

Address to the IPCN Public Meeting (10/02/2021) regarding SSD10444 Blue Gum Community School

My house is next door but one to the proposed school development, on the corner of Rosemead Rd and William St. I have lived here for 18 years.

I **OBJECT** to the proposal by the 'Best Practice Education Group Limited' company to convert the historic residence at 1 Rosemead Rd Hornsby into a private infants' school (K-2) and childcare centre.

I want to start with some general observations before raising a few specific issues.

The Assessment conducted by DPIE does not adequately consider the adverse impact of the proposed development at the location on the amenity for local residents and it overstates the presumed benefits of using this location. The DPIE Assessment does not appear to start from a neutral position regarding the approval of the proposal, rather it seems to look for ways of allowing the development to proceed. It assesses amenity in terms of compliance with individual regulatory standards rather than assessing the cumulative impact of extra noise, traffic and people and reduced trees and heritage on the character of the neighbourhood and therefore the residents' experience of amenity. It largely discounts community concerns about the validity of noise and traffic assessments and the value of tree canopy. Furthermore, the DPIE Assessment appears to accept uncritically assertions made by the proposer and others (for example, that the development will be 'adaptive', not maladaptive, that without the development the site would be in danger of subdivision or the property would remain unused and unmaintained, that the removal of trees is 'unavoidable', etc). These assertions need to be challenged.

Against the background of these general issues with the DPIE Assessment, I wish to raise a few of the many specific reasons the development should not be approved:

1. Traffic impacts

Under the most recent version of the development proposal, all traffic leaving the development would pass my property, and most vehicles would pass it on two sides - along Rosemead Rd and then after turning left into William St. Vehicles turning left from Rosemead Rd into William St are heading uphill requiring acceleration revs which will contribute to the traffic noise experienced by my house and other houses on the intersection. In my view the DPIE assessment has not adequately considered this adverse change to local traffic volumes and noise.

The front of the houses at 1, 1A and 3 Rosemead Rd are staggered to minimise overlooking between them. As a result of this configuration all vehicles leaving the proposed school southward along Rosemead Rd will look directly at the northern bedroom windows of my house (see Figure 1) and the northern bedroom and living room windows of number 1A Rosemead Rd (see Figure 2). The development proposal and the DPIE Assessment report do not address this reduction in privacy from school traffic that would be imposed by the development of 1 Rosemead Rd. The layout of these houses on the street was not designed to deal with the possibility of non-residential traffic along Rosemead Rd. Consequently 1 Rosemead Rd is not an appropriate location for a commercial development that generates such traffic.

Figure 1: View of northern windows of 3 Rosemead Rd from the road after exiting the proposed school exit	Figure 2: View of northern windows of 1A Rosemead Rd from the proposed school exit
	

The DPIE Assessment dismisses the problems of congestion, particularly the around the eastern entrance to William St, and visibility on relevant local roads. The DPIE Assessment arguments are based upon traffic volume guidelines for different road types and assumptions about road user behaviour contained within the consultant traffic and noise reports. There are a number of problems with this approach.

Firstly, the DPIE Assessment does not acknowledge that school traffic will exacerbate the snarl of vehicles and pedestrians that occurs around the intersection of William St and Peats Ferry Rd. There are multiple sets of traffic lights in short succession in this area and multiple pedestrian crossings, as well as street side parking and entries and exits to parking lots on both sides of the eastern end of William St. The area around the intersection of Peats Ferry Rd and William St is complex, with badly designed traffic flows, and is quite hazardous to negotiate during peak times. School traffic will add to this problem for the local community.

Secondly, the DPIE Assessment dismissed valid community concerns about the safety of adding school traffic onto William St given that the road frequently narrows to a single lane as a result of road width and parked vehicles. That is, the DPIE Assessment did not distinguish the theoretical road capacity from the actual capacity. It is likely that increased traffic will increase the risk of incidents.

Thirdly, the DPIE Assessment relied upon consultant traffic and noise reports for the proposal which assessed some threats to road safety using outdated '85th percentile' thinking (that is, designing for the most typical 85% of behaviour) and relied on all road users doing the right thing. This is at odds with the current Safe Systems approach to road safety adopted by Transport for NSW and other national and international road safety regulators. The Safe Systems approach focuses on ensuring that traffic design minimises the likelihood of and protects against the consequences of atypical and 'erroneous' behaviours by road users. For example, not all drivers will take the corner of Dural St and Rosemead Rd at slow speeds and there will be occasions, even if infrequent, when parked vehicles block sightlines through that corner. Modern road safety practice involves assuming these atypical things will happen and being prepared for them not dismissing them as uncommon or unlikely.

2. Out-of-hours, weekend and community use of the facilities

Although it is not clear to me what the final draft consent conditions are for site use outside operational hours, the development proposal indicates the property will be available for community and ancillary school use outside of school hours. Insufficient information about these uses has been provided to allow local residents (or the DPIE) to assess their impact. What particular activities will be permitted, for how many people, when and how often have not been specified. Clearly, these other uses have the potential to significantly reduce amenity for local residents by increasing pedestrian and vehicle traffic and parking. Furthermore, although the DPIE Assessment (section 6.3.27) notes that residents should be given forewarning and that an attempt will be made to minimise noise at that boundary, there is no provision for residents to stop a proposed activity and there is no mechanism to measure whether noise management is actually successful. How can local residents have any confidence in these weak assurances and how can they check or challenge the compliance of the school?

