

# Robert Cann

## 47 Kambala Road

### Bellevue Hill NSW 2023

Phones: (02) 9327 3736 0421 224 288 email: ronelle2@bigpond.net.au

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#### Submission for the Alterations and additions to the Stevenson Library Building, The Scots College DA

I live in Kambala Road, about two thirds of its distance from where it meets Ginahgulla Road, and have no problem with the desire of The Scots College (Scots) to renovate and beautify its Stevenson Library. However, I am more than concerned about how that task will affect parking in the area where I live and will expand on that in this submission.

Since December 2011, I have been involved in making submissions regarding several Development Applications by Scots. They all related to parking problems regarding both the Kambala Road preschool and the College itself, in Victoria Road. I am a member of Concerned Scots Neighbours Inc. and have worked closely with Dr Sam Goldman and Paul Blanket in doing everything possible to help them, and all the nearby residents, seek relief from Scots regarding the parking debacle at our end of Kambala Road. Our aim was for the preschool to have a drop-off and pick-up area within the preschool grounds and the reasons for this are very well known to Woollahra Council, The Scots College, the NSW Land & Environment Court, the legal profession and relevant consultants, among others.

Under great pressure, Scots (perhaps under 'orders' from The Presbyterian Church (NSW) Property Trust?), eventually used a band-aid approach to the problem and now uses a section of Kambala Road as a supervised drop-off and pick-up zone. However, it has not solved the parking problems for many parents, especially those who approach the area from Lamb Street or Bellevue Road, where the width of Kambala Road suddenly diminishes. For them, two- and three-point turns are often necessary and that causes traffic jams in both directions! Regardless, parents often have difficulty in finding somewhere to park and finish up walking a long way to the school – often with one or two extra children – and then the same distance back. And it's not very pleasant for them when the weather is bad. Alternatively, some parents choose to park close to the school and in so doing, may block a driveway. Naturally, that has caused some problems.

My submission basically relates to the parking situation and I will do my best to present it in an organised manner. To try and make easier for you to digest my comments I have segregated them under different headings that are on separate pages.

Please note:

- **Environmental Impact Statement** page numbers are prefaced with "EIS".
- **Parking & traffic assessment** page numbers are prefaced with "P&t assessment".
- The bracketed numbers for pages in both documents are those that appear in a rectangle at the bottom of the relevant website page.
- Scots, instead of The Scots College, has often been used in this document.
- I apologise if there are any errors in the submission.
- Please contact me if you have any queries.

# PARKING

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## EIS page I (10 / 120)

### **Statutory Context ...**

“Development on the site is governed ... by Woollahra LEP 2014 (“WLEP”).”

- a) The current WLEP (Woollahra Local Environmental Plan 2014) has, in item (1) of **Part 1 Clause 1.2 Aims of Plan ...** “This Plan aims to make local environmental planning provisions for land in Woollahra in accordance with the relevant standard environmental planning instrument under section 33A of the Act.”
- b) “The Act” refers to Environmental Planning and Assessment Act 1979 No 203.
- c) The Act’s current version (current from 1 September 2018) **does not have a section 33A.**
- d) The Act’s current version has “3.20 Standardisation of environmental planning instruments (cf previous s 33A)”. [I gather that the lone “s” stands for “section”.]

My reason for referring to the above points is because the ENVIRONMENTAL IMPACT STATEMENT prepared by BBC Consulting Planners is dated July 2018 and I don’t know whether that is relevant or otherwise regarding the DA. I refer specially to BBC’s item (k) on EIS page ii (11 / 120), which is ... (k) **to minimise and manage traffic and parking impacts** and that this is confirmed on page I (10 / 120) with **“The proposal is consistent with the particular aims of the WLEP.”**

I hope it is relevant, as I, and many, many others, would like to see some improvement in the traffic and parking impacts relating to Kambala Road. Due to The Scots College not having included any enhancements to the extremely poor existing traffic and parking situation, I would greatly appreciate your following this up to ensure appropriate, and very long overdue, enhancements will be part of any DA approval.

## EIS page iv (13 / 120)

### **Traffic and parking**

**No increase in pupil or staff numbers at the College is sought** as part of the proposal, therefore other than during the construction phase **there will be no increase in traffic generation or demand for parking on or off the site.**

- “No increase is sought” doesn’t preclude Scots from increasing student numbers, anticipating that all they might get is a slap on the wrist. If they have to pay a fine, they’ll be able to remove a bit from the extra income generated from the increased in pupils.

## EIS page 19 (33 / 120)

**“No changes are proposed** to the existing vehicular access points to the site or **to the existing on-site parking arrangements**, all as described in the Parking and Traffic Assessment in Appendix 14.”

