

25 May 2020

Dear Sir/Madam,

RE: Proposed redevelopment of Trinity Grammar School SSD-10371

Thank you for the opportunity to provide a submission on the above development.

In 2015, Trinity Grammar School sought to increase the number of students at the Summer Hill campus, by 200 students (from maximum 1500 students at the Summer Hill campus as a condition of consent in DA 2006/39, to 1700 students). The Land and Environment Court refused to modify consent and stated "...that it is not in the public interest to approve the modification sought given the likely adverse traffic impacts in Victoria Street and the Jubilee Drive car park and adverse amenity impacts for the local residents" (Item No. 112 at <http://www.caselaw.nsw.gov.au/decision/55249082e4b0fc828c9953f7>).

As a resident living on Victoria Street near the Jubilee carpark entryway, I agree with this Land and Environment decision. The scale of the proposed redevelopment (SSD-10371), with a 40% increase in students (from current allowable 1500 to 2100 students) and concurrent increase in teaching and non-teaching staff, is too large for the site adjacent to an otherwise quiet residential area with conservation zoning and numerous heritage listed items. The proposed car park reconfiguration outlined in SSD-10371, provides for only 12 additional car parking spaces (from current 312 to 324; Appendix 10, Transport and Accessibility Assessment, page 28). This is clearly insufficient to accompany the scale of SSD-10371, given the vast majority of school staff drive to work. When DA 2006/39 was approved, the new carpark was assessed as advantageous to residents with the removal of 100+ cars from surrounding streets. Construction on DA 2006/39 was completed only a few years ago, but the carpark is already at capacity and the school now intends to put 100+ cars back onto surrounding streets.

Trinity Grammar School students and staff who currently park in the local streets have informed residents that they do not use the existing carpark because "it is too congested". This has been confirmed by many friends who are parents of Trinity Grammar School students, who avoid picking up and dropping off underground wherever possible. SSD-10371, with a proposed lengthened internal circulation lane, may further incentivise staff, students and parents to avoid using the underground facility, thereby intensifying adverse traffic and parking issues identified during the Land and Environment Court proceedings. Evidence that the SSD-10371 proposed carpark reconfiguration will resolve existing adverse traffic and amenity impacts is lacking. Surely it is prudent for proposed changes to the carpark to be made independently of SSD-10371, thus providing the opportunity to make an accurate assessment of 'improvements in operational efficiency' before such a large increase in student numbers is granted.

While I appreciated the opportunity for community consultation prior to submission of SSD-10371 (as outlined in Appendix 14), the proponent has chosen not to assess or address many of the concerns identified. I would like to highlight two such concerns that were raised at the community consultation, a) loss of city skyline vista from residences on Victoria Street (page 11) and b) noise from school during breaks (page 12) as follows.

Bulk and scale of built form and view sharing

The View Impact Assessment (Appendix 11, Page 22) stated that there “would be no loss of view of items identified as valued, in Step 1 of Tenacity”. Sufficient evidence to demonstrate the accuracy of this statement was not provided.

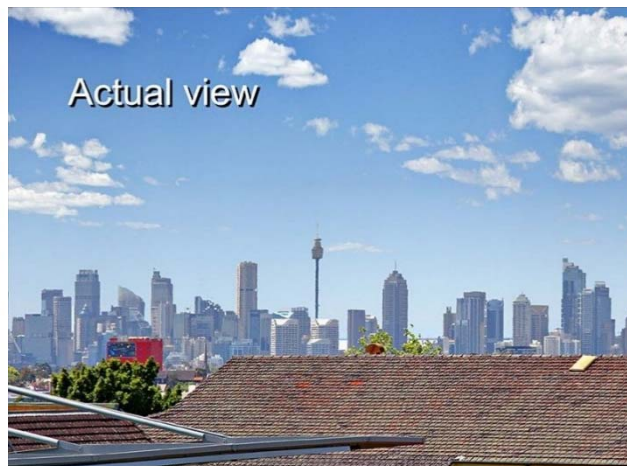
City skyline views from the first level of 157 and 159 Victoria Street.

Figure 1: VP15B View impact assessment (Appendix 11, p53)
View from first floor bedroom standing at window of
157 Victoria Street (50mm lens used for emphasis)



VP15B
View from first floor bedroom standing at window of 157 Victoria Road (50 mm lens used for emphasis)

Figure 2: Photo from real estate listing in 2010 states:
“Actual view” from 157 Victoria Street, Ashfield
showing extensive CBD skyline vista



<https://www.realestate.com.au/soldproperty-house-nsw-ashfield-106878786>.

There are obvious discrepancies in the two photos taken from the exact same location (first floor of 157 Victoria Street). It is significant that VP15B is the only photo in the Visual Impact Assessment that required a “50mm lens used for emphasis” and photomontage and view in place data sheets were omitted from the Appendix.

