

From: [REDACTED]
Sent: Sun, 28 Aug 2022 10:49:50 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: Application No :DA22/0460 File No D/2022/0460

For the attention of Councillors at Wagga Wagga.

I am writing in reference to the above DA, [REDACTED] I can't see how this development is appropriate for the street on so many levels.

There is already a very busy primary school in the street and in very close proximity to the proposed development. The traffic congestion and subsequent danger to so many young children is in my mind a catastrophe waiting to happen. Drop off and pick up times would be extremely hazardous particularly with buses , and parents cars and inadequate parking and or drop off zones not being appropriate for such a development in a mainly residential street. The intersection and access to Urana street is already difficult and hazardous to navigate with the pedestrian island on Urana street being barely viable now without an increase in foot traffic.

I trust that as the elected representatives of Wagga you would look closely at this matter and give it due diligence as I believe the risk far outweighs the benefit.

[REDACTED]

Sent from my iPad

Wagga Wagga City Council

Robyn Bradley

DA22/0460

PO Box 20

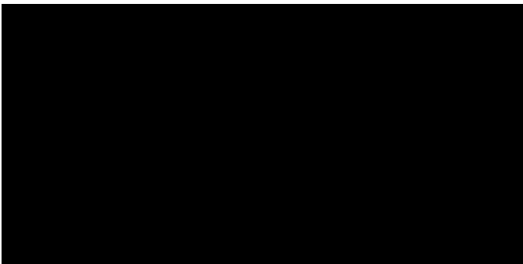
Wagga Wagga NSW 2650

29TH August 2022

I received a letter about a child care centre in Halloran Street.

It would appear that the centre will be that high it will take away [REDACTED] I'm
not against child care but [REDACTED]

Regards,



From: [REDACTED]
Sent: Mon, 5 Sep 2022 20:11:09 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: DA22/0460

The General Manager,

Dear Sir

I am responding to the Notice of Development Proposal for 32 Halloran St. DA22/0460

I cannot understand the idea of building a two story child care centre in this street! With a school across the road with buses dropping children at school, parents dropping children at school and day care the street will be a nightmare for residents or anyone trying to access the street - for deliveries. Most of the day there are cars parked outside the houses which restrict the free flow of the street under normal circumstances.

A 2 storey building would affect the "look" of the street. All of the homes are of a certain style and the street ambiance would be affected.

As well Wagga does not have sufficient rental properties and now there is a plan to knock down 2 residences. Where are the families who currently live in these houses expected to move to? ... more residents for Wilks Park? We need many more houses - not demolishing those we have!

This is not an appropriate development for this street!

Sincerely

[REDACTED]

30th August 2022



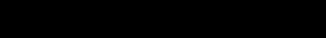
Wagga Wagga City Council

PO Boc 20

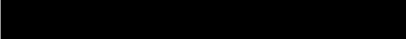
Wagga Wagga NSW 2650

Attention: Robyn Bradley

DA22/0460

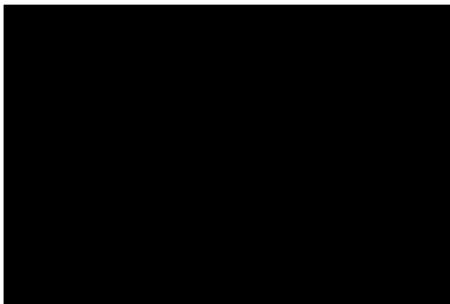
 Wagga strongly disagree with the proposal of the 2-storey building application of a Child Care Centre in Halloran St Wagga!

What a traffic jam that would cause with the primary school across the road.

 as it stands now it's bedlam and you want to add to this!

I say NO to this proposal.

Thank you



30TH August 2022



Wagga Wagga City Council

PO Box 20

Wagga Wagga NSW 2650

Robyn Bradley

DA22/0460

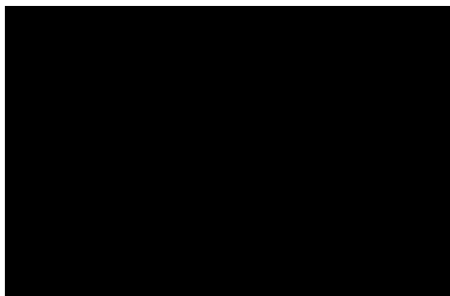
I have been told that a child care centre is to be built



noise from this thing.

What about the

I don't want my privacy taken away.



City of Wagga Wagga
Council of the City of Wagga Wagga
PO Box 20 Wagga Wagga NSW 2650

Attention: Robyn Bradley

27th August 2022

To Whom it May Concern,

We are writing to oppose the following mentioned development: *Two Storey Childcare Centre (46 Places), demolition of existing structures, carparking areas, fencing and retaining walls (Application No: DA22/0460 File No: D/2022/0460) at 32 Halloran St TURVEY PARK NSW 2650, Lot 29 Sec B DP 37333.*

[REDACTED] to the proposed development, we have multiple concerns as listed below.

A) The double story modern structure does not fit in with the style of the buildings in the area. The majority of the residence and buildings in the area were built around the 1950's and are single story double brick structures fitting to the period. As homeowners we are not permitted to add a carpark to the front of our driveway as it does not comply to the look of the era that our home was built. Given this reasoning, the proposed childcare is in no way inline with the neighbourhood aesthetic.

B) There are already issues with the traffic in Halloran St and surrounds. There is very little parking in the area and this already presents problems when Turvey Park Primary School have events such as fetes, assemblies, school performances etc. Even during school pick-up and drop off there are bottlenecks in the streets surrounding the school. Buses and cars often have to line Halloran and Blamey Streets. Getting into Urana St from Halloran or Dalton street is already near impossible due to congestion from the traffic coming from Turvey Park Primary School, Henschke Primary School, Wagga High School and Kildare College.

Residents of Halloran St often have their driveways blocked as it is, let alone without more traffic being directed to the area. The proposal has only allowed for 6 staff carparks with 12 staff. This will impact the already insufficient street parking in the area. This also increases the already high risk to pedestrians in the vicinity especially that of small children who have very little road and safety awareness.

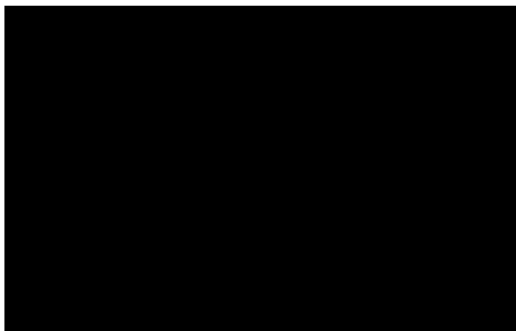
C) The decrease in the value of surrounding properties. If the proposed development is to be approved, homeowners will see a decrease in the value of their properties.

D) There is already 6 childcare centres in the Turvey Park area with another one approved to be built in Coleman St making 7. Another centre is not required in this area.

E) With the proposal of a two story building with open play area on the 1st story, there is a significant impact on surrounding properties privacy both visually and noise wise. Having an open play area with glass screening at a height from which the staff and children can look into the surrounding residence is less than adequate. On top of this you have the noise from the air-conditioning and heating units, the increased traffic and that of the staff/clients of the centre. Plus there is the intrusion of security lighting at night time.

We, along with others in the neighbourhood, strongly oppose this development. We sincerely hope that you take on board our concerns.

Regards,








To – Wagga City Council

Attn – Robyn Bradley

Re – Application No: D/2022/0460

Hi Robyn,

We are writing to object the above proposal @ 32 Halloran St Turvey Park. We see the increase of even more traffic in the already busy street would become even more of a Hazard, 

 but it is already nearly impossible to access  driveway in the Peak Periods of the day being School drop off and pick up hours and the proposal of a Day care centre would add even more congestion. The Number of Buses and Cars that are in the street at these times is already too much and a safety issue. The actual driveway of the proposal is straight across the road from the school entrance and bus zone so logistically it just makes no sense to house a commercial business at this location. The school has extra events which impact the street dramatically, excursions, sporting and sporting carnivals, which have multiple bus pick up and drop offs. Book week, Naidoc week, easter parade, formals etc. These all attract way more cars than Halloran and surrounding streets can handle. The parking area at the development is inadequate with minimal with minimal room given for people to enter and exit, with the allotted spaces so narrow only a professional driver could access them. The unusable car park would than spill out onto the already crowded street. It should be mentioned that not only is the street busy, but the car parking is dramatically less on days of garbage collection and the demand is increased on days of wet weather.

The proposed development looks nothing like anything in the immediate area. This is an area of 50's built homes. The set back on the site is not in keeping with the streetscape. The school is a two-storey building but is stand alone on half a street block. Where houses adjoin the school buildings it is only one storey. I can't imagine how this building will impact the privacy of the surrounding neighbours and I hate to think that such a development might create a precedent for more two storey developments in the area.

Turvey Park is a sort after area for people to buy and this would add no value to the properties in ours or the streets around it. There are already more than enough Schools and Childcare facilities in our suburb and with another new one to be built in Coleman Street being only a minimal distance from Halloran Street which should service the needs in our immediate area.

Regards,



From: [REDACTED]
Sent: Fri, 26 Aug 2022 15:36:57 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: DA22/0460 32 Halloran St, Turvey Park

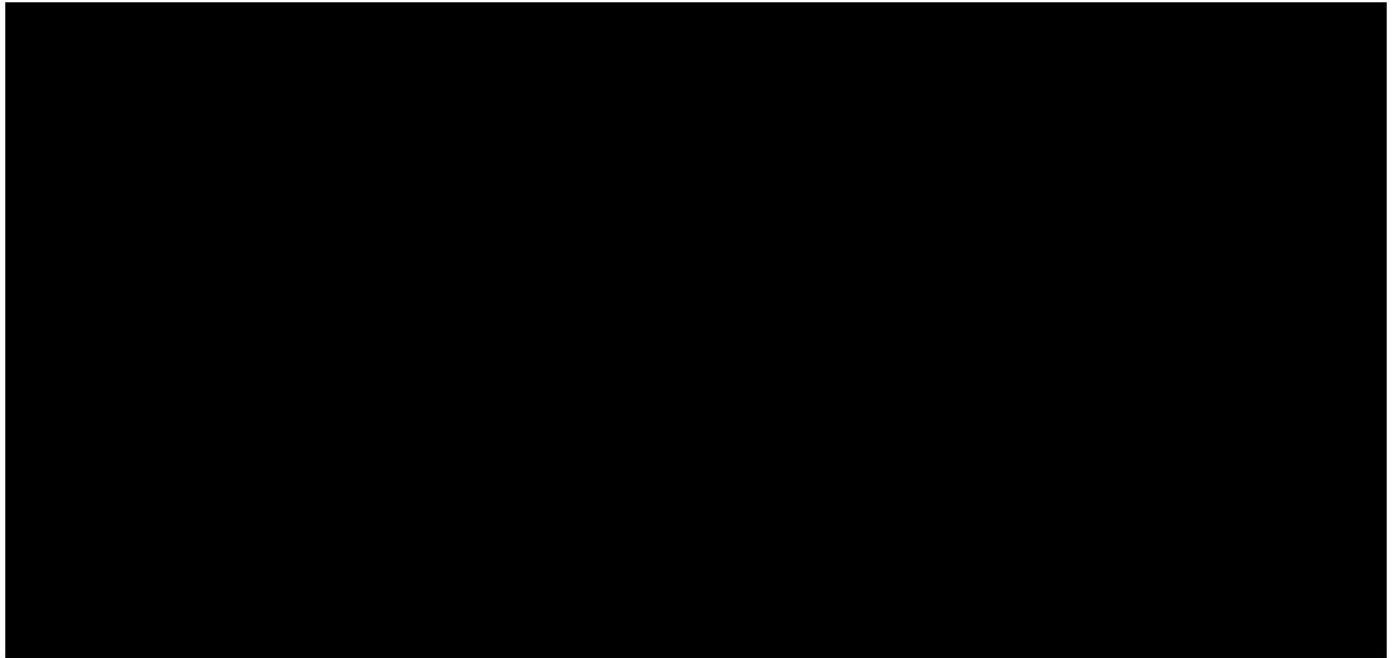
Dear Sir/Madam

Re : Development on Exhibition – DA22/0460 – 32 Halloran St, Turvey Park

Traffic Congestion & Potential Accidents

We wish to note that Halloran St is a very narrow street and that Halloran St & Blamey St are usually very congested & busy at times that our buses travel through that area in the morning & afternoon. There have been occasions of near misses due to the amount of traffic.

This should be considered as extra traffic in this area may lead to further issues.



From: [REDACTED]
Sent: Tue, 30 Aug 2022 13:30:33 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: Re Application No. DA22/0460



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Attention: Robyn Bradley

We would like to submit some ideas about , and objections to , the proposed construction of a childcare centre in Halloran Street , Turvey Park .

As [REDACTED]

[REDACTED] we have already noted and commented on how busy and congested the streets around Turvey Park Primary School are. The increase in traffic, both pedestrian and vehicular, due to a commercial business being established in a residential neighbourhood does not seem practical or safe .

It is already chaotic and quite dangerous when school functions occur and this can be very regular with buses for school excursions and sporting events as well as occasions like Book Week , Special Assemblies , Fetes , Easter Parades and such .

Finding enough parking close to the school [REDACTED] is already very difficult , especially on wet days . The streets are very narrow for parking and traversing at any time , but when school buses travel along Blamey and Halloran Streets , even more congestion is caused . We consider the safety of the children from the area should be a major priority for Council.

