

Submissions in response to SSD-10421 WEIGALL SPORTS COMPLEX, SYDNEY GRAMMAR SCHOOL

NAME – [REDACTED]
ADDRESS – [REDACTED] Darlinghurst, 2010
DATE – December 2020

Introduction

These submissions respond in both general and specific terms to the above SSDA comprising the construction of a sports complex and car park (**Development**) on what is currently green space in Neild Avenue, Paddington.

While the Development Application has been lodged as a State Significant Development, in fact, what is proposed is a private building for a private school: a significant sports complex for the exclusive use of less than a few thousand students of Sydney Grammar School. As such, it should be assessed differently from other public infrastructure such as a hospital, train station or community centre. It provides **no local community or public benefit**, yet its construction and existence will create many disruptions and disadvantages for local residents and the local community, both during construction and through ongoing use.

While the Development may come within the ambit of the SSD framework as being an educational development it is not a regular school building, nor is it set within the context of existing school buildings on the proposed site. The Development is in essence an extravagant over sized indoor sports complex on a site that currently sits within the context of green space and contains tennis courts and outdoor basketball courts.

As such, the Development must be rigorously assessed since normally there would be public advantages to offset against the community disadvantages. Here, there are no public advantages and significant community disadvantages.

In addition to general issues raised in these submissions addressing concerns with the Development and its buildings, the following key issue areas are raised:

- overall bulk and height of the Development
- lack of appropriate considerations in various reports of the affect on the community, flora and fauna and heritage,
- omission of and disregard of impacts on Neild Ave residents outside the suburb of Paddington and the Woollahra LGA
- visual impact on affected stakeholders
- arbitrary and unnecessary removal of mature trees
- noise
- lighting
- traffic while in use, including vehicle and pedestrian traffic
- proposed external elements of the sports complex, in particular the Balcony and Main Access Stairs
- community impact

- Neild Ave footpath
- construction management, including traffic and the allocation of space on the SSDA
- ongoing maintenance of the SSDA site and the Weigall Playing Fields

Submissions are set out below.

Submissions in relation to specific aspects of the Development should not be taken as approval of the Development generally or other aspects of the Development.

Definitions

In these submissions:

- **Development** refers to SSD-10421 Weigall Sports Complex Sydney Grammar School
- All reports and documents available on the planning portal in relation to the Development use the same name and Appendix reference as appear on the portal
- **SGS** means Sydney Grammar School
- The two buildings of the Development are referred to as the **Main Building** (also referred to by its purpose as the **Sports Complex**) and the **Car Park**
- The Main Building is in three sections being the **Western Building**, the **Eastern Building** and the central **Services Area**
- The Western Building comprises two principal levels being the **Main Pool Floor** at basement and ground level and the **Main Sports Floor** on the first level.
- The Eastern Building comprises three principal levels
- **Balcony** refers to the external Balcony (also referred to in the SSDA at times as an “assembly” area) on the north side of the Main Sports Floor
- **Main Access Stairs** refers to the main open Main Access Stairs at the north side of the Services Area
- The SSDA site forms part of the Weigall Playing Fields located on Neild Avenue
- **Critical Trees** comprise trees 31, 32, 35, 36, 120, 122, 125 and 126 in the Arboricultural Impact Assessment Report by Tree IQ (Appendix EE – **Tree Report**)

Submissions

1. Height, bulk and location of the Development

The overall size and bulk of the Development is inappropriate in the context of the Woollahra DCP 2015 and in the context of the current surrounding environment.

The finished Main Building will be approximately 17 metres tall and have a western face of over 55 metres and a northern face of over 60 metres. Despite some variations to the northern face, the building is a vast rectangular bulk when looked at from much of Neild Ave (at the western and north western side of the Development).

It is incorrect to assess the appropriateness of the Development, particularly the Sports Complex, in the context of apartments in Neild Ave or Lawson St; locations which have had buildings on them for decades, with Neild Ave previously being industrial built space before there were apartments.

The Weigall Playing Fields have been green space for over many decades and sit on the floor of the valley, overlooked by thousands of residents from Paddington, Darlinghurst and Edgecliff. The Development will take approximately 25% of the green space of Weigall Playing Fields. Green space in the inner urban area is precious and should be protected as far as is possible. Once built on it is lost.

To put the Development (including a car park) on green space is not only inappropriate and inconsistent in the face of the relevant context but is entirely inconsistent with green space policy contained in the Woollahra DCP 2015.

The placement of the Sports Complex at the southern end of the Weigall Playing Fields plants it squarely in the local residential community area. It is not a residential building and it cannot piggyback on nearby residential uses as a precedent for its approval.

As discussed further in these submissions, the Development, located within the community area, will have many significant negative impacts on the local community and its residents.

The current SSDA site can be compared with one of the alternative sites considered for the Development on Weigall 4, close to the rail overpass and next to New South Head Road, away from residents and the local community and close to the existing Weigall sports buildings on the north of the Weigall Playing Fields, closer to main road and public transport access – overall a more appropriate site for any proposed sports complex.

The Applicant claims that the proposed site is the only area that is not flood prone but little information is provided to verify this claim. The comparative analysis on siting options is brief and merely contains statements, with no quantifiable assessment. Weigall 4 would present a mutually beneficial outcome with residential amenity and the valley floor protected while allowing the Development to proceed.

Apart from the buildings on the southern and western side of the SSDA being previously built residential space (and accordingly, not a precedent for the Development), these buildings have not impinged on the current (and historical) use of the Weigall Playing Fields by SGS (including the SSDA site) as they are to the west and south so do not overshadow the site.

The opposite cannot be said of the effect of the Development on these existing buildings however. Currently the Weigall Playing Fields and the proposed SSDA site are used as playing fields and are green space. The Main Building will severely impinge on the residents along the southern and western sides of the SSDA site, blocking part or all of their view of that green space because of its size and bulk and overshadowing many of them.

It is disingenuous to assert that the Main Building faces onto the Weigall Playing Fields as if this then means there will be no affect outside this space. This is not correct, particular to residents to the north west of the SSDA site along Neild Ave who will experience the full impact of the bulk and size of the Development and the loss of green space. (A map showing sight lines and affected areas appears below in the discussion of Visual Impact.)

Other issues relating to the visual and community impact of the Development which are due to the height and bulk of the building are additionally discussed below and should be part of the overall consideration of the proposed height, location and size of the Development.

The height and bulk and overall size of the building also means that effects such as noise, traffic and light are exacerbated for nearby residents.

The overall context against which the Development should be assessed is that it sits on historical green space.

Outcomes:

- **that the Sports Complex be rejected as too high and large for the SSDA site and as inappropriate for the Woollahra DCP 2015**
- **that the Development be rejected at its current location on the Weigall Playing Fields**
- **that all alternative locations for the Development be fully and independently assessed prior to any determination being made**
- **that the appropriateness of the Development be assessed against the green space in which it historically sits**
- **if approved, that the size and bulk of the Development be reduced to be appropriate in the relevant context**

2. High magnitude visual impact on Neild Ave properties

The Development will have a severe negative visual impact on residents at 12 Neild Ave and 16 Neild Ave facing east onto Neild Ave. These have been overlooked and appropriate mitigation steps accordingly ignored or overlooked.

The Environmental Impact Statement by RUP (EIS) at p17 identifies that of the various possible sites for the proposed development within the Weigall Playing Fields, the selected site caused the most impact to views and overshadowing generally.

The executive summary of the Visual Impact Assessment Report (Appendix Y) states that:

The proposed development causes significant change in the existing composition of private domain views.

Notwithstanding the extent of view loss ranges from severe to devastating for immediately adjacent dwellings in Tenacity terms, the extent of view loss is caused by built forms that are permissible and anticipated under the applicable planning controls.

The compliance with relevant planning controls reduces the weight or significance of the overall visual impact. The overall visual impacts of proposed development were found to be low and acceptable.

The Visual Impact Assessment Report (p24) states that:

“east-facing units at 18-24 Neild Avenue would be likely to have view access towards the WSC and potentially to the subject site. On behalf of SGS contact was made with residents at each of those locations and access to inspect views was requested and given at units 12, 9 and 5 at 8 Vialoux Avenue and unit 204 at 18 Neild Avenue. Urbis accompanied by a professional photographer and surveyor, entered each dwelling to inspect views and record the location of the camera lens.”

Although these same issues apply to east facing residents of 12 Neild Ave and 16 Neild Ave (collectively, **Affected Neild Ave Properties**), particularly those on floors above the tree line, no such assessment was made of these properties. Their status as registered stakeholders in this process has been ignored.

As longer-term residents (these buildings have been occupied since 2010), their loss of amenity and views should have been taken into account, but was not. This was despite many residents of these buildings on the western side of Neild Ave having registered with and participated in the consultation process to convey these concerns.

The only apartment considered from Neild Ave in the SSDA was 18 Neild Ave - a second floor apartment in a building somewhat south west of the SSDA site and only recently completed (occupied early 2020). This apartment is also within the street tree height and therefore underestimates and visual impact of the Development even on other apartments in the same development.

Below are three maps showing the Affected Neild Ave Properties marked in blue highlight (map 1), with yellow highlight showing the relevant line of sight from 16 Neild Ave (map 2) and green highlight showing the relevant line of sight from 12 Neild Ave to the Main Building (map 3, and keeping in mind that 12 Neild Ave will also have a full face view of the Car Park). As can be seen, the Affected Neild Ave Properties cover a considerable part of Neild Ave.

Map 1



Map 2



Map 3



Many of the Affected Neild Ave Properties would be affected through to Step3 of the Tenacity Test.

The Visual Impact Assessment Report (p25) states “*impact on views from living areas is more significant*”. In fact, Affected Neild Ave Properties have most if not all views over the SSDA site with ALL windowed rooms look east onto Weigall Playing Fields). These properties have been ignored.

As such, the impact on these Affected Neild Ave Properties has not been included in the assessment. There is no mention of Neild Ave properties in the Visual Amenity summary on pages 104 of the Design Report (Appendix C).

There has also been no consideration as to whether the “skilful” relocation and generous setback from the south (where properties were included in the assessment) has actually resulted in increased impact from the Neild Ave aspect:

Notwithstanding Building 1 has been massed and located skilfully having been reduced to the south to minimise overshadowing and visual impacts and is separated from neighbouring development by a generous setback.

Accordingly, the Visual Impact Assessment Report conclusions have a major flaw and cannot be considered complete or sufficient. Further assessment must be required.

It should be noted that specific invitations for the architect, project manager and Ms Chikarovski by Margaret McDonald, to visit apartment [REDACTED] (an Affected Neild Ave Property) and by Margaret Shearer to visit apartment [REDACTED] (another Affected Neild Ave Property), based on the suggestion by Ms Chikarovski, did not occur and neither request was responded to, despite email follow up with Ms Chikarovski.

