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Contact: Selwyn Segall

Reference: S12612 / 2019/370679
10 December 2019

Director- Social and Infrastructure Assessments
Planning and Assessment
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam,

Ku-ring-gai Council's submission to State Significant Development SSD9912 - Roseville College - 27-29 and 37 Bancroft Avenue, Roseville - proposed new sport and wellbeing centre (SWELL)

Location

The development site is at 27-29 Bancroft Avenue and 37 Bancroft Avenue, Roseville. Nos 27-19 Bancroft Avenue is the existing Roseville College school campus and No 37 Bancroft Avenue is the recently purchased dwelling house by Roseville College which is proposed to be incorporated into the boundaries of the College as part of the proposed development. Nos 27-29 Bancroft Avenue is zoned 'SP2 infrastructure - Educational Establishment' pursuant to KLEP (Local Centres) 2012. It is surrounded by a heritage conservation area and is opposite a number of heritage items. No.37 Bancroft Avenue is located within the Clanville Conservation Area (C32) in KLEP 2015. The site extends to Victoria Street to the south, with the proposal extending to Recreation Avenue for vehicular access via Nos 27-29 Bancroft Avenue has an approximate area of 19,300sqm and No 37 Bancroft Avenue has an area of 1,321sqm.

Proposal

The proposal is for demolition of the existing sports courts at 27-29 Bancroft Avenue, demolition of the dwelling house and ancillary structures at 37 Bancroft Avenue and tree /vegetation removal. This will then provide the footprint for the proposed construction of a part 2 and part 3 storey sport and wellness centre (SWELL) comprising:

Level 1
Carpark accessed from the existing school basement carpark, 25 metres long by eight lane swimming pool and grandstand, plant rooms, change facilities, amenities and storage which is in a semi-basement area.

Level 2
Carpark accessed directly from recreation Avenue, strength and conditioning area, general learning areas, plant room and on-site detention tank.

Level 3
Rooftop sports court, sports equipment store, food technology space, enclosed veranda and landscaping.

Planning

The proposed box-like structure, with an approximately 60 metres long elevation along Bancroft Avenue and a flat roof form, is out of character with the locality. This is particularly problematic given its location, opposite and surrounding two HCAs and several heritage items. The proposed SWELL development is considerable in scale and is not consistent with the context of established, mainly single and two storey homes, in an established garden setting. It will dominate this part of Bancroft Avenue and is not in keeping with the surrounding dwelling houses which comprise HCA Numbers C32 and C36.

The proposed eastern boundary setback to the neighbouring single residential property (No 39 Bancroft Avenue) of only 513mm is inadequate. This is compounded by the unrelieved wall length of approximately 44 metres at a height of 7 to 9 metres along the entire length of the boundary with No 39 Bancroft Avenue. This is excessive bulk and scale presenting to a single storey dwelling in a HCA which will impact on the visual and acoustic privacy and solar access of No 39 Bancroft Avenue. The proposal is inconsistent with aims, objectives and controls of Council's DCP which are to provide suitable amenity between properties. The 513mm setback is inadequate to provide any suitable screen planting for amenity and for developments to sit within a dominant landscape setting. The proposed eastern setback does not provide sufficient viable deep soil volume for the establishment of suitable and appropriate screen planting (including small trees) for the scale of the development proposed. Noise from the proposed three rooftop courts will adversely affect the surrounding residents, despite the proposed 10 metres covered area between the courts and the side elevation.

The school site, being 27-29 Bancroft Avenue does not have height or floor space ratio development control standards under KLCLEP. However, the part of the development proposed at No 37 Bancroft Avenue breaches the height and floor space ratio development standards of KLEP and therefore impacts on the amenity of the neighbouring property at No 39 Bancroft Avenue. The proposed development has a roof parapet at the south-eastern corner of 9.57 metres which breaches the maximum height of building (HOB) of 9.5m by 700mm. No 37 Bancroft Avenue has a maximum applicable floor space ratio (FSR) of 0.3:1 with a site area of 1,321 sqm, the maximum allowable gross floor area (GFA) permissible on No 37 Bancroft Avenue is 396.3 sqm. The GFA across the three levels of development which are located on 37 Bancroft Avenue have been calculated in accordance with Clause 4.5 of the LEP to be approximately 1,197 sqm. This results in an FSR of approximately 0.9:1. The applicant justifies this increase by stating that Roseville College now owns No 37 Bancroft Avenue and, when it is averaged out over the whole site, the FSR is well below 1:1 at 0.73:1. However, No 37 Bancroft Avenue is zoned 'R2 – low density residential' under KLEP 2015 and is part of the Heritage Conservation Area. The bulk of the proposed SWELL building and the impact on the amenity of No 39 Bancroft Avenue is unacceptable, especially with the

proposed setback of less than one half of a metre between the development and No 39 Bancroft Avenue, which is a single storey dwelling.

