

THE PADDINGTON SOCIETY Inc.
For Community and Heritage
Est 1964

For attention: Prity Cleary
Department of Planning, Industry and Environment
12 Darcy St Parramatta 2150
Sydney NSW

17 December 2020

Dear Prity,

**RE: STATE SIGNIFICANT DEVELOPMENT SSD_10421
PROPOSED WEIGALL SPORTS COMPLEX SYDNEY GRAMMAR SCHOOL, NEILD AVE, PADDINGTON**

Thank you for the opportunity to make a submission in relation to this proposal.

The Weigall Sports fields are located within a very sensitive location in terms of the natural environment and the built landscape of Paddington. The site is located within the Paddington Heritage Conservation Area and interfaces with the residential area of Paddington.

The Opportunity

This development presents an opportunity to resolve key issues of serious concern to the Paddington community, which, if properly resolved, would provide a long-term legacy to the community and benefit to the Sydney Grammar School (SGS). It was disappointing that Paddington Society concerns about access and traffic movement have not, in our view, been adequately addressed.

As inevitably happens, too much early focus was made on the architecture of the building with not enough attention given to resolving the urban design issues that surround the project or consulting with an open mind with the community.

We also note with disappointment that the report on the community consultation process included as part of the Development Application documentation states that the separate car park is a result of community feedback. This misrepresents the position of the Paddington Society as we have consistently opposed a separate carpark structure.

The Paddington Society's Concerns

Our major concerns are to do with:

- broad planning initiatives for the total valley floor,
- landscape sensitivity,
- amount and location of car parking,
- built form, height, bulk and scale,
- overshadowing,
- loss of views and outlook from adjacent housing,
- location of utilities and services,
- vehicular access and removing school traffic from local roads,
- management of construction and
- lack of public benefit.



It is our view that it should be possible to achieve some significant public benefit from a project of this size located within the Paddington Heritage Conservation Area.

Broad planning initiatives for the total valley floor

The Paddington Society objects to the construction of an above ground parking structure (Building 2) as unsuitable within this Heritage Conservation Area and in a flood plain. Any parking should be accommodated within, or skirting, the Building 1 footprint, or be landscaped and on-grade. The proposal to leave the top level of the car park without a roof will result in views of cars located on the roof level intruding into the current unobstructed view corridor from the public domain. With roof-top parking the structure will be of totally inappropriate appearance and will degrade and obstruct views down Alma Street which are called up in the Woollahra DCP as being of significance.

Landscape Sensitivity

Located on the site of the swampland which drained many of the creek lines of the area, and subsequently the Chinese market gardens, Weigall has inherited a special landscape condition of a lowland, surrounded by rising ground. This rising ground is reflected in the change of level from the playing fields to Neild Avenue and in the landscaped berm that underpins properties on the southern edge, including the pavilion overlooking the existing tennis courts. The new berm that has been included to the north side of Building 1 is minimal and fails to achieve the design intent of a berm which should reinforce the quality of the landscape and at the same time reduce the apparent height and bulk of the building, helping to integrate it with its surroundings.

Amount and Location of Carparking

We are opposed to the stated 'requirement' for 102 car spaces, including the 9 spaces proposed adjacent to the proposed buildings, in addition to the 50-60 spaces in the northern on-grade carpark adjacent to Little Weigall and Weigall 4; the latter are generally not mentioned in the documents. i.e. there will be some 170 spaces in all.

We remain of the view that all additional car parking should be limited to the spaces that can be accommodated within or skirting the Building 1 footprint and accessed from Neild Avenue, with a driveway link exiting to Alma Street. It is noted that the applicant's submission that locating parking below grade is restricted by the water table and acid sulphate soils. This claim is not borne out by the experience of recent developments immediately opposite in Neild Avenue, which have deep basement parking.

The proposal put forward is to erect a car parking structure of two levels on the valley floor, all accessed via a narrow two way pinch point from Alma Street. We are told that this car park, accommodating 97 cars in a split level form, will resolve the queuing issue by providing a vessel to accommodate cars waiting for students who are not yet ready to be picked up. The practicality of this concept is difficult to comprehend and we are certain that it will not resolve the problem of cars circulating and queuing along the narrow residential streets. There will be a natural tendency for parents to avoid entering a car parking structure and at best they would only tend to occupy ground levels holding some 50 cars.

The proposed car park, a two level structure in the open valley floor, is poorly sited and no amount of screening treatment to the facades will make it acceptable within the valley floor landscape.

Air pollution from slow moving / idling / stop-starting vehicles is a secondary but significant environmental concern.

SGS and Hakoah Club are proposing to increase car parking in the valley floor from some 130 to 140 existing cars to some 470 cars, all but 5 accessed from Alma Street, a minor residential street. The Paddington Society is opposed to such an increase in car parking and the consequent impact on traffic and the environment. Ideally, SGS and Hakoah Club should negotiate to share on site car parking to achieve an overall reduction in the numbers of car spaces provided on this site.