There are already a number of childcare centres and preschools that exist in the area and we would consider that there would be more appropriate and safer sites for such a business to be placed .

Thanking you for your time and consideration,

[REDACTED]
[Get Outlook for iOS](#)

From: [REDACTED]
Sent: Sat, 20 Aug 2022 16:31:00 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: Application No:DA22/0460 File D/20220460 Contact Robyn Bradley.



This message needs your attention

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Dear Robyn Bradley,

I'm writing to you regarding an application for development of a two story childcare centre (46 places) at 32 Halloran street Turvey Park. [REDACTED]

I have not made any political donations of more than \$1,000 in the past two years.

I object strongly to the application for several reasons..

Firstly the increased flow of traffic generated from 6.30am until 6.30pm Monday - Friday ,in a narrow street especially during school zones..

2nd car parking demands will impact Halloran street, not only are there twelve child care staff, this includes 46 parents and childrencleaning ,cooking ,catering and waste management staff ,just to mention a few ...

3rd the site doesn't appear to be large enough to accommodate a two storey level building of this size and privacy concerns for the adjoining neighbours.

I have noticed another child care centre proposal development in Coleman street Turvey Park, which I feel is a much safer location for young children....

Regards

[REDACTED]
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From: [REDACTED]
Sent: Thu, 25 Aug 2022 19:20:02 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: ATTENTION: Robyn Bradley re DA22/0460

Good afternoon, Robyn

I would like to comment on the proposed two storey childcare centre proposed for 32 Halloran Street.

Upon looking at the application, submitted plans and information regarding the proposed development, I would like to voice my concerns and objection regarding the proposal. My objection is regarding the danger to students and their families due to the construction machines required for the site development and the increase in traffic congestion and volume of cars in Halloran Street that will occur once the centre is operational.

- The demolition and construction phase of this process will take a considerable amount of time and involve heavy machinery (cranes, excavators, cement trucks, front end loaders, trucks) as well as construction deliveries and tradespeople with their trucks, vans, cars and trailers. The impact on the traffic flow will be significant for a considerable time.
- Halloran Street is a narrow Street with parking on both sides of the street and a large bus zone area in front of TPPS. At school drop off time (8:55- 9:30 AM) parking is difficult, traffic is high and with residents parking on the street, parent's and carer's cars parked for short times, TPPS staff trying to park in the school car parks and buses and cars coming through, the street is very congested and the traffic does not flow smoothly. Students are trying to get across the road, buses are having to pull over to let cars through, cars wait behind buses unloading or try to duck around them, unsighted, on the wrong side of the road. We do not have a school staff member out the front to assist students cross the road.
- Halloran Street traffic is far worse in the afternoon. Carers start parking around TPPS from 3 PM to find a park to collect their child. From 3:20 PM until 4 PM, 15 buses use Halloran and Blamey street bus zones; 8 of these buses come directly down Halloran Street and 6 of them come in the first 15 minutes. This is a dangerous and chaotic time for students to be leaving the school. There is one bus duty teacher. Students are trying to cross Halloran Street, Blamey Street and access Bluett Crescent. For 35 minutes, the chaos and danger for students and their families trying to leave the school is extremely high. The same traffic problems occur but at an increased level. Students are trying to get across the road, buses are having to pull over to let cars through, cars wait behind buses unloading or try to duck around them, unsighted, on the wrong side of the road. The bus duty teacher often has to support students across the road at the '4-way' intersection of Halloran St, Blamey St and Bluett Cres.

- This unsafe situation and the congestion are a typical daily occurrence during school term. have had parked cars hit, residents' cars hit, near accidents where students have almost been hit, parking on nature strips, parents and carers blocking driveways and the staff car park, parents and carers parking in residents' driveways and many near collisions at '4-ways'. high local enrolment, many families, and students on their own, who walk home. For them, crossing Halloran Street and Blamey Street is hazardous at drop off time, but highly dangerous at home time. any school or pedestrian crossings, pedestrian refuge islands or Halloran Street bus bays.
- If this development application is successful, there will be an extra 46 children being dropped off and then picked up in our street, waiting to go in and out of a single lane entry/exit to the childcare centre; directly opposite our bus zone. That is potentially 46 extra vehicles in Halloran Street that may be wanting to access their centre via Halloran Street at the same time we already have significant congestion.
- Whilst the DA for the childcare centre mentions providing 12 car spaces there will be approximately ten staff who will probably not to park in the centre carpark or arrive when there are no car parks left. This would mean that they park on the street and there would be increased competition for and fewer places for TPPS staff and parents/carers to park in. I am also concerned that staff and parents/carers from the childcare centre may park in school car park which is easily accessible from Halloran Street.

I have read the traffic report and analysis that was in the DA and the parking the document refers to as being adequate, is in the surrounding streets which I don't believe adults will park when they are dropping off their children at TPPS or the childcare centre. If they did, assuming there was no room in Halloran Street, the traffic congestion that is currently occurring in Mair Streets, Bluett Cres, Blamey Street, Dalton Street and Halloran Street will make crossing the road, line of sight along roads and the potential for traffic accidents and injuring of pedestrians, more likely.

Thank you for the opportunity to submit an objection to the DA. I sincerely hope that WWCC considers our safety concerns for the TPPS students and their families who already must be careful about how they come to and, in particular, leave school.

I can be contacted on the numbers below to discuss this further if needed.


Thank you



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a written submission by way of objection



23 August 2022

City of Wagga Wagga
Civic Centre
PO Box 20
Wagga Wagga

council@wagga.nsw.gov.au

Re: DA 22/0460; 32 Halloran Street, Turvey Park
WRITTEN SUBMISSION: LETTER OF OBJECTION
SUBMISSION: WILD

Dear Sir,

This document is a written submission by way of objection lodged under Section 4.15 of the EPAA 1979 [the EPA Act].

Unless the Applicant submits Amended Plans to resolve all of the adverse amenity impacts raised within this Submission, we ask Council to REFUSE this DA.

We are being assisted by a very senior experienced consultant in the preparation of this Written Submission.

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A. EXECUTIVE SUMMARY

The design of the Child Care Centre does not ensure that the existing high levels of amenity to our property is retained.

The subject site is zoned R1 General Residential under the LEP, and there is no reason, unique or otherwise why a fully compliant solution to LEP and DCP controls cannot be designed on the site.

The proposed development represents an overdevelopment of the site and an unbalanced range of amenity impacts that result in adverse impacts on our property. The proposed development fails to meet Council's planning controls, the objectives and the merit assessment provisions relating to:

- o Traffic Impacts
- o Acoustic Impacts

- o Poor Landscape in Front Setback Zone
- o Excessive Hard Surface Paving Within Front Setback Zone

The proposed development represents an unreasonably large Child Care Centre design, for which there are design alternatives to achieve a reasonable development outcome on the site without having such impacts.

The proposed development does not satisfy the objectives of the zone or contribute to a scale that is consistent with the desired character of the locality and the scale of surrounding development.

We contend that the additional demand for on-street parking will exacerbate the problems faced by local residents in an area where parking demand is already regularly exceeding capacity.

The proposed development does not ensure that appropriate zone considerations are assessed when selecting a site. The proposed development is in a residential zone, and has not adequately considered the acoustic and privacy impacts of the proposed development on the residential properties; the setbacks and siting of buildings within the residential context; and the traffic and parking impacts of the proposal on residential amenity.

The proposed development does not ensure that the location and surrounding uses are compatible with the proposed development or use; and the characteristics of the site are suitable for the scale and type of development proposed having regard to size of street frontage, lot configuration, dimensions and overall size, number of shared boundaries with residential properties. The proposed development will have adverse environmental impacts on the surrounding area. The proposed development does not provide a suitable drop off and pick up areas, and insufficient off and on street parking, that is appropriate and safe for the proposed use.

The proposed development does not ensure that the child care facility is compatible with the local character and surrounding streetscape the proposed development does not contribute to the local area by being designed not in character with the locality and existing streetscape, particularly the car parking in the front setback and inadequate landscaping in the front setback; include design and architectural treatments that respond to and integrate with the existing streetscape; using landscaping to positively contribute to the streetscape and neighbouring amenity, integrate car parking into the building and site landscaping design in residential areas.

We agree with Roseth SC in NSWLEC *Palbum v North Sydney Council*:

"People affected by a proposal have a legitimate expectation that the development on adjoining properties will comply with the planning regime."

The 'legitimate expectation' that we had [REDACTED] was for a development that would not result in very poor amenity outcomes caused directly from the poor outcomes to traffic, acoustics and other matters raised within this Submission.

We want to emphasise the fact that we take no pleasure in objecting [REDACTED]
[REDACTED]

We are objecting because the proposed DA has a poor impact on the amenity of [REDACTED] and the urban design outcomes within the streetscape, and this is caused by the DA being non-compliant to controls.

It does seem unreasonable that the Applicant wishes to remove the amenity of the neighbourhood to improve their own commercial outcomes, and is proposing non-compliant outcomes that would seriously adversely affect [REDACTED]

The proposal does not succeed when assessed against the Heads of Consideration pursuant to section 4.15 of the Environmental Planning and Assessment Act, 1979 as amended. It is considered that the application, does not succeed on merit and is not worthy of the granting of development consent.

We ask Council to reject this DA as the proposed development does not comply with the planning regime and will create further traffic & safety issues.

B. FACTS

1. THE PROPOSAL

The development application seeks approval for:

- Demolition of existing structures
- Construction of new two-storey child care centre
- Associated car parking, site works, shade structures, fencing, retaining walls, drainage and landscaping works

The proposed child care centre seeks to cater for 8 x 0-2 years, 13 x 2-3 years and 25 x 3-5 years, and 12 staff operating from 6:30am to 6.30pm, Monday to Friday.

The proposed child care centre will provide a total of 12 car spaces within the site.

2. THE SITE

The subject land, being Lot 29 in Section B, DP 37333, is regular in shape and has a total area of approximately 1,006sqm. The land is bounded by Halloran Street to the east and residential properties to the west, north and south and has a depth of 50.3m and a 20m wide frontage to Halloran Street.

The subject site currently contains a single-storey dwelling with associated structures and outbuildings, double driveway and garden planting.

Adjoining properties contain one storey buildings with associated structures and outbuildings.

The topography of the development site has a fall from east (front) to west (rear) of approximately 1.1m and drains towards an existing stormwater pit at the north-western corner of the site.

3. THE LOCALITY

The existing character of the local area, including the immediate visual catchment (generally within 150 metres of the site) is of a well-established neighbourhood, made up of a heterogeneous mix of dwelling types within domestic landscaped settings.

The site is located within a well-established low density residential area. The locality is characterised by a diverse mix of dwelling houses in a variety of architectural styles and materials. These dwellings predominantly have a stepped level design in response to the topography of the site.

The subject site is located on the western side of Halloran Street between Urana Street and Blamey Street opposite Turvey Park Public School.

4. STATUTORY CONTROLS

The following Environmental Planning Instruments and Development Control Plans are relevant to the assessment of this application:

- State Environmental Planning Policy (Resilience and Hazards) 2021 – Chapter 4 Remediation of Land;
- State Environmental Planning Policy (Transport and Infrastructure) 2021 – Chapter 3 (Educational Establishments and Child Care Facilities);
- Wagga Wagga Local Environmental Plan 2010; and
- Wagga Wagga Development Control Plan 2010.

C. CONTENTIONS THAT THE APPLICATION BE REFUSED

1. CONTRARY TO AIMS OF LEP

The proposal is contrary to Section 4.15(1)(a)(i) of the *Environmental Planning and Assessment Act 1979* as it fails to satisfy the aims under the LEP.

2. CONTRARY TO ZONE OBJECTIVES

The proposal is contrary to Section 4.15(1)(a)(i) of the *Environmental Planning and Assessment Act 1979* as it fails to satisfy the objectives of the zone of the LEP

The R1 General Residential objectives of the zone are as follows:

- *To provide for the housing needs of the community.*
- *To provide for a variety of housing types and densities.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*
- *To ensure co-ordinated and cost-effective provision of physical, social and cultural infrastructure in new residential areas.*

The proposed development does not minimise the adverse impacts on the residential area.

3. COMPLIANCE WITH THE STATE ENVIRONMENTAL PLANNING POLICY (EDUCATIONAL ESTABLISHMENTS AND CHILD CARE FACILITIES) 2017 (CHILDCARE SEPP)

The State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Childcare SEPP) applies to the proposed development.

Clauses 23 provides as follows:

23 Centre-based child care facility—matters for consideration by consent authorities

Before determining a development application for development for the purpose of a centre-based child care facility, the consent authority must take into consideration any applicable provisions of the Child Care Planning Guideline, in relation to the proposed development.

The Child Care Planning Guideline (CCPG) contains a number of design quality principles in Part 2, and a number of considerations in Part 3. The design quality principles include ensuring that the design responds and contributes to its context (principle 1), that it achieves a scale, bulk and height appropriate to the existing or desired future character (principle 2), that it achieves sustainable design (principle 4), that the landscape and buildings are integrated to result in attractive

development (principle 5), and that it optimises the use of the built and natural environment for safe learning and play (principle 7).

Part 3 of the CCPG includes a range of considerations and controls, including considerations relating to site selection and location, compatibility with the local character and streetscape, delineation between the child care facility and public places, minimising impact on adjoining buildings, providing parking that satisfies the needs of users, and to provide a safe and connected environment for pedestrians both on and around the site.