The demolition of No 37 Bancroft Avenue, which is identified as a contributory item in HCA No. C32, is not supported. This is further discussed under the heritage section below.

The location of the proposed substation along Bancroft Avenue conflicts with the established streetscape character and reduces available deep soil area within the Bancroft Avenue site frontage for the provision of replenishment tree planting. It would be preferable for the substation to be relocated to the Recreation Avenue site frontage which has a more non-residential character and is located away from the residential properties in the HCAs.

Heritage

Nos 27-29 Bancroft Avenue is not individually listed as a local heritage item but is adjacent to the Lord Street/Bancroft Heritage Conservation Area (C36) and is in the vicinity of several herniate items. No 37 Bancroft Avenue is located within the boundaries of the Clanville Conservation Area (C32) in KLEP2015.The applicant's Heritage Impact Statement (HIS) has not fully justified the demolition of No 37 Bancroft Avenue against the KDCP controls Part 19B. No 37 Bancroft Avenue is identified as a contributory item in the HCA as it retains its original Federation form and detailing.

Although it has painted brickwork this can be reversed. The dwelling at No 37 Bancroft Avneue is part of the HCA which has a high aesthetic significance as a cohesive early twentieth century and interwar development. The proposed demolition of the house and garden will have an adverse impact on the HCA.

The proposal includes the removal of Tree 7, a mature Cerdrus deodar (Himalayan Cedar) located within the HCA in the Bancroft Avenue frontage. The tree has high heritage significance and makes a positive contribution to the established streetscape character and landscape setting of the HCA as a mature original specimen and therefore it should be retained.

The proposed formal landscaping would be incongruent within the established landscape character of the area. It is recommended that the prosed planting be less formally structured. Further, the vertical planting design is inconsistent with the existing landscaping character of the HCA.

The proposed eastern side setback of the development form the adjacent property (No 39 Bancroft Avenue) is insufficient to provide any suitable screen planting and is inconsistent with the landscape character within the HCA. The two storey blank wall of the proposed pool area adjacent to No 39 Bancroft Avenue is quite a dominant element and is not in accordance with Controls Part 19 F.2 of KDCP. The separation between the proposed wall and No 39 Bancroft Avenue should be increased. The wall should have some articulation. The proposed trellis for the blank wall is unlikely to grow in a shallow planter box. More deep soil is needed along the side boundary to provide a sufficient buffer in accordance with the controls in part 19 F.3 of KDCP.

The proposed finishes, including the use of dark face brick and timber, will be recessive and will reference the traditional finishes of the HCA and are therefore acceptable.

Landscaping

Trees

The proposal includes the removal of Tree 7, a mature *Cedrus deodar* (Himalayan Cedar) approximately 18.0m high, with a 12.0m canopy spread, located within the established Bancroft Avenue frontage. The tree is in good health and condition, with terminal spring growth. The tree is identified within the applicant's arborist report as having "*high significance with an 'A' rating – Important trees suitable for retention for more than 10 years and worthy of being a material constraint. The tree has no significant defects and could be retained with minimal remedial care*". Tree 7 contributes positively to the established streetscape character, landscape setting and the HCA.

The value and visual importance of Tree 7 was identified to the applicant in the previous approved Development Application (Tree 7 was retained) and at the preliminary discussions in respect of the current application.

The 1943 aerial photograph within the submitted HIS clearly shows Tree 7 and demonstrates that it predates the existing school campus, being part of the long established landscape setting and streetscape character. This is further reinforced, by the tree's trunk diameter of 810mm, signifying its maturity and therefore increasing the tree's significance and value. The HIS neither mentions nor assesses the removal of Tree 7.

Council's Senior Landscape Assessment Officer concurs with the applicant's arborist which reaffirms Council's position that Tree 7 is worthy of being a material site constraint and should be retained with suitable development setbacks. There is no arboricultural justification for its removal.

Eastern setback

The proposed eastern boundary setback to the neighbouring single residential property of 513mm is inadequate for the provision of suitable screen planting. The proposed eastern setback is inconsistent with the established landscape character within the HCA and does not provide for the enhancement of the landscape setting.

