the effects of ongoing development works.

Given, the foregoing, I strongly believe that steps must be taken to: -

1. Cap School numbers so that we do not experience the continual Student / Teacher population creep as we have done in the past. Currently, there is nothing to stop the school increasing numbers post the development and in 10 years the community having to suffer further rounds of major Redevelopment.
2. The School has made no provision for additional car parking. The School alleges it is in compliance with The North Sydney Development Control Plan 2013 which requires 1 parking space per 6 staff for educational establishments. That may or may not be the case, but if a commercial enterprise were to establish operation's they would undoubtedly be required to provide a significantly greater number of parking spaces. This is particularly relevant given the density issues mentioned above. Accordingly, I believe that the School, as a minimum, should be required to amend the plans to provide for a significantly increased level of car parking. Of particular note is the fact that Loreto has a Staff to Car Park ratio of 1.84:1 whereas St Aloysuis ratio is 6.74, Why should St Aloysuis be allowed to provide this totally inadequate level of Staff Car Parking. These ratios ignore the increasing level of Student Car Parking which seems to be becoming more prevalent.
3. Finally, there are a number of other aspects of the St Aloysuis Redevelopment Proposal that I find disconcerting, the majority of which are embodied in North Sydney Council letter to the Department of Planning and Environment dated 13 June 2018.

Finally, thank you for the opportunity to attend this Meeting and present my concerns.

Attachments:

Appendix 1 - Kirribilli School Population Statistics Analysis

Appendix 2 - Kirribilli Dwelling Composition Analysis

Appendix 3 - Kirribilli Statistics Analysis

Appendix 4 - St Aloysuis and Loreto Staff / Car Park Ratio Analysis

Appendix 5 - St Aloysuis and Loreto Development Cost Analysis

APPENDIX 1

St Aloysius College Redevelopment

Kirribilli School Population Stats - Source: ACARA My School Website

	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
St Aloysius College										
Students	1191	1193	1217	1236	1245	1244	1244	1246	1242	1251
Teaching Staff	103	105	109	112	114	113	112	113	119	127
Non Teaching Staff	50	53	53	52	62	61	54	59	95	109
Total Population St Aloysius	1344	1351	1379	1400	1421	1418	1410	1418	1456	1487
Cummulative Change		7	35	56	77	74	66	74	112	143
Cummulative %Change		0.52%	2.59%	4.06%	5.50%	5.21%	4.65%	5.25%	7.90%	9.82%
Loretto										
Students	1046	1044	1046	1045	1040	1054	1077	1079	1096	1099
Teaching Staff	98	97	99	99	102	104	104	109	113	113
Non Teaching Staff	53	53	55	55	56	59	65	70	67	71
Total Population Loretto	1197	1194	1200	1199	1198	1217	1246	1258	1276	1283
Cummulative Change		-3	3	2	1	20	49	61	79	86
Cummulative %Change		-0.25%	0.25%	0.17%	0.08%	1.68%	4.10%	5.11%	6.62%	7.20%
Grand Total School Popultior	2541	2545	2579	2599	2619	2635	2656	2676	2732	2770
Cummulative Change		4	38	58	78	94	115	135	191	229
Cummulative %Change		0.16%	1.49%	2.25%	3.00%	3.59%	4.36%	5.08%	7.14%	8.38%

APPENDIX 2

St Aloysius College Redevelopment

Kirribilli Dwelling Composition Source: ABS Home>Census>Quickstats

(Rounded to nearest decimal)	Kirribilli	Greater Sydney	NSW	Australia
Houses	4.7%	56.9%	66.4%	72.9%
Semi Detached / Terrace	7.9%	14.0%	12.2%	12.7%
Flat / Apartment	86.6%	28.1%	19.9%	13.1%
Other	0.2%	0.6%	0.9%	0.8%