See at the end of these submissions an attached email of 13 August 2020 from Margaret McDonald to Ms Chikarovski referring to concerns raised at the stakeholder consultation held earlier the same day, providing information and seeking a visit to [REDACTED]. No response was received to this email.

See also attached email of 14 July 2020 from Margaret Shearer containing the specific invitation for a visit is in the final paragraph. This follows up what was discussed with Ms Chikarovski at the first consultation event. Ms Chikarovski responded saying she would “come back” on the meeting once she had “more information in this regard”. This did not happen. This email of Ms Chikarovski of 14 July 2020 is also attached.

All Affected Neild Ave Properties have been overlooked and omitted from the Visual Impact Report yet these properties have ALL their windows (bedrooms, living room, dining room, kitchen) to the east, overlooking the Development site and currently have expansive views of Weigall Playing Fields and the valley beyond.

And the visual affect will be greater for properties at higher levels, above the street tree line (which is currently cut back to the height of overhead wires). These properties currently experience an uninterrupted view, filtered by tall trees, of green space and the distant hills on the other side of the valley.

The Environmental Risk Assessment Report by RUP (Appendix E) assesses the likelihood and consequence of risk of various environmental issues based on the following matrix:

Table 2 – Risk matrix

		Consequence				
		1 Insignificant	2. Minor	3. Moderate	4. Major	5. Critical
Likelihood	1. Rare	2 Low	3 Low	4 Moderate	5 Moderate	6 High
	2. Unlikely	3 Low	4 Moderate	5 Moderate	6 High	7 High
	3. Possible	4 Moderate	5 Moderate	6 High	7 High	8 Extreme
	4. Likely	5 Moderate	6 High	7 High	8 Extreme	9 Extreme
	5. Certain	6 High	7 High	8 Extreme	9 Extreme	10 Extreme

In relation to Neild Ave properties the assessment of Visual impacts/loss of views is assessed as high, as shown:

Item	Phase of impact C Construction O Operational	Potential impact	Unmitigated risk			Proposed Mitigation Measures	Residual Risk		
			L	C	R		L	C	L
Visual impacts/loss of views	O	Visual impact of the Building 1 when viewed from Neild and Vialoux Avenue	4	3	7	<ul style="list-style-type: none"> Retention of existing trees in the front setback and street trees on Neild Avenue High quality landscaping (including 2 advanced replacement trees for every tree to be removed) High quality materials and façade articulation. 	2	2	4

It is stated that mitigation of this high risk to a more acceptable moderate risk (and keeping in mind that this risk likely varies amongst the properties and is likely moderate in some and extreme in others to start with) relies on retention of street trees. However, Critical Trees which would work towards such mitigation are slated for removal-without material justification. Mitigation of such a serious impact also requires high quality mature re-landscaping and use of high quality materials. The Application does not provide this, giving only cursory treatment of these aspects, which are currently insufficient for purpose (both of which are discussed elsewhere.)

Shown below are photos of the current views from [REDACTED] and [REDACTED] across the SSDA site. Most of the tall and striking mature trees (sheoaks, gums, the jacaranda and lilli pillis – the Critical Trees) are slated for removal.

Views of SSDA site from [REDACTED] (below)



Views of the SSDA site from [REDACTED] – (below):





The Development is proposed to reach to (or exceed) the height of the taller trees and of the two abovementioned Affected Neild Ave Properties.

The Visual Impact Assessment Report, (p25) Table 2 - Summary Table of Tenacity Ratings of Visual Effects proposes mitigating factors which are not applicable in the case of Neild Ave, where there is proposed a major loss of long established mature tree cover proposed under the Development.

Exacerbating this impact is the fact that along Neild Ave, the western facing building form façade is a solid wall mass and there is insufficient specification for the planting of trees to replace the significant tree loss. In fact, unlike residents to the south and east of the Development, the Affected Neild Ave Properties who were omitted from the assessment, are, under the Development as proposed, left facing the full bulk and height of the Development, which will have a high impact and little to “mitigate the effects of the bulk and scale of the proposed development” – (Visual Impact Assessment Report, Photo Montage pp21 and 23)

Proposed vegetation is not shown in this view but once established will provide significant screening effects of the lower parts of the built form and will help soften the view and mitigate the effects of the bulk and scale of the proposed development - (p 25 Table 2 Summary Table of Tenacity Ratings of Visual Effects)

The proposed plantings along the western side of the Main Building do not however cover the area containing the most northern Critical Trees, cannot replace the jacaranda and do not adequately replace the other Critical Trees.

Affected Neild Ave Properties anywhere to the north of the Main Building will not only face the bulk of the western wall of the Main Building, but also the northern face of the Main Building (to a greater or lesser degree depending on angulation). At present, these properties' view of what will be the northern face of the Main Building comprises green space, a small, old-fashioned style, pavilion in muted colours and several mature pepper trees (all slated for removal). As there is currently no planting or landscaping for the north face of the Main Building these Affected Neild Ave Properties will doubly visually affected (as well as in other ways) as they will be exposed to the both the northern side and western side of the Main Building.

Outcomes:

- **that the Visual Impact Assessment Report be rejected as incomplete and a further full visual assessment, including Affected Neild Ave Properties, be required**
- **that the trees along the Neild Ave boundary including Critical Trees be retained**
- **that the bulk and height of the Development overall, the external appearance, surface treatments, lighting and other visual elements be reviewed and mitigated in light of the visual impact on Affected Neild Ave Properties**
- **that any approval of a Weigall Development specify landscaping measures that include planting a mixture of mature, tall (>3metre) trees in order to mitigate the visual impact including:**
 - **on the western side of the Main Building;**
 - **further north and south inside the Neild Ave boundary of the Weigall Playing Fields; and**
 - **on the north side of the Main Building, particularly the northern side of the Western Building.**

3. Shortcomings in reports and in consultation

Several of the reports in the SSDA, including the Heritage Report (Appendix J), and the Social Assessment Report (Appendix K), consider only the placement of the Development within Paddington. The SSDA site is however bordered by several suburbs including on its boundary on Neild Ave. West Neild Ave sits in Darlinghurst and the City of Sydney LGA.

The Applicant however then seeks to rely on the precedent of these nearby areas (such as the built environment of west Neild Ave, in Darlinghurst) while underplaying (or ignoring) assessment of the impact of the Development on the current residents of these areas. As a State Significant Development, these omissions represent major shortcomings. Impacts outside Paddington on the

adjacent areas and local community cannot be arbitrarily disregarded by the Applicant.

Additionally, the consultation process undertaken by Chikarovski and Associates, resulting in the Consultation Report (Appendix FF) was inadequate. Apart from occurring during the peak COVID period (making access to the meetings impossible for many and causing some sessions to be cancelled at short-notice), the information given was insufficient as was the responses to requests for further information and engagement.

The emails attached below to these submissions indicate a lack of responsiveness to requests for site visits.

Information given at the consultation evenings was insufficient and answers often glib – the message conveyed was that the building was a fait accompli and all of the representatives at the meeting with which stakeholders were able to engage made it clear that SGS was decided on the nature of the development it wanted and simply going through the required motions of consultation.

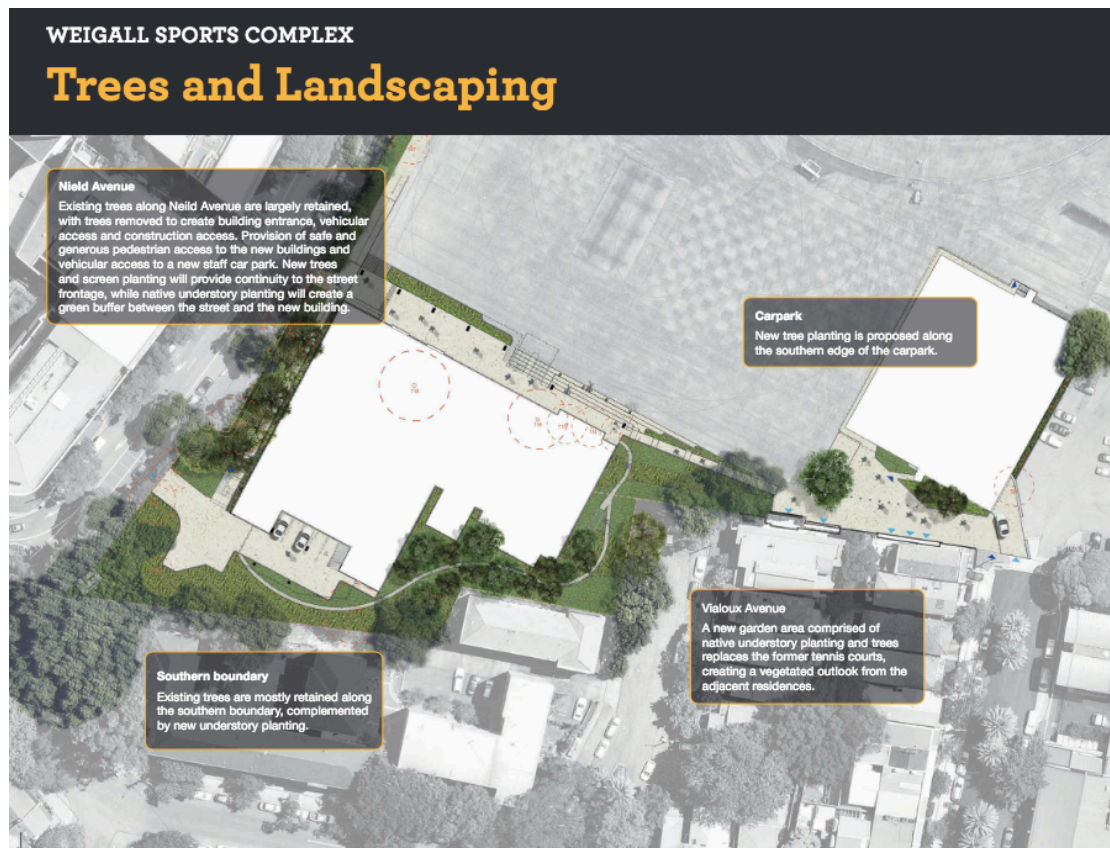
The display boards at the consultation evenings (shown in Appendix C to the Consultation Report) were very light on detail and were not supported with additional information when requested.

Margaret McDonald of [REDACTED] was provided with conflicting and patchy information at the consultation evening in June and July 2020, including in regard to the height of the Main Building and traffic access (particularly bus loading and unloading).

The tree removal plan is further demonstration of how cursory the consultation process was and the degree to which available information was insufficient to allow serious consideration by impacted stakeholders.

