

11 December 2019

NSW Department of Planning, Industry and Environment

**Re: Application # SSD-9912 Roseville College
New Sport & Wellbeing Centre (SWELL)**

To whom it may concern

We are writing to object to the proposed development at Roseville College and believe there are several reasons why this application, in its present form, should be rejected.

Our house is located directly opposite 37 Bancroft Ave and since purchasing in 1986 we have lived with the expansion of the school from being approved for a maximum of about 500 students, to 830 and now over 1250. Each increase has been accompanied by the construction of new facilities on land zoned for educational use and as residents we have accepted this and living with chaotic traffic congestion in the mornings and afternoons, increased noise levels and an overall loss of neighborhood amenity.

But this proposal and the way the consultation process was carried out leads us to think that the college gives no consideration to the consequences of their expansion on the local community.

Our objections to the SWELL development are as follows:

Summary

1. **Demolition and re-zoning of 37 Bancroft Ave Roseville.** This house provides a positive contribution to the local Heritage Conservation Area and should not be demolished or rezoned for educational use. Likewise it should not be exempt from any council regulations for development on land zoned R2 residential.
2. **Built Heritage.** The SWELL building is of a bulk, form and height that will dominate the street and tower over 39 Bancroft Ave (to its east). It should not be permitted in the proposed form.
3. **Noise.** We note that to achieve acceptable external noise emission levels the Acoustic Consultants to the SWELL have based their projections on the inclusion of an acoustic damping feature not included in the architectural plans.
4. **Tree removal and Landscaping.** The SWELL EIS indicates 26 trees are to be removed across the development site but little effort has been made to provide effective screening on the north and eastern sides of the development.

5. **Hours of Operation.** The SWELL EIS indicates that the hours of operation may be in use anytime from 5:15am to 10:15pm. These hours are unacceptable in an otherwise quiet suburban area and hours of operation for the SWELL Centre should be limited.

Objections

1. Demolition and re-zoning of 37 Bancroft Ave Roseville

The SWELL EIS asserts that 37 Bancroft Ave is "*a federation style dwelling which has undergone unsympathetic alteration. As such it's demolition will not adversely impact the heritage value of the Clanville HCA.*" Obviously, this comment is self-serving and it has to be kept in mind that the house while owned by the school and previous owner has been rented for several years with very little time spent on repairs, maintenance or improvement.

However, this house is of the same design and construction type as the surrounding houses and other than having had the brickwork painted it's hard to see what '*unsympathetic alterations*' have been done. Even though the house has been neglected for some time it should be preserved and allowed to continue making a valuable contribution to the surrounding HCA. The proposed development with its out-of-character commercial / industrial type design would do the opposite.

Importantly 37 Bancroft is zoned R2 Low Density Residential and is subject to at least two conditions that the SWELL contravenes:

a. Ku-Ring-Gai Local Environment Plan 4.3 – Height of Buildings

37 Bancroft Ave has a maximum height of building restriction of 9.5m which the SWELL centre exceeds by 700mm (approx. 7.4%). The EIS argues that this is a minor encroachment but it adds significantly to the detrimental impact of the SWELL building and should not be permitted.

b. Ku-Ring-Gai Local Environment Plan 4.5 – Allowable Floor Space Ratio

The Gross Floor Area permissible on 37 Bancroft Avenue is 396.3 sqm. According to the SWELL EIS the GFA of the SWELL is more than 3x this figure at 1197 sqm. This would not be permitted on any other R2 block and should not be allowed on this site.

Allowing the change of use of 37 Bancroft from residential use to an educational establishment use raises serious concerns for residents of Bancroft Ave, Victoria Ave and anyone whose house borders a school or college with sufficient resources to acquire surrounding properties. Will a re-zoning decision that is favourable to Roseville College be used as a precedent for future expansion both in Roseville and elsewhere?

2. Built Heritage

The proposed building is of a bulk, form and height that will dominate the streetscape and tower over 39 Bancroft Ave (to its east). With an extensive area of "*aluminium framed glazing*" on the facade facing Bancroft Ave and elevated Tennis courts it will introduce a new architectural element

not in sympathy with the low scale heritage dwellings adjacent and opposite. This will have detrimental effects on both the heritage significance of the immediate neighbourhood and on the Roseville conservation area as a whole.

Bancroft Avenue, like most suburban streets, is typically house – gap – house. The SWELL centre spreads across 4 blocks without any breaks or features to soften its impact. Contrary to indications in the EIS it is not well screened in the proposed landscape plans (more below).

3. Noise.

Living diagonally opposite the existing Tennis / Basketball courts we are well aware of the high noise levels when this area is in use for sport and other activities.

With growing student numbers, a 50% increase in the court area and its new elevated position, transmitted sound levels during sports, PE classes and other activities are expected to be considerably higher. We note that to achieve acceptable external noise emission levels the Acoustic Consultants to the SWELL have based their projections on the inclusion of a 3m high solid wall and associated canopy. This wall is not shown on the architect's drawing and if included will compound the bulk, form and scale issue raised in point 2 above.

Noise from the Roseville College is already a significant environmental amenity issue that affects many in the neighbourhood and if the SWELL development is allowed to proceed will only become more intrusive.

4. Tree removal and Landscaping.

The SWELL EIS indicates 26 trees are to be removed across the development site but little effort has been made to provide effective screening on the north and eastern sides of the development. The use of deciduous trees on the north side will do little to screen or help buffer noise from the SWELL building for around half the year. Overall the amount of space allowed for greening the site seems very small.

5. Hours of Operation.

The SWELL proposal includes conflicting information regarding the use and operation of the centre. As mentioned in various sections of the EIS the SWELL may be in use anytime from 5:15am to 10:15pm.

"The (proposed) hours are generally 7am to 6pm Monday to Friday and 7am to 2pm on Saturdays". (SWELL EIS 4.7 Hours of Operation)

The (learn to swim) classes and squads typically operate outside of school hours (5.15am-8.15am and 3.15pm-7.15pm). SWELL EIS 6.8.7.3 Traffic Generation

Staff arriving from 7:00am and staff and student/parents departing by 10:15pm SWELL EIS Appendix 6.8.7.3 Traffic Generation

The school hours of operation should be limited to:

Monday to Friday 7:00am to 5:00pm;

Saturdays 7:30am to 12:30pm;

6. Other Matters.

Construction Hours of Work.

The Construction Traffic Management Plan for this development proposal indicates construction activity will be carried out between:

Monday to Friday 6:30am to 5:30pm;

Saturdays 8:30am to 1:30pm;

This will result in large numbers of vehicles and people arriving even earlier than these times and will create an excessive amount of noise in the very early hours. We suggest construction work should be limited to:

Monday to Friday 7:00am to 5:00pm;

Saturdays 8:30am to 12:30pm;

Lack of Meaningful Consultation with Residents.

We were very disappointed with the school's consultation process and willingness to explore other options for the centre. Suggestions to reduce the mass of the SWELL building by additional excavation and / or deleting building components and increasing the setback of the building from the site's eastern boundary, have been ignored.

In conclusion we urge the Department to reject this proposal in its present form and particularly to ensure that 37 Bancroft Ave Roseville is protected from demolition and re-zoning.

Yours sincerely



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