My residence at 159 Victoria Street currently enjoys similar CBD skyline views (as shown in Figure 3). I welcome the provision of a photomontage and a view in place data sheet of existing CBD skyline views from the first floor of my residence to demonstrate the impact of SSD-10371 and provide evidence that the planning principles outlined in Tenacity have been applied in a clear and transparent manner.

Figure 3: City skyline views from first floor of 159 Victoria Street



Environmental impacts

SSD-10371 will have significant and unacceptable noise impacts on neighbouring residential properties both during a very lengthy construction period and more importantly during operation. The Noise Impact Assessment (Appendix 17), states that Trinity Grammar School has provided detailed information regarding facility usage. Appendix 12 (Schedule of uses), indicates significant existing use of Ovals (from 7am to 5pm), but fails to mention routine evening use or very intrusive daily recess and lunch outdoor play noise (more than 500 children with frequent yelling/screaming) on Oval 2 that currently renders the front rooms of my house, including my home office, uninhabitable during the following times:

30 minutes - before school outdoor play

25 minutes (recess A)

25 minutes (recess B)

40 minutes (lunch A)

40 minutes (lunch B)

This equates to 160 minutes (2.7 hours) where my residence and home office are severely impacted by excessive noise. This does not include PE classes and before and after school sport (into the evening), which are also routinely conducted on Oval 2. As previously stated, outdoor noise from the school was identified as a major concern during the community consultation. The consultation report states that Trinity Grammar School is mindful of noise impact on neighbours (Appendix 14, page 12). It was therefore disappointing that the Noise Impact Assessment “deemed it unnecessary to conduct a specific assessment of outdoor play area noise” (Appendix 17, page 18). In fact, assessment of existing noise is a priority that requires the immediate implementation of measures to mitigate noise that is assessed as intrusive to nearby residents.

The current unacceptable noise impact and loss of amenity will be intensified with an additional 600 students (Appendix 12, Summer Sport training number increase = 600, page 1). Additionally, a new play area is proposed above the existing Jubilee Carpark entrance, diagonally opposite my residence. As stated in the consultation report (Appendix 14, page 12), the current student population requires the school to stagger year group breaks throughout the day. Further staggering is likely to accompany SSD-10371. While staggering may lessen overall volume of noise, duration of intrusive noise disturbance is increased. Noise impacts and residential amenity associated with SSD-10371 must be properly assessed, noting that acoustic monitoring was undertaken in November and omitted Year 12 students (~20% of senior students). Upwards adjustments should be therefore be factored in.

Operational noise amenity assessment for residents in Victoria Street as a result of SSD-10371 must take cumulative noise into consideration. This includes existing and new noise impact from:

- a) use of ovals as per the schedule provided (i.e. before/after school sport, PE classes which are frequently located adjacent to boundary fencing, Saturday sport, holiday programs etc),
- b) use of ovals omitted from the schedule (i.e. staggered recess/lunch outdoor play, additional hire of ovals to community groups, evening sports training sessions), as well as
- c) operational noise generating impacts as a direct result of SSD-10371, namely a 40% increase in students, increased traffic, buses and deliveries in Victoria Street to accommodate the student increase, new play area above Jubilee Driveway, multipurpose Pavilion, rooftop chiller plant decks, rooftop AHUs, new carpark exhaust stack and associated machinery.

In addition, there are several areas where details provided by the school are scant. The Lighting Strategy (Appendix 35, 6 pages) contained only 2 pages of content beyond an overview of SSD-10371 with limited reference to proposed external lighting, while the ‘Comprehensive Plan of Management’ (Appendix 14) was only 3.2 pages of content (double spaced) and comprised of dot points.

Lastly, there is conflicting information on the location of construction site access contained within the Construction Diagrams (Appendix 18) and the Design Analysis Report (Appendix 11). However, I note that site access points (all stages) are conveniently located well away from the schools own dwellings (Delmar Gallery/Headmaster's residence), despite the fact that much of the proposed construction is located in close proximity to these venues.

I am very concerned that it is proposed to establish a construction site access opposite my residence (corner of Holwood Avenue) for a minimum of four years (2021-2015). This is a very long duration where residents will be subject to the arrival/departure of articulated vehicles, heavy rigid vehicles, concrete trucks etc. This is not in keeping with a school that states it is "mindful of noise impacts to neighbours", most of whom are unable to screen themselves from the adverse amenity impacts the school generates due to conservation zone restrictions.

Stage 3 Appendix 18A Construction site access (red arrow): Aug 2021- Nov 2023 (2.5 years, Appendix 18B)



Stage 4 Appendix 18A Construction site access (red arrow): Nov 2023 to Jul 2025 (1.5 years, Appendix 18B)



SSD-10371 fails to provide sufficient assessment regarding visual and acoustic impacts. Further, SSD-10371 does not demonstrate any substantial steps to ensure environmental amenity (current or future) for neighbouring low density residential-zoned conservation areas that will result from a very lengthy construction period and substantial intensification of use during operation.

For the reasons stated above, I wholly object to SSD-10371. I have no political donations to declare.

Dr J. Iversen
159 Victoria Street, Ashfield