Our major concerns relate to:

- Traffic Impacts. Further information See attached Traffic Review from Traffic Engineer, Garry Gaffney
- Acoustic Impacts
- Poor Landscape in the Front Setback Zone
- Excessive Hard Surface Paving Within Front Setback Zone

The proposed development does not accord with the 'Child Care Planning Guideline' as required by State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.

We are concerned on the following matters:

1. The proposed development does not ensure that appropriate zone considerations are assessed when selecting a site. The proposed development is in a residential zone, and has not adequately considered the acoustic and privacy impacts of the proposed development on the residential properties; the setbacks and siting of buildings within the residential context; and the traffic and parking impacts of the proposal on residential amenity.
2. The proposed development does not ensure that the location and surrounding uses are compatible with the proposed development or use; and the characteristics of the site are suitable for the scale and type of development proposed having regard to size of street frontage, lot configuration, dimensions and overall size, number of shared boundaries with residential properties. The proposed development will have adverse environmental impacts on the surrounding area. The proposed development does not provide a suitable drop off and pick up areas, and insufficient off and on street parking, that is appropriate and safe for the proposed use.
3. The proposed development does not ensure that the child care facility is compatible with the local character and surrounding streetscape the proposed development does not contribute to the local area by being designed not in character with the locality and existing streetscape, particularly the car parking in the front setback and inadequate landscaping in the front setback; include design and architectural treatments that respond to and integrate with the existing streetscape; using landscaping to

- positively contribute to the streetscape and neighbouring amenity, integrate car parking into the building and site landscaping design in residential areas.
4. The proposed development does not ensure that the scale of the child care facility is compatible with adjoining development and the impact on adjoining buildings is minimised setbacks to the street should be consistent with the existing character.
 5. The proposed development does not provide landscape design that contributes to the streetscape and amenity. Appropriate planting has not been provided along the boundary integrated with fencing.
 6. The proposed development does not take into account streetscape, local character and context when siting car parking areas within the front setback, using low level landscaping to soften and screen parking areas.
 7. The proposed development does not minimise the impact of the child care facility on the amenity of neighbouring residential developments. Hours of operation within areas where the predominant land use is residential should be confined to the core hours of 7.00am to 7.00pm weekdays.
 8. The proposed development does not provided parking that satisfies the needs of users and demand generated by the centre. Off street car parking has not been provided at an adequate rate
 9. The proposed development has not provided an adequate Traffic and Parking Study to support the proposal to quantify potential impacts on the surrounding land uses and demonstrate how impacts on amenity will be minimised. The study has not addressed the adequacy to the parking rates and has not demonstrated that the amenity of the surrounding area will not be affected and there will be no impacts on the safe operation of the surrounding road network.
 10. The proposed development does not provide a safe and connected environment for pedestrians both on and around the site
 11. The proposed development has not provided design solutions incorporated into a development to help provide a safe pedestrian environment; pedestrian paths that enable two prams to pass each other; delivery and loading areas located away from the main pedestrian access to the building and in clearly designated, separate facilities, vehicles can enter and leave the site in a forward direction.
 12. The proposed development does not provide a car parking design including a child safe fence to separate car parking areas from the building entrance and play areas, nor included adequate wheelchair and pram accessible parking.

4. TRAFFIC

The proposed development does not adequately address the traffic impact of the proposed development, including potential risks to pedestrians using the footpath in front of the site, and the adequacy of car parking.

Street Characteristics

We contend that there already are existing concerns regarding safety due to existing traffic congestion, illegal parking, cars backing up due to the insufficient street width, vehicles exceeding the speed limit, limited sight lines and the limited number of on-street parking spaces.

The Traffic Report fails to identify that the narrow 9m wide street, with cars parked at either side, leaves a zone of only 4m for passing traffic.

We attach a series of photographs to show Council the current poor Street Characteristics

Intersection Operation

The Traffic Report states that the existing traffic volumes are very low and as such the intersection operates at a very good level of service with practically no delays at any of the approaches. This is incorrect. The intersection is often blocked with extensive delays.

DCP Part D 12.5 Childcare Centres

The proposed development does not accord with the DCP:

- Subject site is not on a corner site
- Poor landscaping in front setback
- Inadequate space for drop off and parking requirements for the site
- Inadequate Traffic impact Study
- Enter and leave in a forward direction for the two spaces adjacent the building
- No loading or unloading zone
- Inadequate site lines
- Inadequate parking spaces for 46 parents dropping off 46 children – 6 spaces provided

Traffic Generation

We consider that the additional 35 trips 'in and out' in the morning will prove unacceptable. We consider that the additional 30 trips 'in and out' in the afternoon will prove unacceptable.

There has been no consideration of trucks arrivals and departures, and the implications of those arrivals and departures at the peak periods.

Traffic Distribution

The assumption that trip generation and attraction to be equal in all directions is considered inappropriate in this neighbourhood.

Traffic Impacts

We understand that complaints have been received with regard to other childcare centres regarding parking activity in No Stopping zones or across driveways, restricted sightlines due to parked vehicles and congested conditions at drop off and pick up periods. If this centre were approved without adequate off-street parking similar issues are anticipated.

The photographs below clearly show that the existing street already has considerable traffic problems.

The results of the traffic flow surveys indicated that the peak school traffic occurred between 08:30 and 09:15 in the morning and between 15:00 and 15:45 in the afternoon.

We consider that the parents of children at this proposed facility will arrive and depart at the same time.

We challenge the suggestion that the morning traffic generation peak at child care centres mostly occurs earlier than the observed morning peak at the school. This is not an outcome that is expected or proven in Wagga Wagga.

We challenge the suggestion that the afternoon pick-up peak at the child care centres occurred earlier than the observed peak at the school. This is not an outcome that is expected or proven in Wagga Wagga.

We are very concerned that the school pick-up and drop-off activities are likely to create capacity and safety issues for the proposed child care centre, as more and more parents will be forced to park in un-safe locations.

We are concerned that the Traffic Report fails to adequately address the Driveway Operation, the Allocation of Parking, the Pedestrian Sight Distance at Property Boundary, and any consideration of a Traffic Management System.

We contend that the additional demand for on-street parking will exacerbate the problems faced by local residents in an area where parking demand is already regularly exceeding capacity.



Street Characteristics: Cars constantly backed up to allow vehicles to pass safely. 9m wide street with cars parked either side, only allows a 4m zone for two cars to pass. This width is too narrow.



Street Characteristics: Insufficient zone for two cars to pass



Intersection Operation: often blocked with illegal stopping and parking.



Illegal Parking and stopping: to allow children to egress



Illegal parking on corner locations



Illegal Parking and stopping: to allow children to egress and parking on the grass verge clearly shows the inability of the existing street to cope.



Illegal Parking and stopping: to allow children to egress and parking on the grass verge clearly shows the inability of the existing street to cope.

5. ACOUSTIC IMPACTS

We are concerned that the level of noise emission by the proposed Child Care Centre will not meet the noise level requirements of the Childcare SEPP, the CCPG, the Association of Australasian Acoustical Consultant's Guideline for Child Care Centre Acoustic Assessment, and the NSW Environment Protection Authority Road Noise Policy.

We are concerned that there are inadequate acoustic treatments, including sound barrier walls, absorptive treatment above the first-floor outdoor play area, and glazing requirements

We are concerned that there are no Noise Minimisation Measures Reviews recommendations within the Acoustic Report such as:

- Prior to the issue of an Occupation Certificate (OC) and then also 30 days following the commencement of operations at the Child Care Centre an Acoustic Review shall be carried out to ensure all requirements and recommendations for: children playing both inside and outside, Mechanical plant, and cars entering and exiting the carpark, contained within the Environmental Noise Assessment have been implemented including the Noise Management Plan. A copy of the review report shall be submitted to the certifying authority and Council for its records. If any rectification works are required these shall be completed within 60 days. Reason: To ensure all noise control measures has been implemented.

We are concerned that there are no Noise Minimisation Ongoing Reviews recommendations within the Acoustic Report such as:

- Noise minimisation requirements, including the Noise Management Plan, and recommendations in the Environmental Noise Assessment shall be included in the Centre Management Plan maintained at all times ongoing and a copy kept on site. These measures include, as recommended, but are not limited to: Ensuring all staff and parents are provided with a copy of the centres Noise Management Plan and its implications for them during their time at the centre; The name and contact details of the centres manager to be clearly displayed at the front of the building to ensure neighbours can contact that person at any time the centre is operating; Ensuring a sufficient number of educators are provided to supervise children outside play to discourage unnecessary loud activities. Facilitating children's small-group play when outside and encouraging educators to engage in children's play and facilitate friendships between the children; Crying children should be comforted as quickly as possible and moved indoors; Activity considered acceptable in the passive play area include the following: reading, drawing, arts and craft, puzzles, block play, planting, painting, and gardening; Ensure description of management strategies for how the passive play area will be used on a day-to-day basis should be included in the childcare centres Plan of Management; A copy of the Centres Plan of Management and Noise Management Plan are to be provided to the Acoustic Engineer; Certifying Authority and Council prior to Occupation of the Centre. Reason: To prevent a noise nuisance to neighbouring occupants

We are concerned that the hours of operation do not accord with the legislation. We ask for the following:

- Hours of Operation. The hours of operation are to be restricted to: Monday to Friday – 7am to 7pm. Saturday Sunday and Public Holidays closed. Upon expiration of the permitted hours, all service shall immediately cease, no clients shall be permitted entry and all clients on the premises shall be required to leave within the following 30 minutes. Reason: Information to ensure that amenity of the surrounding locality is maintained.

We are concerned that the Plan of Management has not been confirmed by the Owners:

- Compliance with Plan of Management. Operations must comply with the Plan of Management submitted with the DA.

6. PUBLIC INTEREST

The proposal is contrary to the public interest pursuant to Section 4.15(1)(e) of the *Environmental Planning and Assessment Act 1979*. The proposed development is not in the public interest as the development is inconsistent with the scale and intensity of development that the community can reasonably expect to be provided on this site by nature of the applicable controls. The development does not represent orderly development of appropriate bulk, scale or amenity impact in the locality and approval of such a development would be prejudicial to local present and future amenity as well as desired future character and therefore is not in the public interest.

H. CONTENTIONS THAT RELATE TO INSUFFICIENT INFORMATION

- Incomplete Traffic Report: Consideration of illegal parking and dangerous traffic within the street. No adequate consideration on Driveway Operation, Allocation of Parking, Pedestrian Sight, Distance at Property Boundary, Traffic Management System
- Incomplete Environmental Noise Assessment, Noise Reduction Design Requirements & Noise Minimisation Measures & Ongoing Reviews
- Incomplete Plan of Management
- Incomplete Emergency Plan
- Incomplete Accessibility Report
- Inadequate On-site Stormwater Detention Details and drainage pits along the boundaries
- Incomplete Environmental Management Plan (EMP)
- Incomplete National Construction Code Report
- Incomplete Construction Traffic Management Plan
- Details of the draft Kitchen Design
- Details of the draft Food Business Notification

I. CONTENTIONS THAT MAY BE RESOLVED BY AMENDED PLANS

- Reduction of number of children in the Centre to reduce poor traffic and poor acoustic outcomes
- No car parking in front setback zone

J. REASONS FOR REFUSAL

- o CONTRARY TO AIMS OF LEP
- o CONTRARY TO ZONE OBJECTIVES
- o CONTRARY TO THE STATE ENVIRONMENTAL PLANNING POLICY (EDUCATIONAL ESTABLISHMENTS AND CHILD CARE FACILITIES) 2017 (CHILDCARE SEPP)
- o TRAFFIC IMPACTS
- o ACOUSTIC IMPACTS
- o POOR LANDSCAPE IN FRONT SETBACK ZONE
- o EXCESSIVE HARD SURFACE PAVING WITHIN FRONT SETBACK ZONE
- o PUBLIC INTEREST

K. CONCLUSION

The proposed dwelling is not consistent with the intent of the LEP standards and DCP controls as they are reasonably applied to the proposal.

The variations to LEP standards and DCP controls are considered unreasonable in this instance. The cumulative effect on these non-compliances cause considerable amenity loss [REDACTED]

The development will not sit well within the streetscape with non-compliance to LEP standards and DCP controls causing considerable concern. In this regard, the proposal is considered to have inadequate landscaping in the front setback zone and would be consider jarring when viewed from the public domain.


It is considered that the proposal is inappropriate on merit and unless amended plans are submitted, this DA must be refused for the following reasons:

- The application has not adequately considered and does not satisfy the various relevant planning controls applicable to the site and the proposed development.
- The proposed dwelling is incompatible with the existing streetscape and development in the local area generally.
- The proposed dwelling will have an unsatisfactory impact on the environmental quality of the land and the amenity of surrounding properties.
- The site is assessed as unsuitable for the proposal, having regard to the relevant land use and planning requirements.

It is considered that the public interest is not served.

The proposed development does not follow the outcomes and controls contained within the adopted legislative framework.

Having given due consideration to the matters pursuant to Section 4.15 of the Environmental Planning and Assessment Act, 1979 as amended, it is considered that there are multiple matters which would prevent Council from granting consent to this proposal in this instance.