- This is just another on-site parking negative from Scots.

## EIS page 94 (108 / 120)

Under the heading **25. REASONS JUSTIFYING THE CARRYING OUT OF THE PROPOSED DEVELOPMENT** on page 93, is this interesting wording:

Insofar as economic considerations are concerned, the proposed development **will be privately funded** and will generate around 418 jobs, as detailed in Section 315 of this EIS. **The economic impacts of the proposal will be positive.**

- a) If an appropriate person from Scots gets to read this submission, please contact the private funders to seek funds for the cost of an onsite drop-off and pick-up facility in the Kambala Road campus. Thank you. :-)
- b) If the positive outlook in the last sentence eventuates, the request in a) may not be needed.
- c) "Section 315" doesn't exist. The correct Section is 3.15!

## EIS 13 (17 / 36)

### 4.4.2 On-Street Parking Facilities

The wording accompanying Figure 12 is, "The exiting (sic) on-street parking controls are shown in Figure 12. This shows that there is a **significant amount of on-street parking provisions** within the local vicinity of the college, which is **available to staff, students and the local community.**"

- **Kambala Road features prominently** for having unrestricted on-street parking and we don't need to be made aware that it is available to staff and students. They've been parking there for years!

## P&t assessment page 3 (7 / 36)

### Item 6.5

SEARs (Secretary's Environmental Assessment Requirements) is seeking ... Proposed number of on-site parking spaces for **teaching staff and visitors** and corresponding compliance with existing parking codes and justification for the level of parking provided on site.

The response from Scots is ... The [proposed development] does not seek to increase staff or student numbers and therefore no changes are required to the existing parking provisions on site (refer to Section 4 for details).

- It's upsetting to see so many negative comments from Scots regarding parking. They're not doing the right thing for students, teachers and visitors, and from our point of view, the on-site drop-off and pick-up facility. Shame!

## COMMENTS THAT NEED TO BE FOLLOWED UP

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Construction hours are presented differently in the three occasions in which they appear, and are highlighted below in yellow. However, this can be amended by you due to the fact that “The hours of work will be determined through the conditions of consent as advised by the consenting authority” (as in P&t assessment page 22 (26 / 36)).

### **P&t assessment page 22 (26 / 36)**

#### **6.2 Hours of Work**

The hours of work will be determined through the conditions of consent as advised by the consenting authority. However, **it is anticipated** that the working hours will be as follows:

- Monday to Friday 7:00am to 5:00pm;
- Saturdays 7:00am to 1:00pm;
- Sunday or public holidays No works to be undertaken **without prior approval**
- Demolition works 8:00am to 3:00pm (with breaks every hour)

### **EIS page 86 (100 / 120)**

#### **22. CONSTRUCTION HOURS**

A **preliminary construction management plan** is provided in **Appendix 23**. It provides the following anticipated construction hours:-

*Monday to Friday 7:00am to 5:00pm*

*Saturday 7:00am to 1:00pm*

*Sundays / Public Holidays No work permitted*

*Demolition works 8:00am to 3:00pm with breaks every hour*

### **EIS page 101 (115 / 120)**

#### **5.3.3 Work programming**

Work should be programmed such that works, and particularly noisy works, occur **during standard working hours wherever feasible**, namely:

- Monday to Friday 7 am to **6 pm**
- Saturday **8 am** to 1 pm
- No work on Sundays or public holidays.

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### **EIS page i (10 / 120)**

#### **Capital Investment Value ...**

The proposal ... will generate a total of **around 418 jobs** during construction.

- “Around” implies there could be some more jobs or some less. However, on EIS page 21 (35/120) the total is qualified with “The proposal is likely to result in the following **(full-time equivalent)** construction employment generation”. This implies that there could be many more than 418 construction employees.

## P&t assessment 2<sup>nd</sup> page (un-numbered) (2 / 36)

This chart shows that the Final Parking and Traffic Assessment was completed on 23/05/2018 and that the Updated Final was on 25/06/2018. I don't know if that is relevant or not but thought I'd bring it to your attention, just in case.

## EIS page 24 (38 / 120)

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

(c) *establishing consistent State-wide assessment requirements and design considerations for educational establishments and early education and care facilities to improve the quality of infrastructure delivered and to minimise impacts on surrounding areas.*

- a) "Early education and care facilities" would include the Kambala Road preschool. ☹️
  - b) "improve the quality of infrastructure delivered" would encompass an on-site drop-off and pick-up facility. ☹️
  - c) "minimise impacts on surrounding areas" implies giving local residents much less to worry about re the current parking problems. ☹️
- Can this be brought to the attention of The Scots College?