It is recommended that the eastern side setback be significantly increased to allow sufficient area, including unconstrained deep soil volume/area, for the provision of screen planting in scale with the development proposal. It is recommended the screen planting consist of small to medium sized trees and a shrub layer to enhance resident amenity and privacy and to reduce visual bulk by filtering views while maintaining solar amenity.

Landscape design outcomes

No eastern boundary amenity planting is proposed. The proposal includes 'row' planting of Buxus/Japanese Box, a small evergreen hedging shrub that will not grow above fence height which does not provide screening of the development and therefore does not provide visual amenity to the neighbouring single residential property.

There is insufficient soil depth and volume for elevated planters to sustain the proposed plantings. For example, Section 3 indicates a planter depth of 250mm for the proposed

trellis plantings. As per the ADG Part 4P planting on structures as an example the minimum soil standard (Table 5) recommends a minimum soil depth of 500-600mm for shrub planting and 300-450mm for ground covers assuming fortnightly irrigation with increased planter depths to accommodate sub surface drainage.

The landscape design proposes replacement planting of 1000Litres *Cedrus deodar* (Himalayan Cedar) to compensate for the removal of Tree 7. While the species is appropriate, the Bancroft Avenue site frontage depth and the proximity of the proposed planting to the building and retaining structures has not considered the species mature dimensions (as evidenced by Tree 7) and therefore the trees would not be viable in the long term. The planting schedule identifies the species growth potential as up to 20m high x 8.0m wide, Tree 7 has dimensions of 18m high x 12.0m wide. Planting of the replenishment trees requires further consideration. An ideal location within the Bancroft Avenue site frontage would be where the substation is currently proposed.

The proposed row planting of 6 x *Pyrus calleryana* (Callery Pear) is inconsistent with the existing desired landscape character. The proposed structured landscape design outcome is inconsistent with the established landscape character. It is recommended the proposed planting be reconfigured to increase tree species variety and to be less formally structured.

The landscape design and architectural design outcomes rely on vertical plantings. Vertical planting design outcomes are inconsistent with the existing or desired landscape character, particularly within the HCA.

Water management

The Roseville College SWELL Centre site ("the subject site") consists of a re-development of two lots, being:

- The existing on-grade sports courts within the Roseville College site (No. 27-29 Bancroft Avenue); and
- Consolidation of the neighbouring residential lot at No. 37 Bancroft Avenue.

The subject site occupies a total calculated "area of works" of 3,893m2.

The existing site is relatively flat, with the on-grade sports courts incorporating a slight fall towards Bancroft Avenue to the north, and the remaining grassed area to the south of the sports courts falling towards Recreation Avenue to the south.

Stormwater runoff from all pervious and impervious surfaces within the proposed development will be collected by an in-ground pit and gravity pipe system.

Roof water runoff from non-trafficable roof areas over the Level 3 General Learning areas and covered Spectator areas will be collected by eaves gutters and downpipes to drain into a 20m3 rainwater storage tank.

Roof water runoff from trafficable roof areas such as the tennis courts and uncovered walkways will be collected by rainwater outlets and grated drains to discharge into the

OSD system. Roof water from trafficable roof areas will bypass the rainwater tank due to the high level of contaminants that will be collected compared to non-trafficable roofs.

Stormwater disposal for attenuated OSD runoff from the SWELL Centre building footprint will be by gravity connection to an existing private stormwater pit within Recreation Avenue, which accepts flows from other areas of Roseville College. This private stormwater pit within Recreation Avenue drains to the existing Council system within Recreation Avenue, before draining to an existing Council stormwater channel. Sydney water has confirmed that the connection point in Recreation Avenue is to Council's infrastructure.

The proposed OSD system will consist of a storage tank within the SWELL Centre building envelope, located above the Level 2 floor slab.

A rainwater storage tank volume of $20m^3$ will be incorporated into the design, which will be located adjacent to the OSD tank and within the building envelope of Level 2. This rainwater tank will be provided for rainwater collection from non-trafficable roof areas (924m2 area) for reuse in toilets and irrigation.

There will be a 74% reduction in rainfall runoff days in the post development case, satisfying Council's requirement in Part 24C.3 of the Ku-ring-gai Local Centres DCP, which requires rainwater retention and re-use to be provided to achieve a 50% reduction in runoff days.