We strongly encourage the adoption of an effective Green Plan.

Built Form, Height, Bulk and Scale – Building 1

Generally the proposal does not fit into its context and has significant impacts on the amenity of adjacent residents. The location of Building 1 should be critically re-evaluated to ensure that the amenity of adjacent residential premise is retained to a much greater extent than proposed.

We acknowledge the applicant's claim that the site selected of the four options presented is the least flood prone.

However, some 80 apartments at 23, 25 to 27, and 29 to 33 Lawson Street and 8 Vialoux Avenue currently face north to the tennis courts, providing views and outlook across the sports grounds. The dwellings enjoy good solar access that penetrates into the interior of the dwellings. Introducing a solid wall of built form along the northern boundary of these homes will dramatically alter the amenity now enjoyed by some 120 residents.

By its very nature, the proposed sports complex is a large building designed with high internal volumes to accommodate sporting activities. The challenge must be to reduce the apparent scale of the building in order to fit more comfortably with the smaller scale urban form of the Paddington precinct east of Neild Avenue. This was clearly stated as a significant Design Principle on the original flyer and documentation for the proposal; it has not been achieved.

Height

Building 1 at more than 17m (5 storeys) is much higher than the 10.5m maximum (3 storeys) in Woollahra Council's LEP for zone R3. The development application has been submitted under the provisions of Clause 42 of the Education SEPP and State Significant development which enables proposals with a Capital Investment Value of more than \$20 million to potentially set aside local controls:

*Clause 42: State significant development for the purpose of schools—application of development standards in environmental planning instruments. Development consent **may be** granted for development for the purpose of a school that is State significant development even though the development would contravene a development standard imposed by this or any other environmental planning instrument under which the consent is granted.*

However, the application of this provision is discretionary and does not set aside the requirement for the proper assessment of environmental impacts to be undertaken to ensure the protection of environmental and residential amenity.

In this instance, the height in excess of the Woollahra LEP, overshadows and is of excessive bulk and scale; it obstructs views of residents in 23-33 Lawson Street (65 apartments) and 8 Vialoux Avenue (12 apartments); the height should be reduced.

Overshadowing

Shadow diagrams have only been provided for the winter solstice. It is unclear whether habitable rooms, including and in addition to those of living spaces, are affected during Autumn and Spring equinoxes.

Residents at 23, 25 to 27 and 29 to 33 Lawson Street have raised concerns that they will lose direct sunlight into their homes and query the applicant's claim that they will not. The information is not presented in a readily understandable manner to demonstrate to the community the full extent of shadowing impacts.

In addition, the shadow drawings do not address the garden courtyard areas of the social housing residents at 25-33 Lawson Street where there are no individual balconies. The courtyard is an important private communal open space and clothes drying area serving a large vulnerable population; it is a space that currently enjoys complete winter sunshine.

Three homes at 8 Vialoux Avenue will also lose significant winter sun in the living spaces. Two apartments will lose four hours of sun and another will lose one and a half hours. This will reduce quality of life and property value, with cumulative impacts from the loss of views and light.

The impact on all the adjoining residential premises should be tested against the separation distance requirements included in the SEPP 65 and Apartment Design Guide and the results documented as an amendment to the EIS.

Impacts on views and outlook

No view analysis has been carried out for residents of 23, 25 to 27, and 29 to 33 Lawson Street. Homes at 18 Neild Avenue and 8 Vialoux Avenue will have the views from their apartments eliminated, replaced by an almost solid built wall. The outlook and views to the north are important to the wellbeing of these apartment residents, who live with no private open space.

Location of utilities and services

Substation

The proposed substation has been located directly on the south west corner of the boundary in close proximity to 33 Lawson Street. The location is of great concern to the nearby residents. An alternative, more appropriate site, including underground, should be investigated.

Plant exhaust

The drawings show plant rooms facing the southern boundary, but the application is silent on the location and nature of mechanical exhausts, especially from pool facilities where chlorine or other such noxious substances may be present.

Vehicular Access

The Paddington Society maintains that there should be no further traffic generated in the residential streets of Alma and Lawson Streets and Vialoux Avenue, already under regular stress due to existing Weigall events and SGS Preparatory School. However, at the very least, vehicular ingress for this proposal should be from Neild Avenue to the north of Building 1, with egress only via Alma Street.

Drop-off and pick-up of students attending Weigall sporting events and the Preparatory School already severely impacts the neighbours living in the narrow residential streets of Lawson, Alma and Vialoux. These streets contain in the order of 150 houses and apartments that largely rely on kerb side parking for access to houses.

The residents in these and surrounding streets are significantly disrupted on a daily basis by the movement and queuing of vehicles. With an enrolment of 306 boys in the Preparatory School it can be expected that a large number of vehicles enter the area for drop-off and pick-up, creating significant disruption for residents. Imposing substantial additional two-way vehicular burdens onto these streets from visiting students and supporters on Saturday mornings is unacceptable.