At the first consultation evening in June 2020, stakeholders were advised that only a “few scruffy trees” were to be removed and that all efforts were being made to retain others.

At the next consultation evening the following board was on display (page 57 of the Consultation Report):



As can be seen, a strategically placed text box at the top left hand corner covers many trees to be removed (being Critical Trees). What other trees are to be removed is almost impossible to glean. Despite specific requests, information was not forthcoming at the consultation.

This is further demonstration of the systematic disregard and dismissal of concerns raised by residents of Affected Neild Avenue Properties throughout the process.

When additional information was requested by a stakeholder from an Affected Neild Avenue Property resident (see email 26 August 2020 below) the following image was provided, again with no legend. This despite a clear request to Ms Chikarovski for not only this page of the A3 document but all other pages (one of which presumably had a legend of the trees)



Appendix B of the Consultation Report shows the letterbox drop area - which **does not even include most of Neild Ave** but does include streets in Paddington several streets back from the Development. Some of the brochures appearing in Appendix C of the Consultation Report were not received by Margaret Shearer of [REDACTED] (being pages 49-60), although some did.

Outcomes

- that these reports (and any others that have incomplete coverage of impacts assessed) be rejected and that effects of the Development on the whole of the local area be considered.
- that insofar as presumptions in one report leads to shortcomings in the assessment in another that these be rejected
- that additional consultation with the community be required, based on access to all affected stakeholders and with full and frank disclosure of the plans to allow informed consultation and responses

4. The Heritage Report and Woollahra DCP 2015

To the extent that the Heritage Report cites Woollahra DCP 2015 (although referred to as the Woollahra DCP 2012 in the report), the following applies. These submissions therefore relate to flaws in the Heritage Report and the relevant provisions of the Woollahra DCP 2015.

The Heritage Report, p29, sets out relevant controls that affect the SSDA site and concludes as follows:

a vision statement about the future image and function of the Paddington HCA. Applications will be assessed, among other matters, against their ability to satisfy those outcomes relevant to the development proposal

The buildings allow for views and vistas and are designed to allow view sharing. This is addressed in the panning(sic) report further.

The Heritage Report does note however that because the land was not previously suitable for construction that the three sites (Trumper Park, Hakoah and Weigall Playing Fields) that:

The combined contribution of the three contiguous sites (apart from any specific heritage elements) is the provision of the large open space and sports facilities within the precinct. Almost the entirety of the balance of the precinct is densely developed with predominantly Victorian period development.

In relation to the Woollahra DCP, various objectives of the requirements in relation to the Paddington heritage area are noted however the responses are not tenable, including in the face of other reports in the SSDA.

In relation “Desired Future Character” provisions in the Woollahra DCP (p28), the Heritage Report notes that these set out:

a vision statement about the future image and function of the Paddington HCA. Applications will be assessed, among other matters, against their ability to satisfy those outcomes relevant to the development proposal

Desired Future Character Objectives

In relation to these Desired Future Character Objectives, the Heritage Report reviews individual objectives (from p 28) as follows (where the letter is the objective, “Response” is the Report’s response and “Submission” is this submission’s assessment):

a) retains the unique national heritage significance of Paddington and recognises it as a rare and distinctive urban area;

Response: The proposal does not affect these values. The addition of a building that supports the sports use of the site is consistent with the current precinct listing. The site has a long history of use by the school and a range of buildings have come and gone on and around the site that relate to sport and entertainment uses. This proposal is consistent with the history of use and building in the area.

Submission: The site has a long history of being primarily open space. Previous buildings were in the context of the history and use of the area at that time. The current buildings on the Weigall Playing Fields do not support the size and bulk of the current Development.

b) reinforces the area as a special residential precinct;

Response: The site is not residential and development on it will relate to its use as a sporting facility.

Submission: The SSDA site has a long history of being primarily open space. The surrounding area is high density residential. Open spaces are critical to the overall texture of a community and the overall enjoyment of residents within this high density area. The SSDA site sits on the valley floor and provides important green space. The SSDA site is on a busy pedestrian and bike corridor along Neild Avenue to Rushcutters Bay Park.

c) retains and promotes evidence of the historical development of the area and enables interpretation of that historical development;

Response: The site has been used for recreation and sport for a large parts [sic] of its occupation, the proposal is consistent with that use.

Submission: The use of the SSDA site as green space sports ground is different from the use of the site for a similar purposes but housed within a large building. This rationale is flawed.

j) provides for sharing of views and vistas;

Response: The buildings allow for views and vistas and are designed to allow view sharing. This is addressed in the panning [sic] report further.

Submission: This is clearly incorrect as many residents (including in particular the Affected Neild Ave Properties) will lose all or some of their views and vistas. This is addressed in more detail elsewhere in these submissions.

k) exhibits contemporary design excellence.

Response: The buildings are very well-designed in response to their use and the setting. As Paddington is a living place and will be subject to change over time, Council seeks to encourage new development of a high design standard which respects the significance of the area.

Submission: Whether or not the Development exhibits excellent design will depend on its place in the context of the site and the community. As noted, for many reasons including its bulk and height, its destruction of green space and trees, and its noise and light issues, this Development does not exhibit design excellence. A building that was perhaps part buried underground or covered with green walls or a green roof might be considered a more “excellent” design in the green space context of where it sits.

Infill developments

In relation to Infill development (new development) provisions in the Woollahra DCP (p30), the Heritage Report notes that the current Development is not strictly an “infill” development although it is undoubtedly a “new development”. The fact that the Woollahra DCP does not envisage a stand alone new development in the Paddington HCA indicates that the Development, being on wide green space, is simply inappropriate.

In relation to the objectives and controls of the DCP set out in the Woollahra DCP and discussed in the Heritage Report, the following response is made (where the number is the objective or control, “Response” is the Report’s response and “Submission” is this submission’s assessment:

03 - Objective 03 To ensure infill development respects the scale and setting of adjacent contributory buildings.

Response: The adjoining buildings as noted are of considerable scale being three and in part four storeys. The new buildings, through the use of topography, setbacks and siting respond to this setting.

Submission: This is an example of the pick and choose approach of the SSDA which relies on the precedent of the nearby built area but has disregarded the effect on many of these areas in its reports. In the context however, the Development should not be compared with nearby buildings but with the historical fact of the Weigall Playing Fields being substantially green space for many decades and the critical need to retain green space (even if not publicly accessible) for the benefit and enjoyment of the surrounding community and the overall texture of the area.

04 - Objective 04 To protect the amenity of adjoining or adjacent residential uses.

Response: The buildings are sited and designed to retain amenity to adjoining buildings.

Submission: For many reasons set out in these submissions, the amenity of adjoining buildings, many with elderly and retired residents and many with work from home residents, will be extremely adversely affected by the construction, presence and use of the Development. The amenity for these residents, in particular Affected Neild Ave Properties) will be largely removed.

C3 - Control 3 Infill development must: a) maintain the significant features and qualities that combine to represent the character of the neighbourhood and area; and b) make a positive contribution to the character of the neighbourhood and area.

Response: There are no features to retain on the site. The new buildings make a very positive contribution to the area through design and siting.

Submission: The SSDA site in fact has significant features to be retained. Its current features are as a green playing field and green space surrounded by trees, used, without lighting structures, for the playing of sport and recreation for school students in the outdoors and part of the Weigall Playing Fields overall.

C4 - Control 4 Infill development must not overwhelm its context and should be consistent with the predominant scale of significant contributory development adjoining the site or within the group/row.

Response: The site relates directly to a range of larger scaled buildings in the vicinity and immediately adjoining. This provides the context for the new building form, scale and massing. The site does not directly adjoin small scale development although several houses are located on the eastern side of Vialoux Street that have a slightly removed relationship to the site. These buildings however retain their street view to open space to the north.

Submission: Again, the use of the precedent of nearby buildings to the built form the Development is inappropriate given the context and history of the various sites. The context of the Development must be on the basis of the Weigall Playing Fields and the related green spaces, not previously industrial or residential areas. That they are adjacent does not mean they should be treated the same. The fact that houses in Neild Ave (Affected Neild Ave Properties will lose their view and relationship to the site is not addressed in the Response.

C5 - Control 5 Infill development must be consistent with the predominant built form (volume and configuration) of significant contributory development adjoining the site and in its immediate area....

Response: ...The new elements are designed in the round and in response to the site, its function and the adjoining buildings to the south and west. Understandably the smaller houses further to the east do not form an immediate context and their scale is different to the proposed buildings.

Submission: The above submission is restated here.

C12 - Control 12 Infill development must be sited to: a) include sufficient deep soil landscaped area; and b) have no adverse impact on significant trees on the site or adjoining land, including public land.

Response: Trees are addressed elsewhere noting that no heritage trees are to be removed. Deep soil planting is available widely across the site.

Submission: This requirement is not met as Critical Trees are proposed to be removed. These are discussed further elsewhere in these submissions.

Views

The Woollahra DCP 2015 states, in relation to views that:

Paddington's sloping topography and the orientation of streets and subdivisions combine to offer panoramic and lesser views of the harbour, distant foreshores and city skyline from private properties and public areas. Views from private and public lands also take in the built landscape, including the stepped development pattern of terraces, roofscapes and winding streets. Public views from streets, footpaths, parks and other public areas are among Paddington's prized assets and are significant features of the area's character. Protection of public views allows people to see and interpret the landscape and landmark features. The height, bulk, form and scale of new developments have the potential to adversely impact on views gained from private and public lands. For private lands, the concept of view sharing is promoted. View sharing controls seek to strike a reasonable balance between new development and access to views from existing development.

These "views" provisions, and the related "views and vistas" provisions of the Woollahra DCP, is considered in the Heritage Report as follows (where the number is the objective or control, "Response" is the Report's response and "Submission" is this submission's assessment:

01 - Objective 01 To minimise the impact of new development on views from existing development.

Response: Building 1 will have an impact on views from the apartment buildings directly behind the development. Any built form in this location will have an impact as currently there is effectively no built form in this part of the area. The building is designed to be set back to allow sufficient space between built elements.

Submission: This entirely overlooks Affected Neild Ave Properties and falls short of an adequate assessment. This objective of the Woollahra DCP has not been met for these properties.

02 - Objective 02 To promote the concept of view sharing from private properties as a means of ensuring equitable access to views.

Response: This is addressed in general planning.

Submission: We submit that this has not been considered or addressed in relation to Affected Neild Ave Properties.

C1 - Control 1 (Views) New development must enable view sharing with surrounding development, particularly from main habitable rooms of that development.

Response: Addressed in planning report.

and,

C1 - Control 01 (Views and Vistas) To retain existing vistas and create opportunities for new views where possible.

Response: New views are not relevant to the proposal. Existing identified views are to be retained.

