

## Submission - State Significant Development

# Weigall Sports Complex, Sydney Grammar School.

A new Weigall Sports Complex for Sydney Grammar School comprising demolition of structures, construction of three-storey and single-storey building. Ancillary works involving landscaping, tree removal, kiosk substation, car parking and signage.

The submission is made on behalf of the adjoining owners located at unit [REDACTED]

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Despite being adjoining land owners and directly affected by the scale and location of the facility the proposal is flawed based on a number of criteria including:-

- Location & Context
- Planning Controls
- Access & Parking
- Height, Bulk & Scale – Impact on Adjoining Residential Amenity

### Location & Context – Wrong Location

The SEE on page 6 places weight on a Siting Option undertaken by the Architect, based on a range of ten factors. In order to validly consider Options the criteria should be solely focussed on external impacts; internal matters such as building cost, least impact to playing fields are irrelevant in the search for an optimum location

The factors include:-

Footprint can accommodate the brief	Internal factor irrelevant to analysis
Built form can respond to the surrounding built context	External
Built form can respond to the surrounding landscape context	External
Least flood effected	External
Least impact to playing fields	Internal factor irrelevant to analysis
Maximises northern orientation and aspect to playing fields	Internal factor irrelevant to analysis
Minimises view impacts	External
Minimises overshadowing impacts	External
Site coverage and land cost	Internal factor irrelevant to analysis
Building cost	Internal factor irrelevant to analysis

Factors such as public transport access do not appear in the evaluation.

If you review each of the four option considered below; the weighting is biased. If you evaluate the responds to the built forms ability to respond to surrounding built and landscape context there is no differentiation in the field between Option 1 and Option 4.

Similarly, the weighting between Option 1 & Option 4 in relation to flooding establishes a marked contrast and does not weight the extent of flooring for Site 4.



Having identified legitimate external factors for the evaluation it would be normal to weight factors according to the external impacts that would arise; for instance the fact that the site is flood affected; is of less importance than the other agreed factors of minimising view losses and overshadowing; the preferred option is ranked lower than two other options if factors were weighted.

For factors of Traffic, nature of the use, hours of operation, building scale/relationship to surrounding and adjoining developments including all the consequential impacts on residential amenity; the proposed development is located in the wrong location with Option 2 and Option 4 being better alternatives than Option 1 – The Proposal

Page 27 of the SEE identifies significant constraints for the site – Option 1 including:-

## 2.4.2 Constraints

The SSDA site:

- Is located within the Paddington Heritage Conservation Area (HCA) necessitating a sensitive design response
- Has an interface with residential flat buildings to the south (8 Vialoux Avenue and 25-33 Lawson Street) and west (on the former Advanx Tyres site) and adverse amenity impacts should be minimised (using the controls in Woollahra DCP 2015 and the Apartment Design Guide (ADG) as a useful assessment tool)
- Is affected by acid sulfate soils and groundwater (limiting excavation depth)
- Is in a flood planning area.

## Conclusion

On the basis that a case can be made for the Facility (given the relatively low stated and proposed usage rates) the first contention is that the Facility is in the wrong location with discarded options having less external negative impacts than the pursued option particularly in view of the preferred sites location within the Paddington Heritage Conservation Area (HCA) and its incompatible relationship with surrounding and adjoin development.

## Planning Controls – No Height and No FSR Controls

The SEE makes much of the planning controls applicable to the proposal and in particular the development standards that apply under Woollahra LEP 2014. See extract of Figure 62 below



Figure 62 – Proposed site plan showing Woollahra LEP 2014 height & FSR standards (Source: mark up of AJ+C, A1001\_A)

The reason why more than have the site has no Height or FSR controls is there was no need to contemplate the built form in this location and it is inherent in the zoning and reflected in the controls that the planning outcome for this portion of site was active sporting facilities including tennis and basketball courts.

Indeed the planning controls – Height & FSR (extract of Figure 56 below) only apply to the R3 zoned portion of the site; this portion of the site contemplated as residential infill within the context of the adjoining units and the Paddington HCA. Appropriate development standards applied to the site in order to establish a suitable building envelope.



The planning controls do not allow nor contemplate a built form of development of the height, bulk and scale of the Facility on that portion of the proposed site zoned Private Recreation RE2.

The objectives of the RE2 zone are

- To enable land to be used for private open space or recreational purposes.
- To provide a range of recreational settings and activities and compatible land uses.
- To protect and enhance the natural environment for recreational purposes.

The objectives make no reference to the built form.

The underlying objects contemplate low impact Facilities; leading to the conclusion that the Facility is incompatible with the zoning of the land upon which it is proposed.