APPENDIX 3

St Aloysius College Redevelopment

Kirribilli Stats

	Source
Population - Residents	3824 ABS 2016 Census / Profile.id.com.au
Land Area	0.44 Profile.id.com.au using ABS Census of Population & Housing data
Population - Schools 2018	
- St Aloysius	1487
- Loretto	1283
Total	2770
Population Density Ranking Sydney - Kirribilli	8 microburbs.com.au
Population Density Ranking Sydney - Milsons Point	3 microburbs.com.au
Population Density per square kilometer - Kirribilli	8691 Resident Population / Land Area
Population Density per square kilometer - Combined Schools	6295 Area
Derived Population Density - Combined Residents + Schools	14986

APPENDIX 4

St Aloysius College Redevelopment

Kirribilli Stats

Source

Primary Schoolers	111 Profile.id.com.au using ABS Census of Population & Housing data
Secondary Schoolers	57 Profile.id.com.au using ABS Census of Population & Housing data
Total School Aged Population	168 Profile.id.com.au using ABS Census of Population & Housing data
Dwellings - Houses	106 Profile.id.com.au using ABS Census of Population & Housing data
Dwellings - Medium Density ie Semi Detached	377 Profile.id.com.au using ABS Census of Population & Housing data
Dwellings - High Density ie Apartments	1994 Profile.id.com.au using ABS Census of Population & Housing data
People who travelled to work by public transport	1,014 ABS 2016 Census
People who travelled to work by car	591 ABS 2016 Census
Number Registered Vehicles	1320 ABS 2016 Census

School Stats

St Aloysius Student Population	1251 ACARA My School Website
Loretto Student Population	1099 ACARA My School Website
Grand Total Student Population	2350
St Aloysius Total School Population	1487 ACARA My School Website
Loretto Total School Population	1283 ACARA My School Website
Grand Total School Population	2770

Analysis

Students Out of Area (B15-B6)	2239 Assumes all Children of School age in Kirribilli attend these schools.
%Students Out of Area (B23/B15)	95.28%

APPENDIX 5

St Aloysius and Loreto Development

Development Costs per Student

*Source: Kirribilli School Population Stats - Source: ACARA My School Website

	\$Development Cost	# Students 2018*	
St Aloysius	\$140,000,000	1251	\$111,910
Loreto	\$100,000,000	1099	\$90,992



all corre

13 June 2018

Dear Sir,

RE: REDEVELOPMENT OF ST ALOYSIUS COLLEGE (CONCEPT AND STAGE 1)

North Sydney Council appreciates the opportunity to provide comment on the concept proposal and Stage 1 development for the St Aloysius College Campus.

Please be advised that due to recent resident and Councillor interest in the subject proposal as well as that of the Loreto School (SSD 7919 also being concurrently assessed by the Department), the following resolution was passed at the Council meeting of 28 May 2018 regarding the two proposals:

RESOLVED:

- 1. THAT Council holds a briefing session(s) so that Councillors can be fully updated on both the Loreto Kirribilli and St Aloysius College proposed projects.*
- 2. THAT both representatives from Loreto and Aloysius be invited to give presentations to the Councillors and representatives of the local community on their proposed projects.*

The briefing sessions have been arranged to occur on the evening of 19 June 2018 with the respective school representatives. Whilst the outcome of the briefing sessions is not known, it is possible that further concerns may be raised by the elected Council.

It is understood that Department is, however, seeking details of the principle concerns as currently raised by North Sydney Council staff. Council staff has reviewed the application package provided by the Applicant and wish to raise the following objections and submissions regarding this development:

Traffic / Pick up and Drop off

The suburb of Kirribilli is identified as having one of the highest population densities in Sydney. Traffic associated with the existing school and morning drop off and evening collection of students contributes to the significant shortfall in existing parking and traffic problems in the immediate locality.

Particular concern is raised regarding the potential impacts to local traffic and the rejection by the applicant to consider the provision of additional parking spaces and functional a pick-up/drop off zone.

Whilst an increase in the student population is not specifically noted as being sought as part of this proposal, *Planning Circular PS 17-004 Regulating Expansion of Schools* makes it clear that absolute caps to student numbers in the form of conditions of development consent should be avoided particularly if impacts can be reasonably addressed through amendments in the application and negotiated during the assessment.