C2 - Control 2 New development in the public and private domain should be designed and located to minimise the impact on existing vistas or improve existing vistas where possible.

Submission: These assertions are simply incorrect as the Development will have a major deleterious impact on the views of Affected Neild Ave Properties, a fact recognised in the Environmental Risk Assessment Report (Appendix E) discussed elsewhere in these submissions. In fact, in many cases, the Development will mean complete loss of easterly views from all rooms of some residences while for others there will be a significant reduction of views. The impact on a number of these residences is the equivalent of the (Moderate to Devastating) assessment in the Visual Impact Assessment Report p25.

Outcomes:

- **that a full and complete visual impact report for Affected Neild Ave Properties be required (including by appropriate site visits to all levels and north and south situated properties) and allow Affected Neild Ave Properties an opportunity to respond**
- **require retention of Critical Trees to mitigate the very high magnitude of visual impact on Affected Neild Ave Properties**
- **require additional planting:**
 - **of medium to tall trees (>3 meters) in keeping with the current landscape character of the area (being a mix of trees) on the western and northern sides of the Main Building**
 - **that the current proposed planting along the western wall of the Main Building be varied and include a range of trees with different shape and some taller heights to reduce the visual impact and to reduce the impact on the existing landscape and visual character the area**
 - **of medium and tall trees along the western side of the boundary fence of the Weigall Playing Fields at the northern side of the SSDA site and further north and south along this boundary**
 - **of medium and tall trees along the western face of the Car Park to reduce visual impact including full visibility of cars parked on the roof and lights and reflection from parked cars**
- **that the height and bulk of the Main Building be reduced to lessen its visual impact.**

Affected Neild Ave Properties

In addition to the above Visual Impact issues, these overlooked Affected Neild Ave Properties, and in particular in the higher floors of these buildings, need to be given additional consideration in relation to the negative effects of:

- tree removal
- building finishes (including as to how light and noise will be affected by the finishes and also by the appropriate overall appearance of the Development)
- noise
- light
- the Main Building's northern and western face design overall

These matters are also discussed separately in this report.

5. Compensation, dilapidation reports

The Proposed Development will involve, particularly at the beginning, significant excavation, pile driving and concrete pouring. This will be extremely noisy and cause vibrations as well as dust.

It should therefore be a condition of approval that dilapidation reports be obtained for stakeholder properties, in particular, Affected Neild Ave Properties and that compensation for any damage be payable.

The EIS notes that noise from construction activities will exceed noise management levels at sensitive receivers (such as Affected Neild Ave Properties) and that the building contractor will need to consider measures to manage noise impacts from construction activities. These measures need to be stated upfront and done in consultation with affected residents. The Construction Management Plan (Appendix V) does not list any mitigation measures to minimise construction noise.

Outcomes

- **require dilapidation reports of all Affected Neild Ave Properties (and others as appropriate) as well as the common areas of these developments**
- **require adequate noise mitigation and management measures, working in consultation with affected residents, particularly Affected Neild Ave Properties**

6. The building site – noise

The Noise Impact Assessment Report (Appendix M) (p47) asserts that:

An assessment of additional traffic noise generated by vehicles using the site has been undertaken and calculated noise levels comply with the requirements of the EPA's Road Noise Policy.

However, in several key areas, the claimed compliance from the modeling is reliant on the original grossly understated traffic generation estimates.

On pp35 and 36, the Noise Impact Assessment Report details that in making this noise assessment of future traffic noise levels generated by this Development, the following assumption have been made:

1. Day time Worst 1 hour periods: a. Additional car and small vans using the site – Up to 45
2. Night time Worst 1 hour periods: a. Additional car and small vans using the site – Up to 25

This is gross underestimation. No margins of reliability were modeled (high case –low case estimates).

This is especially critical, in light of the NSW Government's NSW Road Noise Policy (**RNP**) which sets out the assessment criteria to be applied at residences potentially impacted by additional traffic volumes based on the road category and land use.

The RNP includes criteria for sites where exiting noise levels exceed those levels detailed in the table above. Section 3.4.1 Process of applying the criteria includes the following: For existing residences and other sensitive land uses affected by additional traffic on existing roads generated by land use developments, any increase in the total traffic noise level should be limited to 2 dB above that of the corresponding 'no build option'.

The calculations in the Noise Impact Assessment Report demonstrate that even using the gross underestimation of traffic levels generated, there is increased noise generated very close to this 2Db limit. The Noise report requires more substantiation on this sensitive parameter by modeling high case –low case estimates.

Outcomes

- **that the current Noise Impact Assessment Report be rejected**
- **that an updated report be required and be made available for comment and review**
- **that the SSDA site be made larger so that there is greater traffic and onsite flexibility to mitigate noise. (The SSDA site is also discussed elsewhere)**

7. Tree, garden and footpath maintenance and upgrade

The Proposed Development encompasses the eastern side of Neild Ave from the current bus parking area at the northern end near New South Head Road to the pedestrian and car entrances at the southern end near Lawson Street (taking into account that there will be pedestrian access by students dropped off at the bus stop at the northern end and walking to the entry gate). It is therefore appropriate that any approval encompass provisions for this public footpath and related landscaping.

To date, SGS has had a poor record in garden and fence maintenance and in management of its students and parents on this strip of footpath and on the roads.

The gardens inside SGS's current fence along Neild Ave have not been well maintained for approximately a decade. The plants are in poor condition, as is the fence and the southern garden area has been strewn with rubbish and old bleachers for a decade. This does not create a confident precedent for reliable maintenance of any planting and landscaping proposed under the Development. Examples of the current state of the fence line are shown below (dated 26 November 2020):





Nor does SGS currently exercise control or take responsibility for its student or carer users of the public footpath along this fence line, even though it is extensively used by the school and is treated as an extension of the school. For example, parents of students defied COVID requirements and gathered in groups - contrary to relevant COVIDsafe guidelines - obstructing the footpath when they were not permitted on the field to spectate (see below, dated 15 August 2020).



Parents regularly contravene parking regulations to double park, park over driveways and stop in no stopping zones or close to corners to drop off their children. Despite the area effectively functioning as a school activity “drop-off” zone, there is no oversight or supervision of this activity by the school. Residents of the area fear pedestrian accidents, especially in busy peak traffic periods.

Accordingly, in addition to appropriate traffic plans, any approval must include clear maintenance for plants and the footpath given the footpath will now have significantly more traffic by students, and their carers.

As part of any approval for any Development that will increase pedestrian traffic in the area, SGS should be required to upgrade the eastern Weigall footpath area (as were the developments on the western side) and improve visibility, including by:

- digging in power lines and cables
- upgrading the footpath surface
- maintaining and upgrading the plants and fence along the footpath

This will also allow the street trees to grow without requiring substantial pollarding (the “utilities haircut”), further enhancing the streetscape and mitigating the visual and community effects of Development on this site.

Given the many hundreds of student pedestrians proposed to use this part of the footpath at any one time (and then meeting each other going to and from the buses), the pressure on this footpath area will be extreme and will block other pedestrian users. This is discussed further elsewhere with proposals designed to improve the amenity and pedestrian traffic flow along the Neild Ave fenceline of Weigall Fields.

As part of any approval for any Development which will increase pedestrian traffic in the area, SGS should be required to provide school monitors to manage traffic (bus, carer, pedestrian) during periods of high activity.

Outcomes:

- **that a footpath be required from the bus drop off to the Sports Complex inside the Weigall Playing Fields**
- **that an upgrade of the footpath (a major pedestrian precinct), be required as a condition of any development to provide for undergrounding of powerlines and cables, and street lighting modernisation**
- **that maintenance of the existing planting be required (in addition to ongoing maintenance requirements within the SSDA site)**
- **that parking and pedestrian monitors be required for times of peak use of the Sports Complex**

8. Site Management and layout

The SSDA site covers only about 25% of the current Weigall Playing Fields area. It certainly seems to have been placed on the smallest possible parcel of land at least inconvenience to SGS and at maximum detriment and inconvenience to residents and at the cost of trees and the community.

All access requirements or temporary structures that create additional and dangerous traffic issues and the loss of Critical Trees should be accommodated by enlarging the SSDA site and making use of more of the Weigall Playing Fields to contain these.

For instance, the site compound (currently on the north western area of the SSDA site in a tight cut-out along the fence line) could be placed to the north of the Main Building within the Weigall Playing fields, contiguous with the northern side of the SSDA site. This would obviate need for removal of Critical Trees which cannot be readily remediated.

It seems reasonable, and better for all surrounding stakeholders, as well as allowing for greater tree cover preservation that some of the Weigall playing fields should be used for these purposes rather than mature and important trees be removed which are then not indicated for equivalent replacement.

It would enable more flexibility within the site to allow for staff parking of construction workers, a smoking area (all of which presumably will be on the surrounding streets at this stage), easier truck access and turning and other vehicle access (such as cement mixers).

It is reasonable that SGS be required to use some of the remaining 75% of the Weigall Playing Fields for its construction site than mature Critical Trees be removed. It will remove various site elements from along the boundary, where residents will be most affected.

Additionally, the SSDA site plan currently allows the youngest students to walk from Vialoux Ave through the site. This is dangerous and, again, puts the convenience of SGS and its students above the good operation of the site and the residents. The students must remain outside the SSDA site. They can perhaps use the footpath or SGS should seek an arrangement with Hakoah to access playing fields.

Outcomes

- **that the proposed layout of the SSDA site be rejected and that additional use of Weigall Playing Fields be required for the good layout and operation of the site**
- **that alternative layouts to reduce public inconvenience and the removal of trees be required**
- **that children not be permitted to cross the SSDA site**

9. External appearance

The colour palette for the Development set out in the Architectural Design Report (Appendix D), page 96 is too pale overall such that the building will stand out inappropriately, particularly given the “glow” from the pools where translucent cladding is indicated.

Paint colour is not indicated for masonry but it appears from images provided that a white shade is intended (including on the Balcony)

Consistent with the rationale for and proposal to green the top of the Car Park and camouflage its exterior with planting, the Main Building should comprise colours that reduce its visual impact and take into account the landscape, trees and grass of the current surrounding area. Darker tonal natural hues are indicated. This will also help reduce reflected light back into residences of affected stakeholders and reduce the visual impact.

Planted walls (with plants in the ground to ensure growth) would be consistent with this treatment.

The roof, which is intended to have solar panels attached, should be the same colour as the solar panels (rather than pale grey) so that the roof does not look so patchworked to those whose homes overlook it.

Solar panels are highly reflective so those facing west towards Affected Neild Ave Properties should be removed from the plans.