The proposed development represents an overdevelopment of the site and an unbalanced range of amenity impacts of which would result in adverse impacts on 

We contend that the additional demand for on-street parking will exacerbate the problems faced by local residents in an area where parking demand is already regularly exceeding capacity.

Due to all the above impacts raised within this Submission, including the adjoining Review of TIAR by Garry Gaffney, we ask Council to REFUSE this DA.

Yours faithfully,





Regional Transport Planning

ABN 41 813 428-421

79 Kincaid Street Wagga Wagga NSW 2650

Mob. 0439 656769

Email garudagaff@yahoo.com.au

29 August 2022

Proposed Child Care Centre Halloran St Wagga Wagga Review of TIAR

Regional Transport Planning was recently approached by residents of Halloran St to assist them to appreciate the traffic situation which might result from increased traffic at the southern end of Halloran Street after the opening of a proposed Child Care Centre

I have briefly read the TIAR prepared by a Sydney based traffic engineer TEF. I also met on-site with several concerned residents of Halloran Street and Bluett Cr and observed the traffic situation outside the public school at school break up time. I listened to the concerns of the residents.

Having formed the opinion that the proposed development will occur in a place where there are serious traffic risks to children, and that the Child Care Centre could make the situation worse, **I could not walk away**. As an experience Traffic Engineer with 30 plus years of experience, (including chairman of the Wagga Wagga Traffic Committee), I strongly felt that I should write an opinion. I offered to do this "Pro Bono" and allow the residents to use my opinion to support any submission that they might make to Council.

I have also practiced as a Consultant Traffic Engineer in this city for over 15 years and have written many TIARs.

I feel that the TIAR prepared by TEF does not adequately describe the existing situation and therefore the resultant detrimental threat that the development might have on Child Safety.

It is the purpose of the TIAR to accurately and clearly set out the existing situation and the likely impacts of a proposed development on traffic and safety.

I will set out briefly, some comments on the TIAR after my brief reading of it. I only highlight these to illustrate that the report is inadequate. It is not a comprehensive critique of the report. This would take more time that I have to offer.

Consultation

It seems that the consultant has not carried out interviews with the relevant stakeholders. There is no mention of the opinions of the School Principal, the P and C, the bus operators, the pick-up parents and carers, or the residents in the location. In my brief consultation and observations, I believe that the existing traffic conflicts and concerns of stakeholders would have been worthy of inclusion in the TIAR.

Road Width Description

Most of the local streets in the area are 9 metres of width. In Wagga Wagga, and elsewhere, this width is regarded as having 3 lanes – two parking lanes and one two way travelling lane. Oncoming vehicles, (where the parking lanes are occupied), must wait and weave into parking spaces to pass oncoming vehicles. This works well in lightly trafficked streets. Where it doesn't work the remedy is to restrict parking. It is misleading for the Traffic Engineer to describe the 9 m street as having 4 lanes – two for parking and two for opposing traffic. See page 3 of the TIAR. This is a fundamental issue in understanding the traffic impacts.



This photo illustrates how the narrow streets operate.

Both sides of the street are parked including on one side by a large bus. There were 4 oncoming northbound vehicles and the south bound vehicle needs to wait in behind the bus. I measured slightly more than 4 metres between the parked vehicles.

The Traffic Engineer has either made a serious error or does not understand Wagga conventions.

Parking Spaces and congestion.

The congestion in the area at school breakup time has been minimised in the TIAR. The report states:

The survey results indicated that there were at least 20 spaces vacant throughout the day (to a maximum of 43) in the survey area during the times of operation of the proposed child care centre. • There are ample parking opportunities within walking distance from the site.

My observations, (that were confirmed by residents) were that there are seldom vacant spaces for parent pick-up in the afternoon. Some parents park up in Bluett Cr and walk down to Blamey St and cross at a “staggered” intersection

amid turning traffic and moving buses. Some carers actually illegally park on the nature strip on the western side of Halloran St in the PM pick-up. Many parents arrive quite early to get close to the school. Unfortunately the majority of close parking spaces are on the western side of the street. This means that children need to cross the street and are often unescorted. Sometimes there are siblings being picked up, meaning that loading into the back seat behind the driver requires opening of doors into the passing traffic. Increasing the traffic in the street by adding a Centre with 46 students and 10 staff (with 12 parking spaces) must have some impact on the traffic in Halloran St.

The report goes on to advise:

No congestion due to bus movements nor their parking was observed. There was no double parking or blocking of intersections nor driveways. In Halloran Street, buses took advantage of the No Parking zone (2b in Figure 5) on the approach to the bus zone, as necessary (only observed once). Not more than one bus stopped at the Blamey Street stop at any one time

The photos above and below shows that this is not true. This bus is almost opposite the proposed entrance to the new centre.



Looking south



Looking north

The parked buses on the corner of Blamey St , east of Halloran, outside the school are, in fact, illegally parked as the rear end is too close to the prolongation of the Halloran St K&G and obstructs sight distance for turning cars and pedestrians.

Traffic Impacts. The author states:

***Traffic impacts.** ° There will be no negative impacts on street network operation.*

While I have not done a thorough assessment, it is hard to imagine how there will not be negative impacts from the traffic generated from the new development with 56 students and staff with only 12 parking spaces on-site. This traffic is being added to the traffic generated by over 400 school students and staff.

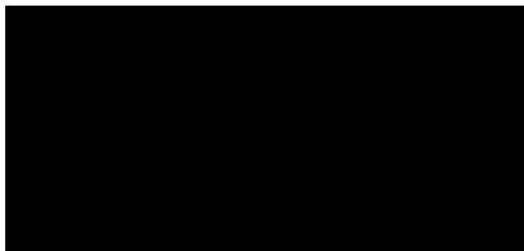
Concluding Statement

To be fair to the developer, the traffic generation from the Child Care Centre may be fairly small and often “staggered” in arrival and departure when compared to the Public School. Also, most of the vehicular and pedestrian safety issues result from the management of students at the primary school. Over many years, this has been difficult to improve and many attempts have been made. The situation that I observed represents many of the worst aspects of school safety at break up time.

I observed students running, unattended while crossing the road, playing with balls and mingling with moving cars and buses.

The school is one of the largest in Wagga Wagga with over 400 students and staff. There are at least 15 bus routes servicing the school. The decision makers, who are to consider the suitability of the subject development, must consider the likely impact on the safety of all children frequenting the area.

In act judiciously; they deserve to be presented with a comprehensive statement of the Traffic Impacts.



From: [REDACTED]
Sent: Wed, 17 Aug 2022 13:37:27 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: Application DA22/0460

Attention: Robyn Bradley & Emma Molloy

[REDACTED]
I feel I have the right to object to this application.

Apparently no thought has been put into this application as to the impact it will have immediately & in the future of added traffic congestion in Halloran & Blamey Streets. Also the increased danger of accidents happening around Turvey Park Public School.

[REDACTED] Halloran Street is directly opposite the Turvey Park Public School's bus stop areas.

I am not just speaking about the added congestion at pickup & drop off times for school buses travelling along Halloran & Blamey Streets each school day.

Have you taken any thought into the extra workers & trucks, who will be accessing & parking in these streets during construction,

But the ongoing extra cars having to access the driveway and/or park in the streets to deliver their children to & from the childcare.

I know that they will have car parking but it is never enough space.

Also buses travel up & down both these street during the day & school holidays as well as school times.

Because of the narrow streets drivers of buses have many obstacle's to negotiate the cars that regularly park in these streets.

PLEASE TAKE INTO CONSIDERATE the need for heavy vehicles to regularly travel these roads.

From: [REDACTED]
Sent: Mon, 29 Aug 2022 11:05:31 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: Objection re DA22/0460

Attention Robyn Bradley,

I am writing to express my objection to the proposed development of a two-storey childcare centre at 32 Halloran St Turvey Park. DA22/0460

As a local resident [REDACTED] I have experienced the traffic congestion and lack of parking in the vicinity of the school.

I fear that adding a childcare centre directly opposite the school bus stop in an already busy street will cause further traffic issues and will contribute to a reduced level of safety to the students of TPPS.

The provision of carparking within the development will not be sufficient to support the additional parking requirements for staff of the proposed centre nor will it be sufficient for the safe dropping off or picking up of the young children attending the centre.

There are already several childcare centres in the area that don't have the same traffic concerns as they either have more appropriate parking or are in a less busy area (that is not directly across from a busy school bus stop)

Further to my concerns regarding the impact of the proposed development of a childcare centre to the traffic congestion, parking, and child safety I don't think the development of a two-storey commercial building in a residential area such as Halloran St, or the surrounding streets is appropriate.

The proposed design of the building does not, in my opinion, suit the existing streetscape of the area.

[REDACTED]

From: [REDACTED]
Sent: Fri, 9 Sep 2022 10:01:35 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>; "Grp - Councillors" <Grp-Councillors@wagga.nsw.gov.au>
Subject: DA 22/0460



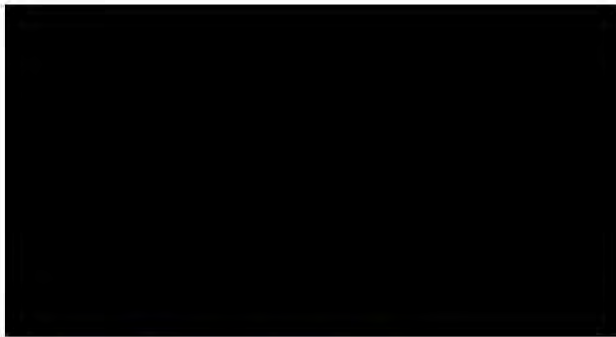
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Wagga Wagga City Council



council@wagga.nsw.gov.au

Councillors@wagga.nsw.gov.au

Application No: DA 22/0460
Property: 32 Halloran Street TURVEY PARK NSW 2650
Contact: Robyn Bradley

[REDACTED] I have looked at the proposed Day Care Centre and have some concerns about this project. I am disappointed that I was not informed of the proposal but found out second hand [REDACTED]s. I object to the project on the following grounds.



Once we have allowed one two storey development, then what others will follow. The area is

predominantly single storey residential dwellings. There is no place for a two storey building as is proposed. 'A building of that height and appearance can only detract from the look of the area

The noise from this proposal will radiate out from the first floor, the play areas across the rear and sides of the building and out across Dalton and Blamey Streets. I do not hear a lot of noise from the school but I'm sure this will [REDACTED] property. This is a relatively quiet area and this is the reason people want to live here. Has it been taken into consideration the amount of noise that will generated by the construction of this commercial premises.

I am opposed to the height of the fence they have proposed. It's as high as the ceilings in my house. Barriers of this height only detract from the whole neighbourly appearance of the area. What is to happen with the runoff from this development. [REDACTED]

I don't think the traffic report provided is a true indication of the demands that are placed on the roads in the area at school peak times. If the school has an event on, [REDACTED] To add another lot of vehicles and children into the area when the access is so close to the transport facilities of the school is ridiculous. The intersections of Halloran and Blamey plus Halloran and Urana Streets are bad enough, both being offset, without this added demand. The roads in the immediate area are just too narrow.

Why is a commercial development being proposed in our residential area. [REDACTED]

[REDACTED] I'm sure this development would be better suited in another location.

Regards,

[REDACTED]

Wagga Wagga City Council

PO Box 20

Wagga Wagga NSW 2650

Application No: DA 22/0460

Property: 32 Halloran Street TURVEY PARK NSW 2650

Contact: Robyn Bradley

It has come to my attention that there has been a child care centre proposed in our suburb at 32 Halloran Street. After viewing the proposal on line, I have some concerns and object to the proposal for the following reasons.

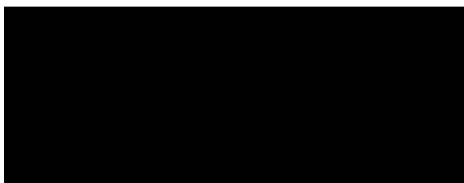
I think it quite bizarre that the developers want to knock down these premises when we are in the midst of a housing shortage. The building itself, looks nothing like any architecture in the area. It is a modern design that would be better suited to an area like Boorooma or Gobbagumbalin. There are very few two storey buildings in our area. A school and a fire station that are set on sites of their own, and a handful of houses that have been there for years.

A resident in Halloran Street has erected two flags on poles next to the development to show the true height of the building. Oh my God. The height of the proposal is ridiculous and will be an eyesore on the Turvey Park landscape. I can't begin to imagine how much of the privacy of the surrounding residents is going to be taken away. I am opposed to any two storey development in the area. What sort of a precedent will this proposal cause.

I don't think the report of the proposal reflects the problems associated with the traffic movements around the school. I have on a few occasions been witness to children trying to cross Blamey Street to access [REDACTED] Bluett Crescent, and have come to such a close contact with motor cars it isn't funny. In fact, it is dangerous. To have more cars at this already busy intersection would be crazy. Who will be responsible if a child from the school or the proposed centre was run over. The whole driveway and car park for the proposal is in a really bad location. The school bus stop is opposite and congested. The surrounding streets are not wide enough to accommodate parked cars both sides and still allow free flowing traffic. I cannot think of a worse location for this development.

I would ask that council consider the safety of the people that use this area, the lost privacy of the nearby residents, and the look of this development on the landscape of our suburb.

