



# Greenwich Community Association Inc

PO Box 5057, Greenwich, NSW 2065

For current committee contact details see [www.greenwich.org.au](http://www.greenwich.org.au)

24 October 2019

Assessment Officer -Major Projects  
NSW Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Sir/Madam

**State Significant Development SSD 10260  
International Chinese School  
Objection to proposed development**

#### **Status of Greenwich Community Association Inc**

The Greenwich Community Association (GCA) is a non-profit incorporated community association dedicated to gathering and promoting the views and interests of the residents of Greenwich. It was established over 70 years ago and has extensive experience in the planning issues affecting the community – see our website: <http://www.greenwich.org.au/>

The GCA acknowledges the need for additional educational establishments in the St Leonards and Crows Nest area, given the projected population increases in the precinct.

Notwithstanding this need, the GCA objects to the proposal on the grounds outlined below.

#### **Grounds of objection**

- 1. The site and design features are inappropriate for a school for the following reasons:-**

##### **1.1 Location within a heritage site of cultural and historical significance**

The Gore Hill Cemetery is a heritage-listed cemetery and one of the oldest and most significant remaining cemeteries in metropolitan Sydney.

It offers a place of contemplation and passive recreation for the many residents in the area in addition to the students and staff in the adjacent TAFE and staff and visitors in the Royal North Shore Hospital and North Shore Private Hospital.

The location of a primary school, with the noise and activity inherent in that use, will diminish the significance of the cemetery and the enjoyment of it as a place for passive recreation.

**1.2 The size of the enclosed site is inadequate for the active play and social needs of primary school age children**

At approximately 1500 sq m the site is too small to allow for the communal spaces (indoor and outdoor) required for a primary school population of 210, staff and on-site parking.

Primary schools that have been constructed on restricted sites incorporate required communal spaces within them but this proposal does not include such features, precipitating the request to use public open spaces to address the shortfall.

**1.3 The proposed Kiss & drop zone and vehicular access through the Avenue poses public safety risks for pedestrians and for those who use the Avenue as a place of passive recreation.**

**2. The Environmental Impact Statement contains no information as to the compliance of the proposed school structure and site with the registration criteria of the NSW Education Standards Authority (NESA).**

The Environmental Impact Statement contains no information as to the financial capacity of the applicant to undertake the proposed activity.

**2.1 Proprietor of proposed school unclear**

It is noted that the proprietor of the International Chinese School is listed on the NESA website as International Chinese School Ltd.

The applicant named in the SSD application is the Anglo Australian Christian and Charitable Trust.

The assessment of this application should include clarification that the applicant will be authorised by NESA to operate the proposed school.

**2.2 No details as to the financial capacity of the applicant to operate the school on an ongoing basis**

It is noted that the 2018 Financial Report and Annual Information Statement for the applicant are listed on the register of the Australian Charities and Not for Profit Commission as Overdue.

In the absence of this information, it is not possible to verify that the applicant has the financial capacity to conduct its activities on an ongoing basis.

We trust that appropriate assurances to this effect will be sought as part of the assessment process for this SSD.

**2.3 NESA to provide confirmation that proposed site and improvements will be approved by NESA for registration as a primary school K-6**

The locality of the International Chinese School is listed on the NESA website as Chatswood.

The school is registered for K – 4 and holds initial registration for Year 5.

Given that the proposed development is constrained as follows:-

- Location adjacent to 6 lane major traffic thoroughfare, Pacific Highway

- dangerous access from Pacific Highway
- small site
- uncertainty as to access to open space
- lack of enclosed open space
- inadequate toilet numbers

the applicant should be required to provide evidence that the new site and improvements will be accepted by NESAs for registration.

Given that it is proposed to offer K-6 classes at the Gore Hill site for significantly higher numbers than are at the current Chatswood site (35 to 210) the applicant should be required to provide evidence that the increased student numbers and extended year offerings will be accepted by NESAs for registration.

### 3. Adverse impacts on the community of lack of open play space on the site

#### 3.1 Access to Willoughby Council facilities cannot be guaranteed for the long-term operation of the school

It is noted that the Environmental Impact Statement states that *"The proposed site for the International Chinese School has limited open space for the students and negotiation with Council has commenced to allow the school to access Gore Hill Oval and surrounding facilities. Council has indicated that they are open to the idea of the school to use Gore Hill Oval and surroundings under the condition that the booking concludes before midday due to existing corporate bookings associated with the use of the oval after this time and have been consulted regarding this."*

The facilities at Gore Hill Oval are Council owned and maintained and are intended for public use. With increasing demand for open space in the St Leonards and Crows Nest precinct, it will not be possible, nor should it be contemplated, that Willoughby Council will enter into agreements with the applicant to allow exclusive access to either Gore Hill Oval or the adjacent facilities.

It is not sufficient to ground an application on a statement as vague as *"Council has indicated that they are open to the idea of the school to use Gore Hill Oval and surroundings"*.

The development should not be approved without evidence that Willoughby Council has agreed to grant the school exclusive access to the oval and the adjacent facilities on a long term basis.

Willoughby Council has already made it clear that this will not happen.

#### 3.2 Risk to users of playground

The equipment in the playground adjacent to Gore Hill Oval is suitable for children ages 1-8 years.

It is already experiencing a high rate of usage at all times of day.

It is not equipment that is appropriate for use by children in the latter years of primary school.

The prospect of large numbers of older and stronger children using the playground equipment with younger children who are not students of the proposed school raises

significant public liability issues for Willoughby Council and will erode access to and enjoyment of the children for whom the playground is intended.

**4. Security of tenure not detailed in the SSD application documents**

The documents in support of the application contain no information as to the applicant's long term security of tenure of the site.

It is noted that the registered proprietor has provided consent to the lodgement of the SSD application (Appendix D) but there is no mention of agreement to grant a lease to the applicant or the proposed terms thereof.

The applicant's Environmental Impact Statement is non-specific in this regard.

The applicant should be required to provide evidence that it will hold in place a lease for a term appropriate to allow the viability of the school on an ongoing basis.

For the above reasons we request refusal of SSD 10260.



Merri Southwood  
President  
Greenwich Community Association Inc  
[southwood@bigpond.com](mailto:southwood@bigpond.com)  
0412 361331