

9 April 2020

Independent Planning Commission NSW
Level 3, 201 Elizabeth Street
SYDNEY NSW 2001

Submission - Proposed Santa Sophia Catholic College – Fontana Drive Box Hill North – SSD 9972

Thank you for the opportunity to provide comment on this proposal.

The proposed Santa Sophia Catholic College is part of the Our Lady of the Angels Rouse Hill Parish. As members of the parish community we have significant concerns with the design and location of the proposed school. The school will not just serve the Box Hill area, but the broader area including Rouse Hill. In particular, Our Lady of the Angels Primary School at Rouse Hill will be a feeder school for the high school component of Santa Sophia. The number of submissions from other parts of the Hills LGA, as noted on Page 5 of the meeting transcript with the Department of Planning, Industry and Environment (DPIE) is reflective of this fact.

In terms of the school, we do not support the current proposal at the proposed location. The reasons for our concerns, many of which were raised in our previous submission on the proposal are detailed below.

- **Non-Compliance with State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017** – The proposal does not satisfy the design principles within Schedule 4 of the Education SEPP. In particular:
 - Principle 2 – The design of the school is not durable or adaptable and cannot cater for any future expansion.
 - Principle 4 – The proposed design within a high rise setting and the associated lack of open space does not provide for a safe and healthy learning environment. It is questioned whether the designated recreation areas would be functional noting the differing needs of Kindergarten to Year 12 students.
 - Principle 5 – Open space and outdoor learning areas that are available to all students and which are open to the sky are not provided.
 - Principle 6 – The design of the school does not account for future needs.
 - Principle 7 – The design is not aesthetically pleasing, and as it is essentially a single building it is of a bulk and scale that is not appropriate for a school.
- **Access to Natural Light** – The lighting study for the recreation areas has set a lighting level of 400lux. This is considered inadequate as this is an accepted daylighting level for indoor spaces only. For outdoor spaces, the minimum lux level should be a minimum of 1,500 to 2,000 lux if not higher. The daylighting study clearly indicates that some areas of the proposed design will never achieve these levels of lighting at any given time.
- **Suitability of the site** – The location of the site will result in a heavy reliance on private vehicles as a means of getting to and from the school.
- **Amenity** - There is a very large number of students proposed to be accommodated on a relatively small site. This will impact negatively on student enjoyment and will result in limited access to physical activity during recess and lunch times. There is also likely to be excessive noise levels generated with such a large number of students in a confined space. There appears to have been

no consideration of this issue in the assessment of the proposal. The lack of access to suitable levels of natural light as detailed above is also of concern.

- **Bulk and Scale** – The proposed development is essentially one large building that covers a significant proportion of the site. The building will dominate the streetscape and lacks suitable articulation and variation in height.
- **Traffic and Parking** – The proposed development has inadequate parking and does not cater for the volume of traffic that would be anticipated. In particular:
 - *Incorrect Catchment* – The school catchment area on which the traffic study has been based is incorrect. With Our Lady of the Angels Primary School at Rouse Hill being a feeder school for Santa Sophia, the actual catchment area extends much further towards the east and south east taking in areas including Rouse Hill, Kellyville, North Kellyville, Beaumont Hills, Riverstone and Schofields. This larger catchment will have a significant impact on traffic volumes and a large proportion of the movements to and from the school will be via private vehicle due to the distance travelled and lack of public transport.
 - *Senior Students Driving Policy* – The traffic study indicates that it is CDEP policy that senior students do not drive to school. It is understood, that most if not all, of the other CDEP senior schools within the area allow senior students to drive to school. Noting the location and the lack of public transport, this will also likely be the case at Santa Sophia. This needs to be taken into consideration particularly in relation to parking.
 - *Non-compliance with the Hills DCP 2012* – For a development of this nature, the Hills DCP would require over 200 spaces for staff, visitors and the senior students. The allocation of parking within the shopping centre for the school is well below the amount required. This is a significant non-compliance and will not even cater for the number of staff that will be employed at the school.
 - *No Visitor Parking* – There will often be visitors to the school at various times and there has been no provision has been made for visitor parking. Visitors should not be expected to park in the shopping centre.
 - *Kiss and Drop Facilities* – The location of additional kiss and drop spaces on Fontana Drive is not considered appropriate considering the potential traffic volumes that would be anticipated for a road of that nature. The proposed spaces are also a significant distance from the school site. It is more likely that the shopping centre carpark would be used as an alternative kiss and drop facility. This will increase traffic around the Road B kiss and drop area. In addition, the traffic study has been based on a turnover rate of 1 vehicle every minute which is considered inadequate. A sensitivity analysis in relation to the turnover rate has not been undertaken.
- **Safety** – A critical feature is access to a suitable evacuation and assembly point that can accommodate all occupants. Such is not available in this case. Whilst the proposed playing fields could be utilised, this is a significant distance away and will require the crossing of public roads making evacuation difficult. This is not appropriate for a school of this size. Consideration must be given to the age of the occupants, and in particular those within the early childhood centre and others that need assistance to evacuate. This will significantly increase the time it would take to evacuate all the occupants, as it is likely that some occupants will need to be carried by a carer during an evacuation. The lack of adequate visitor parking and kiss and drop facilities as stated earlier, will also put the safety of children at risk.

The proposed school development will result in a poor-quality learning environment that will put the safety of children at risk. It is also likely to have a detrimental effect on the surrounding area.

There is a more suitable location currently available where the proposed school could be constructed. This alternative site is much larger and provides a greater scope for a more appropriate built form, increased levels of open space, better addresses the safety of the occupants and allows

for improved accessibility. It is understood that this site is currently zoned R3 and educational establishments are a permitted use in this zone.

We also feel that the conduct of the proponent during this process has not been appropriate. It has sought to wherever it could silence and disregard the concerns of people that were not supportive of this proposal. Most notably, the soon to be former and highly regarded Parish Priest of Our Lady of the Angels. The CDEP's attempt at community consultation in March 2019 after significant community backlash was meaningless. It indicated its intention to proceed without change, even though the submissions period the CDEP allowed had not yet concluded.

We also do not trust what the CDEP are stating about the future of the Terry Road site. Even though the CDEP has indicated its intention to retain the site, many people in the community suspect some form of land swap or sale agreement is proposed. This is particularly relevant considering the potential value of the Terry Road due to its size and its current R3 medium density residential zoning.

We thank you for taking all of our concerns into consideration. Should the Commissioners wish to discuss these concerns further, we would be happy to do so.

Finally, we please request that any personal details in this submission remain **confidential**.

Kind Regards

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