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22 June 2018

NSW Planning and Environment  
Major Project Assessment

Dear Sirs

**RE: CRANBROOK SCHOOL REDEVELOPMENT - SUBMISSIONS**  
**PPTY: 5 VICTORIA AVENUE, BELLEVUE HILL**

We act on behalf of Today Pty Ltd which exchanged contracts on 27 November 2017 for the purchase of a property located 23 Victoria Avenue, Bellevue Hill and intends to complete on 2 July 2018. 23 Victoria Avenue incorporates a significant frontage to Rose Bay Avenue in excess of approximately 90 metres.

We advise that on 23 April 2018, Woollahra Municipal Council approved the subdivision of the land into 3 lots. We advise that the application to subdivide the property ("**the DA**") was lodged with the consent of the current owner which is Cranbrook School ("**the School**"). We **enclose** a copy of the stamped draft approved plan of subdivision and consent.

It appears that the School in preparing the Redevelopment Application failed to advise their traffic consultant of the DA and/or its approval, and accordingly, there has been no consideration of the additional impact that the proposal has in respect of the future residences, being located at 9 and 11 Rose Bay Avenue, which will only be able to access their property via Rose Bay Avenue.

We advise that our client has some significant objections to part of the Proposed Redevelopment primarily in respect of:

- a) the *modus operandi* of the proposed student drop off/collection scheme;
- b) the location of the car park entry and exit; and
- c) the proposed parking restrictions of Rose Bay Avenue.

In support of our client's concerns, it has retained an independent transport planning consultant, namely TTPP (Jason Rudd, director) We are instructed to **submit** in support of our client's concerns TTPP's report dated 21 June 2018 ("**the Report**") which sets out their findings and recommendations

We note that the Report criticises the traffic and parking aspects of the Redevelopment Application because there has been an inadequate assessment, flaws in traffic generation

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and distribution assumption, a failure to assess operating capacity conditions for the car park and drop off area and a failure to consider the future increased usage, particularly given the commercial usage of the aquatic centre (3500 places over 7 days) and a café, and an increased capacity for the school.

In addition, our client makes the following additional submissions which in part are reinforced by the Report:

### **Student Drop off/Pick Up**

Our client's primary position is that it supports the recommendation set out in the Report that as the drop off/collections are likely to require more than a 100m zone they should be relocated within the proposed car park.

Our client's secondary position is that if that recommendation is not adopted, there needs to be an approval of an enforceable plan of management of its operation including full time traffic wardens. You will note from the Report that the proposal is likely to create traffic banking on Victoria Road and congestion for increased traffic movement to the new car park.

We also note the Report recommends that any vehicles that are exiting the School onto Rose Bay Avenue should be directed to turn left only i.e. towards New South Head Road.

It appears that there has been a failure to undertake a proper assessment of the operational method of this drop off/collection formula. We note that TTPP have made recommendations given their experience and analysis of another school (Trinity), and in our view, their recommendation is sensible particularly given the fact that even within their internal road, congestion will be increased at the throat and it is likely to create vehicle queues leading along Victoria Road and possibly as far as to New South Head Road.

Page 7 of the Report states "no assessment and analysis of potential vehicle queuing or at the drop off/pick up exit to Rose Bay has been provided in the Traffic Report" nor has there been "...an assessment of the potential risks and mitigation measures for the high traffic volume driveway..." noting that "traffic flows will be highest simultaneously with high pedestrian flows."

### **Car Park Entry and Exit**

Our client has significant concerns about the car park and its location. Our client takes the view that the following factors will significantly increase the likely number of vehicles that are likely to drive along what is otherwise a very quiet residential road and convert it into a high traffic road:

- a) the School is, by undertaking its development works, not only enhancing the educational facilities (class rooms/size) available but is increasing its capacity so that it will in the future be entitled to increase the number of additional enrolments;
- b) the creation of the car park of 100 car spaces will encourage students, teaches and other employees of the School to use the car park when otherwise they may have been travelling to the school by public transport; and

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- c) the significantly increased size of the aquatic centre (and creation of a café) and its commercialisation to a 'learn to swim' venue will increase the number of users (including those with small children) to drive along Rose Bay Avenue to access the car park and the facility.

Needless to say, this increased traffic generation will have a significant adverse impact, both noise, traffic, on street parking issues and safety to pedestrians.

It is our client's submission as follows:

1. our client's primary submission is that the entrance and exit of the car park should be relocated to the north western part of the site so that cars will enter through the left hand parking lane of New South Head Road, and exit through that indented slip car parking lane on New South Head Road which ought not to impede on any traffic onto New South Head Road;
2. as an alternative and as a secondary proposal, the car park should have an exit point there on the north western part of the site onto New South Head Road so at least it limits the traffic generation to the exists; and
3. as the third alternative, adopt the proposal suggested by TTPP which is that all cars who exit the car park (if it remains on Rose Bay Avenue) must turn left and are forced to do so by some form of an island structure (at the car park exit point) requiring them to turn left down Rose Bay Avenue onto New South Head Road and not to turn right up Rose Bay Avenue.

#### **Off Street Parking Controls**

- a) our client supports that there should be no loading zones on Rose Bay Avenue. We also do not know what the size (length) of the buses that are contemplated to be driving along Rose Bay Avenue which we assume will be a short time bus zone.
- b) We strongly support the installation of restrictive residential parking, particularly along the eastern side of Rose Bay Avenue so as to limit daytime uses by School students and teachers to occupy all spaces along Rose Bay Avenue particularly given the fact that a new car park is proposed as part of the development. That restrictive parking should grant parking rights to residents with parking permits and otherwise other drivers for limited number of hours to park on the street during weekdays.

We would respectfully request that officers assessing the application have due regard to these concerns.

Yours faithfully



**Gil Baron**  
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