Thanking you,

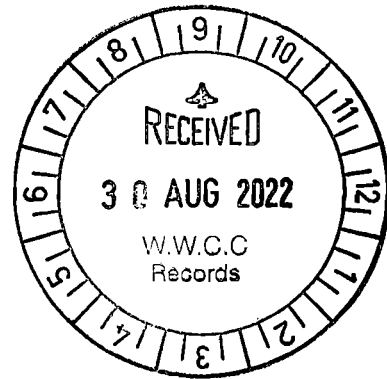


30TH August 2022

Wagga Wagga City Council

PO Box 20

Wagga Wagga NSW 2650



Attention: Robyn Bradley

RE: Development Application by

Applicant: Money Aint Got No Owners Pty Ltd

Proposal: Two Storey Childcare Centre (46 places)

Location: 32 Halloran Street, Wagga Wagga, NSW 2650

I refer to the above application and herewith tender our objection to this development proposal for the following reasons:

The proposed development is in an awkward place near an intersection that often sees vehicles having to stop in the middle of Blamey Street to allow others to move out of Halloran Street. I have been caught here on a couple of occasions myself.

The car park entry is straight opposite a school bus stop. This is going to cause problems with buses coming and going, and cars lining up to access the car parking area of the proposed centre which is too small. From the design included in the application there is not enough room to access the two parks closest to the building without driving onto a shared area. Surely this dangerous.

Vehicle numbers being increased in this already busy area doesn't seem right. The parking outside the school is already taken with employees at the school. The application states there is twelve employees at the child care centre and only twelve car parks. Where does everyone park? How will there be enough room for 46 more children to be dropped off?

The number of parking spaces available during the day is severely diminished on Council rubbish collection days. The number of cars in the street is dramatically increased on days when it is wet. Where will the loading zone be that the development will require for drop off of supplies and their waste removal?

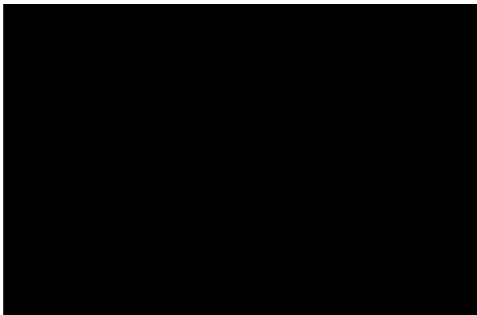
The whole look of the proposed building is not in keeping with the neighbourhood. It looks like boxes stacked on each other with a roof. It has no eaves and is pushed back way past the building set back of the area.

The neighbourhood already has seven child minding businesses available. Fernleigh Road, Mount Austin Avenue, Urana Street, Macleay Street, Coleman Street, Shaw Street and Station Place are all available close by. I do not think another, particularly a two storey one is needed in this area.

The application says that this development is in the best interest of the community. I believe not. All this development will do is put children's lives at risk.

I appreciate being given an opportunity to state my views. I strongly believe this is not the location for this development.

Regards,



The General Manager
Wagga Wagga City Council
council@wagga.nsw.gov.au

1 September 2022

Dear Sir

RE: OBJECTION TO DA22/0460 Two Storey Childcare Centre (46 Places), Demolition of Existing Structures, Carparking Areas, Fencing and Retaining Walls 32 Halloran Street, TURVEY PARK NSW 2650

Introduction

The proposed development application seeks consent for demolition of the existing dwelling and construction of a 2-storey childcare centre.

The Environmental Planning & Assessment Act, 1979 Clause 4.15, contains the matters for consideration for a consent authority considering a development application. One of the matters most relevant to this application is *"the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality"*.

We submit that the proposed development would have adverse impacts on the built environment and negative social impacts in the locality.

Objection to Proposal – impacts on the built environment

Streetscape and Character We concede that the development site is not within a heritage conservation area therefore protection of the streetscape is not a statutory consideration. We do note, however, that a walk around the neighbourhood reveals a consistent development pattern and architectural character of Inter-War, single storey dwellings on relatively large lots. Uniformity and rhythm are important aspects of the streetscape. Apart from the 2 storey Turvey Park Public School opposite the site, there are very few 2 storey developments in the immediate vicinity. 2 storey development is more common upslope of the site, where development on sloped sites incorporates additional levels.

The car parking area at the front of the site combined with the building's setbacks creates a large inappropriate void in the streetscape. The proposed building does not respect the prevailing streetscape in terms of its setback.

Interface The proposed child care centre has not been designed with reference to the existing development in the vicinity. The design in no way responds to the context of the site and

on the boundary to indicate the height of the proposed building, including the proposed floor levels and these are shown in Figure 1.



Figure 1 Flagged poles indicating proposed building height

The proposal to construct acoustic barriers around the development site may protect neighbours from adverse noise impacts however this will be to the detriment of the aesthetic appearance of the boundaries. High solid fencing will affect the residential character and provide an unattractive outlook for adjoining properties. We note that the acoustic barrier heights recommended in the supporting acoustic report are for *minimum* heights and range from 1800mm to 2400mm. We object to this height of fencing.

Materials The building materials likewise do not reflect the development in the vicinity, which characterised by red Willis bricks, with some rendering. The charcoal brick, charcoal stria cladding and Pilbara brick do not reflect the predominant colours in the vicinity and the modern design is also inconsistent with surrounding development.

Stormwater and Drainage We note that the existing stormwater infrastructure servicing the development site and surrounding lots is inadequate, with frequent blockages and overland flow in rainfall events. [REDACTED]

[REDACTED] Other residents have constructed concrete bunding

to protect their homes from inundation. Rear of block drainage was installed in the early 2000s to address urban salinity however this has resulted in properties in Halloran and Dalton Streets discharging to the same line, which is clearly not adequate for the load. With the subdivision of 2 lots in Blamey Street, there are now an additional 2 dwellings discharging into the system. The extensive hardstand areas proposed by this development will contribute to an exacerbation of this situation. We therefore request that a stormwater masterplan be developed for the area regardless of the outcome of this application.

Objection to Proposal – social impacts

Non-Residential Uses In Residential Areas The development requires the demolition of 2 dwellings, forcing the relocation of 2 families from the site. The introduction of a non-residential use in a predominantly residential neighbourhood, albeit a permissible land use, contributes to the erosion of community.

Loss of Privacy

to be experienced by properties surrounding the development and beyond. As the land slopes east to west, the upper floor of the proposed child care centre, with its windows and outdoor play area will overlook the private areas of a large number of homes.

this asset. This is an unacceptable impact and no installation of screens and barriers can take away this impact.

Hours of Operation The application seeks approval of operating hours from 7am to 6pm Monday to Friday however states that staff will be in attendance before and after these times. As staff preparation, and end of day procedures form part of the operation of the centre and therefore the *operating hours*, the application should clarify this aspect of the development. 6:30am is considered too early for a non-residential land use in a residential area and will reduce amenity for neighbouring properties. It is also inconsistent with the Child Care Planning Guideline, which recommends a start time from 7am in residential areas.

Objection to Proposal – Traffic Impacts

The subject site is located opposite Turvey Park Primary School. Halloran Street is not a wide street and is restricted in the provision of on street parking to allow for bus parking on the eastern side of the street outside the school buildings. When there are cars parked along the western side of the street, there is only room for one vehicle to pass.

Peak times for traffic congestion on the street are school start and finish times, with the afternoon period more congested. During the day, there are often school events that generate traffic, such as excursions, Book Week, parent teacher interviews and similar events. There is also a marked increase in traffic on wet days. Garbage collection day adds a further level of congestion on a weekly basis. We have witnessed vehicles parking illegally on the corner, across driveways and on the nature strip. The proposed childcare centre, with up to 46 children and 12 staff each school day will generate up to an additional 58 vehicles (116 trips) in the peak times. We note the provision of 12 spaces on the site and that council is unable to require parking in addition to DCP requirements.

We are concerned that the parking spaces shown on the plans will not be practical once constructed. The front 2 spaces are 2400mm wide, with the 3 spaces behind being wider at 2600mm then the last spaces closest to the building are reduced to 2400mm. The access to the rear spaces will be difficult if the carpark is full and relies on vehicles swinging wide of the

allocated space. The accessible space does not appear to be easily accessible to a larger vehicle, such as a van or adapted wagon. An increase in the width of the rear spaces would be required to ensure their useability by the average driver.

Objection to Proposal – Noise Impacts

The proposed development will increase noise at sensitive receptors through a combination of traffic, parking, parents and staff attending the site, children playing at the site and equipment (play and mechanical) in use at the site. The acoustic report makes recommendations for the construction and operation of the centre that will ensure it can operate within the NSW EPA's, Association of Australian Acoustical Consultant's Guideline and Wagga Wagga City Council's general noise requirements. We object to the attenuation measures which will create a high solid wall around the development site and adjoining residential sites and the management solutions of restricting the hours and numbers of children outside, which will require the surrounding residents to monitor and report any breaches.

Consistency With Child Care Planning Guideline

The Child Care Planning Guideline was issued by the NSW Department of Planning & Environment to guide development and take precedence over DCP provisions for a consistent approach across the state. The guideline is referenced in the Child Care provisions of the Transport and Infrastructure SEPP.

The matters addressed within the guideline are briefly addressed below:

Site Selection & Location – the site is within a residential area that has a primary school opposite. The acoustic and privacy impacts of the proposed development on the residential properties, the setbacks and siting of buildings within the residential context and traffic and parking impacts of the proposal on residential amenity are considered unacceptable by the Kenyons.

Local character, streetscape and the public domain interface - The objective to ensure that the child care facility is compatible with the local character and surrounding streetscape has not been achieved as outlined earlier in this submission.

Building orientation, envelope and design – the development is not consistent with objectives to protect privacy of neighbours, avoid overshadowing of properties, build to a height consistent with other buildings in the locality and respond to the scale and character of the street. Setbacks proposed for the front and sides are not consistent with the prevailing setbacks. The 2 storey design and contemporary materials do not respond to the physical context of the site. The submitted landscape plan is conceptual only.

Visual and acoustic privacy -The 2 storey design with first level play area does not minimise impacts on privacy of adjoining properties. Private open space areas of several neighbouring properties will be overlooked by the development. The installation of acoustic barriers will contribute to acoustic privacy at the expense of an open outlook.

Hours of operation – proposed hours are outside the core hours of 7am – 7pm recommended for residential areas.

Traffic, parking and pedestrian circulation – the traffic impact on the adjoining street is considered unacceptable by the Kenyons.

We have not addressed the National Regulations as these will be considered by the child care regulator and these matters are not what concerns the Kenyons about the development.

Consistency With WWDCP 2010

We note that development for childcare centres is largely regulated under the SEPP, overriding

the DCP however the objectives of the DCP need to be considered in the assessment of this proposal.

Section 2 contains controls for all developments.

We do not consider that the proposal is consistent with the objectives for vehicle access and movements as it will potentially reduce the safety and efficiency of urban roads adjacent to the development.

The application does not detail the signage proposed for the development. As a non-residential development in a predominantly residential area, the design, location and any illumination of signage is an important matter for consideration.

The residential chapter of the DCP applies to residential development however provides a guideline, in the absence of any other control over the design of child care centres, to developing in the residential zone. The principles include:

- *Achieve a density and scale that reflects the zone*
- *Building siting, footprint, scale and bulk should be compatible with adjoining development and the established or intended built form.*
- *Respond to the issues highlighted in the site analysis. Take advantage of natural features, minimising potential impacts to neighbours and achieving compatibility with neighbourhood character.*
- *Visual and acoustic privacy are important for good residential amenity. When designing new developments care should be exercised to ensure that impacts on the privacy of adjoining developments is minimised to ensure the privacy of occupants of the new development.*

As outlined in this submission, we do not consider that the development as proposed is responsive to these principles.

The DCP Objectives for child care centres are:

O1 Encourage child care centres to be located on corner sites and sites [where] parking and access to the centre can be easily managed.

The proposal is not consistent with this objective as the development site is not on a corner and is located on a middle block opposite a school in an already congested street. We dispute that parking and access to the centre can be easily managed.

O2 Protect the amenity of adjoining land uses through good site planning, landscaping and layout.

The proposed design and location of the child care centre will have an adverse impact on the amenity of adjoining residential land uses because it will introduce substantial noise from 60 people on site, traffic noise and congestion, reduction in visual privacy from the 2 storey design and increase overland flow through adjoining sites.

O3 Enhance the streetscape and provide a visually attractive buffer between the street and building/ car park.

The proposed design is a modern architectural style with contemporary materials which do not relate to existing historic development in the vicinity. The 2 storey design will stand out in the predominantly single storey townscape. There is no detailed landscape plan for us to comment on the attractiveness of the buffer between building/car park and the street. In a development with impacts as we have identified, we consider it important for the landscaping to be detailed prior to any approval. As the vehicles leaving the site will be crossing a footpath frequented by unaccompanied children, the selection of vegetation is important to ensure good vision. The plant selection should be provided upfront to enable thorough assessment for safety.

O4 Provide children with learning and educational opportunities through landscaping initiatives such as flower beds and vegetable gardens.

We consider this to be a programming matter for the child care operators but concede that the development appears to be consistent with this objective.

The proposed development does not satisfy the following controls:

C4 Design and locate outdoor activity areas to maximise the natural site features, including climate considerations such as avoiding afternoon sun but take advantage of cooling breezes in summer. All playgrounds must be capable of supervision at all times.

The first floor play area faces west and is enclosed by a high Perspex acoustic fence. With the prevailing hot winds coming from the west in summer, we assume this area will not be useable in summer therefore does not satisfy this control.