The subject proposal will increase the potential for the school to take on more enrolments and increase the school's student and staff population. With no consideration given to provision of further parking and an internalized pick up/drop off point, the proposal in its current form can only exacerbate the existing local temporal traffic problems the area is experiencing. This issue is of such concern, that were Council assessing the proposal, they would likely withhold any consideration for approval until a mutually agreeable outcome could be negotiated.

This issue, in conjunction with other concurrent State Significant application for the nearby Loreto School (SSD 7919), poses indefensible impacts to the capacity of the local street network to absorb the impact of the development(s) and would be to the detriment of the local Kirribilli residents. With no provision for additional park and detailed plans for management of traffic impacts, the proposal is not supported by Council in this regard.

Use of Public Open Space

It is noted that the proposal further consolidates development on school sites by building over the already limited existing private open space. Whilst a new rooftop outdoor area is proposed, this space does not alleviate the already considerable impact the school as existing has on the public open space in the locality.

By allowing this development and its accompanying potential to accept further student numbers, it exacerbates the current school practice of using Bradfield Park south as defacto school grounds. The overflow of students onto this area of parkland places physical stress and "wear and tear" on the grass coverage as the use of the space by the students usually involves informal sports use. Bradfield Park is maintained entirely at North Sydney Council's expense and the school contributes nothing to that upkeep.

It also should be noted that the sheer number of private school students using that space alienates any other active or passive usage by the general public during those times of use. In effect, the current and likely increased usage amounts to the local rate paying residents subsidizing a private school usage of a community open space and is not supported by Council in this regard.

Inappropriate Building Character and Context to the Kirribilli Locality

The existing building of the Middle Campus is already an incongruous built form within the Kirribilli locality with nil street setbacks and no tangible landscaped area. The building as existing creates an imposing vertical street wall and lack of setbacks does not allow for landscape relief to the Upper Pitt Street and Kirribilli Avenue streetscapes.

The design response with regard to the further and new infilled section to the building is inconsistent with the desired built form for educational establishments prescribed under the Part C Section 8.2.3 Desired Built Form of the character statement for Kirribilli Neighbourhood of NSDCP 2013 which states:

P2 Educational establishments are to reflect the scale and massing of development on adjoining properties at its interface with the adjoining property.

Planning Issues

State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017

Whilst the submitted Environmental Impact Statement has identified that State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 is applicable to the development there does not appear to be any consideration of the proposal against the Schedule 4 Design Quality Principles for Schools contained within the SEPP.

North Sydney Local Environmental Plan 2013

Building Height

Clause 4.3(3) of NSLEP 2013 states that the maximum permitted building height on the site is 12 meters or 8.5 metres depending of the location of the respective campus and applicable height controls (refer to Figures 1 below).

The height control lines have not been plotted upon the elevation and section plans as submitted and accordingly it is difficult to gauge the full extent of existing breaches to the Building Height control and impacts associated with new elements in breach of the control.

Council is of the view that the scale of the new additions particularly the new infill building located close to the eastern boundary site are incompatible with density of the locality. Whilst from a design standpoint, the location of the additions is appropriate, from a density standpoint, the additions infill what little remaining airspace remains between two five storey built forms. Existing buildings on adjoining sites the east and south generally exhibit building heights of 3-4 storey. Buildings to the west of the site are generally 2-3 storeys in height and accordingly the building as existing already displays densities far above that typical of the immediate locality.



**North Sydney Local
Environmental
Plan 2013**

Height of Buildings Map
- Sheet HOB_003

Maximum Building Height (m)	
1	8.5
2	10
3	11
4	12
5	13
6	15
7	16
8	19.15
9	20
10	24
11	25
12	26
13	30
14	33
15	40
16	42
17	49
18	50