Outcomes

- **that the current colour scheme be rejected and a tonal colour scheme suited to minimising the northern and western aspect visual impact of the Development be required**
- **that planted walls be required**
- **that solar panels not be permitted to face west on the roof**

10. Noise during use of Sports Complex including building materials – Main Building

The Noise Impact Assessment (Appendix M) makes recommendations in relation to use of areas inside the Main Building and the Car Park.

It is based on normal use of the facilities for the sports carried out inside the Proposed Development

In this regard it recommends a range of building materials and noise amelioration steps to be taken.

One of these is that *“any openable glazing is to be closed ... during high noise generating periods including periods when whistles are being used and any time after 6pm”*. (pages 6 and 7). This however creates an irresolvable conflict with the intention to have “natural ventilation” including through very large sliding glass doors to the north of the Western Building and louvres and windows to other sides (see intention statement at page 98, para 6.3 of the Design Report).

This Design Report notes that *“Assembly areas and circulation spaces have been externalised to maximize the ability to be naturally ventilated”*.

This raises several issues:

- The most likely time when through flow ventilation will be desired in the buildings is during periods of peak use and noise. The noise report therefore leads to an irresolvable issue for the Main Building during normal use considered within the Noise Report.
- The noise reducing building materials recommended in the Noise Report need to be specified in any approval for the Proposed Development. This is not clear from the Design Report.

- Because open windows are an integral part of the ventilation of the building and this will likely lead to excess noise, alternative design, usage and building materials as well as sound barriers need to be considered to reduce adverse effects on affected stakeholders
- The Noise Report fails to address noise issues from standard use of the Main Building to those on Neild Ave to the west. The noise from the front of the Main Building as well as the western side will be significant. Residents at 12 and 16 Neild Ave are no further away from the Main Building than many residents to the east and south (which are specifically mentioned in the Noise Report).
- There is no reference to a loudspeaker system of any sort, whether for regular or occasional use.

Accordingly, taking into account the above, a closed building with appropriate ventilation and soundproofing should be required as a condition of any approval in order to avoid undue noise, even for normal use of the Main Building.

The Noise Report does not address outside or extraordinary use of the Sports Complex. This is discussed further below.

Outcomes.

- **that the Main Building, particularly the Western Building, cannot stay within sound limits even in normal use and approval should require that the Main Building be closed and ventilated and the building made of appropriate sound inhibiting materials**
- **to require additional reporting on the noise associated with any external use of the Main Building including the Main Access Stairs and the Balcony (see below)**
- **require appropriate noise mitigation steps (discussed below) in relation to the Balcony and including to enclose these.**

11. Lighting and external finishes

No lighting plan is given and the Lighting Report (Appendix N) provides no detail on the proposed lighting. It contains many advisory statements (p8, for example) but no concrete requirements.

The risk of light spillage from the Main Building and the Car Park roof is great. The SSDA site is currently unlit (as is the whole Weigall Playing Fields in the main) so light spillage needs to be carefully addressed. This is a significant change to the current use of the area.

As the SSDA currently entails outdoor spaces such as the Main Access Stairs, entrance pathway, circumference paths, parking and utility area and the Balcony, these will likely need significant and in some cases continuous lighting.

The Main Building also has substantial transparent and translucent components through which light will glow or spill.

A full lighting design, with specific details of times of operation, should be required before any approval is given. Lighting should certainly comply with the general concepts set out in the Lighting Report.

Additional steps to reduce light spillage in the Main Building Design and Car Park are however needed. Some of these are discussed elsewhere (including the planting of additional trees, the removal/enclosure of the Balcony and enclosure of the Main Access Stairs) however additional steps should be required to reduce light spillage and glow such as:

- opaque (non-transparent) awnings on the lower floors of the Main Building, including the western side
- opaque louvres on windows
- down lighting with dimmers and timers
- undertakings as to lighting of the building, including undertakings that the building will go “dark” from a certain time each day

Outcomes

- **a detailed light plan be required before any consent is given, with additional time for public response**
- **additional light spillage and glow mitigation steps (in addition to noise mitigation steps, discussed elsewhere) be required**

12. Landscaping

Matters of landscape and visual impact are also discussed elsewhere in these submissions.

The Landscape Report (Appendix Z) sets out additional planting within the SSDA site. This is to be commended. However, it falls short and fails to address impact on Affected Neild Ave Properties in that:

- There is no additional planting proposed on the northern Weigall boundary of the SSDA site where considerable tall trees are proposed to be removed. While we submit Critical Trees should not be removed, any that are must be replaced with mature, like, trees and additional planting be required to augment the screening provided by the current Critical Trees
- That mature (>3metres) mixed tree planting is required along the northern face of the Western Building to mitigate the visual impact on Affected Neild Ave Properties (this impact is discussed elsewhere in these submissions)
- That planting proposed along the western wall of the Main Building is currently not in keeping with the surrounding landscape. This should be a mix of tall mature trees in keeping with the street planting and the current landscape and include more dense planting.

Outcomes

- **that additional planting be required as part of any approval of the Development along with a requirement to maintain and replace any planting and landscaping:**
 - **that mature (>3metres) mixed tree planting be required along the northern face of the Western Building to mitigate the visual impact on residents**
 - **that planting proposed along the western wall of the Main Building is currently not in keeping with the surrounding landscape. This should be a mix of tall mature trees in keeping with the street planting and the current landscape.**
 - **that Critical Trees (Nos 31, 32, 35, 36, 120, 122, 125 and 126 in the Arboricultural Impact Assessment Report by Tree IQ (Appendix EE – Tree Report) be retained**

13.Assembly areas and access, Balcony and Main Access Stairs

The Noise Report (and the SSDA generally) fails to detail or take into account any noise or use of the external areas of the Main Building including the open Main Access Stairs on the northern side and the first floor open Balcony. Some illustrations show people standing against the railings of the Balcony, apparently watching the action on the main field, with a backdrop of wide sliding windows with open access from the Main Sports Hall. The reasoning given at consultation sessions as to the intended purpose of the large open Balcony (as opposed to no balcony or appropriate indoor space) the advice provided was that “its what the school wants”. Repeated assurance was given that the Balcony was not to be used for functions or as a spectator area (despite the fact of there being a notation on earlier designs that the Balcony included a “function” space).

It is notable that there is however a substantial “servery” facility servicing the “Assembly Area/Terrace” within the Main Building, indicating that functions will indeed be covered.

All this indicates that the Sports Complex has been planned to cater for significant gatherings and events. This Balcony may be used for functions and as an elevated (12.65 metres high) grandstand for spectators, leading to considerable increased noise not considered in the Noise Report (or elsewhere).

Even if it is not used for either of these purposes then the noise caused by the assembling of children and parents on the Balcony area needs to be considered and addressed (which it has not been in the Noise Report). Given large sliding glass doors open onto this Balcony it is likely it will be a high traffic area and those outside will need to compete with the noise coming from inside.

The noise effect of the use of the external Main Access Stairs and Balcony for normal use must also be considered (as the noise from external areas generally has not been included in the Noise Report).

If it is also possible that the Balcony (or any other spaces including near the bleachers or on the covered area on the ground floor) be used as function areas or for gatherings of any size, including in particular by spectators during matches on the main playing fields, then these uses fall outside the current Noise Report. Spectator activity for outdoor sports are already catered for at the northern end of Weigall Playing Fields. Additional “Landscaped Spectator Terraces” incorporated in the design on the Eastern Building of the Sports Complex provide more than adequate capacity for even the maximum number of spectators evidenced in the Application (84 spectators –Winter Rugby- Appendix G - Indicative Usage profile by SGS) such that the Balcony should not be permitted for this purpose.

Since the Main Building is already close to and at times risks being over the noise limits permissible through normal use, it seems likely these various additional definite and possible noise sources (50-84 spectators) may tip the balance.

No estimates of how many people will be on the Balcony or Main Access Stairs, specifically (as outdoor spaces) has been made. There is no assessment of the safe numbers to use the Balcony. If functions are considered then these visitors are not included in the estimated numbers to use the building or the related parking, traffic times of use etc. These uses have also not been considered in any other reports. The Noise Report in particular omits any discussion of use of the “Assembly” areas and outside areas and the plans do not discuss any such uses and provide no details in terms of proposed use, hours of use or proposed numbers for these areas, despite the building design building this in.

Similar considerations apply in relation to the main external staircase on the northern side (contiguous with the Balcony). This juts out well beyond the north face of the Main Building and is open on all sides.

While natural ventilation is desirable, these Main Access Stairs should be enclosed or set back to be in line with the rest of the main north face of the building (not the Balcony), with suitable noise barriers to the east and west.

Images in the SSDA documents of people using the Main Access Stairs to view the main field suggest that the Main Access Stairs are designed for, and intended to be used as, an additional viewing platform (and will likely be used in this way even if this is not the intention).

The Main Access Stairs and Balcony will need to be well lit at all times for safety. This will add light pollution to the noise from both structures. This impact has not been specifically considered, and is absent from the Application, a further deficiency of this SSDA.

This is especially pertinent as in all cases the assessment of the impact needs to take into account that it is noise from school children (and spectating parents): not the most quiet cohort.

Outcomes:

- **a full assessment (as to use, safety, noise, light and other aspects) be required in relation to the Balcony and Main Access Stairs, including normal use and extraordinary use**
- **any approval include a requirement that use of the Sports Complex be exclusively for indoor sporting activities and no social gatherings or functions be permitted**
- **that the surrounding area of the Main Building not be used for social gatherings or functions**
- **the servery be removed from the Main Building**
- **the Balcony be:**
 - **removed from the plans**
 - **or, be enclosed with appropriate noise and light limiting finishes**
 - **at the very least the Balcony should be shorter and moved to the Eastern side of the Main Building (outside the Eastern Building) and substantial sound barriers placed at the western end (including to the north)**
- **the Main Access Stairs be:**
 - **set back into the frame of the Main Building and fully enclosed with appropriate noise and light limiting finishes**
 - **or, if they remain in the current position, be fully enclosed with appropriate noise and light limiting finishes to prevent light and noise pollution and also discourage gathering on the stairs**

14. Proposed tree removal

There is no justification given for removal of Critical Trees.

There is no clear reason in the Tree Report as to why the Critical Trees are to be removed however it appears from other material in the SSDA that this is to allow use of the space for the site office, to allow staff to enter and exit, for some truck movements and for a pedestrian entry to the completed Development, for signage.

The Additional Trees are being removed it seems to allow the placement of the substation and some truck movements.

Most of the these trees, particularly the Critical Trees, are stated in the Tree Report to be of "Consider for Retention" yet are indicated for removal.

The Critical Trees are all essential to achieving some level of mitigation of impacts (noise, visual, light) of the Main Building to Affected Neild Ave Properties (this is also discussed elsewhere).