C9 Locate play equipment such as cubby houses, trampolines and slides not to overlook neighbours properties. Shade structures should not be located where they will be elevated in relation to boundary fences where they could cause visual or shadow impacts.


This development places a playground at first floor level, which will overlook not only the adjoining properties but properties further away from the development. This control is not satisfied by the development.

Conclusion

We acknowledge that child care centres are permissible in the zone with consent. The proposed child care centre is not sufficiently respectful of surrounding residential development, taking into account the cumulative adverse impacts on its neighbours to the north, west and south. Non-residential land uses should not be permitted at the expense of neighbour amenity. The development does not adequately address the impacts on traffic, parking, noise, privacy or neighbourhood character as addressed within the Wagga Wagga LEP 2010, The Wagga Wagga DCP 2010, nor the *Child Care Planning Guideline*. We therefore OBJECT to the application and advocate that Council refuse the application on these grounds.

Yours sincerely






Robyn Bradley,
Wagga Wagga City Council
Civic Centre
PO Box 20
WAGGA WAGGA NSW 2650

Dear Robyn

**Re Development Application No DA 22/0460 Proposed Two Story Child Care Centre 32 Halloran Street
Turvey Park N.S.W. 2650, Lot 29 Sec B DP 3733**



development. I have the following objections to this development.

- Whilst it could be seen that the development near the Turvey Park Primary school as being complementary, I think it has severe implications on children's safety in terms of traffic congestion and parking. Even though we know that drop off times for a childcare centre are flexible  allows me to know that parents tend to drop off and pick up their school age child/children at the same time as they drop off and pick up their child/children from childcare. The six car spaces that have been allotted for this proposed childcare centre would not alleviate parking restrictions in the area and the associated traffic congestion and road safety for children.
- One of the advantages of living in regional areas is that we need not be restricted by space. Therefore, it seems puzzling why a childcare centre would be a two-story construction meeting just the minimum space requirements of the early childhood and care regulations. The research informs us that children thrive in terms of their physical, emotional, and cognitive wellbeing when they have access to spacious outdoor environments. The Early Childhood Education and Care National Quality Standards in NQS 3.1.1 identifies as a measure for quality that "the outdoor and indoor spaces, buildings, fixtures and fittings are suitable for purpose, including supporting the access of every child." On this basis as an expert in the field I see the space allocated is minimum and the design is flawed.
- On examination of the plans for this development there does not seem to be included disabled access for the first storey of the childcare centre. This is of concern as it would be in breach of the regulations and the national quality standards for the Early Childhood Education and Care sector, and I assume this would also be a requirement of local government.
- A further concern that I have is that there is currently a severe skills shortage in early childhood services. In Wagga alone, rooms have been closed as there have not been staff available to meet the regulated staff ratios. This shortage is expected to be ongoing at least for the next two years. I have concerns that the applicant Money Ain't Got No Owners Pty. Ltd. has undertaken due diligence and established the viability of yet another early childhood centre in Wagga Wagga.
- Finally, I am confused as why Playroom 4 (upstairs) has been identified space for 8 children in the 3 – 8-year old's given that my understanding is the Child Care Centres are a service for children aged 3 – 6.

I appreciate the opportunity to respond to the development application.

Yours faithfully



DA 22/0460

File Number D/2022/0460

Attention Robyn Bradley

32 Halloran St Turkey Park

Lot 29 section DP 37333

30TH August 2022

Dear Robyn,

It has been brought to our attention about the development at 32 Halloran St Turkey Park.

[REDACTED] we are of the opinion that this development is not suitable for the location, and we believe there are several childcare services within a five kms radius of this proposal. Two of these centres cater for children of the same age group.

The proposed two-story centre is not in keeping with the buildings of the area. The major concerns are:

- Parking 12 car parks 12 staff where are the parents/ carers parking when dropping off and collecting the children
- The shadowing of the childcare centre on the neighbouring properties
- The trees indicated in the development application look to be a gum tree which is not suitable to a residential area.
- Storm water runoff is already an issue in the area. The storm water pits run off from Halloran St into Dalton St yards. They are not large enough to cater for present run off. It is interesting to note that the storm water run off point 6.8.1 in the application will comply with Sydney Water requirements. We thought this should have been Riverina Water and Wagga Wagga City Council.

We hope you consider the above points along with the other neighbouring properties. In accordance with the Information Protection Act we are requesting that this submission is not made available to the public.

Yours Sincerely,

[REDACTED]

Wagga Wagga City Council
Cnr Bayliss & Morrow Streets
Wagga Wagga NSW 2650

24th August 2022

Attention: Robyn Bradley

Re: Application No: DA22/0460 File No: D/2022/0460

**I am objecting to the proposed development planned for 32 Halloran St Turvey Park
Lot 29 Sec B DP37333**

I have never made a political donation in the previous two years and I don't belong to any political party.

I object to the development of a Child Care Centre in Halloran St on several grounds, my main concerns are for the safety of the school children and children who will be attending the child care centre. [REDACTED] I am fully aware of the movement of children and traffic, especially in Halloran Street and the surrounding streets

- Turvey Park Public School is a large complex for Halloran St, established in the 1950's, which creates a very diverse traffic and pedestrian flow before and after school hours, plus during school hours. At school times there are many cars parked in the street with buses coming and going in and out of the allocated bus zones simultaneously. Due to vehicles parking in the street becomes very narrow for traffic flow and only allows for one line of traffic to move safely. It is impossible to pass an oncoming vehicle. The proposed child care centre will have 46 vehicles dropping off and picking twice daily. Added to the equation are the 12 staff members who could be moving several times during the working day. Further to this, there will be service vehicles delivering to the centre daily. There will be an extra 100 vehicles moving in the street daily. With this extra traffic allowed in the street due to the proposed development, it will only add to more hazardous situations for the safety of children going to and from school. This puts children's lives at risk of having a serious accident. [REDACTED]

[REDACTED] had witnessed many near misses due to buses and cars navigating a congested narrow street. Service vehicles using the child care centre will not be able to turn around within the centres carpark and will have to reverse out onto Halloran St, which could prove a very dangerous manoeuvre. Parents trying to access the full car park centre will have to reverse in or out, as there is no room to turn around in such a small carpark. This would create further difficulty for parents delivering and picking up children, especially at peak traffic times. This safety issue has not been addressed in the DA. At no time in the DA has it addressed the issue of extra traffic flow of over 100 vehicles a day. Not considered in the DA are the extra curriculum activities, which are held at Turvey Park Public School of transporting children to special events. Extra bus movements are required to transport children for school excursions, special cultural events, sporting events and carnivals organised by the school. Other events held at the school, which increases car traffic flow, with parents parking in Halloran St and surrounding streets to attend parent teacher interviews, Book Week Parade, Easter Hat Parade, Year 6 Formal, Presentation Ceremonies and weekly School Assemblies. The survey in the DA has not considered any of these events, which increases traffic flow and reduces the amount of parking available in the streets around the school due to an access of 150 to 200 extra cars.

- As there isn't adequate staff parking on Turvey Park Public School grounds there is an overflow of staff looking for safe parking, which includes teachers, casual teachers, administration staff, teacher aides, ancillary staff, volunteers, cleaners and general assistance need to find parking in Halloran St and surrounding streets. The 12 parking spaces supplied by the new child care centre will be inadequate as these spaces will be taken up by the 12 staff who will be working at the centre. Parents wanting to drop off preschool children will have to find a park some distance away from the centre. This creates a safety issue for the preschool children and the parents, walking from their cars to the centre. There no Zebra crossings in the area, which makes it difficult to cross roads safely. There is a pedestrian refuge in Urana St, which is at the other end of Halloran St. The Halloran St, Blamey St and Bluett Cres intersection is a very dangerous intersection especially with the movement of busses and service vehicles. It is not a clear intersection but an offset intersection. This style of intersection is also very dangerous when trying to cross Blamey St. Parents using the Child Care centre who park on the southern side of Blamey St, would put their children at risk when crossing the street to drop off and pick up children.

- A further concern, there are already a number of child care centres and preschools in the local area. A new child care centre has already been approved for Coleman St along with an already existing preschool Kookaburra in the street, I may note some distance apart. Along with other centres including Wagga Wagga Early Years Learning Centre, Wagga Wagga TAFE Childrens Centre, St Lukes, Little Wonders Early Education Centre and Kingfisher. With adequate number of centres in Turvey Park precinct, which has an aging population who do not have preschool age children, another centre is not necessary. There are many new suburbs being developed in Wagga Wagga and a new centre in one of these developments would be more suitable and be well serviced by families in close proximity and would be well welcomed. The centre proposed for Halloran St would be out of the way for many parents traveling to and from work, why not build one closer to the population who will need such a centre, which would reduce travel times for the parents.

- The design of the building doesn't keep within the street scape of Halloran St. Turvey Park Public School was established in the 1950's and its architecture is vey much in context with the other residential housing that exists in the street. The proposed child care centre will only contradict the present dwellings in the street and the suburb of Turvey Park. It is important that the heritage and architecture integrity Turvey Park be kept and not spoilt by modern designs.

The proposed DA for a Child Care Centre in Halloran St should be rejected by Wagga Wagga City Council. The proposed design is not in keeping with the architecture integrity of the present structures in Halloran St. There are many safety issues that have not been addressed in DA, as Turvey Park School has a population of about 375 students. A lot of foot traffic to be considered in the equation along with the extra vehicles in the street. Who will be held responsible if a child is involved in a serious accident due to the extra traffic?

Yours Sincerely



From: [REDACTED]
Sent: Mon, 29 Aug 2022 17:43:05 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Cc: [REDACTED]
Subject: Re: Application No: DA22/0460 - attn Robyn Bradley
Attachments: We sent you safe versions of your files, Halloran St Letter 290822.pdf

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Wagga Wagga City Council
Cnr Baylis & Morrow Streets
Wagga Wagga 2650

[REDACTED]

26th August 2022

Attention: Robyn Bradley

Re: Application No: DA22/0460

I am objecting to the proposed development planned for 32 Halloran St., Turvey Park
Lot 29 Sec B DP37333

My objection is based on the safety and welfare of children, families and the broader local community.

I have reviewed the plans and documents provided and have put together the following summary of my concerns:

- * The proposed development does not fit within the established character of the area being predominantly double brick, heritage style bungalows.
- * The proposed development results in a substantial impact on the privacy of adjoining private homes both immediate neighbours and those within close proximity. The area is characterised by single storey dwellings - the proposed height for a double storey Child Care Centre is not in keeping with the current architecture.
- * The current traffic along Halloran, Urana and Blamey Streets is already congested during drop off and pick-up times. [REDACTED] I am fully aware of the congestion and risk of passing vehicles (picking up and dropping off children) during busy periods.
***See attached independent traffic assessment.
- * With an additional 46 vehicles arriving and leaving twice a day, taxi services dropping off and picking up, and the added traffic relating to the general day-to-day operation of the centre, will create an even greater traffic hazard to children.
- * The proposed development on Halloran St (West side) boasts a wide footpath which is currently the only safe refuge for: walkers and runners; people with prams; people using walking aids or wheeled devices (toddlers on tricycles, people with limited mobility maintaining their independence on gophers) and those with restricted vision. People's safety is at risk due to vehicles entering and leaving the child care centre.
- * The proposed development has very limited space for an emergency evacuation.

* Currently, Turvey Park is well serviced with numerous Pre-Schools, long-day care centres and family day care services. Adding to this, the recently opened centre at Turvey Tops, and another centre recently approved for construction in Coleman Street-is surely adequate.

* Currently the impact from congestion in Halloran Street is during School term. Long day-care centres operate up to 50 or more weeks of the year providing little or no reprieve from noise (opening and closing of vehicle doors and traffic pollution and noise).

* What guarantee do the residents mostly impacted have on the centre not operating on a week-end or adding to their proposed operating hours?

The proposed DA for a Child Care Centre should be rejected by Wagga Wagga City council. Safety issues have been highlighted - namely traffic and pedestrian safety in an area which already has a large Primary School.

Yours Sincerely

A black rectangular box used to redact the signature of the sender.



Regional Transport Planning

ABN 41 813 428-421

79 Kincaid Street Wagga Wagga NSW 2650

Mob. 0439 656769

Email garudagaff@yahoo.com.au

29 August 2022

Proposed Child Care Centre Halloran St Wagga Wagga Review of TIAR

Regional Transport Planning was recently approached by residents of Halloran St to assist them to appreciate the traffic situation which might result from increased traffic at the southern end of Halloran Street after the opening of a proposed Child Care Centre

I have briefly read the TIAR prepared by a Sydney based traffic engineer TEF. I also met on-site with several concerned residents of Halloran Street and Bluett Cr and observed the traffic situation outside the public school at school break up time. I listened to the concerns of the residents.

Having formed the opinion that the proposed development will occur in a place where there are serious traffic risks to children, and that the Child Care Centre could make the situation worse, **I could not walk away**. As an experience Traffic Engineer with 30 plus years of experience, (including chairman of the Wagga Wagga Traffic Committee), I strongly felt that I should write an opinion. I offered to do this "Pro Bono" and allow the residents to use my opinion to support any submission that they might make to Council.

I have also practiced as a Consultant Traffic Engineer in this city for over 15 years and have written many TIARs.

I feel that the TIAR prepared by TEF does not adequately describe the existing situation and therefore the resultant detrimental threat that the development might have on Child Safety.