## Conclusion

**The prevailing planning controls do not support nor do the instruments contemplate a Facility, such as that proposed in the current location; indeed when the objectives of the Private recreation RE2 zone are examined the proposed use is inconsistent with the zone and the objectives.**

**The suitability of this location should be the subject of a “Planning Proposal” and the associated rigour of this process rather than relying on a “development application” process to legitimise an incompatible development not only with its underlying zoning but within the context of the surrounding residential areas.**

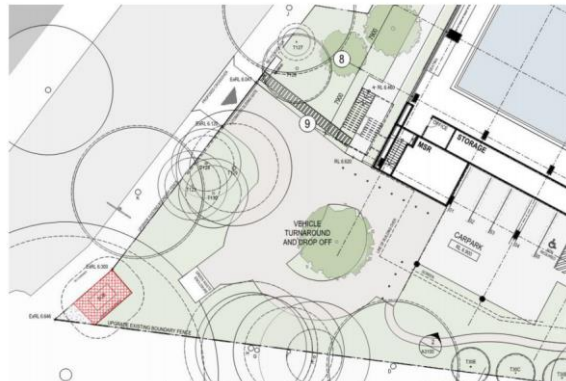
**On Page 81 the SEE states that the facility is “consistent with the Objectives of the RE2 zone”; our contention is that this statement is incorrect and reinforces the fact that the site is the wrong Location.**



### Access & Parking - Constrained Location – Heritage Impact

The majority of the access to and from the Facility will rely on Neild Avenue, which is an already heavily trafficked residential street (40kmh); being a major gateway into the Paddington Conservation precinct and Fiveways.

At any time of the day empty car parking spaces are limited in Neild Avenue from Craigend Street to its junction with Brown Street and Boundary Street. This is demonstrated in the SEE by the photo below with the right turn arrow in the bottom left foreground the deviation of Neild Avenue into Boundary Street.



There appears little consideration regarding the cumulative impacts of the expected traffic generated by the facility particularly during the peak period of use of the facility; bringing vehicles into a highly trafficked area to “drop off and pickups” reinforces the poor location of the facility.

Parking associated with the facility will be directed along Neild Avenue into the narrow streets of Lawson Street then Alma Street;

The drop – off roundabout off Neild Avenue as depicted above right: is poorly located and has insufficient queuing distance to cater for the expected vehicles and is restricted to a left in and left out movement.

The driveway location will not allow a motorist after drop off to merge across the eastern lane of Neild Avenue to exits into Boundary Street, thus the only reasonable safe movement will be to continue into Lawson Street or Brown Street returning to Boundary Street via Neild Avenue; either way the traffic will be forced into the Paddington Precinct will be substantially increased.

If, as is asserted in the SEE, drop offs will be directed to the car parking proposed in Alma Street the net effect is the same as the problem identified above; substantial increased traffic will be directed into the Paddington Streets impact residential amenity and changing the context of the HCA in this location. See **Figure 65 Page 100** of the SEE

### Conclusion

**The nature of the operation (opening hours) and the proposed traffic control provision of the development will exacerbate an already deteriorating local traffic condition which will have a significant impact of the residential amenity of the area, particularly in view of the sites location within the Paddington Heritage Conservation Area (HCA); another demonstration that the wrong option was selected.**

**The Access and Parking arrangements result from an ill-conceived design made to fit in an inappropriate location resulting in a built form out of context. All supporting Traffic analysis reflects a “post rationalisation” rather than proactive analysis seeking the optimum solution for the community. Traffic & access we note was no one of the selection criteria in the “preferred Option” Analysis.**

### **Height Bulk Scale – Impact on Adjoining Residential Amenity**

Pages 98 to 114 of the SEE address issues of height, scale, context visual impact, view loss etc. Multiple other pages of the SEE raise and dismiss concerns from an operational and construction impact perspective.

The conclusion reached within the SEE is that the proposed facility will have a significant impact in many of these areas of environmental planning concern primarily due to the context within which the facility is proposed to be located.

Naturally, the SEE argues that the impacts are manageable and minor and acceptable.

The scale of the facility is out of context and completely incompatible with the surrounding neighbourhood; accordingly the following list of negative impacts can be readily identified as arising to surrounding and nearby residential properties identified in the SEE:-

- Loss of Privacy
- Loss of View/outlook
- Loss of Sunlight
- Loss of Acoustic Privacy
- Loss of key significant trees
- Loss of on street parking spaces

The purpose of this submission is that greater weight should be given to the impacts of the facility on its neighbours than given within the SEE.

### **Conclusion**

**All the surrounding properties within Neild Avenue, Lawson Street, Alma Street, Boundary Street, whether by traffic or direct impact of the facility on solar access, cross ventilation, outlook/views, acoustic and visual privacy will be impacted.**

**The questions to be answered are:-**

- **Has the location and alternate locations for the facility been rigorously tested against key environmental planning criteria? The answer is NO.**
- **Do the prevailing planning controls envisage a facility of the scale and nature proposed in the SEE? The answer is NO.**
- **Is the Facility consistent with the zoning objectives of the site? The answer is NO.**
- **Has the traffic planning and impact on the road network influenced the design of the Facility? The answer is NO.**
- **Evaluated against key environmental planning criteria and associated impacts; is the Facility a suitable and compatible form of Development within its context? The answer is NO.**
- **Is approval of the Facility in the Public interest? The answer is NO.**