

level 7  
66 hunter street  
sydney nsw 2000  
australia

t +61 2 9222 8333  
f +61 2 9233 6399

www.baron.com.au

gil baron/b.comm. ll.b.  
gil@baron.com.au

associates

our ref:gb:cw:05/0406  
your ref:

3 October 2018

BY EMAIL

NSW Government  
Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Sir/Madam

**RE: PROPOSED ALTERATIONS AND ADDITIONS TO THE STEVENSON LIBRARY  
BUILDING - EIS EXHIBITION  
PPTY: – THE SCOTS COLLEGE**

We act on behalf of Jackie Baron, the registered proprietor of 21 Carrington Avenue, Bellevue Hill. Our Mr Baron also resides in the same residence, and this submission is made on behalf of both Gil Baron and Jackie Baron.

We have reviewed the relevant online attachments forming part of the proposed application which is on public exhibition. As a result, we set out the following matters of concern and raise objections to the development unless and to the extent that they can be properly addressed by the provision of additional information and or the imposition of conditions unless otherwise rendered not acceptable:

**a) Sarah George Consulting Report**

The Report by Sarah George Consulting asserts that there has been community consultation and with respect to the author, that was not evident with at least our residence in Carrington Avenue, and we understand with others along our road (Report of Sarah George Consulting Page 11).

**b) Intensification and Increased Use**

We note that certain reports assert that the significant expansion of the Stevenson Building will have no adverse impact and will not involve any increase in people or staff numbers. We note that the planning report (E15) says that "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". The misleading component of that assertion is that the consequence of the significant increase in the "library" over 800sqm is that it would permit there to be

.../2

3 October 2018

additional space for pupils and staff. Accordingly, whilst that application is not part of the current one, the natural consequence of the increase in capacity would be to impact on those two components. As a result, it is our view that the school should provide an analysis of the additional areas that could accommodate classrooms and the number of pupils that could be accommodated within those classrooms or study areas in order to extrapolate a likely consequence of approval being the grant of permission for the intensification in the number of students and teachers.

**c) Traffic Generation and Parking**

The prime concern that we have is the intensification will inevitably lead to a significantly increased number of visits to the Property, whether it be on Victoria Road, Cranbrook Road or Cranbrook Lane. As a result, the intensification of traffic with the limited parking constraints arising from students parking in Carrington Avenue both legally (and illegally from time to time) will be somewhat exacerbated by their use. This interfered use will be not only of Wednesday but also on sporting weekends (which have been regrettably omitted from the reports) and regularly on evenings on which there are functions, presentations and events. Each of these circumstances create an adverse impact upon the residents in the immediate vicinity.

The reports that have been commissioned, and in particular the Traffic Report, are also in our view misleading. We note that the Traffic Report asserts that the Development does not propose any "changes to the existing traffic transport parking arrangements currently in place at the College". The report however fails to acknowledge that those arrangements are inappropriate and insufficient for the number of existing students, never mind the additional likely influx arising from the additional space that is being constructed.

The report curiously does not undertake any new surveys and relies on surveys carried out supposedly in 2013 without supporting dates and does not deal with the provisions from dropping off and collecting students. Whilst they may appear to be not relevant to the expansion of a single building, they are relevant to the overall amenity of issues and adverse impacts to residents. Those adverse impacts to neighbouring residents means there are significant delays and traffic jams from time to time particularly in the 45 minutes before school commences and from the 3pm to 4pm, in addition to the evening events and sporting weekends.

**d) Construction Traffic Management**

The concern of the Construction Management Plan is that Carrington Avenue is a cul-de-sac. Accordingly, traffic banks up along Cranbrook Road in a southerly direction up to Victoria Road and prevents vehicles entering and exiting Carrington Avenue particularly in the morning.

In our view, the use of traffic controllers only at the corner of Cranbrook Lane is insufficient to enable access to be uninterrupted from Carrington Avenue.

It is also noted that the access point into Cranbrook Lane is extremely narrow and it likely means that the truck and dog entry and egress route will occupy all of the width of Cranbrook Road to enable a wide turning circle which will prejudice the residents of Carrington Avenue as and when they enter and exit their property. In our view, any

3 October 2018

consent should be conditioned that no such construction vehicles should be permitted to enter the site and even park on Cranbrook Lane in the period prior to 9am each morning and that they must leave the site prior to 3pm or after 4:30pm so that they do not exasperate the traffic arising from the parents collecting and dropping off children, and students driving from the site.

If NSW Planning & Environment is inclined to approve of such application, it is our strong request that there be conditions imposed including:

1. No additional student numbers with the provision of daily on-site traffic wardens at Cranbrook Lane and Carrington Avenue and additional on-site parking;
2. Signage on the street installed throughout all of Carrington Avenue that prevents parking other than for residents for less than 2 hours; and
3. Installation of "No Standing" signs on the corners of Cranbrook Road, both the north and south side, and on each corner, so as to prevent cars parking close to the corner which limit the line of site for vehicles driving up Cranbrook Road or down.

Those are our comments and we look forward to NSW Planning & Environment's favourable response in considering these matters in its determination of the application.

Yours faithfully

**Gil Baron**  
Principal  
gil@baron.com.au

