SUBMISSION FOR ROSEVILLE COLLEGE - NEW SPORT AND WELLBEING CENTRE

Application No: SSD – 9912

Location: 27-29 and 37 Bancroft Avenue, ROSEVILLE, NSW

I wish to make a submission for the above application as I OBJECT to the proposals for the following reasons:

1. The proposed development reduces the value of the two Heritage Conservation Areas (HCA) in which it is located as:
    a. It requires the demolition of an existing residence which is contributory to the HCA.
    b. It requires the rezoning of residential land within the HCA to educational use; this is detrimental to the requirement of State Government to have sufficient residential housing available for the growing population.
    c. The form of the proposed development is not contributory or even sympathetic to the HCA. The amenity the Roseville College enjoys from the HCA is being lessened by the proposed development.
    d. Roseville College owns other residences nearby to the School which are also contributory to the HCA, and approval of the current proposal would set a precedent for the subsequent demolition and redevelopment of these properties also to the detriment of the HCA.
    e. The proposed development results in "death by a thousand cuts" as an impact on the HCA.
2. The scale and bulk of the proposed development is not within keeping of the surrounding properties and the existing school development.
3. There is no need for the school to carry out this development as the existing school development already has facilities similar to those being proposed. Although Roseville College has DA0261/16 approved by Ku-Ring-Gai Council to progressively increase the number of students over the years to 2030, in my view this does not automatically give Roseville College the right and authority for property rezoning and subsequent redevelopment. If Roseville College has insufficient space within existing school footprint for both educational buildings and required student recreational space for the number of students currently approved at the time of the DA, then they should not have applied for the DA to increase numbers and they should not have the expectation that the DA would then automatically enable rezoning and redevelopment of other properties they acquire.
4. The Traffic Impact Assessment {**TIA**} (dated 25/10/19) by ptc Consultants (Appendix 22 to the Proposal) is in error, such that it is unreliable and misleading, and therefore should not be relied upon in support of the Proposal, for the following reasons:
    a. Section 2.1 of TIA (and inter alia Figure 2.1) does not identify the Ku-ring-gai Art Centre, which also relies on Recreation Avenue for vehicle / patron access, and is located to the east of Roseville Lawn Tennis Club (which is to the east of the proposed development, not "west" as per TIA).
    b. Section 3.1 of TIA similarly fails to mention Ku-ring-gai Art Centre in relation to Recreation Avenue.
    c. As a result of this omission, Section 5 of the TIA is flawed and unreliable.
    d. Figure 3.3 of TIA shows Bus Route 558 incorrectly, which indicates that any site assessment by ptc Consultants was insufficient and is flawed. Bus Route 558 was altered due to the RMS upgrade of Boundary Road at the Hill Street and Archer Street intersections such that the route is now from Archer, to Wandella, to Victoria to Hill Street as shown by the route map at https://transportnsw.info/routes/details/sydney-buses-network/558/34558. The 558 service from Chatswood at 0750 to Roseville station should have been observed by ptc Consultants during their site monitoring of traffic. Consequently, the error by ptc Consultants calls into question the veracity of their traffic survey.
    e. Section 4.1.1 of TIA does not identify when the traffic surveys for drop off and pick up were carried out. Since Section 5.1 of TIA in relation to existing traffic conditions was based on a single survey on 26/3/19, it would be reasonable to assume that Section 4.1.1 survey was also carried out at the same time, ie assumed to be on 26/3/19. In my opinion the survey is a single "snap shot" and there is no evidence to demonstrate how reliable the "snap shot" might be. In fact, the results presented

in Figures 4.1 and 4.2 are misleading in relation to traffic and parking conditions observed virtually every day in Victoria Street. The results appear particularly misleading for the chaos during afternoon pickup when many SUV vehicles are trying to find a spot for pick up on Victoria and seriously impeded traffic flow in both directions to the detriment of local residents attempting to use Victoria Street to gain egress from the area.

