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5 May 2022

Gabriel Wardenberg
Planning and Assessment
Department of Planning and Environment

Dear Mr Wardenberg

RE: Cranbrook School Redevelopment-Mod-4 (SSD-8812-Mod-4)

Further to my submission via email of 17 March, I strongly object to the increase in operation of hours requested by Cranbrook School in their *Redevelopment-Mod-4* as an increase in hours of operation of the school's facilities will greatly affect my amenity. It will become almost impossible for me to find a spot to park my car in the vicinity of my apartment anytime between 5am and 10pm Monday to Sunday.

Since submitting my original submission, I have managed to read through the documents submitted by Cranbrook School and am extremely disappointed in the school's lack of foresight in considering carparking requirements for staff, students and visitors to the school.

My problem is that I have an apartment in Wolseley Rd that was constructed in the 1940s without any carparking facility, with no ability to construct any carparking facility, and so I (and other owners in my apartment block) rely solely on street parking to house my car.

Since moving to Wolseley Rd over 20 years ago, I have realised that if I leave my apartment any time during school term and also during the weekend when sporting and other functions occur at Cranbrook, on returning to my apartment, I am unable to find a car park anywhere remotely in the vicinity of my apartment until after school time or after any event at Cranbrook over the weekend.

Consequently, I was delighted that Cranbrook was developing car parking in their original application. Stupidly, I presumed that the 124 new spaces would be in addition to any existing on-site car spaces.

It appears that the 124 spaces in the new development will be completely inadequate to accommodate the more than 300 staff, and also visitors to the school, and also is not to accommodate the numerous P-plated drivers who are students at the school who regularly park outside my apartment.

Street parking availability has markedly decreased since the return of students to the school this year. I have frequently had to park several blocks away along Wolseley Rd, and also in other streets such as Wentworth Place and the far end of Wentworth St.

I have searched all the documents provided by the school in their request to extend the hours of operation of the school's facilities. As a result of that search, I am extremely disappointed that I have discovered that the carparking included in their original development (124 car spaces) is well below what should have been included in their original application to accommodate the already approved development, let alone any extension to the operating hours as requested in *Redevelopment-Mod-4*.

I do not understand why council approved the original DA with clearly inadequate parking provisions. These days, unlike when my apartment block was built in the 1940s, any development from private residential accommodation to shopping centre complexes are required to provide adequate on-site car parking and not rely on street parking at all. How is Cranbrook School allowed to even consider an extension to the hours of operation and in their own words an extension of the hours that patrons (staff, students and visitors to the school) will be using on street parking.

In the documents provided, there is no mention of carparking to be made available on-site at Cranbrook for the large number of students who presently park their cars in my street in the vicinity of my apartment block.

Looking at the individual documents provided by Cranbrook to discover references to car parking, whether on-site or in surrounding streets, little reference is made to the solution for the huge car parking issue that is a result of the operation of Cranbrook School under its present hours of operation, let alone any extension to the hours of operation of the school's facilities.

Any extension of the hours of operation would adversely affect my amenity as there would be resulting increase in pressure on street parking in my neighbourhood. Currently in the evening, all on street carparking spaces on Wolseley Rd are taken up by residents of the area.

Following is an analysis of Cranbrook's own documents to support *Redevelopment-Mod-4*.

(1) MODIFICATION REPORT - AFC HOURS – a report by Urbis (a 26-page document) mentions car parking in some form (it appears as a token gesture) just 3 times.

1st mention is at 1.4.1. *Original SSD-8812*, pg. 2

... Specifically, consent was granted to ...

- Construction of a new 124 space **car park** to ease pressure on the surrounding road network for parking servicing the school.

2nd mention is at 2. *Strategic Planning Framework*, pg. 4

Table 1 Strategic Planning Framework

Document: NSW Long Term Transport Master Plan 2012

Aims Relevant to Proposal: ... (my note: a long statement here with no reference to car parking on-site)

Consistency: The proposal is consistent with the *NSW Long Term Transport Master Plan 2012* due to its close proximity to public transport, pedestrian connections and **parking onsite**.