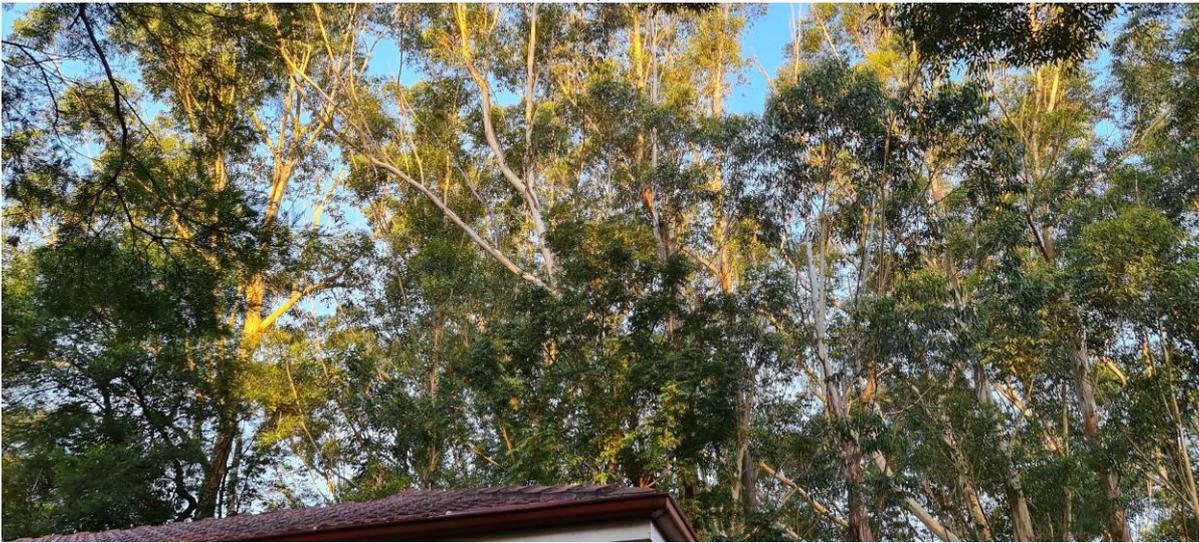
3. Tree removal

By framing the DPIE Assessment of the impact of tree removals solely in terms of plant biodiversity and heritage, the Assessment fails to acknowledge the cumulative negative impact of vegetation removal on the treed character of the local area, and on urban heat load. It fails to acknowledge the increasing role of tree cover in mitigating and adapting to the heating climate. It fails to acknowledge the cumulative negative impact of tree removals on other plants and animals in the urban environment, such as for heat management, food provision and nesting or habitat provision.

The DPIE Assessment also fails to acknowledge that selecting only mature trees for preservation means there is no succession. Younger trees must be preserved, as well as mature trees, to ensure there are larger trees in future. The Assessment acknowledges that *E. pilularis* (Blackbutt) is an endemic species in the Mt Errington area, but wrongly devalues most specimens on site because they are not old or may have been planted. Regardless of whether individual Blackbutt specimens were planted or self-seeded on 1 Rosemead Rd, they are locally appropriate and important.

Currently, a line of these trees on the western side of the tennis court is proposed to be removed to allow for the carpark and utilities to the new bathroom blocks. These larger trees form a frontier in the area (see Figure 3) because most *E. pilularis* on properties to the east have already been removed. Because of its size, 1 Rosemead Rd is one of the few properties that can accommodate a cluster of these trees and so it is quite important for the local area that it does. Indeed, the DPIE Assessment report indicates that GML originally recommended the trees be retained in their heritage report. The proposal to use 1 Rosemead Rd as a school/childcare centre which requires removal of these trees is not appropriate or ecologically sustainable. So 1 Rosemead Rd is not an appropriate site for this development.

Figure 3: The *E. pilularis* on the western edge of the tennis court. Most are slated for removal for the carpark and services installation (viewed from 3 Rosemead Rd)



Two *E. pilularis* are proposed to be retained on the site however it is entirely foreseeable that any dropped branches will initiate parental or workplace safety complaints that will result in their removal. This has not been considered but clearly presents a short to medium term threat posed by the proposed development to the local environment. The DPIE Assessment should have identified this foreseeable threat to the remaining larger trees. Again, this demonstrates that 1 Rosemead Rd is not an appropriate site for a commercial school/childcare development.

4. Signage

The development proposal indicates that a single business sign will be displayed on the premises but a number of street signs will also have to be installed outside other properties in the neighbourhood to indicate the operation of school zones and regulate school traffic. The imposition of additional signage including flashing light school zone signs outside people's houses will reduce their amenity and diminish the streetscape. In addition, the affected residents will not be informed until after approval of the development, which is unfair.

5. Practically irreversible

Should the development proceed and the DPIE Assessment be found to be overly optimistic about the impacts, there will be little if any scope for remedy. It seems extremely unlikely that the approval will be reversed once the school is operational.

6. Public interest and state significance

The DPIE Assessment that the proposed development is in the public interest is unsubstantiated. There might be need for more educational and childcare places in northern Sydney generally but the location of this development is not in the local public interest. Nor will a small private school and childcare have a significant positive impact on childcare and educational demand in the Hornsby shire but it will have a significant adverse impact on the local heritage and the amenity of the local residents.