f. As the Bureau of Meteorology rainfall data for Sydney Observatory Hill shows only 0.6mm rainfall to 9am on 26/3/19 and nil rainfall to 9am on 27/3/19 it is reasonable to conclude that any data gathered on 26/3/19 was during fine weather. Rainfall data for Chatswood Bowling Club (nearest rainfall station to the site) gave similar results of 1.0mm and nil respectively. Therefore, I would conclude that the data was not gathered on a rainy day. The traffic and parking problems can be observed to be worse on a rainy day and should be taken into account by the TIA. There is no evidence that the TIA has considered a rainy day and therefore both Sections 4.1.1 and 5.1 of TIA are unreliable and misleading.
g. Section 4.2.2 of TIA presents unreliable data in relation to Victoria Street since the survey results from Years 1 to 6 represent only 9.1% of the student responses. The TIA does not normalise the responses to the number of students within each year group considered. It is quite observable that the bulk of Year 1 to 6 students access the school via Victoria Street due to proximity of the drop off areas (as monitored in Figures 4.1 and 4.2) to the primary school part of the campus. As such the modes of travel in Figures 4.6 and 4.7 of TIA are misleading in relation to Victoria Street and the Years 1 to 6 cohort.
h. Section 5.1 of TIA does not take provide any analysis of traffic generated by the Roseville Lawn Tennis Club (which has 10 car parking spaces) and the Ku-ring-gai Art Centre which has 29 car spaces. Traffic from the Art Centre is particularly relevant during the afternoon pickup as the afternoon art session finishes at 3:30pm with traffic typically extending until about 4pm.
i. Section 5.1 of TIA relies on a traffic count on one day, 26/3/19. It is axiomatic that the traffic numbers and timing may vary depending on the day of the week (such as due to extra-curricular activities) and weather. Therefore, the traffic count used is not statistically reliable for analysis and forecasting purposes.
j. Section 5.1 of TIA: data in Figure 5.2 has been selective as to the timing presented; viz 3:15 to 4:15pm. Figure 4.2 of TIA shows that a significant proportion of Victoria Street traffic occurs before 3:15pm. From 14:50 to 15:15 there are at least a further 24 vehicle movements in addition to those presented in Figure 5.2. Full data should be presented for Assessment, not a selected data set which appears to be skewed.
k. There is no indication in Section 5.1 of TIA that data was sought from Ku-ring-gai Council who have carried out traffic counts in Roseville. Traffic count apparatus is known to have been deployed on the local streets, presumably by Council (since RMS is unlikely to have done so). Such data would assist with validation of the TIA, or otherwise demonstrate how unreliable the analysis is.
l. As per item 4 f above, traffic counts are likely to vary significantly with weather. This aspect has not been addressed in Section 5.1 of TIA.
m. The effect of school activities before and after school on traffic has not been addressed in Sections 4 and 5 of TIA other than by reference to the swim school (Section 5.2.4). There are other extracurricular activities that are relevant, such as music rehearsals or gymnastics, to consider just two. The survey results need to address what impact extra-curricular activities would have on the survey results and how they might change on different days of the week and at different times of the year as sport types change.
n. From the above it is clear that projections of future traffic given in Section 5.2 of TIA are based on misleading and inaccurate data. Therefore, the whole of Sections 5.2, 5.3 and 5.4 of TIA need to be revised for Assessment based on a sound survey methodology and subsequent unbiased analysis.
o. Such analysis of future traffic (Sections 5.3 and 5.4) needs to take into account increased traffic flows over the time interval being addressed (to 2030) due to population growth, not just the increase due to the proposed development. There is no indication that TIA has made such an allowance and is

therefore deficient and misleading. Such increased traffic over time will have a measurable impact on the intersection analysis and subsequent conclusion.

p. By way of additional comment, Figure 5.3 of TIA addresses future traffic at Wandella / Victoria intersection in the morning peak (selected times only). This intersection is impacted significantly by traffic in Wandella which includes "rat runners" attempting to avoid traffic pinch points on Pacific Highway. Traffic on Boundary has a direct impact on egress traffic from Wandella, frequently resulting in delays and tail backs on Wandella past the Wandella / Victoria intersection which in turn cascades back into Victoria traffic flow. A more extensive traffic survey would have identified this fact. In addition, increased traffic flow on Boundary over time (to 2030) would have a significant impact on the conclusion that the traffic impact of the proposed development would be minor. In addition, although there is now no morning peak hour Right Turn from Wandella into Boundary, not all traffic obeys this, causing lengthy delays on Wandella tailing back. This factor has not been acknowledged / addressed by TIA.