Figure 1 – Extract from Height of Building Map in NSLEP 2013

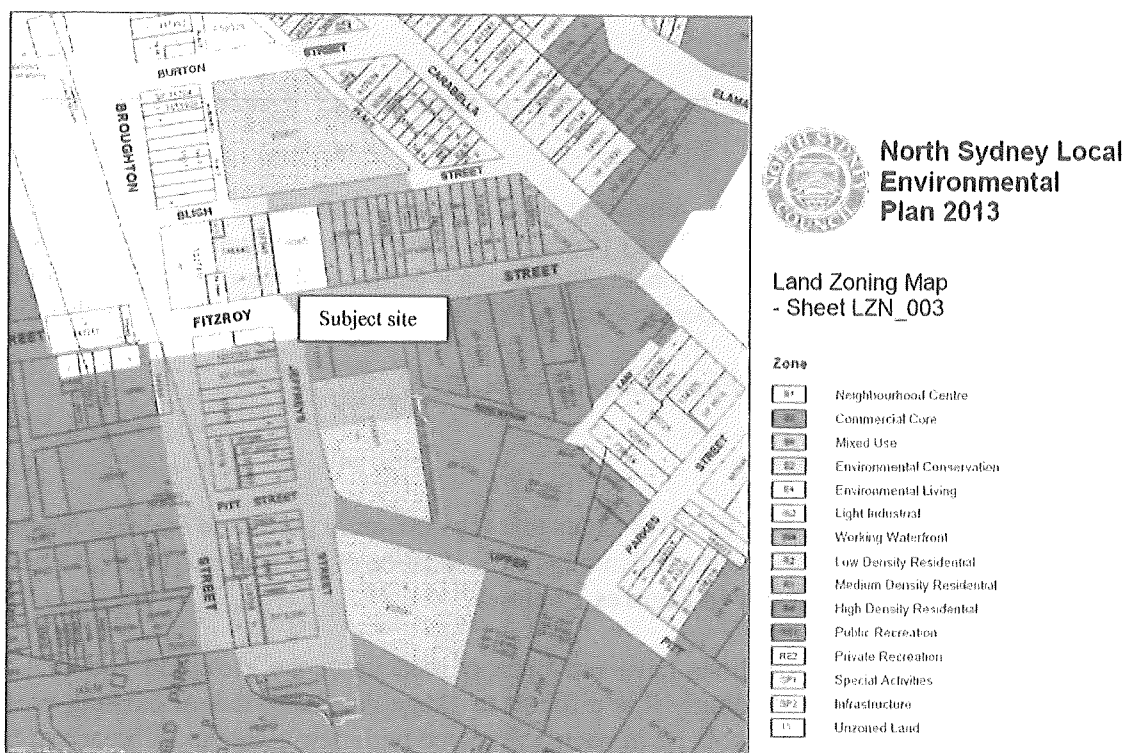


Figure 2 – Extract from Land Zoning Map in NSLEP 2013

Accordingly, the non-compliances with the building height control for this building is contrary to the Aim of Plan 1.2(2)(b)(i) and *Building Height* objectives 4.3(1)(e) and (f) of NSLEP 2013 which seek to:

1.2 Aims of Plan

(b) *in relation to the character of North Sydney's neighbourhoods:*

(i) *to ensure that new development is compatible with the desired future character of an area in terms of bulk, scale and appearance, and*

4.3 Height of buildings

(1) *The objectives of this clause are as follows:*

(e) *to ensure compatibility between development, particularly at zone boundaries,*

(f) *to encourage an appropriate scale and density of development that is in accordance with, and promotes the character of, an area.*

As detailed earlier in this issues letter, the additions have the potential to provide for greater student numbers to be accommodated at the school. Combined with the additional bulk and scale being added to the existing site, Council does not agree that the new breaches to the Building Height control accord with the objectives of the *Aims of the Plan* and objectives of the *Building Height* control.

Excavation

Clause 6.10 Earthworks of NSLEP 2013 requires that earthworks associated with any development should not have a detrimental impact on environmental functions and processes, neighboring uses.

A significant amount of demolition and excavation is proposed particular regard to the junior campus with potential excavation to 3 metres below existing ground level in close proximity to the boundaries of the site.

The applicant is to ensure structure stability of the ground against bulk movements during excavation and construction.

The applicant is to ensure adequate measures are incorporated into the proposal to ensure ground water flows and surface drainage are not directed towards adjoining properties.