None of the Critical Trees (T31, T32, T35, T36, T120, T122, T125 and T126 in the Arboricultural Impact Assessment Report by Tree IQ (Appendix EE – **Tree Report**) are encroaching on the Main Building on completion. Even the jacaranda (T31) is 8 metres from the western wall of the Main Building.

These trees, particularly the jacaranda during November when it is flowering, are all important to the local community's enjoyment of the neighborhood and are much loved by the community.

Instead of removing these mature Critical Trees as a convenience for construction, it should be required that better use be made of the Weigall Playing Field area for any such purposes. The Weigall Playing Fields can be remediated much more easily than tall trees can be regrown and it would also be more fair and equitable that SGS be required to utilise a small amount of its enjoyment of this adjoining space for a short period in order to enable retention of established and essential trees. The retention of trees is also prioritised in the Woollahra DCP 2015.

Likewise, any reasons for removal of the Critical Trees for post construction purposes (such as pedestrian and car entry or the position of the substation) should be rejected as small changes will allow the retention of these trees.

In the BDAR Waiver Report (Appendix S) it was found after just one or two visits (in January 2020, when the bushfires were still affecting NSW) that there were no significant trees on the SSDA site, that there was no impact on threatened flora and fauna species and that the trees on site did not form a corridor or significant habitat for fauna.

This was based on only a few visits and on no inquiries of local residents.

It should be noted however that:

- there are material inconsistencies, as some of the types of mature trees to be removed (and which are considered by the report as not significant) are the same types of trees that will be replanted under the Landscape Report (Appendix Z)
- the line of boundary trees along Neild Ave, including the Critical Trees, forms a significant home for a multitude of bird species and bats. The sheoaks in particular are a good food source for some native birds. These trees are constantly full of birdlife and birdsong and, at night, bats, and their removal will substantially affect the enjoyment of the community in this experience as well as removing habitat when it is not justified or necessary to do so
- that earlier in 2020, on at least two occasions a Powerful Owl roosted in the Critical Trees; its highly distinctive call identifying it clearly. This is listed as a "threatened" bird in the BDAR Waiver Report.

Objectives

- **require that the Critical Trees be retained and any reason given for their removal be obviated by better construction site management or design**

15. Social impact and pedestrian impact

The Social Impact Assessment by CSA RUP (Appendix K) assesses the social impact of the construction and use of the Development and the benefit to the community.

The five “Project Objectives of the Development” (at paragraph 3.4 of the Social Impact Report) include:

...D. “Minimise impact to the site and stakeholders and maximize the opportunity for the community to benefit from the new facilities”; and

...E. “Weigall Sports Complex is to be an exemplar building of the highest architectural standards that is sympathetic to the landscape of the site and the local community.”

The Social Impact Report notes that many local residents work from home. There are also many retired residents in Neild Ave and that these people will be severely adversely affected by construction of, the existence of and use of the Development.

The Social Impact Report, in its assessment of the Unique Characteristics of the Local Community (paragraph 8) states that the local community is Paddington and assesses the population, age, education etc. of the “Paddington” community (paragraph 5).

We submit that the Social Impact Report uses the wrong definition of “community”, underestimates the negative impacts and overstates the benefits to the community.

Community and impacts

To limit the community to Paddington misrepresents the “community” which will be affected by the Development since Weigall Playing Fields are at the junction of many suburbs and are surrounded by several suburbs including Darlinghurst to the west, Rushcutters Bay to the north west and Edgecliff to the north and east with Darlinghurst is directly bordering on the Development.

The high car ownership mentioned in the Social Impact Report for the Paddington community belies the fact that the community is very much a local community - a village - with high outdoor pedestrian activity and a “European” lifestyle with outdoor cafes and parks. This is recognised by the Woollahra DCP 2015 and the Paddington HCA.

Neild Ave is currently a significant pedestrian and pushbike conduit to and from Rushcutters Bay Park as well as being a busy pedestrian path for locals. The street is constantly full of runners, walkers, small children on bikes and scooters, walkers with dogs and families with strollers.

The Social Impact Report has failed to consider the extent and character of the relevant community and how Neild Ave is used and viewed (as a pathway through a green space) by the local community. The report has consequently failed to consider the likely negative effects on that community.

The negative impacts of the Development are noted to be construction and increases in pedestrian and vehicular traffic (paragraph 8.2). The report then simply refers the reader to other reports in the SSDA such as the Traffic Report and Noise Impact Report (which are themselves referred to elsewhere in these submissions).

The increased traffic and pedestrian traffic caused by construction and use of the Development will have a harmful effect on the village community and on the enjoyment and access of Neild Ave and the connected Rushcutters Bay Park in particular.

Benefits

The benefits of the Development are overstated (paragraph 8.2). The likelihood of community use of the Development is conceptual at best and, given the current planned usage by SGS itself, the requirements to reduce noise and light from the building and likely security requirements for the SGS students, it is hard to see when and how other community members could be allowed access.

There is no precedent for such sharing by SGS. No access is currently made available to Weigall Playing Fields for local schools and these could readily be accommodated. This benefit must therefore be dismissed.

The suggestion that the Development will enhance the relationship of the school and community or showcase local culture and history is risible.

Mitigation steps

Only a handful of “mitigation measures” are provided in this report. These appear at paragraph 8.3 and include:

- the establishment of a Community Consultative Committee during construction however this is unlikely to mitigate the adverse community affects of the Development, no matter how “accessible and welcoming” it is to members of the local community;
- proper management of construction
- that the school “continue to investigate options for the local community to use the facilities” (which promises nothing)

- that SGS will “implement measures to promote safety and security” during construction

None of these mitigation steps address the direct negative impacts on the local community (including those identified in the Social Impact Report) and are mainly focused on construction, not on the eventual use of the Sports Complex and Car Park when complete.

In particular, this Social Impact Report does not address how increased vehicular traffic (including buses), massively increased pedestrian traffic along Neild Ave, increased weekend traffic and the presence of the building itself (including the noise and light from its use) will affect the local community and how this will be mitigated.

Insofar as the flaws in this report have a flow on effect on other presumptions and assessments in the SSDA, they must also be taken into account.

Outcomes

- **require proper identification of the “community” affected by the Development**
- **require an updated community assessment report taking this community into account and the nature of the community and to properly consider all negative impacts on that community**
- **fully address any identified negative community impacts with tangible mitigation steps**
- **ensure that the correctly identified “community”, its characteristics and the negative impacts on the community are properly taken into account in the assessment of other aspects of the SSDA overall (such as traffic, pedestrian traffic, noise etc.)**

16. Traffic issues

The Traffic Report is deficient and misleading in several key aspects and its assumptions. These grossly underestimate traffic levels to be generated by this additional high intensity use facility. This unsubstantiated underestimate is fed into further analysis, which in turn, feeds into modeling of traffic patterns, pedestrian movements and noise levels and impacts from the development. This negates the validity of many of these assertions in the documents about the impact of this project.

On p13, the report asserts that Neild Ave has a speed limit of 50kph. This is incorrect. The City of Sydney's Local Pedestrian, Cycling and Traffic Calming Committee (LPCTCC), endorsed a 40kph limit by unanimous decision (2019/172095) at its meeting on 16 May 2019. The City of Woollahra's Local Traffic Committee (LTC), endorsed this by unanimous decision (19/79511) at its meeting on 4 June 2019.

The 40km limit was in recognition that this is an increasingly a school and pedestrian heavy zone. Continued fast driving by cars along this street is endangering pedestrians and school children using the school playing fields during the week and at weekends. Roads and Maritime Services finalised the speed zone review and had the new 40km/h zone speed limit installed in January 2020.

The Traffic Report underplays and dismisses without substantiation the heavy traffic load associated with the existing SGS Prep School. This traffic generates queuing activity within the local road network during weekdays.

And keeping in mind that for 20 months there will be a significant increase in heavy traffic with construction vehicles of many types using Neild Ave. It is also to be noted that the Hakoah site development will have its construction trucks along this road also, which, if construction overlaps (which seems likely) there will be double construction traffic in Neild Ave and also additional traffic using the Alma Street entrance.

The report acknowledges while that while drop-off traffic is being managed by SGS employees with the aim of maximising efficiency of the drop-off and pick-up activity, the limitations of space within the local roads is evident. In that regard, it is noted that the location and design of the Car Park has been determined so that it is intended to be used as a queuing area **within SGS grounds**.

The traffic report states that:

“The existing drop-off arrangement will be retained, but carers **will be able** to enter the car park to queue.”

However, there is no substantiation of this and no undertakings to make this a requirement of future operations. There needs to be a requirement made to force SGS, for example, to designate:

- all allowable pick-up and drop-off areas along Alma St entrance well **inside the SGS grounds**; and
- **have City of Woollahra and the Department of Roads and Maritime Services designate a No Stopping Zone adjacent to the pedestrian entry to the facility on the Eastern side of Neild Ave**, to prevent this becoming a default pick-up and drop-off area.

The Traffic Report is seriously deficient in respect of the cumulative impact of this proposed development and that of the Hakoah Club and Maccabi Tennis Club. It also likely makes an unworkable arrangement inside the Car Park as carers seek to park or exit while others wait to pick up their child.

The Traffic Report states that:

It is acknowledged that the adjacent Hakoah Club and Maccabi Tennis Club is planning a redevelopment, but the cumulative impact also shows no detrimental effects on the surrounding road network.

The Traffic Report provides no substantiation of this assertion.

Public Transport

The Traffic Report (p16) asserts that :

It is envisaged that due to the frequent services and the proximity of the station to the subject site, trains will be an attractive alternative mode of transport for prospective staff and students.

In actual fact, the 700m distance to the Edgecliff or Kings Cross rail stations is not a straightforward walk - in either case (both involving crossing very busy main roads and hilly terrain), and is not typically a commute used by students, or parents.

The Traffic Report (p18) asserts that:

The subject site is located in a residential area and is predominantly surrounded by residential streets. Hence, sufficient pedestrian infrastructures are available with pedestrian walkways on both sides of the streets and pram ramps and crossings available. Hence, for local staff and students, it is deemed that walking is a viable active mode of transport.

This is not substantiated in the report and reaches an incorrect conclusion not based on evidence from current utilisation and traffic patterns.

In fact, the proposed staff parking entry and main pedestrian (and cyclists) entry point at the southern end of Neild Ave has no immediate pedestrian crossing. This proposed expanded entry point is in an area of complex traffic movement (involving a merge to two way traffic in Neild Ave leading to Brown St, right turn to Boundary St, left turn to Lawson St and entering traffic from underground parking from nearby residential and commercial developments (18-28 Neild Ave – capacity 45 cars, and Advanx (16 Neild Ave – capacity 100 vehicles, plus 20 plus commercial truck movements (entry/exit) per day).