5. The Preliminary Construction Traffic Management Plan {**PCTMP**} (dated 25/10/19) by ptc Consultants (Appendix 25 to the Proposal) is in error, such that it is inadequate and misleading, and therefore should not be relied upon in support of the Proposal, for the following reasons:
    a. Section 2.1 of PCTMP (and inter alia Figure 2.1) does not identify the Ku-ring-gai Art Centre, which also relies on Recreation Avenue for vehicle / patron access, and is located to the east of Roseville Lawn Tennis Club (which is to the east of the proposed development, not "west" as per PCTMP).
    b. Section 3.1 of PCTMP similarly fails to mention Ku-ring-gai Art Centre in relation to Recreation Avenue.
    c. As a result of this omission, Section 4 of the TIA is flawed and unreliable.
    d. Figure 3.3 of PCTMP shows Bus Route 558 incorrectly, which indicates that any site assessment by ptc Consultants was insufficient and is flawed. Bus Route 558 was altered due to the RMS upgrade of Boundary Road at the Hill Street and Archer Street intersections such that the route is now from Archer, to Wandella, to Victoria to Hill Street as shown by the route map at https://transportnsw.info/routes/details/sydney-buses-network/558/34558. The 558 service from Chatswood at 0750 to Roseville station should have been observed by ptc Consultants during their site monitoring of traffic. Consequently, the error by ptc Consultants calls into question the veracity of their traffic survey.
    e. Section 4.1 of PCTMP focuses on the site of the proposed development and its immediate vicinity. The objectives do not consider the wider context of the site; in particular the PCTMP is silent on the potential safety impact on the Archbold / Bancroft intersection which is heavily used by parents and students of Roseville Public School on Archbold Road. Any observation of this intersection during morning and afternoon drop off/ pick up times would clearly identify how the eastern end of Brancroft is heavily used by vehicles for access and parking and subsequent pedestrian traffic. In view of the omission of overt consideration of this intersection, I consider that the PCTMP is deficient and inadequate for the Assessment.
    f. Section 4.6 of PCTMP (page 17) states "*all vehicle routes are constrained to existing public roads that have the physical geometry to accommodate the turning movements*". I consider this statement is incorrect and deficient in the light of safety objectives given in Section 4.1 of the PCTMP for the reasons given below.
    g. Figure 4.5 of PCTMP shows the swept path for truck and dog at Bancroft / Archbold intersection (Intersection 2). The figure clearly shows there is insufficient physical geometry to avoid trailing axles impacting the southern kerb. This impact results, in part, from the physical constraint of the centre kerb at the wombat crossing. Inevitably the actual swept paths will vary with the skill of the driver. Therefore, impact on both the southern kerb and the centre kerb is inevitable with consequent high probability of physical damage due to the loads imposed.
    h. In addition, Figure 4.5 of PCTMP does not identify the effect of parked cars on Bancroft if parked close to the wombat crossing as occurs most afternoons. Such parked cars will further impact the swept path and consequent probability of damage. It would seem wise to have additional parking constraints during the use of truck and dog vehicles, but no mention is made of such a control in the

PCTMP. There are additional concerns with respect to pedestrian safety whilst drivers dropping off or picking up primary school children are accessing parked vehicles in the vicinity of this intersection, which again is not mentioned in the PTCMP.

i. Figure 4.6 of PCTMP shows the swept path for truck and dog at the Bancroft / Wandella intersection (Intersection 3). The swept path analysis shows that the truck will have to swing wide in Bancroft into the oncoming outbound (eastward travel) lane to be able to negotiate the single lane chicane on Wandella. This swept path has obvious safety impacts on the oncoming traffic which have not been identified in the PCTMP. It is likely that variations in swept path will result in damage at the chicane.