It is the purpose of the TIAR to accurately and clearly set out the existing situation and the likely impacts of a proposed development on traffic and safety.

I will set out briefly, some comments on the TIAR after my brief reading of it. I only highlight these to illustrate that the report is inadequate. It is not a comprehensive critique of the report. This would take more time that I have to offer.

Consultation

It seems that the consultant has not carried out interviews with the relevant stakeholders. There is no mention of the opinions of the School Principal, the P and C, the bus operators, the pick-up parents and carers, or the residents in the location. In my brief consultation and observations, I believe that the existing traffic conflicts and concerns of stakeholders would have been worthy of inclusion in the TIAR.

Road Width Description

Most of the local streets in the area are 9 metres of width. In Wagga Wagga, and elsewhere, this width is regarded as having 3 lanes – two parking lanes and one two way travelling lane. Oncoming vehicles, (where the parking lanes are occupied), must wait and weave into parking spaces to pass oncoming vehicles. This works well in lightly trafficked streets. Where it doesn't work the remedy is to restrict parking. It is misleading for the Traffic Engineer to describe the 9 m street as having 4 lanes – two for parking and two for opposing traffic. See page 3 of the TIAR. This is a fundamental issue in understanding the traffic impacts.



This photo illustrates how the narrow streets operate.

Both sides of the street are parked including on one side by a large bus. There were 4 oncoming northbound vehicles and the south bound vehicle needs to wait in behind the bus. I measured slightly more than 4 metres between the parked vehicles.

The Traffic Engineer has either made a serious error or does not understand Wagga conventions.

Parking Spaces and congestion.

The congestion in the area at school breakup time has been minimised in the TIAR. The report states:

The survey results indicated that there were at least 20 spaces vacant throughout the day (to a maximum of 43) in the survey area during the times of operation of the proposed child care centre. • There are ample parking opportunities within walking distance from the site.

My observations, (that were confirmed by residents) were that there are seldom vacant spaces for parent pick-up in the afternoon. Some parents park up in Bluett Cr and walk down to Blamey St and cross at a “staggered” intersection

amid turning traffic and moving buses. Some carers actually illegally park on the nature strip on the western side of Halloran St in the PM pick-up. Many parents arrive quite early to get close to the school. Unfortunately the majority of close parking spaces are on the western side of the street. This means that children need to cross the street and are often unescorted. Sometimes there are siblings being picked up, meaning that loading into the back seat behind the driver requires opening of doors into the passing traffic. Increasing the traffic in the street by adding a Centre with 46 students and 10 staff (with 12 parking spaces) must have some impact on the traffic in Halloran St.

The report goes on to advise:

No congestion due to bus movements nor their parking was observed. There was no double parking or blocking of intersections nor driveways. In Halloran Street, buses took advantage of the No Parking zone (2b in Figure 5) on the approach to the bus zone, as necessary (only observed once). Not more than one bus stopped at the Blamey Street stop at any one time

The photos above and below shows that this is not true. This bus is almost opposite the proposed entrance to the new centre.



Looking south



Looking north

The parked buses on the corner of Blamey St , east of Halloran, outside the school are, in fact, illegally parked as the rear end is too close to the prolongation of the Halloran St K&G and obstructs sight distance for turning cars and pedestrians.

Traffic Impacts. The author states:

***Traffic impacts.** ° There will be no negative impacts on street network operation.*

While I have not done a thorough assessment, it is hard to imagine how there will not be negative impacts from the traffic generated from the new development with 56 students and staff with only 12 parking spaces on-site. This traffic is being added to the traffic generated by over 400 school students and staff.

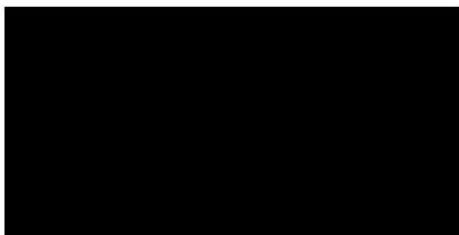
Concluding Statement

To be fair to the developer, the traffic generation from the Child Care Centre may be fairly small and often “staggered” in arrival and departure when compared to the Public School. Also, most of the vehicular and pedestrian safety issues result from the management of students at the primary school. Over many years, this has been difficult to improve and many attempts have been made. The situation that I observed represents many of the worst aspects of school safety at break up time.

I observed students running, unattended while crossing the road, playing with balls and mingling with moving cars and buses.

The school is one of the largest in Wagga Wagga with over 400 students and staff. There are at least 15 bus routes servicing the school. The decision makers, who are to consider the suitability of the subject development, must consider the likely impact on the safety of all children frequenting the area.

In act judiciously; they deserve to be presented with a comprehensive statement of the Traffic Impacts.



Att; Robyn Bradley WWCC


RE: DA22/0460

RE: File No. D/2022/4060

Hello Robyn,



Whilst both of us agree with progress, we wholeheartedly disagree with this proposal. I will list and explain our reasons for this disagreement below. They are in no order of importance.

1. During peak times at TPPS (Turvey Park Public School) with all the buses, let alone the parents, carers etc picking up and dropping off students, it is difficult enough to navigate Blamey/Halloran/Dalton streets as it is, without an increase in danger to everyone in the vicinity, especially the children and other pedestrians.
 2. It is chaotic enough now as it is at TPPS when they conduct school excursions, Book Week, Fete's, Easter Hat Parades and other special events, without the added pressures of a child care centre in the mix. When they will also hold their own special days too.
 3. We cannot fathom where the parents are going to park to drop off or pick up from the childcare centre or where the employees are going to park, as there is an overflow of teachers etc from TPPS already, that use nearly all the available street parking as it is.
 4. We do not believe a commercial business belongs in the neighbourhood, and is it even a zoned area for such placement?
- 

7. Lastly, we do not believe a 2 storey building is in keeping with the existing streetscape, with all the surrounding single story dwellings.

Thankyou for your time and consideration. We are hoping for a favourable outcome to our opinions and concerns.

Kind regards



Wagga Wagga City Council
Cnr Bayliss & Morrow Streets
Wagga Wagga NSW 2650

18th August 2022

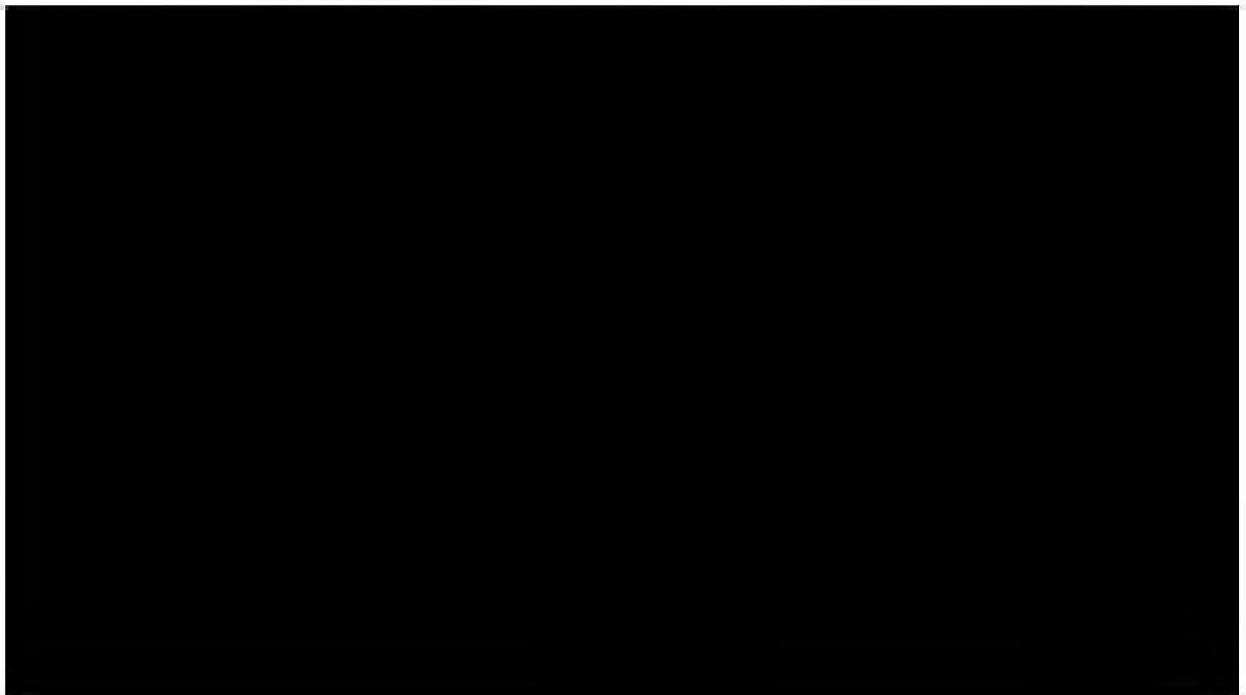
Attention: Robyn Bradley

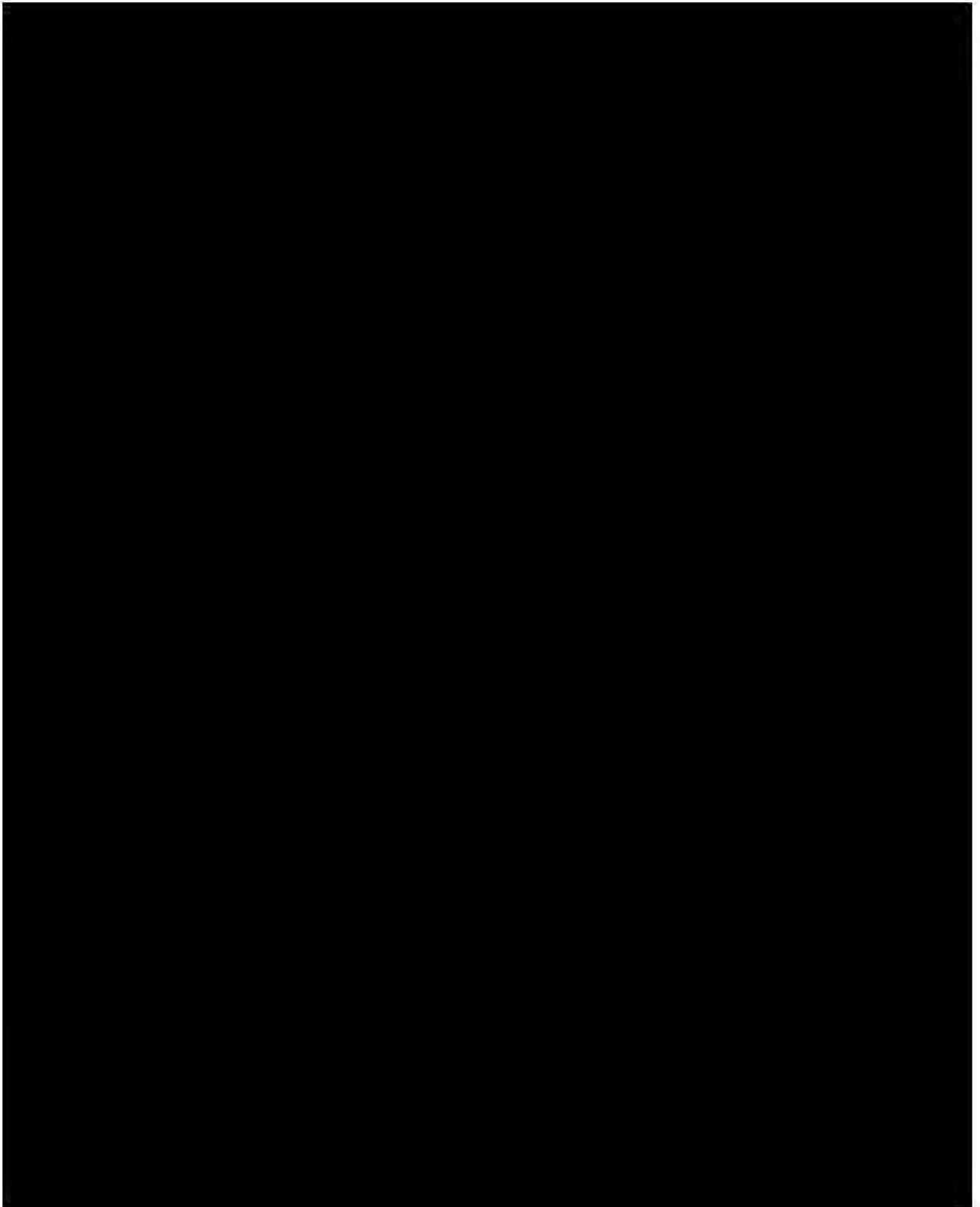
RE: Application No: DA22/0460 File No: DD/2022/0460

I am writing to express my views regarding the proposed development at 32 Halloran Street, Turvey Park.


I have made no political donations in the previous two years.

I object to this proposal. The grounds of my objection to this development are:



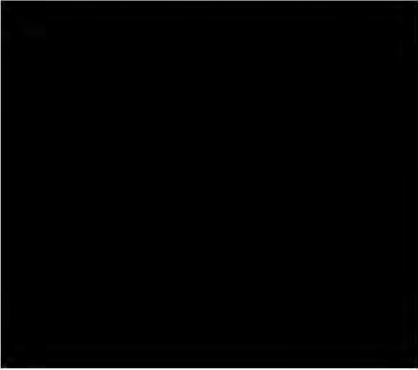


Yes, there may be a need for childcare in Wagga Wagga, but this is not the location for such a development.