3rd mention is at 5. *Evaluation of The Modified Project*, pg. 9

Table 3 Consideration of Reasons for Approval

The following matters were taken into consideration in making this decision:

Reason: ▪ **the impacts on the community** and the environment, including heritage, trees and landscaping, residential amenity, traffic and **parking**, and drainage impacts can be appropriately minimised, managed or offset to an acceptable level, in accordance with applicable NSW Government policies and standards. The consent authority has imposed conditions to manage impacts in relation to potential construction and operational impacts on surrounding land uses;

Response: The proposed modifications do not result in an increase to known or create new impacts as discussed in **Section 5.5** of this report.

NOTE: FYI, **Section 5.5** of this report, the *Modification Report - AFC Hours*, makes **no reference at all to parking or its impact on the community**, contrary to what is stated in Cranbrook's document above.

(2) COMMUNITY USE MANAGEMENT PLAN FOR THE PROPOSED NEW FACILITIES (an 11-page document) **discusses on street car parking availability** from "7.30am and 7.30pm Monday to Friday, 7.30am to 5.00pm Saturday and 7.30am to 12.30pm on Sundays" ... "**freed up** though the provision of the new underground carpark" (see extract below from pg. 3).

Learn to Swim Program ... These learn to swim programs are for children who may or may not be students of the School and are expected to run for various levels of ability for 30-minute periods, between 7.30am and 7.30pm Monday to Friday, 7.30am to 5.00pm Saturday and 7.30am to 12.30pm on Sundays.

... **Carparking** for the learn to swim operations will be both within the new 124 space underground carpark **and on street**. **On street parking will be freed up though the provision of the new underground carpark**.

Security ... The alternative access **for patrons using on street parking** or pedestrian access is via the doors located on Rose Bay Avenue which lead directly to the reception area.

Actually, neighbours of Cranbrook School were hoping that the new underground carpark at Cranbrook School would free up on street carparking for the local residents use, not for the use of Cranbrook school staff, students and visitors to the school.

Again, why didn't council insist Cranbrook School provide adequate parking on site in the original DA rather than allowing Cranbrook School to use on street parking for all its P-Plated students, its visitors and those staff whose cars cannot be accommodated on site.

(3) TRAFFIC IMPACT STATEMENT (a 4-page document)

NOTE: This *Traffic Impact Statement* from Cranbrook School's application does not mention car-parking at all.

The writer of this document comes to the conclusion that extending the hours of use of Cranbrook's facilities may actually have a positive impact on AM peak traffic impact! Amazingly, *Traffic Impact Statement* is written assuming there is no increase in traffic at all from Community use of the schools facilities **because** the "modification application does not involve an increase in the student population"!

The report does not take into consideration for example in particular during the week increase in traffic from children in the Learn to Swim Program (caters from the ages of 6 months to 14 years) who *may not be students of the School*, increase in swimming pool activity from early morning, or visitors to the school during the weekend for example during extended hours of inter-school competition.

At pg. 2:

1. Traffic activity

Considering that the s4.55 modification application **does not involve an increase in the student population**, the proposed changes to the operating hours are not anticipated to negatively effect (sic) the performance of the surrounding intersections from a traffic perspective. In fact, a staggered arrival / departure profile achieved by expanding the hours of extracurricular activities is likely to result in a reduction in the peak school traffic activity.

NOTE AGAIN: This *Traffic Impact Statement* from Cranbrook School's application does not address car-parking issues at all.

(4) OPERATIONAL PLAN OF MANAGEMENT FOR THE PROPOSED NEW FACILITIES (a 9-page document) states the new 124 carparking spaces primarily will be used by staff and that *"the provision of the car park also increases the availability of on-street parking in the vicinity of the school, which would also be available for use by patrons of the learn to swim facility,"* and *"Again, given the peak activity periods are outside peak school usage, the on-street car parking will be predominantly vacated at these times"*.

