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Director – Social and Infrastructure Assessments
Planning and Assessment
NSW Department of Planning, Industry and Environment

By online submission: SUB-6391

Dear Director

Objection to Roseville College – New Sport and Wellbeing Centre (SSD-9912)

I am a resident of Bancroft Avenue with my family, in the vicinity of Roseville College. I object to the proposal on the grounds of:

- A.** Failure to adequately address Key Issue 7 of the SEARs, specifically
 - “an assessment of road and pedestrian safety adjacent to the proposed development” and
 - “identification of infrastructure required to ameliorate any [...] road safety impacts associated with the proposed development, including details on improvements required to affected intersections...”
- B.** The increased road safety risk to pedestrians, particularly children, using Bancroft Avenue to access Roseville Public School, Bancroft Park, transport links and local residences, due to
 - increased traffic as a result of the proposal
 - lack of safe crossings at the Bancroft Avenue/Wandella Avenue intersection
 - already high traffic volumes on Bancroft Ave and Wandella Avenue
 - the lack of road safety culture in the Roseville College community

The impact of the proposal on pedestrian safety was not addressed in the EIS or traffic report (other than during construction) and should be properly assessed before the proposal is considered further.

- C.** Demolition of the contributory heritage dwelling at 37 Bancroft Avenue and its replacement with an unsympathetic development out of scale with the surrounding area.
- D.** Usage of the site at 37 Bancroft Avenue contrary to its residential zoning.

I recommend that the proponent be required to:

- Conduct an study of the impact on pedestrian safety of the proposal, including assessment of the impact on children crossing the Bancroft Avenue/Wandella Avenue intersection
- Amend the proposal in consultation with Ku-Ring-Gai Council, to include works to provide safe crossings for children at the Bancroft Avenue/Wandella Avenue intersection

- Amend the proposal to preserve the heritage dwelling at 37 Bancroft Avenue
- Amend the proposal to comply with the residential zoning of 37 Bancroft Avenue
- Consider an alternative location for the development, within the Roseville Local Centre or other nearby location in which such development is compatible with planning instruments

Reasons for each of my objections are below.

A – Failure to Adequately Address SEARs

1. Under Key Issue 7 of the SEARs, the EIS was required to address:
 - “an assessment of road and pedestrian safety adjacent to the proposed development” and
 - “identification of infrastructure required to ameliorate any [...] road safety impacts associated with the proposed development, including details on improvements required to affected intersections...”
2. The EIS acknowledges consultation feedback regarding pedestrian safety but does not include any measures to address this issue. The EIS only touches on road safety issues in relation to construction, not as a result of increased traffic from the proposal
3. For comparison, the EIS for SSD-10352 (Moriah College Redevelopment) commissioned a road safety audit which recommended:
 - Improvements to an existing crossing and safety barrier
 - Traffic surveys to be undertaken to determine whether an existing crossing warrants upgrading to a children’s crossing or pedestrian crossing
 - The proponent educate all staff and parents to address identified road safety concerns
4. The Moriah College Redevelopment proposal also includes construction of a new loop for drop-off/pick-up of students within the school grounds.
5. The Moriah College Redevelopment seeks approval for an increase in student numbers of 17% (290) over 15+ years, less significant than the Roseville College proposed increase of 28% (277) over 10 years.

B – Safety Risk to Pedestrians using Bancroft Avenue

6. Bancroft Avenue is a local road. It is heavily used in AM and PM periods as a ‘rat run’ by drivers travelling between the Pacific Hwy and Archbold Road and/or Babbage Rd – bypassing delays on Boundary St at Penshurst Rd and Archbold Rd. Local traffic accessing Roseville College and Roseville Public School also uses the road.
7. Bancroft Avenue is also used by a high volume of pedestrians, particularly children, accessing Roseville Public School, Roseville College, Bancroft Park, Ku Ring Gai Art Centre and transport links.
8. The Bancroft Avenue/Wandella Avenue intersection is poorly designed for pedestrians. There is no safe crossing of Wandella Avenue. The single lane speed bump on Wandella causes cars entering Wandella to ‘swing around’ the corner to occupy the space in front of the bump. Driver

attention is focused on the oncoming traffic and not pedestrians. Sightlines are blocked by vehicles stopped in the intersection. The risk is exacerbated by the high speed of traffic on Bancroft Avenue in this location at the bottom of a hill.

9. Roseville College has a poor road safety culture. The following can be readily observed on Bancroft Avenue with school staff present and taking no action:
 - Vehicles parked in the no stopping zones on either side of the pedestrian crossing outside the school gates to drop off or pick up students
 - Chartered buses parked in a no stopping zone
 - Chartered buses double parked
 - Chartered buses parked across residents' driveways
10. The increased traffic as a result of a 28% increase in student numbers will exacerbate the above safety issues.
11. Bancroft Avenue and Wandella Avenue were not designed for the anticipated level of traffic. Traffic calming measures and safe pedestrian crossings are required to reduce the risk of pedestrian injury or death to an acceptable level.

C – Demolition of Contributory Heritage Dwelling at 37 Bancroft Avenue

12. Prior to current protections for built heritage in NSW, Roseville College demolished:
 - Two contributory heritage dwellings at 33 and 35 Bancroft Avenue in the 1990s/2000s
 - Five contributory heritage dwellings on Recreation Avenue in the 1980s/1990s
13. The demolished dwellings can be seen in the 1983 aerial photo in Figure 37 of the Heritage Impact Statement. They have been replaced in part by a significant development which severely detracts from the character of the area - the 'Joy Yeo Centre' – faced with low value metal cladding in an unrelieved box form.
14. 37 Bancroft Avenue is a Federation bungalow characteristic of the high heritage value of the Clanville Heritage Conservation Area.
15. The proposed development is beyond the scale of and out of context with the surrounding dwellings. At approximately 15 metres in height it would unreasonably overbear and overshadow 39 Bancroft Ave, within only a few metres of the property boundary (illustrated in Figure 21 of the EIS).
16. The present day planning protections are in place to prevent the very kind of demolition of heritage dwellings and unsympathetic development proposed in the application.
17. Approval of the proposal would set a precedent that heritage conservation does not matter for large developments, and the proponent or others could be expected to progressively acquire and demolish heritage dwellings throughout the area.

D – Proposed Usage Contrary to Residential Zoning

- 18.** 37 Bancroft Ave is zoned R2 low density residential. Educational establishments are not permitted. The objectives of the zoning are to:
- Provide for the housing needs of the community within a low density residential environment
 - Enable other land uses that provide facilities or services to meet the day to day needs of residents
 - Provide for housing that is compatible with the existing environmental and built character of Ku-ring-gai
- 19.** The proposed usage of the site as an educational establishment, including after-hours use, is contrary to the zoning and incompatible with objectives of the zone.
- 20.** A residential zoned high value heritage conservation area of single family dwellings is not an appropriate location for major development to significantly expand a school.
- 21.** Nearby sites within the Roseville Local Centre would be more appropriate for this type of development. The Roseville Local Centre is:
- not within a heritage conservation area
 - zoned for educational establishments
 - within walking distance of the existing Roseville College site
 - close to transport links

Yours sincerely
Tim Archer