OceanGuard pit inserts by Ocean Protect will be provided to all in-ground stormwater pits, to provide primary treatment of surface runoff.

A secondary filtration chamber will be provided downstream of the OSD tank to house 14x 690mm head-loss PSORB filtration cartridges by Ocean Protect. The filter cartridges will treat all runoff from the building footprint, existing hardstand areas along Recreation Avenue and landscaped areas draining to Recreation Avenue. The landscaped area draining to Bancroft Avenue will bypass the filter cartridges and will only be treated by OceanGuard primary treatment.

The above treatment train configuration satisfies Ku-ring-gai DCP requirements.

The OSD design has been checked as follows. A completed OSD calculation sheet has been submitted. OSD has been designed with 100% of proposed built upon area. Required volume is $95.41m^3$. In accordance with *Ku-ring-gai DCP Part 24C.5 – Control 6(iii)*, an offset has been applied to the SSR for the proposed 20m3 rainwater tank. A maximum reduction of 10% of the SSR, being 9.54m3, has been applied to the SSR. The resultant required SSR will be 85.87m3.

An orifice plate has been designed with a 106mm hole to achieve the above PSD.

In the event of OSD tank overflow, surcharge will occur through the 900x900 grated opening, located within the courtyard external to the building envelope. Site grading will direct overflows safely away from the building entries and to the existing overland flow path along the driveway to Bancroft Avenue.

The pipe from the OSD/OSR system is discharged via a 300mm diameter pipe to Council's existing stormwater network in Recreation Reserve.

Vehicular access and parking

The College benefits from two road frontages, comprising Victoria Street and Bancroft Avenue. Vehicular access to the basement car park is currently only available via two driveways off Recreation Avenue. There is another driveway off Bancroft Avenue which is only used by emergency vehicles and garbage trucks.

The current parking provision within the College comprises 127 car parking spaces (including six disabled parking spaces, two parking spaces for College's minibuses and one loading bay. The parking spaces are provided for staff and Year 12 students and are located across multiple basement car parks and at-grade car parks, with access via Bancroft Avenue, Recreation Street and Victoria Street. There are currently no parking spaces or pick-up/drop-off areas for parents within the College.

An online questionnaire was prepared for the staff and distributed by the College which revealed that 92% of staff travelled to and from the College by car.

The development application proposes 56 car spaces across the ground and basement levels of the new car park. The increase in staff parking demand will be accommodated within the new car park.

DA0261/16 issued by Ku-ring-gai Council on 12 April 2017 allowed a progressive increase in the student population to 1250 students, with 152 staff by 2030. It is estimated that there will be 145 Year-12 students. The car parking requirement catering for 2030 is therefore:

- 152 x 1 =152 staff spaces
- 145 x 0.125 = 18 student spaces for Year 12 students
- A total of 170 spaces being required

It is also noted that there is a loss of one disabled space since the development building outline currently includes one parking space.
Therefore, the proposed parking provision of 127+56-1=182 spaces complies with the school parking requirements in 2030 as provided for in Council's DCP.

The proposal provides two accessible spaces in the new car park, increasing the total number of accessible parking to 7 spaces, which complies with the DCP.

The basement level and the ground level car parks are not inter-connected. Access to the basement level car park is via the existing staff car park off Recreation Avenue; while a new driveway is proposed on Recreation Avenue to the ground level car park.
The new basement level ramp to the existing staff car park has a width of 3.4m between kerbs and 28 car spaces (less than 30 car movements in peak hours) which satisfies the minimum 3.0m width of one-way ramp requirement as per AS2890.1 Section 3.2.2.

The car park access and parking arrangements of the basement car park have been assessed against the requirements of AS2890.1:2004, with reference to Class 2 (sporting) facilities.

The submitted SIDRA analysis demonstrates that the net traffic impact at the four analysed intersection is minor. By 2030, all the intersections will likely continue to operate at Level of Service A, with significant spare capacity to accommodate additional traffic activity. The average vehicular delay and queuing will also be reasonable without affecting the non-development traffic.

Waste collection

A private contractor is used for the collection of wastes and recyclables. This is a five times per week service for general waste and commingled recycling. However, additional services can be arranged as required.
The 6.0 m3 skip bin is serviced approximately once per month.
Access for Council's waste collection vehicle is not required.

Construction management

A separate indicative construction management plan has been submitted.

The proposed development of the site will involve demolition, shoring, earthworks, excavation and construction, to which the CTMP relates.