Currently SGS' vehicle entry on the Eastern side at this point is kept locked only available for pedestrian traffic at weekends, special needs and for service and maintenance vehicles (average 2 movements per day).

There is already a pressing need for additional pedestrian crossings and traffic calming measures in the southern end of Neild Ave to deal with the increase in local pedestrian traffic and the increased driveways and car use. This has been exacerbated in 2020, with a significant increase in pedestrian traffic along Neild Ave accessing Rushcutters Bay Park and other local amenities.

The proposal for this area to include the additional main (signed) pedestrian entry risks it becoming a major drop-off point for private vehicles. This would create dangerous traffic conditions, and with such a major increase in traffic and pedestrian movements, will cause major traffic hazards.

The Traffic Report grossly underestimates the proportion of private car drop off using an unsubstantiated (and incorrect) assumption (p 25 Table 8), and again repeated on p35 and in Attachment 3 to arrive at the gross under-calculation of additional peak hour traffic movements cited on p43.

Assuming the following: out of the total number of students 30% of the students get dropped-off by a private vehicle (p25)

The assumptions regarding the mode split stated in Section 6.1.3 and calculated in Attachment 3 were used to determine and calculate the existing traffic generated by the subject site (p35)

Therefore, it is assumed that the proposed development will result in an additional 43 inbound and 43 outbound vehicular trips during the evening peak period (p43)

No margins of reliability were modeled (high case –low case estimates). No school survey was undertaken. Rudimentary observation indicates that the number of private drop offs is far greater than 30% and more like 80% based on observations.

After School

Section 6.4.3 of the Traffic Report entitled After School (p35) highlights serious issues with risk of buses queuing and idling for long periods during peak traffic times. There are already many instances observed of this even under current activity levels at Weigall. The calculations at Attachment 3 on which the proposed methodology is based are based on this false assumption:

The arrival times are to be staggered such that only two (2) SGS buses are occupying the existing Bus Zone at any one time. It is anticipated that 5 minute intervals will be sufficient for SGS buses to perform drop off duties. The proposed methodology will transport 403 students from the main campus to the Weigall site within the span of 20 minutes.

and

With pick-up and drop-off times staggered by 5 or 10 minutes, the school will ensure that no bus queuing will be observed at the bus zone

The increase in passenger traffic proposed by the development of this scale render the assumptions simply unrealistic: 57 people cannot offload from or load onto a bus in 5 minutes. Nor can the arrival of buses travelling down William Street (or any other route from the school) be assured. This is not observable

currently (bus idling times and turnarounds in this bay at the north end of Neild Ave are much longer than this in practice) and no basis is provided to justify why this would change. There is currently significant bus queuing at various times including out across the pedestrian crossing at the lights on the corner of New South Head Road.

Pedestrian traffic

If 403 students are being transported to and from Weigall Playing Fields in the space of 20 minutes then all those students must travel along the Neild Ave footpath, an already very busy pedestrian area.

This will put unreasonable pressure on the footpath, particularly as many students are likely to have sports bags with them.

Arriving students during the day will then meet their colleagues coming in the other direction or arrive to a large mass of students already waiting to board.

This will cause unreasonable and unsafe blocking of the pedestrian path.

These issues can be mitigated by requiring a pedestrian area and access path inside the boundary of the Weigall Playing Fields at the northern end to allow students to move from the bus area to inside Weigall Playing Fields and along an internal path to the Sports Complex. It will also give students somewhere to assemble safely if the bus arrival and departure schedule is not as streamlined as anticipated.

Outcomes

- **that the Development at the current SSDA site be rejected as creating dangerous and excessive traffic to Neild Ave and the area adjacent to the SSDA site**
- **that the transport and travel projections and plans be rejected as having insufficient basis and as allowing dangerous traffic conditions**
- **that the Traffic Report is rejected and further investigation conducted with surveys undertaken to understand how students travel to the grounds i.e. traffic impacts**
- **that a revised traffic plan (using more accurate data and working models for traffic including pedestrian traffic and use of the Car Park) be required**
- **that the proposed bus arrivals and pedestrian management plan is unworkable and allows no margin for variation. An alternative management plan is required**
- **that current public pedestrian use of Neild Ave be assessed to obtain a proper baseline**
- **that student use of the public pedestrian path be assessed in light of this baseline**

- **that through traffic and parking arrangements on Neild Ave be changed to calm traffic, prevent the dangerous stopping of cars for drop offs and to reduce danger to pedestrians**
- **that a path be required within the boundary of the Weigall Playing Fields to take student pedestrians off the footpath**

17. Conclusion

The proposed SSDA should be rejected in its current form and at its current location on the Weigall Playing Fields. The current SSDA also fails in its obligation to obtain and provide accurate and complete information. Many of the assertions and requirements for approval are therefore not met or not based on sufficient information.

The following matters are of particular note:

- overall bulk and height of the Development, in particular, the Main Building Sports Complex is inappropriate and oversized for its context
- there is serious lack of appropriate considerations in various reports of the affect on the community, flora and fauna and heritage,
- omission and disregard of impact of the proposed development on the bulk of affected Neild Ave residents (who are outside the suburb of Paddington and the Woollahra LGA)
- visual impact of the Main Building Sports Complex on affected stakeholders
- unnecessary and arbitrary tree removal
- noise, in use and from construction
- light pollution
- traffic while in use, including vehicle and pedestrian traffic
- proposed external elements of the sports complex, in particular the Balcony and main access Main Access Stairs
- community impact
- development should require Neild Ave footpath – use and maintenance
- construction management, including traffic and the allocation of space on the SSDA
- ongoing maintenance of the SSDA site and the Weigall Playing Fields

Attachments:

Email M Shearer and L Chikarovski 14 July 2020

Email M McDonald and L Chikarovski 13 August 2020

Email M Shearer and L Chikarovski 28 August 2020

From: Lisa Chikarovski [REDACTED]
Subject: Re: Weigall Sports Complex Information and Feedback session
Date: 14 July 2020 4:36 pm
To: Margaret Shearer [REDACTED]
Cc: Harriet Price [REDACTED]

Thanks Margaret - I have passed the feedback onto the project team. They will need some time to work through it and consider how the design might respond to your concerns.

Can I come back to you regarding a meeting once I have more information in this regard?

Many thanks

Lisa

Sent from my iPhone

On 14 Jul 2020, at 16:27, Margaret Shearer <[REDACTED]> wrote:

Hi Lisa

Thanks for your email. I look forward to hearing from you again.

And please keep me informed of the various stages of the planning process, including when the plans are submitted and open for comment.

I meant to copy Harriet Price on my email to you. I have copied her here now.

I'll wait to hear further, including if you want to make time to visit our apartment.

Regards

Margaret

On 14 Jul 2020, at 4:02 pm, Lisa Chikarovski [REDACTED] wrote:

Hi Margaret

Thanks for your email and apologies if I've caused any distress or confusion.

The community consultation sessions were postponed shortly after the letterbox drop due to the emerging situation with COVID in Victoria and the potential for community transmission. Hence some follow up email invites were not sent as the sessions were not going ahead - those who had registered or contacted me in the lead up to the events were notified they had been postponed.

We are currently monitoring the emerging situation and will be in touch with new dates once schedule.

Note the application will not be lodged until after these sessions take place.

I will pass on your detailed feedback to the project team for consideration - they are continuing to make changes to the design in response to feedback from the community and what you've provided below is really helpful for this process.

Please let me know if you have any questions

Many thanks

Lisa

Sent from my iPhone

On 14 Jul 2020, at 15:51, Weigall Fields [REDACTED] wrote:

From: Margaret Shearer
Sent: Tuesday, 14 July 2020 3:51:29 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: Lisa Chikarovski
Cc: Weigall Fields

Dear Lisa

I apologise for the delay in responding but we have been away.

I am disappointed to see that while I have been absent that the next consultation period has, according to a note in my letterbox, already been and gone despite your undertaking to email me details about any such event. I would have returned for it.

I have had a chance to review and consider the material so far provided and find that it falls far short of providing sufficient information for me to feel I have been informed or consulted. To date, all we have been shown are a few basic graphics and all we have been told is that it is going ahead but it won't be as bad as we think or as it looks in the graphics.

I remain extremely concerned about the proposed development and have many objections to it (based on information to date) and ongoing concerns.

The main issues I have are as follows:

1. the appropriateness of the development at all, particularly in this green space
2. the placement of the development on the Weigall site and general issues with the proposal
3. what the specific and final plan may look like in detail and resulting issues from that, including to local residents and the environment
4. construction disruptions and consequences
5. ongoing use consequences and disturbances

These issues can be further broken down into the following:

1. the need for the development at all, particularly in this green space

There is little enough green space in the area: it is a precious and irreplaceable resource. I cannot imagine that Sir Henry Parkes would see such a building on this site as an appropriate legacy! The limited green space should not be depleted to make way for an exclusive sports facility and certainly not for a standalone car park. I am concerned that a building to accommodate sports such as water polo and basketball (which were the key sports mentioned to us) will not guarantee the longevity that such a substantial building requires. What will happen when water polo and basketball are no longer the "in" sports? And it is such a substantial building for what is actually a small number of users. This limited benefit for a very few needs to be considered against the loss of green space and other disadvantages for many.

2. the placement of the development and general issues with the proposal


The current position of the proposed building is in the southern section of the Weigall site, abutting the Lawson Street public housing site and across the road from residential developments in Neild Ave. The car entry is proposed to be through Alma St, also used by the White City development and already a dangerous bottleneck. There are two entries proposed from Neild Ave (trees apparently will go). The website for the development states there will be a basement car park but this seems to have been superseded by the new standalone car park.

The Weigall site owned by Grammar has access to New South Head Rd and there is already a building at the northern end of the site. That end of the site is on a main road and next to a train line and there are no directly adjacent residential developments. The closest is across the road in Neild Ave but there is a car park covering several stories at the northern end of this building. This would therefore be a much more suitable and less disruptive location, both short and long term, for the development, either by replacing or adding to Grammar's current facility. Traffic could then enter from New South Head Road without the traffic congestion and dangers of the Alma St and Neild Ave access.

Apart from its specific position on the Weigall site there are other aspects of the current proposal (based on the limited information to date) that are excessive or unsuitable. These include the overall footprint of the building, the removal of trees, the standalone car park, the design and appearance of the building and its height.

The current proposed location would cause a significant degradation in the quality of life for residents around the development, particularly those opposite and those in Lawson Street.

Many of the residents of Lawson Street will find themselves in darkness. Many of these residents are vulnerable. Many are longstanding. They are an important and respected part of the local community. The irony of a grand and exclusive sports facility being built next to, and to the

From: Lisa Chikarovski [REDACTED] 
Subject: RE: Plans for Weigall development
Date: 26 August 2020 12:46 pm
To: Margaret Shearer [REDACTED]

Hi Margaret,

Thanks for your email.

