

Clovelly Public School Parents & Citizens Association Inc

ABN 20 090 594 877
1 Arden Street
Waverley NSW 2024
Tel: 9665 6710



Attention:

Mr Tony Reed,
General Manager,
Waverley Council, PO Box 9, Bondi Junction 1355

Objection to Bronte RSL, 113 Macpherson St, DA-72/2013.

From: The Parents & Citizens Association of Clovelly Public School,
1 Arden Street, Clovelly, NSW 2031

Date: April 11, 2013

Dear Mr. Reed,

We, the Parents and Citizens Association of Clovelly Public School, Arden Street, Clovelly, represent the families of the 531 students attending our school. We strongly object to the above mentioned DA for redevelopment of the Bronte RSL site, 113 Macpherson St, Bronte.

We echo overwhelming public concern regarding school pedestrian safety and regarding increased traffic that would be caused by a development of this nature and scale. We also object as the DA contravenes planning laws quite extensively.

DA contravenes B1 Zoning.

1. The zoning of the above site is that of 'B1: Neighbourhood Centre'. The objectives of this zoning, according to the Waverley Environment Plan 2012 (LEP) are:

- *To provide a range of small-scale retail, business and community uses that serve the needs of people who live or work in the surrounding neighbourhood.*
- *To ensure that non-residential uses do not result in adverse impacts on the amenity of existing and future residential premises.*

2. Zoning for 'Neighbourhood Centre' carries an 80m²

neighbourhood shop size. The 'Fresh Food Supermarket' component of this DA is more than ten times the permitted size.

DA breaches Council Height, Floor Space Ratio, Length, Depth, and Building Separation Restrictions.

- The proposed building is 7.5metres higher than the permitted maximum height of 13metres.
- The proposed building carries a floor space ratio more than double that of the maximum permitted 1:1 floor space ratio.
- The residential component of the proposed building is 14metres longer than the permitted maximum length of 24metres.
- The residential component of the proposed building is 19metres deeper than the permitted maximum depth of 18metres.
- The residential component of the proposed building does not comply with the 18metre building separation control from neighbours ` habitable rooms and balconies.

In addition to the many points where the DA contravenes planning laws, our grave concern is that of safety and amenity to our students, parents and staff.

We refer back to our last submission to Mr. Peter Monks, and Mayor Sally Betts on 12 December 2012. In that submission we asked that Council conduct an independent Traffic Impact Assessment (TIA) around Clovelly School. In addition to an increase in general traffic, the above DA calls for the frequent delivery trucks required to feed the oversized 'Fresh Food Supermarket' to access the site via a large commercial loading dock on Chesterfield Lane. Thus increasing traffic directly beside Clovelly Public School.

We note with considerable disappointment, and some confusion; that Council vetoed its own recommendations of a TIA around Clovelly School, on the same date. Tragically, also on that same date, a Kindergarten student was knocked down and killed outside his Sydney school.

<http://www.smh.com.au/nsw/kevins-tragedy-boy-hit-by-car-just-loved-school-20121212-2ba2v.html>

Once more we request that an Independent Traffic Impact Assessment be undertaken around Clovelly Public School; and that no large-scale, high-rise and high-traffic development be allowed in such close proximity to Clovelly Public School.

We note that Council published a *Traffic and Parking Peer Review pertaining to the Bronte RSL Redevelopment* on its website, Nov 2012. (Ref: 13S1083000). We note this Review is based on a [Varga] Traffic and Parking Study funded and provided by Winston Langley Burlington Property Developers (Sep 2012); and referencing the *Bronte RSL Redevelopment Impact Assessment* document, also funded and provided by Winston Langley Burlington Property Developers (August 2012).

We request that Council conduct an independent Traffic Impact Assessment pertaining to the proposed Bronte RSL site redevelopment. We note that Council has identified many inaccuracies and vital omissions in the Traffic and Parking Study funded and provided by WLB Property Developers.

Omissions and misrepresentations included in WLB-funded 'Varga' Traffic and Parking study include inaccurate estimations of: Traffic Generation; Traffic Distribution; RSL Traffic; and Seasonality of Traffic Flows; Traffic Impacts; Contribution; Site Access; Loading Dock Locations and Access; Loading Dock Capacity; Truck maneuvers; Truck Vertical Clearance; Parking Provision; Pedestrian Facilities; and Traffic Impact Assessment Re Macpherson Street/St Thomas Street, Arden Street/Chesterfield Parade and Chesterfield Parade/St Thomas Street Intersections. Council notes all of the above points.

We voice our concern specifically about the inaccuracy of the WLB-funded 'Varga' 'Schedule of Traffic Surveys'. Council note: "The surveys did not cover the peak drop-off/pick up periods of the nearby Primary School and pre-school Child Care Centre."

We also share Council's concern re the WLB-funded 'Varga' Traffic Report's lack of "an assessment of traffic impacts of other access intersections to the site, including Macpherson Street/St Thomas Street, Arden Street/Chesterfield Parade, Chesterfield Parade/St Thomas Street intersections."

No official reporting (independent or funded by WLB Developers) has been carried out on current parking and traffic levels around Clovelly Public School, or indeed Bronte Childcare Centre, during school hours. The above report surveyed local traffic, only when the school was closed.

We feel an independent Traffic Impact Assessment is vital to address the current dangerous traffic conditions around Arden Street / Chesterfield Parade / Chesterfield Lane / St Thomas Street. Such a report is also a clear necessity to accurately inform the community of the dangers of increasing traffic, and decreasing parking on streets surrounding this well-attended public school.

