

Apartment 401
the Horizon
184 Forbes Street
Darlinghurst NSW 2010

2 April 2019

Ms Prity Cleary
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Cleary

Objection – SSD 17_8993 SCEGGS Darlinghurst Concept DA and Stage 1 DA

Thank you for the opportunity to lodge an objection to the SCEGGS Masterplan Concept and Stage 1 documents. I wish to register a number of objections:

1. Staff and student numbers on which the Concept DA of the 2040 Masterplan for SCEGGS is based

The application states that no increase in staff and student numbers will occur as a result of the SCEGGS 2040 Masterplan. However, SCEGGS lodged a Workplace Profile report to the Workplace Gender Equality Agency on 19 April 2018, as it is required to do under legislation, which indicated a total of 182 staff (33 manager level and 149 non-manager). The SCEGGS 2017 annual report states that the school has 900 students from kindergarten to year 12.

The traffic impact assessment prepared by Traffix states that there are 185 staff and 931 students (178 kindergarten to year 4 and 753 year 5 to year 12).

In addition, the Concept DA proposes the option for SCEGGS to include a childcare centre for 90 children. If approved these additional student numbers represent a material increase in the existing operational infrastructure and staffing on site along with the adjoining properties. The impact of the proposed childcare centre has not been taken into account holistically as part of the Environmental Impact Statement and supporting reports, this is explicitly stated on page 36 of the Traffix report.

Confirmation of the current staff numbers and approved student numbers is requested in order for the application to be assessed properly.

A condition of consent should be a requirement that SCEGGS maintain the current approved student numbers, on the grounds that any increase in traffic movements are unacceptable, given the constrained nature of the surrounding streets.

A condition of consent should be to exclude the provision of a childcare centre for the Concept DA given that there is insufficient information detailing the proposal and its future impact.

2. Proposed Gross Floor area

The Masterplan proposes an increase of over 3,000 square metres of Gross Floor Area, but argues that the additional area does not represent an increase in 'intensity of development at the site. It claims that this will not generate high levels of traffic as existing student numbers and staff populations will not change.

This is not the case, given the current increase in student and staff numbers, and the significant proposed increase resulting from the childcare development.

3. Section 94 Contributions

The proposal seeks exemption from the requirement to make a Section 94 contribution to the City of Sydney on the grounds that the development will not result in a net population increase. Based on the staff and student population numbers referenced above in item 1, this is not the case, and a condition of consent should require a Section 94 contribution be a requirement on the proponent.

4. Traffic Management

The current traffic impact of parents and carers dropping off and collecting students is a major concern for residents of the Horizon. The narrow Forbes and Bourke Streets, which are local roads, were not designed to cope with the amount of traffic now generated by SCEGGS at peak morning and afternoon periods. Apart from a person supervising students at pedestrian crossings, SCEGGS plays no role nor takes any responsibility for the impact of the traffic generated by student drop off and collection. Parents routinely double park, park in unauthorised zones and frequently use the Horizon entrance as a turning circle.

The Traffic Impact Assessment submitted as part of the Masterplan DA suggests that SCEGGS could deploy supervisors to manage traffic. Repeated requests to SCEGGS to do this have been to no avail. I believe a condition of consent to the DA should include a requirement for SCEGGS to provide authorised traffic controllers at peak periods at both the Forbes and Bourke Street entrances each school day, to more effectively manage traffic movement and ensure compliance with road rules and parking restrictions.

Traffic congestion is compounded outside peak drop off and collection times as a result of SCEGGS control of St Peters Street, a public road. I do not know why SCEGGS has taken control of this road, and determined when the public may have vehicular access to it. The result is that when the road is restricted all traffic is required to u turn at the end of Forbes Street, significantly increasing two way traffic movement. This is compounded at night and weekends, when the gymnasium is regularly used by other groups. A condition of the DA consent should require SCEGGS to provide 24 hour, 7 day a week access to the public to use this public road.

The Masterplan includes provision for a 90 place child care facility. The traffic generated as a result of SCEGGS incorporating a child care facility would be very significant, as most parents would drive and be required to park and leave their vehicles to drop off and collect their children. The Traffic Impact Assessment does not address the impact of the proposed child care centre. This is a significant omission. The DA consent should prohibit the development of a child care facility at SCEGGS, on the grounds that the traffic impact it would generate is unacceptable.

5. Capital Investment Value (CIV)

The supporting Capital Investment Value report (Appendix B) prepared by Altus Group on 21 November 2018 details a series of exclusions from the calculation which appear inconsistent with the Capital Investment Valuation definition under the Environmental Planning and Assessment Regulation 2000.

Specifically, but not limited to the following exclusions:

- Latent site conditions including in-ground contamination
- Temporary accommodation
- Services diversions, external connections and/or improvement
- No escalation beyond October 2018

On this basis the CIV should be reviewed and adjusted to reflect all costs necessary to establish and operate the project, including the design and construction of buildings, structures, associated infrastructure and fixed or mobile plant and equipment as defined by the Department.

6. Design Excellence Competition

In addition to the proponent submitting an accurate CIV as contemplated in item 5 above, the likelihood of the development exceeding a CIV of \$50M is highly probable and furthermore grounds to support a competitive design process.

This will ensure design excellence is enhanced through the conduct of a competitive design process.

A condition of the development approval should include a requirement to undertake a competitive design process.

7. Wilkinson House

I strongly object to the demolition of Wilkinson House. This is a listed heritage building and part of the East Sydney Heritage Conservation area. I understand it was designed by Emil Sodersten, who later achieved recognition as the winner of the design competition for the National War Memorial in Canberra, and went to design other notable apartment buildings in Potts Point and Elizabeth Bay, including Birtley Towers and Marlborough Hall. Wilkinson House is thought to be his first Sydney commission. So this building is significant in contributing to the recognition of an under recognised and influential architect of the early twentieth century.

The building occupies a highly prominent position on the SCEGGS site, and its design complements the series of buildings on the southern side of William Street, also recognised in the East Sydney Heritage Conservation area.

I support Option 2 outlined in the Heritage Assessment documentation, for the retention of the complete building façade, and the adaptive re-use of its interior configuration. The DA consent should approve this option and preserve this item of local heritage significance.

I trust my comments are of assistance in achieving a balanced outcome of benefits to the local community in the further development of the SCEEGS school facilities.

Yours sincerely

Peter Morton