North Sydney Development Control Plan 2013

The principle Section of the NSDCP 2013 applicable to the development is *Section 3 Non Residential Development in Residential Zones*. The following matters raised relate to the following headings within this section of the DCP.

Solar Access

The height and proximity of the new infill addition section of the Middle Campus to the eastern boundary is likely to significantly impact upon the solar amenity to the occupants of 88 Kirribilli Avenue, Kirribilli (also known as "Craiglea").

A limited suite of shadow diagrams has been submitted as part of the application package. However, it is considered appropriate that an hour by hour breakdown (from between 9.00am to 3.00pm June 21) of the impact be submitted in order to accurately detail the impact.

Three dimensional suns eye view shadow diagrams should also be provided on an hour by hour basis for a more detailed analysis of the impact to individual apartments as shadows move across the elevation of the most affected buildings.

It should also be confirmed whether shading devices are to be employed to the rooftop area which may impact upon the solar access.

Privacy (Visual and Acoustic)

Privacy concerns are raised regarding the new infill additions and proposed rooftop outdoor area at the eastern end of the site with the view and noise corridor created as a result of the existing northern building wing towards the existing residential flat building at 88 Kirribilli Avenue, Kirribilli.

Any use of this area should be restricted (preferably in the form of a separate management plan) to ensure there are no adverse noise or visual privacy impacts occurring from this new roof area or the usage limited to specific times of the day to minimize impacts to adjoining residential properties.

Views

Concern is raised that there will be loss of outlook and views to high amenity bridge and water views currently afforded from the western outlook particularly from the lower levels of 88 Kirribilli Avenue, Kirribilli. The applicant should pursue access to the premises and expand upon the view analysis to detail impact to these areas.

Additionally, the plans indicate the roof top outdoor area will be enclosed by a glazed barrier. It has not been specified whether there are to be frameless panels or whether they require structural support i.e. metal brackets

It should also be confirmed whether shading devices are to be employed to the rooftop area which may impact upon the view analysis.

Artificial Illumination

A detailed external lighting plan should be submitted (if proposed for newly created outdoor areas which details the proposals compliance with *AS4282 Control the Obtrusive Effects of Outdoor Lighting*).

Reflectivity

The types of glazing and their reflectivity levels should be specified to ensure the extensive rooftop barrier screening and new or refurbished windows will not result in excessive glare to surrounding properties.

Site Coverage and Landscaped Area

North Sydney Council's Development Control Plan 2013 (NSDCP 2013) specifies maximum site coverage (45%) and minimum landscaped area (40%) controls. The proposal (particularly the Middle Campus) is significantly non-compliant with the maximum site coverage control in NSDCP 2013. The amended proposal should incorporate greater deep soil landscaping across the site or in site where landscaping cannot be provided, management strategies put in place to enable student access to bona fide landscape area across the range of St Aloysius campuses in Sydney.

Internal Referral Comments

Heritage and Landscaping (Including Tree Removal)

Council's Conservation Planner is in the process of reviewing the plans. Comments related to Heritage and Tree Removal Issues will be forwarded to the department at Council's earliest convenience.

Traffic, Parking and Transport

Council's Traffic and Transport Operation's Manager has reviewed the amended plans and documentation and provided the following comments:

"Traffic Generation

Currently, the school includes a total of approximately 1200 students and 181 full time staff. It is stated in the traffic report that the proposed Concept Plan will not include any increase in either staff or student population and therefore, the net increase of traffic generation was concluded to be zero. There is however no limitation to new student enrolments or student numbers.

As the school does not have any off-street pick-up/drop off facilities and rely on on-street pick up/drop off zones, any increase of school population will have significant impact on the traffic flow and on-street parking supply in the surrounding road network and may have implications on road safety.

It was noted in the traffic report that the predominant travel mode by staff and students from Junior Campus is by private vehicle then by train. Council's adopted Community Strategic Plan aims to minimise the impact of the private motor vehicle. The traffic report did not include any formal Green Travel Plan as part of this application, but suggested that the requirement could form a condition of consent to be submitted at the time of Construction Certificate.