j. In addition, vehicles will be using Wandella north bound through the chicane. At present, such vehicles are often in conflict with the morning peak hour traffic in particular. Sight lines for the truck coming down Bancroft to turn into Wandella are limited. There will be obvious safety concerns and traffic conflicts at this intersection which are not addressed by the PTCMP. Some form of temporary traffic management by signals and/or traffic controllers will be required for safety at this intersection whilst truck and dog vehicles are being used.

k. Figure 4.7 of PCTMP shows the swept path for truck and dog at the Wandella / Victoria intersection (Intersection 4). The swept path analysis shows that the truck will have to swing wide in Wandella to make it into Victoria, but even so, the dog trailer will impact the central traffic separation kerb. This impact will inevitably cause damage to the central traffic separation kerb. In addition, the swept path analysis does not take into account possible parked cars in Wandella or in Victoria which are frequently present all day. Such parked cars will significantly impact the physical geometry available for the truck and dog to negotiate this tight corner. As a consequence, either the theoretical swept path (as per Figure 4.7) or the more likely actual swept path will have safety impacts on other vehicles in Victoria at this intersection. There will be obvious safety concerns and traffic conflicts at this intersection which are not addressed by the PTCMP. Some form of temporary traffic management by signals and/or traffic controllers will be required for safety at this intersection whilst truck and dog vehicles are being used.

l. Figure 4.8 of PCTMP shows the swept path for truck and dog at the Victoria / Recreation intersection (Intersection 5). The swept path analysis shows that the truck will have to carefully negotiate this intersection if the dog is not to impact the kerb adjacent to the tennis courts. Likely swept paths will increase the probability of damage to the kerb and adjacent infrastructure (power pole). In addition, sight lines for traffic egressing from the Roseville College car park off Recreation, or from Roseville Lawn Tennis Club or from Ku-ring-gai Art Centre are severely restricted by the mesh on the tennis courts at the intersection. It will be inevitable that traffic conflict with incoming truck and dog will result, especially in the afternoon school peak period which also coincides with termination of art courses at the Art Centre. There will be obvious safety concerns and traffic conflicts at this intersection which are not addressed by the PTCMP. Some form of temporary traffic management by signals and/or traffic controllers will be required for safety at this intersection whilst truck and dog vehicles are being used.

m. It is noted that Figure 4.1 of PTCMP shows egress of the truck and dog from the proposed development site via Bancroft. The extent of excavation required will have an impact on the practicality of this proposed egress route. Egress via Recreation may be suggested later once the practical difficulties become obvious. However, the difficulty is foreseeable and the consequence of changing the egress route are significant. For clarity, if the PTCMP is to be adopted, which I consider it should not, then a Condition of Consent should be that the proposed egress route cannot be changed at a later date.

n. Similarly, Figure 4.1 of PTCMP shows egress of truck and dog from Bancroft to Archbold heading south. In the modern idiom “good luck with that”. Any observation of this intersection, particularly in morning peak hour traffic, shows the practical difficulty of achieving such a turn by passenger (sedan style) vehicles. Such a manoeuvre by a 19m truck and dog is likely to have a significant impact on traffic flow on Archbold Road in both directions and consequent impact on the safety to all involved. There will be obvious safety concerns and traffic conflicts at this intersection which are

not addressed by the PTCMP. Some form of temporary traffic management by signals and/or traffic controllers will be required for safety at this intersection whilst truck and dog vehicles are being used.

o. I note that a relatively simple solution to the traffic and safety issues discussed above would be for the Conditions of Consent to forbid the use of 19m truck and dog during demolition and excavation and to require the use of truck only since the swept path is less onerous and would actually fit within the physical geometry of the existing intersections. Other traffic management suggestions given above could also be adopted by the Conditions of Consent if consent is given.

Declaration of Reportable Political Donations made in Previous Two Years

Refer to covering letter

Signed by:

Name and address to be withheld for personal privacy reasons; refer to Covering Letter.