Major concrete pours and crane/plant erection and dismantling will only take place during school holiday periods. Fixed cranes, excavation plants, as well as piling plants, will enter the site after hours via Bancroft Avenue, with appropriate traffic control.

During the demolition, shoring and excavation phases, the construction vehicles will access the site via Recreation Avenue and exit onto Bancroft Avenue in a one-way arrangement. As loading and unloading will occur within the site at these stages, a Works Zone is not required.

During the construction stage, a Works Zone will be required on Bancroft Avenue for delivery trucks and concrete trucks. Unloading of materials and excavation plants will occur within the Works Zone.

Construction vehicles will not access the site via Recreation Avenue at this stage.
Gate controllers will be utilised to safely manage access and egress from the site at all times.

Impacts on Council infrastructure

There will be minimal impact on Council's existing infrastructure. The proposed on site stormwater management will be connected to the existing Council stormwater pit in Recreation Reserve. Access will be via the existing vehicular crossings.

Geotechnical Investigation

Excavation to depths of 6 m to 8 m is anticipated for the car park, building basement levels, and swimming pool.
This investigation included the drilling of boreholes, installation of groundwater wells and laboratory testing.

The current field work for this investigation included:

- Inspection of the site by an experienced geotechnical engineer;
- Drilling of six boreholes within the area of the proposed SWELL Centre.
- Drilling of two hand-augured boreholes along the eastern side of Recreational Avenue.
- Standard penetrometer tests (SPTs) and dynamic cone penetrometer (DCP) tests were undertaken within the boreholes and at location 409 to assess the soil strength;
- Co-ordination of field work, logging of the soil/rock profile, and photographing and Point Load Strength Index (Is50) testing on selected samples of the rock core by a geotechnical engineer.

The subsurface conditions encountered in current boreholes within the area of the proposed Recreation Avenue widening can be summarised as:

- Pavement – A concrete kerb to 0.15 m underlain by road base gravel to 0.3 m depth in BH407;
- Filling – sandy silt (topsoil) filling then clayey filling to 0.6 m in BH408, located behind the existing retaining wall;
- Natural Soil – firm/stiff to very stiff clay to depths of 1.4 m and 1.6 m, at which depth the boreholes were discontinued due to hand-auger refusal on ironstone bands.

No free groundwater was observed within the borehole depths whilst drilling.

Following purging of drilling fluid, groundwater was measured on 16 July 2019 within groundwater monitoring wells in BH401 and BH406 at approximate depths of 3.8 m (RL 78.3 m) and 3.3 m (RL 83.1 m), respectively.

During construction and in the long term, it is anticipated that seepage into the excavation could be controlled by perimeter and subfloor drainage connected to a sump-and-pump system. On this basis, a drained basement may be considered for this site.

Dilapidation (building condition) reports should be undertaken on surrounding properties that may be affected by excavation prior to commencing work on the site to document any existing defects so that any claims for damage, due to construction related activities, can be accurately assessed.

Conclusions and recommendation

1. The bulk and scale of the proposed large SWELL development within a Heritage Conservation Area is excessive and totally out of scale with the existing streetscape, clearly not conforming to the existing character of the area.

2. The demolition of 37 Bancroft Avenue, identified as contributory in the boundaries of Clanville Conservation Area (C32) in KLEP 2015, is not supported on heritage grounds.

3. The proposed SWELL development breaches the maximum height of building (HOB) development standard of KLEP by 700mm at the south-eastern corner of 37 Bancroft Avenue.

4. The proposed SWELL development has a Floor Space Ratio (FSR) development standard of KLEP of 0.9:1 which is well in excess of the maximum FSR permitted of 0.3:1.

5. The eastern side setback of 513mm is inadequate to provide sufficient separation, including deep soil, to permit planting of vegetative screen to the immediate neighbour at 39 Bancroft Avenue.

6. The location of the proposed substation within the Bancroft Avenue frontage is uncharacteristic of the established streetscape character and reduces the available unrestricted deep soil landscape area within the Bancroft Avenue site frontage for the provision of replenishment tree planting.

7. The mature Tree No. 7 (Himalayan cedar) on Bancroft Avenue is significant from a streetscape, landscape and heritage perspective and should not be removed.

For the above reasons, it is recommended that development consent to Development Application SSD9912 be refused.

Please contact Selwyn Segall, Team Leader Development Assessment (Team South) on 9424-0000 during business hours if you require any further information or clarification.

Yours faithfully

Shaun Garland
Manager Development Assessment Services