Service access and noise

The proposal shows delivery and service access, including garbage collection from Neild Avenue at the rear of Building 1. This will further erode the residential amenity of residents in the adjoining residential building.

The residents of 29-33 Lawson Street will suffer from delivery trucks, queuing vehicles and parking vehicles from as early as 6 am. Vehicular circulation to the proposal should be north of Building 1, away from these residents. The current mitigation proposal of a 2.2m lapped and capped timber fence along the south boundary will be ineffective; the ground at the boundary is a storey below the garden courtyard level and the many units that will be affected by the noise of service vehicles.

Management of Construction

With approximately 500 metres of peripheral regional roads abutting the site boundary it is not unreasonable to expect that construction access could be provided without further impacting upon the amenity of narrow residential streets and the residences themselves.

Construction trucks are shown as entering the site at Vialoux Avenue, traveling south of the development site and then exiting at Neild Avenue. The route is located between the site of Building 1 and the adjoining residential buildings. The adverse impact of construction vehicle movements on residential amenity will be considerable.

Trucks will enter the site as early as 7am on weekdays and 8am on Saturdays. This is very early in the morning to have trucks idling adjacent to homes causing noise and air pollution. There is also no indication of the number of truck movements expected during construction.

We strongly advocate the relocation of the construction truck route to the north of the Building 1 development site.

Cumulative Impacts – Construction

Significant development is planned adjacent to the school at the Hakoah Site. If the timing is not coordinated, local residents will be subjected to unreasonable and prolonged impacts.

Construction impacts on adjacent residents will include noise, dust, vibration, lighting and traffic for possibly some two years. The proposal to have a Community Consultative Committee which includes local residents is welcome. It is essential that the Committee has strong community representation and that there is a responsive and effective complaints response.

Public Benefit

This proposal provides little public benefit while having a significant number of detrimental effects on the neighbouring area in terms of the loss of views and outlook, overshadowing, increasing traffic movements, greatly increased car parking and loss of amenity.

To be successful the proposal needs to provide the following public benefits:

- vehicular access to the north of Building 1 that does not depend upon the use of Lawson and Alma Streets and Vialoux Avenue for access to the site,
- car parking accommodated within or skirting the Building 1 footprint or on grade, screened with suitable landscaping,
- guaranteed community use of the facilities,
- reduction of the apparent height of Building 1 with a more effective landscaped berm at its base,
- accommodation of the Paddington Greenway along the Sydney Water channel and reinstatement of the shared right of way to the east

Paddington Greenway

The SGS site includes green areas along Rushcutters Creek (a Sydney Water Channel) that Council and the local community have identified as part of an enhanced and linked green pedestrian and cycling

corridor known as the Paddington Greenway. Working with Woollahra Council and other land owners the Greenway will be a significant community benefit delivered as part of this proposal. Critical to this is the reinstatement of the shared right of way between Weigall and Hakoah.

This development is a great opportunity to further the achievement of the vision of both State Government and Woollahra Council. The Greenway is included in the NSW Department of Planning, Industry and Environment Discussion Paper "*A 50 year Vision for Greater Sydney's and Parklands*" published in July 2020.

Any approval for this Development Application should include as a condition of consent that SGS dedicates a 5m strip of land adjacent to the drainage channel (3.5m shared path plus 1.5m landscaping buffer). This is not an onerous exchange for the considerable uplift in site value potentially achieved by the setting aside of the LEP height standards to the considerable benefit of SGS.

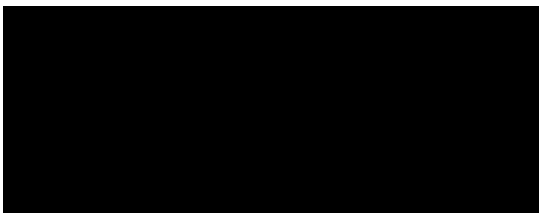
Conclusion

In summary, the Paddington Society believes that the proposal should be amended as follows:

1. The valley floor open space should be devoid of building structures and appropriately landscaped;
2. Building 2 is inappropriate and should be deleted;
3. Car parking should be accommodated within or skirting the Building 1 footprint, or on-grade, screened with suitable landscaping;
4. The location and height of Building 1 should be critically re-evaluated to ensure that the amenity of adjacent residential premises is retained to a much greater extent than presently proposed;
5. The apparent scale and bulk of Building 1 should be reduced by augmenting the landscaped berm;
6. Vehicular access should be from Neild Avenue and not from Alma Street or Vialoux Avenue;
7. The possibility of shared car parking across Weigall and Hakoah sites should be addressed through collaboration;
8. Construction access within the site should be located to the north of Building 1 and all construction vehicular ingress and egress should be from Neild Ave, and;
9. The Greenway shared path should be accommodated along the Sydney Water channel.

This development presents an opportunity to resolve key issues of serious concern to the Paddington community which, if properly resolved, would provide a long-term legacy to the local community as well as benefits to SGS.

Yours sincerely



Will Mrongovius

President, The Paddington Society