*The proposed development will not have unacceptable traffic implications in terms of road network capacity **provided** that there is no increase of school populations and a Green Travel Plan be submitted as part of this application or a condition of consent prior to the issue of Construction Certificate/Occupation Certificate.*

Car Parking – Supply

The school currently has an open-air car park on the Senior Campus capable of providing a total of 16 parking spaces. It is expected that these parking spaces are provided for staff of the Senior Campus.

The traffic report stated that the morning school generated parking demand was estimated to be 21-45 vehicles based on the parking occupancy rates recorded from 9:15am to 9:45am. However, the report stated that the parking survey was undertaken between 7:00am-9:00am with data provided only until 9:00am. Therefore, it is unclear how the above result was derived.

The afternoon school generated parking demand was estimated to be 95 vehicles based the parking occupancy rates recorded between 3:15pm and 3:30pm.

The traffic report justified that each of the pick up and drop off zone (5 spaces) can provide a total of 150 parking opportunities per location capable to accommodate the estimated 117 drop-offs by private vehicles. It is questionable how these numbers were calculated and over what time period these parking opportunities are expected to be available. The applicant would be requested to confirm these numbers.

Notwithstanding the above, it is evident from the parking beat survey and Council's experience that the parking spaces in streets closer to the school are generally highly occupied. Therefore, any increase of parking demand by the school will have significant impact on the surrounding road network.

Loading Facilities

The school currently has a loading dock in Upper Pitt Street accessed from Jefferies Street which will remain unchanged as part of this proposal.

Construction Traffic Management Plan

The proposed Construction Traffic Management Plan can be accommodated except for the proposed Works Zone locations in Upper Pitt Streets that are replacing the existing Kiss & Drop zones. Relocation of any Kiss & Drop zones will require community consultation and approval by the Traffic Committee. Additionally, there is no feasible location on the northern side of Upper Pitt Street to implement any additional Kiss & Drop zone. Should Works Zones be required at these locations, alternative Kiss & Drop Zone must be determined prior to the issue of Construction Certificate. It should also be noted that the supposed Works Zone in Kirribilli Avenue is not considered ideal as it requires construction vehicles to travel in a longer route through residential areas.

Furthermore, there is a proposed redevelopment of Loreto Kirribilli pursuant to DA371/17 currently with Council. It is unknown at this stage the extent of construction activities will involve for the Loreto redevelopment and the cumulative impacts of the redevelopments of both school sites in such close proximity. A combined CTMP should be required to coordinate construction activities of both sites if occurring at the same time.

It recommended that, additional traffic study detailing the impacts of the proposed redevelopment and the cumulative impacts of both schools be provided.

Conclusion

Council objects to the potential traffic impacts to the St Aloysius Stage 1 Concept Plan and detailed built form proposal of Upper Pitt Street Main Campus and Wyalla Senior Campus. This objection will not be rescinded until workable traffic solutions are provided to Council which can provide relief to the traffic circumstances around the Kirribilli suburb.

Accessibility

Council's Community Development Officer has reviewed the plans and documentation and provided the following comments:

Council's Development Control Plan (DCP) 2013 - Section 12 on Access "aims to provide provisions for the promotion and acceptance of people as individuals and their access to a fair and equal opportunity to participate in community life". The legislation that relates to disability discrimination is the Disability Discrimination Act, (Cth) 1992 [DDA]. It is noted that the Applicant has submitted a separate Masterplan Access Design Assessment Report (produced by Design Confidence (Sydney) Pty Limited). It is noted that the "report is to identify the extent to which the schools existing infrastructure and proposed upgrade works comply with the accessibility provisions of the Building Code of Australia 2016". The report should be treated as preliminary as it lacks certain detail about how the design features will be fully incorporated. Given the scale of the project that St Aloysius College proposes, the opportunity to provide improved and enhanced access which overcomes current shortfalls in disability access is considered essential to be assessed as part of the DA. In particular, the Access provisions should address:

<i>Australian Access Standards</i>	<i>Comment</i>
<i>Australian Standards: AS 1428.1: 2009 – Design for Access and Mobility</i>	<i>All aspects of the access requirements need to meet this standard</i>
<i>Australian Standards: AS 1428.2: 1992 – Enhanced and Additional Requirements - Buildings and Facilities</i>	<i>Given the scale of the development, enhanced access requirements should also be met. In particular, continuous accessible paths of travel and circulation spaces for people who use wheelchairs, sanitary facilities for people with disabilities, equitable access to buildings and rooms within buildings, accessible counters, and signage and hearing augmentation systems should comply with AS 1428.2.</i>
<i>Australian Standards: AS 1428.4: Tactile Ground Surface Indicators (TGSI)</i>	<i>The Applicant's Access Report notes: "TGSI's have not been detailed at this stage. TGSI's will be addressed as the design develops". These should be included at a future stage.</i>

<p><i>Australian Standards: AS 1428.5: 2010 - Communication for people who are deaf or hearing impaired</i></p>	<p><i>Signage and Hearing augmentation systems are noted as required by the Applicant's Access Consultant who also noted that they will provide further detail with future design progression. These should be included at a future stage.</i></p>
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Specific Disability Access issues

Existing pedestrian entrance to the school – It is noted that the existing principal pedestrian ramp access to the entrance on Upper Pitt Street is non-compliant, and this will be rectified. To further facilitate access, an automatic sliding entrance door is also recommended.

The paths of travel - from the principal pedestrian entrance to any new part of the redeveloped facility should be fully accessible to people with disabilities. These should be assessed at a future stage.

Lifts: Within the Upper Pitt Street Campus - a lift is proposed at the southern end of the Upper Pitt Street Campus (Kirribilli Avenue). As such, compliant level access to this area is necessary. Wyalla building - Whereas, the access consultant notes, "a new lift is not proposed within the Wyalla Building", but access "is provided via the Upper Pitt Street bridge connection". The explanation given, including that Wyalla is a heritage building needs to be questioned because as it stands, it does not give equal access to all areas in the Wyalla building for people with disabilities. It is recommended that a new lift be installed in the Wyalla Building.

Access ways - the access consultant noted that "within the Upper Pitt Street Campus standard doorways have a clear opening width of approximately 820mm" which is non-compliant to the Australian Standards. Design modifications are recommended to be fully compliant with AS1428.1-2009. Further, the access consultant states that: "There will be some areas of the Wyalla building (primarily levels 01 and 02) that cannot be accessed by wheelchair users". It is recommended that the floor areas be redesigned so that a wheelchair user can access all areas.

Accessible Sanitary Facilities - the access consultant noted: "no new or existing Accessible WCs are proposed within the Wyalla Building". It is recommended that Accessible WCs be incorporated into the Wyalla Building to provided equal access for people with disabilities.

The hours of operation of the school should acknowledge Before and After School Care, operations between 7.00am and 6.00pm, Monday to Friday.

Should the application be approved, conditions of development consent should be imposed addressing the following matters:

- *Access Considerations taking into account Australian Standards: AS 1428.1, 1428.2, 1428.4 and 1428.5 should account for:*
 - *A new pedestrian entrance to the school including the installation of an automatic sliding entrance door*
 - *enhancing the paths of travel in the redeveloped to include improved access to all areas of the school including buildings, rooms and facilities*

- *improved access to all areas by installing lifts as designated within the Upper Pitt Street Campus and a new one suggested for the Wyalla Building.*
- *recalibrating the Wyalla building so as to ensure compliance with the standards and improved access ways, and*
- *Incorporating accessible WCs into the Wyalla Building.*

Submissions from the Community

Please be advised that submissions were received at Council regarding the proposal. To ensure they form part of the considerations of the Department, they are attached to this letter for your reference.

Draft conditions of consent

North Sydney Council can provide the Department with draft conditions of consent if required. However, in light of this objection, further information and modification to the application is required before consent should be granted.

I trust that North Sydney Council's additional comments will be taken into consideration prior to the determination of this application. Should you have any questions regarding Council's submission, please contact Kim Rothe, Senior Assessment Officer, on [REDACTED]

Yours faithfully,



**STÉPHEN BEATTIE
MANAGER, DEVELOPMENT SERVICES**