I've attached the draft landscape plan that was contained in the A3 booklet.

As you note below, the plans that were shown in the rest of that folder are WIP documents and are in the process of being finalised by the team.

Once there are final plans lodged and available for feedback they will be put on exhibition by the Department of Planning, Industry and Environment. I will let you know once this happens. In addition, I will check back with the team post lodgement to see if they are able to share them earlier than via the Department's exhibition process.

Please let me know if you have any questions in the meantime.

[REDACTED]

-----Original Message-----

From: Margaret Shearer <[REDACTED]>
Sent: Tuesday, 18 August 2020 9:45 AM
To: Lisa Chikarovski <[REDACTED]>
Subject: Re: Plans for Weigall development

Hi Lisa

Thanks for getting back. What Lee showed me was a multi paged booklet in A3 size. I would like to see all of it since it contained all of the main information including what was on the display boards and more information as well. Given it was available for viewing on the night I'd be surprised if it needs to be redacted. (Consultation and feedback depends on having the best and most current information.)

I appreciate that the plans are still in development so won't take them as final or complete but these plans seem to be the current starting discussion point.

Many thanks

Margaret

On 18 Aug 2020, at 9:11 am, Lisa Chikarovski <[REDACTED]> wrote:

Hi Margaret,

Apologies for the delay in getting back to you - I am just waiting for the project team to confirm in what format the plans can be sent.

Can I please confirm it was the landscaping plans you are referring to? This is what Lee has conveyed to me.

Many thanks

Lisa

[REDACTED]

-----Original Message-----

From: Margaret Shearer <[REDACTED]>
Sent: Friday, 14 August 2020 10:30 AM
To: Lisa Chikarovski <[REDACTED]>
Subject: Plans for Weigall development

Hi Lisa

Thanks for organising the information session.

From: Margaret McDonald <[REDACTED]>
Subject: Re: Rescheduled Community Information and Feedback
Session: Sydney Grammar proposed Weigall Sports Complex
Date: 13 August 2020 at 6:32:56 pm AEST
To: Lisa Chikarovski <[REDACTED]>

Hi Lisa

Thanks for the consultation this afternoon. It's all so very difficult in these COVID days.

I'm very sorry that I had to rush off to another commitment. I promised Michael (the architect) that I would send through some photos of the site showing the aspect from our balcony. I thought this might assist in understanding our concerns about the height of the building and the roof angle.

Here are two photos looking directly east from our apartment.

As we discussed, I am happy to arrange a suitably socially distanced visit for some of the team to see for themselves if that was helpful.

Kind regards

Meg





On 5 Aug 2020, at 5:12 pm, Lisa Chikarovski

<[REDACTED]> wrote:

Hi there,

Hope you're having a lovely afternoon.

Many thanks for your patience regarding the postponement of the Weigall Sports Complex community feedback sessions.

Note that due to the ongoing uncertainty regarding COVID19, Sydney Grammar will be holding a single, extended session for the community on **Thursday 13 August 3.30pm – 7pm, Weigall Pavilion, 6 Neild Avenue, Paddington.**

Further details are provided in the attached invitation.

Please let me know if you have any questions.

Look forward to seeing you there.

Many thanks

Lisa



<14201_SGS_Weigall_Invite_072020 13 Aug.pdf>

So that we can consider the current thinking fully can you please send an electronic copy of the plans that were shown to us last night. To be clear, I am not talking about the display boards (where there is little detail and where some important details were covered by text) but the multi paged detailed plans that were shown to us by Leigh.

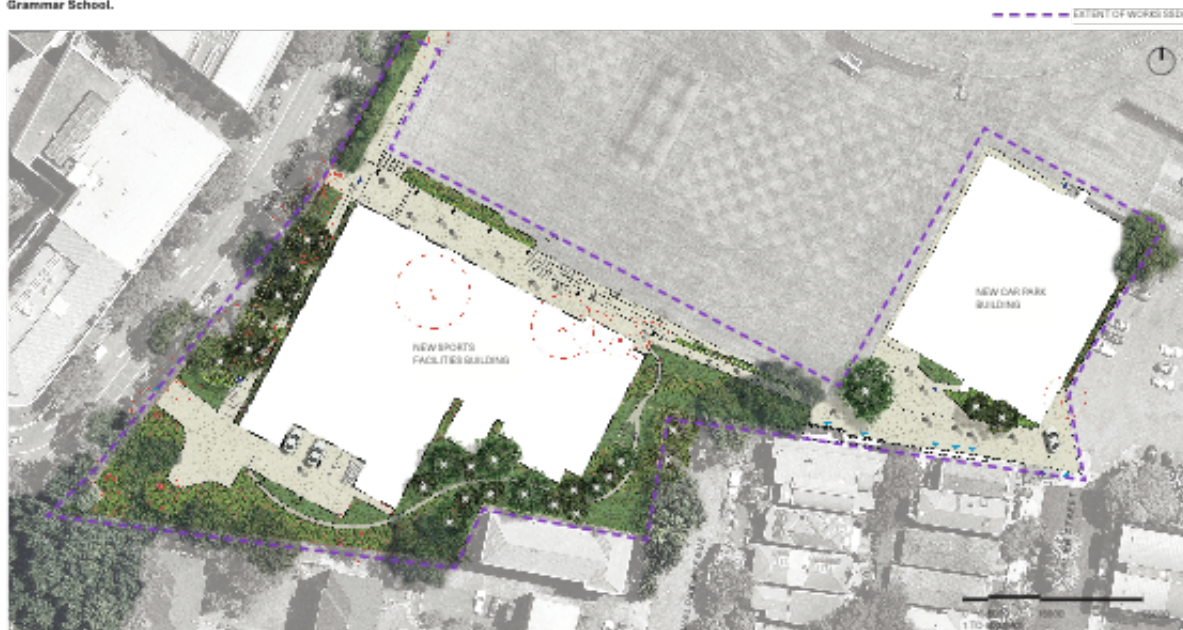
Many thanks

Margaret



Weigall Sports Complex Landscape Plan

The new Sports Facilities at Weigall Sports Complex will enhance the existing sports fields of the Sydney Grammar School.



disadvantage of, long term public housing tenants should be seen for the social shame that it is.

The residents across the road in Neild Ave will be extremely adversely affected by the presence of the proposed building on the site. This development can't be compared with the apartment buildings nearby (as it was at the consultation), it is more like a Westfield being built on the site.

These issues with the building are discussed below but can't be fully addressed without some more detail about the building including detailed and accurate images and plans.

3. what the specific and final plan may look like in detail and resulting issues from that, including to residents and the environment

The current picture of the main building looks like the Taj Mahal: a white and gleaming edifice, with a large external staircase (this must certainly be enclosed along with any balconies). There were discussions during our consultation meeting of different external materials to soften the look and to shade the light pollution from the main building but no detail. The car park is represented simply as a rectangle on the plan, with no image or information provided.

With the necessary loss of trees for the construction (and even if these are kept) and even if some panelling is done to soften the building the building is out of context with the surrounding buildings and the location.

There will be significant light pollution from within the building (since much of the building will be glass we were told) and there will be substantial outside lighting for the driveway, pedestrian access and for security, as well as on the external stairs and balconies. The car park will add to this.

It also appears there will be a significant loss of trees (including what were referred to as a "few scruffy trees" which I take to be the she-oaks which are both vital to our view and as part of the bird habitat).

There was no discussion of significant planting or green walling of the building. No roof garden. We heard nothing of significant tree planting or water saving and recycling proposals included in the plan. I am particularly concerned about the fate of the birds that use the trees (including the she-oaks which provide food for native birds) and particularly for the large family of magpies that lives in that tree corridor. Magpies mate for life (about 20 years) and are territorial. Their carolling (which the Neild Ave magpies do for hours at a time) is their way of exchanging information. Lost trees will remove the habitat for this family.

Further comments on any actual plan are reserved until details are provided including of proposed lighting, landscaping, finishes, noise abatement and other environmental provisions.

4. construction disruptions and consequences

We have been told this is a development of around \$50 million. From experience, the dust and dirt and noise and disruption of such a development is significant, especially to residents who work from home or are at home for other reasons. Trucks arrive and idle in Neild Ave as it is a flat road from as early as 5am, waiting for the site to open. Workers likewise park in Neild Ave and surrounding streets early and then talk and play their radios loudly. I don't expect that all the construction vehicles will go down Alma St (perhaps that is the plan) which means likely cutting a bigger swathe into the trees at Neild Ave. The traffic in Alma Street will also be significant and noisy and dusty. The noise and dirt of the construction overall will be significant and disruptive for years.

5. ongoing use consequences and disturbances

No matter what parking facilities are made available there will be parents double parking and buses idling early and late and on weekends. Neild Ave is a child pedestrian fatality waiting to happen. We see children running across the road without sufficient supervision, distracted by their heavy bags of sports gear. There are many entrances to buildings in Neild Ave so cars come out into the street all the time. Kids dashing out from behind their parents' 4WDs can't be seen. The street itself is a busy street, feeding traffic from New South Head Road up through Paddington and Darlinghurst. The speed limit is breached more than followed. Parents looking for a park or who have inadvertently gone past Weigall then try to turn around, causing further risk. We see it all the time.

The likely hours of training and games will mean more traffic and noise in the early mornings and evenings and on weekends. The external stairs and balconies will lead to increased noise pollution, in addition to the light and noise issues discussed above.

Lisa, this is a summary only of my issues only however it is impossible to comment or to have been "consulted" when no details have been provided. It seems strange that no further detail is available when your time line suggests the plans will be finalised soon.

I would invite the architect, project manager and yourself to visit our apartment to consider our position and our issues. Please contact me on [REDACTED] to arrange a suitable time.

Regards

Margaret Shearer

On 22 Jun 2020, at 12:20 pm, Lisa Chikarovski [REDACTED] wrote:

Hi Phillip and Margaret,

Many thanks for attending the proposed Weigall Sports Complex Information and Feedback session on Friday evening. I have attached the PDF of the boards that were presented – Margaret, I already sent them to you but attaching so Phil has a copy in his inbox too.

The project team is currently looking into your concerns regarding light and noise emanating from the building and we will come back to you once we have further information and/or solutions.

We have also relayed your concerns regarding construction impacts (and etiquette!) to the consultants developing the Construction Management Plan for them to consider in their report.

Once we have locked in the dates for the next round of information and feedback sessions I will let you know via both email and letter.

In the meantime, please let me know if you have any questions or additional feedback for the team.

Many thanks

Lisa

[REDACTED]

<14176_SGS_[REDACTED]

[REDACTED]