## EIS page 14 (28 / 120)

"Just less than half of all day students travel to and from the College by bus."

- I think that statement should have been qualified, as I don't think it applies to the Kambala Road campus.

The following extract shows that "improved learning for students" will take place in the rebuilt library and this implies that more students may be accommodated at the school.

## EIS page 90 (104 / 120)

### 24.3.3 Social and Economic Impacts

The alterations and additions to the Stevenson Library Building will deliver a much-improved existing facility which will enable improved learning and performance outcomes for students of the College. A social impact assessment is provided in **Appendix 22**.

## EIS page 87 (101 / 120)

"The consultation process which has been undertaken for the project, consistent with the SEAR's, is detailed in the community consultation report in **Appendix 25** of this EIS."

The next page (EIS page 88 (102 / 120) follows with:

The key insights that emerged as a result of the consultation process are as follows:-

The last of the five key insights that emerged as a result of the consultation process is:

*Feedback regarding traffic and parking in the surrounding streets and interest in the School's future plans.*

- Concerned Scots Neighbours Inc., along with many individuals, have provided much feedback about "traffic and parking in the surrounding streets" but their feedback was to no avail. It wasn't even swallowed!

## EIS page 49 (63/120)

### 5.9.6 Chapter F2: Educational Establishments

Very many development controls relating to educational establishments appear under in this Chapter and the description given is “WDCP 2015 contains specific development controls in Chapter F2 for “Educational Establishments” such as the College.” There seven sections in the chart that commences on that page (**F2.2 Building and urban design**) and they all have three columns ... Objectives, Controls, and Compliance and all the compliance answers refer to the Stevenson Library Building! The last section, **F2.8 Community use**, is on page 55 (69 / 129) and here are the relative wordings ...

**Objective 1** ... “To encourage use of school facilities **by the wider community**”.

**Control 1** ... “Buildings are flexibly designed and capable of being used for a variety of purposes.”

**Compliance** answer ... “**Yes**”.

- a) In this context, **Control 1** refers to the Stevenson Library Building.
- b) “the wider community” in **Objective 1** would apply to parents and visitors, among others.
- c) The **Compliance** answer means that, when required, Scots will allow more people than just students and teachers to be present and this could mean more parking spaces are required. However, this does not seem likely, due to the following ...

### **P&t assessment page 3 (7 / 36)**

**Item 6.4** ... *The proposed development of the Stevenson Library is a refurbishment of an existing facility and does not seek to increase staff or student numbers, or alter the existing car or bicycle parking provisions (refer to Section 4 for details). Therefore, **the development should not impact the existing parking** and cycling provisions.*

*To further confuse the situation, here’s a positive statement from Dr Lambert:*

### **EIS page 17 (31 / 120)**

*“The Principal Dr Ian Lambert enunciated a vision for the Library as a new ‘hub’ for the College, a central point for students, staff **& visitors** as both a Library, a **teaching & learning resource** and a place to bring counselling staff together and create a Student Support Centre.”*

## STUDENT NUMBERS

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The Scots College (Scots) has a sad history of not being truthful to Woollahra Council regarding the number of its students when it made a development application. It has constantly stated words to the effect, “there will be no increase in student numbers”, knowing it will once again be able to breach the statutory cap on the student numbers and increase it as they wish. Those extra numbers have resulted in more students and teachers driving to school and looking for somewhere to park that’s close to school. Many of them come to Kambala Road and, as it becomes congested near the Ginahgulla Road intersection, they drive further along and park where they can.

My wish is that an appropriate authority will direct Scots to provide adequate on-site parking for students, teachers and (when relevant) visitors ... at the preschool and at the Victoria Road precinct.

Apropos the DA stating yet again, “there will be no increase in student numbers”, and repeating it many times, I can only interpret that as meaning that there is a strong possibility there will be an increase in students and teachers, albeit maybe not as many as previously.

Following, are ... (drum roll) ... relevant extracts re, “there will be no increase in student numbers”. They are not in any particular order.

### EIS page i (10 / 120)

The last two sentences under *The Proposed Development* ... No increase in pupil or staff numbers at the College arises from the proposal. No such increase is sought by the College as part of this SSD DA.

### EIS page 57 (71 / 120)

**6.1.1 Staff and student numbers** No increase is proposed to either the number of staff or the number of students as part of the proposed development.