Of primary concern to the Parents and Citizens Association of Clovelly Public School, is the considerable and grave health and safety concerns for the Clovelly Public School community, should the current DA be approved. Our P&C represents the families of 531 children. Many of these children also attend the Clovelly 1st Scout Hall for extra-curricular activities.

Clovelly P+C's Primary Objections to DA-72/2013

1. TRAFFIC - SAFETY CONCERNS TO CLOVELLY SCHOOL STUDENTS

Current traffic levels on Chesterfield Parade, the tight blind corner of Arden Street and Chesterfield Parade and the Chesterfield Parade/St Thomas Street/Trafalgar Street junctions, present considerable dangers to Clovelly School pedestrians.

At the Save Bronte Public Rally 8/12/12, a Clovelly Public School staff member noted that school office staff receive weekly reports (sometimes daily reports) of near misses - children almost getting knocked down by traffic on Chesterfield Parade and the above junctions.

The proposed high-traffic, high-rise development and the close vicinity of these streets would severely increase danger to our students attending and leaving school premises. In our opinion, an increased risk of school pedestrian fatalities would follow.

Developers WBL informed the community its proposed development would target a 30,000-person catchment area (*The Beast* November 2012 pg32). The projected \$15million annual turnover that it is estimated is required to keep the mall profitable, would mean up to 200-300 transactions per hour leading to a significant increase in traffic around the above streets, 7am to 9pm, seven days a week.

Drivers already speed around schools. 78,015 speeding fines were recorded with clearly signed fixed speed cameras in school zones, NSW, last financial year. Drivers text/take phone calls while driving. Drivers looking for parking spots, do not concentrate strongly enough on the road. Visibility of small children is severely limited in large delivery trucks, and 4WDs - a common vehicle in this area.

Increased traffic on these already dangerous roads would increase the risk of student pedestrian accidents and fatalities.

A large 'fresh food supermarket', as proposed in this D.A. would require frequent fresh produce deliveries, via large trucks. Large trucks on these dangerous bends will increase the risk of school pedestrian accidents and fatalities.

Children are not 'traffic smart' until 10 years of age (Child Accident Prevention Foundation of Australia). With the above conditions, even 'traffic smart' children aged 10+ and adults would be in danger.

2. TRAFFIC - VIRTUALLY NO PARKING AROUND CLOVELLY SCHOOL - REDUCED ACCESS TO LOCAL FACILITIES, INCLUDING BRONTE BEACH.

Currently parking at school drop-off and pickup times is at a premium, and difficult to find. In addition to the estimated parking overflow of proposed 200-300 customer transactions per hour, staff parking in surrounding streets from the proposed shopping mall and high-rise development would leave virtually no parking opportunities for school staff and parents.

Parents and staff would need to park further away, increasing pedestrian traffic in the pathway of increased road traffic. Parents would need to search harder for a drastically reduced pool of parking spaces, further increasing danger to pedestrian traffic.

The infrastructure of the above streets could not support substantially increased traffic. Bronte and Bronte Beach are on a peninsula and the two-lane Macpherson Street is the main artery. Traffic gridlock from the proposed development would severely increase traffic back to all local streets feeding to Macpherson Street, the peninsula and Bronte beach.

Local public transport would be substantially slowed by above traffic, especially during peak hours.

3. AIR POLLUTION

Health effects of short-term and long-term exposure to air pollution.

Source: WHO, 2006. Air Quality Guidelines: Global Update 2005.
http://www.who.int/phe/health_topics/outdoorair_aqg/en/

There is robust scientific evidence indicating the following effects from exposure to short-term air pollution:

- Increased use of respiratory medications (e.g. asthma puffers)
- Increased symptoms such as wheezing, coughing, phlegm production, respiratory infections
- School absenteeism
- Respiratory and cardiovascular hospital admissions and emergency department visits

Young children are more susceptible to the effects of air pollution than healthy adults. This is due to the fact that they have a higher intake of air pollutants per unit of body weight, their lungs are still growing, and they spend more time outdoors than adults (School playgrounds border Chesterfield Parade/Chesterfield Lane Junction).

Long-term exposure (e.g. 7 years spent at primary school) to high levels of air pollution including diesel truck emissions could damage the growing lungs of young children.

In addition, the group most likely to be affected from air

pollution in our school is children and staff with asthma or other respiratory conditions. The increase in air pollution caused by frequent delivery trucks and increased car traffic has the potential to worsen asthma and other respiratory symptoms of these more susceptible groups.

4. NOISE POLLUTION

Clovelly School's library building, which also houses classrooms, does not have air conditioning. Windows need to be opened in warm weather. Students and teachers would be affected by noise (and air) pollution.

In addition to the many breaches of planning restrictions contained in the DA, we repeat our grave concerns about traffic safety. We object to the increased risk of school pedestrian injury and fatality emanating from the levels of traffic accompanying the proposed development outlined in DA-72/2013. The close vicinity of our school, coupled with the dangerous road intersections involved, we feel makes this proposed development untenable.

We welcome an appropriately sized development of the above site that adheres to Council's Neighborhood Centre Zoning controls. We additionally stress our deep concerns that no Council ruling on DA-72/2013 be made without publishing an independent Traffic Impact Assessment report and allowing sufficient time for public consumption of the report.

Yours Sincerely,

Jane Lea
President

Clovelly Parents and Citizens Association