At pg. 5 of the *Operational Plan Of Management For The Proposed New Facilities*:

The development provides a parking provision of 124 spaces, with school staff being the primary users. The peak usage time of the learn to swim facility is outside the school staff core hours of 8.00am to 4.00pm and patrons would be able to use the Aquatic and Fitness Centre car park.

It should also be noted that **the provision of the car park also increases the availability of on-street parking in the vicinity of the school, which would also be**

available for use by patrons of the learn to swim facility, should the need arise.
Again, given the peak activity periods are outside peak school usage, the on-street car parking will be predominantly vacated at these times.

How is Cranbrook School allowed to even consider an extension to the hours of operation because given the peak activity periods are outside peak school usage, the on-street car parking will be predominantly vacated at these times. In Cranbrook's own words there will be an extension of the hours that patrons (staff, students and visitors to the school) will be using on street parking.

I strongly object to the fact that Cranbrook School does not consider that local residents already have difficulty parking in their own street anywhere near their own dwellings due to the extremely inadequate car parking available on-site at the school to cater for existing staff, students and visitors to the school.

I had hoped that the addition of 124 car spaces would mean that maybe I would be able to find a carpark in the vicinity of my apartment but extension of the school's activities mean that it would be impossible for me to find a car park up until 10pm in the evenings and also most of the weekend.

Under **Parking**, pg. 8 of the *Operational Plan Of Management For The Proposed New Facilities* is stated:

- Please refer to the Traffic Management Plan for details on both existing and future carparking facilities and arrangements.

NOTE: the above statement is incorrect, as pointed out above, the **Traffic Impact Statement** submitted by Cranbrook (I cannot find a Traffic Management Plan) makes no reference whatsoever to carparking.

Parking, pg. 8 of the *Operational Plan Of Management For The Proposed New Facilities* continues with no mention of car parking for students on-site, "the volume of visitors on average across the year is **not expected** to increase significantly, and where there is any expected increase, these are not in the core operating hours of the School" ... "the underground car park will provide on-site parking provisions for use by staff on weekdays and to **assist in accommodating parking demands** associated with the new sporting facilities outside typical school hours".

Given these statements by Cranbrook which really make no sense when other documents supplied by Cranbrook imply for example that sporting events at the weekend plan to increase in number, I strongly object to any increase in the hours of operation of Cranbrook's facilities as requested in *Redevelopment-Mod-4*. Currently visitors to the school attending inter-school matches at the weekend use Wolseley Rd as a parking lot. Increasing the hours of operation of the school's facilities would adversely affect my amenity as owners in my apartment in Wolseley Rd (and others in the area) rely entirely on street parking.

(5) ACOUSTIC ASSESSMENT (a 12-page document)

Although this document does not address carparking, it does not address any noise impact on Wolseley Rd either, particularly during sporting events at the weekend, not just the 5 residences referred to below.

At pg. 10:

Q6: Are a number of people affected by the noise?

The most affected receivers will be residences immediately adjacent the subject site along New South Head Road, and Rose Bay Avenue which are generally individual dwellings as opposed to apartment buildings. As indicated above, impacts to the New South Head Road residences will be mitigated by the masking effect of traffic noise. The remaining number of residences affected number **5 residences**.

In conclusion, and particularly after reading Cranbrook's documents in support of their proposal, I object to *Cranbrook School Redevelopment-Mod-4* as already inadequate on-site car parking available at Cranbrook School will adversely affect my amenity w.r.t. the subsequent increase in the use of street parking in the vicinity of my apartment by users of the facilities, making it impossible for me, or any of my visitors, to be able to park anywhere near my apartment during the hours of 5am and 10 pm Monday to Sunday.

Yours sincerely

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