### P&t assessment page 21 (25 / 36)

## 5. Traffic and Parking Assessment

The proposed development will not result in any increase in the staff of (sic) student numbers, or any changes to the existing access, traffic, transport or parking arrangements currently in place at the college and therefore no traffic or parking impacts will arise as a consequence of this development, other than during construction.

### P&t assessment page 32 (36 / 36)

## 7. Conclusion

The project does not propose any increase in the staff or student population, or changes to the existing traffic, transport or parking arrangements currently in place at the college.

### EIS page 34 (48 / 120)

- *Direction 1.10: ...* Whilst not increasing pupil numbers at the College, the proposal will provide improved educational, operational and design outcomes for students and staff.

## **P&t assessment page 3 (7 / 36)**

**Item 6.1** ... The proposed development of the Stevenson Library is a refurbishment of an existing facility and does not seek to increase staff or student numbers.

**Item 6.5** ... The “Comment” from Scots is, “The [proposed development] does not seek to increase staff or student numbers and therefore no changes are required to the existing parking provisions on site (refer to Section 4 for details).”

## **EIS page iv (13 / 120)**

### ***Traffic and parking***

No increase in pupil or staff numbers at the College is sought as part of the proposal

## **EIS page 91 (105 / 120)**

### **24.3.5 Traffic, Parking and Access Impacts**

The proposal will not result in an increase in student or staff numbers and thus will not generate any additional traffic or parking demand.

## **EIS page 82 (96 / 120)**

Moreover, given that there is no increase in staff or student numbers as part of this DA, the proposal will not increase demand for local facilities.

## **EIS page 18 (13 / 120)**

The above activities will greatly improve the facilities available to students and staff. These improved specialist facilities of themselves will not generate more staff or students and, as a consequence, will have no impact on traffic or parking.

## **FWIW, here are the relevant wordings ...**

will not generate more staff or students,

there is no increase

will not result in an increase

No increase

Whilst not increasing

does not seek

does not propose

will not result in any increase

No increase is proposed

No such increase is sought

No increase in pupil or staff



## THE GOOD AND THE BAD

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P&t assessment page 29 (33 / 36)

### 6.11 Construction Staff Parking

Due to site constraint, there will be limited parking available to site personnel on site. All site personnel are to be advised that they are not to park in the on street parking **in the vicinity of the development site**. To minimise the required parking, **the contractor will be encouraged to assist in the transportation of workers to the site. Also, site personnel will be advised to car pool (where ever practicable) and site personal (sic) will be informed of the public transport options** available in the vicinity of the site (refer to Section 4) and advised to utilise these facilities (where ever practicable).

- **THE BAD**

The second sentence advises us that Kambala Road can expect more traffic and parking problems.

- **THE GOOD**

The contractor/s might assist in having workers being transported to the site, and car pooling will also be encouraged.

## **“Something is rotten in the state of Denmark” (aka FALSE AND MISLEADING INFORMATION)**

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### **Extract from Certification of Environmental Impact Statement on page 3 of the EIS**

I certify that the Environmental Impact Statement, to the best of my knowledge, has been prepared in accordance with the requirements of Clauses 6 and 7 of Schedule 2 of *Environmental Planning and Assessment Regulation 2000*, **contains all available information that is relevant to the assessment of the proposed development** and **contains information which is neither false nor misleading.**

Having taken into account all you have read in this and other submissions regarding the increase of student numbers over very many years, and the false and misleading way that The Scots College fed it to Woollahra Council, I am sure you will be as taken aback as I was when reading the signed **Certification of Environmental Impact Statement** on page 3 of the Environment Impact Statement. If Robert Chambers, the signatory, was aware of the history – “the false and misleading way that The Scots College fed it to Woollahra Council”, and that an increase in student (and probably teacher) numbers (even were it to be small) was therefore more likely than not – then the signed Certification of Environmental Impact Statement did **not** contain all available information that is relevant to the assessment of the proposed development.

Regardless, if Robert Chambers was not made aware of the situation and chose not to, and/or was not asked or required to, “dig and delve” into previous development applications of The Scots College, then the appropriate person at The Scots College (I have chosen not to provide a name) would surely have been made aware of what was being signed, knowing that he had not provided all available information that is relevant to the assessment of the proposed development. (Sorry for the long sentence.)

**Apropos the above, the following wording from EIS page ii (11 / 120) should be taken into consideration.**

Section 5 of this EIS contains a detailed discussion of all the relevant statutory instruments as well as policy and guideline considerations which are relevant to the assessment of the proposal. **Nothing arises from this discussion which warrants alteration, reduction, or removal of any aspect of the proposal.**

I trust you will take all of the above into consideration when deciding on how to respond to this development application. It would be greatly appreciated!