More vehicle movements, just means more chaos. I'm sure the residents of Halloran Street, would agree with my views.

I thank you, for allowing me to present my objection and I hope this is heard for a favorable outcome for the Halloran Street Community.



Council Administration Centre Morrow Street
Wagga Wagga
NSW 2650


Application No :DA22/0460. File No:D/2022/0460

Dear Peter Thompson,

In regards to the development of the property at 32 Halloran Street Turvey Park 2650 Lot 29 Sec B DP 37333: Two Storey Childcare Centre proposal I wish to submit the following objection.

The grounds for objection are as follows:

1, Firstly, as it is a two storey, modern design building it is not aesthetic to the surrounding infrastructure. While there are some two storey buildings in the area they are mainly additions to existing premises and do not cover the entire block. The height of the building will cast shadows over the surrounding homes as well as removing any privacy they have. Obscure glazing or screening is not part of this proposal and is only mentioned as an "if required". Families will be impacted by not wanting to utilise their outdoor areas during the week.



2. Noise levels will increase once the centre is operational. With the centre operating from 6.30am until 6.30pm this residential area will be impacted by cars arriving and departing during what are usually quiet hours.

As the children will be playing in a small enclosed area on two levels noise will be amplified. While acoustic fencing is proposed this will not have much impact on the second storey. No details for the acoustic mitigation report are available at this point. What type of material will be used? Who will enforce the adherence of the outdoor play times as reported in the documents to minimise noise for the surrounding neighbours?

3. With 12 staff, most of whom have to park in the street, this will add to the already quite minimal available space. The school has no kiss and drop area and parking is limited to one side of the street being the side where the houses are. The school had to lobby for an extended period to have this area made non parking for the safety of the children. Parents often park and let children cross the road to or from the school.

When school hours drop off and pick up are added into the mix the demand for parking will exceed availability. This will force people to use the adjacent streets parking and then cross the road at the intersection of Halloran, Blamey and Bluett which is very chaotic at that time. As the streets do not form a cross intersection but are offset it is quite dangerous when there are lots of cars parked or moving through it.

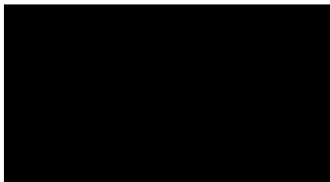
The proposal refers to low local traffic flow which is true for the middle of the day but hectic during the times from 8.30 to 9.30 and 3.00 to 4.00. Couple this with buses arriving during these times as well as being used for special events at other times of the day eg excursions, sporting events. Through experience working with children it is not unusual for some children to resist going into care or school and will often run away. With the increase in traffic at these times this would be potentially dangerous. When events are held at the school eg. book week parades, Easter parades, kinder orientation, etc they can have hundreds of people looking to drive and park in the area.

While the centre has 6 parking spaces for visitors concern must be raised about cars reversing onto Halloran St directly in front of the school. Is the planned parking suitable for a car to drive in, park and then change direction to enable it to drive out if spaces on either side or directly behind it are used?

4. The children will have very limited access to the natural environment which is highly valued for growth and development. While shade is available the western side will be fully exposed to the western sun. [REDACTED]

[REDACTED] While trees are envisioned to soften the appearance of the building natural shade does not seem a priority unless the shadow from the building itself is considered enough. 30% shade as stated will not be enough in summer. Glass acoustic on the upper floor facing west will only increase the heat for this play area.

While this proposal satisfies the R1 Residential objective of enabling other land uses that provide facilities or services to meet the day to day needs of the residents do we really need this facility on a small block in a fully residential area. There are a number of both preschools and child care centres in the area already that have access to more outdoor space and better access for traffic. Child centres are encouraged to be on corners not near them as stated in the report so is this really the best place for one? Would you want your child in a narrow two storey building or in an open environment?



From: [REDACTED]
Sent: Thu, 1 Sep 2022 14:20:10 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: 32 Halloran St Wagga Wagga



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Robyn Baradley

I'm writing to you with some concerns about the new development at 32 Halloran St

[REDACTED]


Thank you

[REDACTED]



29 August 2022
City of Wagga Wagga
Civic Centre
PO Box 20
Wagga Wagga
NSW 2650

council@wagga.nsw.gov.au

Re DA 22/0460; 32 Halloran Street Turvey Park. NSW 2650 Lot 29 Sec B DP 37333
WRITTEN SUBMISSION; LETTER OF OBJECTION
SUBMISSION; 

Dear Sir

This letter is a written submission by way of objection lodged under Section 4.15 of the EPAA 1979 [the EPA Act]

WE ARE OPPOSED TO THIS PROPOSED DEVELOPMENT IN ITS ENTIRETY! AND WOULD BE OPPOSED TO ANY TWO-STORY DEVELOPMENT COMMERCIAL OR OTHERWISE IN THE TURVEY PARK AREA.

1) CONSIDERATIONS THAT THE APPLICATION BE REFUSED.

We believe that this proposed development is contrary to section 4.15(1)(a)(i) of the Environmental Planning and Assessment Act 1979 as it fails to satisfy the aims under the LEP and fails to satisfy the R1 General Residential objectives of the Zone of the LEP.

2) COMPLIANCE WITH THE STATE ENVIRONMENTAL PLANNING POLICY (EDUCATIONAL ESTABLISHMENTS AND CHILD CARE FACILITIES) 2017 (CHILDCARE SEPP)

Among other things within the document Part 3 of the CCPG includes a range of consideration and controls, including consideration relating to site selection and location, compatibility with the local character and streetscape, delineation between the Child Care facility and public places, minimising impact on adjoining buildings, providing parking that satisfies the needs of the users, and to provide a safe and connected environment for pedestrians both on and around the site.

We do not feel this can or will be met. Our concerns relate to:

2.1) Traffic Impact to an already congested use of Halloran, Blamey and Urania Streets during school drop offs and pickup times. The proposed additional hours for dropping off and picking up will further exacerbate this chaotic period adding approximately 5 hours to this existing problem.

2.2) We contend that there already are existing concerns with the residents of Halloran Street regarding safety due to existing traffic congestion, illegal parking, cars backing up due to the insufficient street width, vehicles exceeding the speed limit, limited sight lines and the limited number of on-street parking spaces.

2.3) We do not believe there has been any consideration for Trucks or Tradesman's vehicles with trailers during school hours or the additional hours proposed for drop-off and pickup and the implications of those arrivals and departures at peak periods.

2.4) We are very concerned that the school pickup and drop off activities are likely to create capacity and safety issues for the proposed child care centre, as more and more parents will be forced to park illegally or in unsafe locations, we regularly witness and have made complaints to council with regard to people illegally parking on the nature strip, across driveways and close to the

corner of Blamey and Halloran streets preventing drivers from safely negotiating the turn into Halloran street.

2.5) The Traffic Report fails to identify that the narrow 9m wide street (Halloran st) with cars parked on both sides, leaves a zone of only 4m for passing traffic this is further compromised when the 16 or so Buses servicing the school have to negotiate the congested street. We have witnessed the unsafe practice of parents with their children using the street as a pedestrian thoroughfare as traffic is moving so slow, further adding to the chaos.

The Bus Stop is directly opposite the entrance to 32 Halloran Street (the proposed site for the child care centre) which would in our opinion make access and egress to the proposed site unsafe.

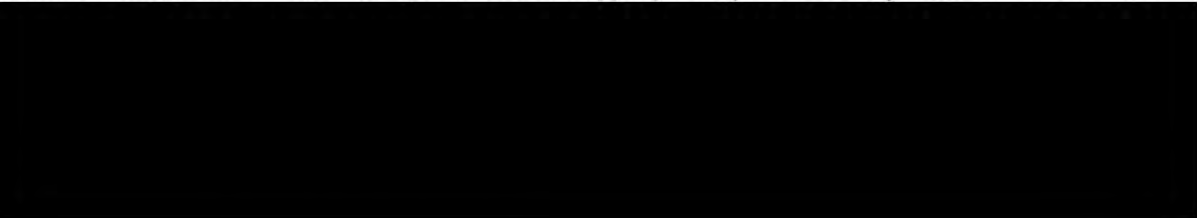
3) DCP PART D 12.5 CHILDCARE CENTRES

The proposed development does not accord with the DCP.

- * Subject site is not on a corner site
- * Poor Landscaping In front setback
- * Inadequate space for drop off pick up and parking requirements for this proposed site
- * Inadequate Traffic impact Study
- * Entre and exiting in a forward direction for the two spaces adjacent the building
- * No loading or unloading zone
- * Inadequate site lines
- * Inadequate parking spaces for the 46 parents dropping off 46 children provided

4) We feel the proposed development does not ensure that the Childcare facility is compatible with the local character and surround streetscape, the proposed development does not contribute to the local area by being designed not in character with the locality and existing streetscape, particularly the car parking in the front setback and inadequate landscaping in the front setback.

We also have concerns with the ability of collecting and disposing of stormwater into an already overloaded stormwater system installed by council down the length of Halloran and Dalton streets (rear of blocks) the installation of said stormwater was very flat and tradesmen had problems gaining enough fall to allow the system to drain appropriately. Ours is very flat and holds water.



5) IN SUMMARY, REASONS FOR OBJECTION.

- * CONTRARY TO AIMS OF LEP
- * CONTRARY TO ZONE OBJECTIVES
- * CONTRARY TO THE STATE ENVIRONMENTAL PLANNING POLICY (EDUCATIONAL ESTABLISHMENT AND CHILDCARE FACILITIES) 1017 (CHILDCARE SEPP)
- * TRAFFIC IMPACTS
- * ACOUSTIC IMPACTS
- * POOR LANDSCAPING IN FRONT SETBACK ZONE
- * EXCESSIVE HARD SURFACE PAVING WITHIN FRONT SETBACK ZONE.
- * EXCESSIVE IMPACT ON AMENITIES
- * PUBLIC INTEREST







Regional Transport Planning

ABN 41 813 428-421

79 Kincaid Street Wagga Wagga NSW 2650

Mob. 0439 656769

Email garudagaff@yahoo.com.au

29 August 2022

Proposed Child Care Centre Halloran St Wagga Wagga Review of TIAR

Regional Transport Planning was recently approached by residents of Halloran St to assist them to appreciate the traffic situation which might result from increased traffic at the southern end of Halloran Street after the opening of a proposed Child Care Centre

I have briefly read the TIAR prepared by a Sydney based traffic engineer TEF. I also met on-site with several concerned residents of Halloran Street and Bluett Cr and observed the traffic situation outside the public school at school break up time. I listened to the concerns of the residents.

Having formed the opinion that the proposed development will occur in a place where there are serious traffic risks to children, and that the Child Care Centre could make the situation worse, **I could not walk away**. As an experience Traffic Engineer with 30 plus years of experience, (including chairman of the Wagga Wagga Traffic Committee), I strongly felt that I should write an opinion. I offered to do this "Pro Bono" and allow the residents to use my opinion to support any submission that they might make to Council.

I have also practiced as a Consultant Traffic Engineer in this city for over 15 years and have written many TIARs.

I feel that the TIAR prepared by TEF does not adequately describe the existing situation and therefore the resultant detrimental threat that the development might have on Child Safety.

It is the purpose of the TIAR to accurately and clearly set out the existing situation and the likely impacts of a proposed development on traffic and safety.

I will set out briefly, some comments on the TIAR after my brief reading of it. I only highlight these to illustrate that the report is inadequate. It is not a comprehensive critique of the report. This would take more time that I have to offer.

Consultation

It seems that the consultant has not carried out interviews with the relevant stakeholders. There is no mention of the opinions of the School Principal, the P and C, the bus operators, the pick-up parents and carers, or the residents in the location. In my brief consultation and observations, I believe that the existing traffic conflicts and concerns of stakeholders would have been worthy of inclusion in the TIAR.

Road Width Description

Most of the local streets in the area are 9 metres of width. In Wagga Wagga, and elsewhere, this width is regarded as having 3 lanes – two parking lanes and one two way travelling lane. Oncoming vehicles, (where the parking lanes are occupied), must wait and weave into parking spaces to pass oncoming vehicles. This works well in lightly trafficked streets. Where it doesn't work the remedy is to restrict parking. It is misleading for the Traffic Engineer to describe the 9 m street as having 4 lanes – two for parking and two for opposing traffic. See page 3 of the TIAR. This is a fundamental issue in understanding the traffic impacts.



This photo illustrates how the narrow streets operate.

Both sides of the street are parked including on one side by a large bus. There were 4 oncoming northbound vehicles and the south bound vehicle needs to wait in behind the bus. I measured slightly more than 4 metres between the parked vehicles.

The Traffic Engineer has either made a serious error or does not understand Wagga conventions.

Parking Spaces and congestion.

The congestion in the area at school breakup time has been minimised in the TIAR. The report states:

The survey results indicated that there were at least 20 spaces vacant throughout the day (to a maximum of 43) in the survey area during the times of operation of the proposed child care centre. • There are ample parking opportunities within walking distance from the site.

My observations, (that were confirmed by residents) were that there are seldom vacant spaces for parent pick-up in the afternoon. Some parents park up in Bluett Cr and walk down to Blamey St and cross at a "staggered" intersection

amid turning traffic and moving buses. Some carers actually illegally park on the nature strip on the western side of Halloran St in the PM pick-up. Many parents arrive quite early to get close to the school. Unfortunately the majority of close parking spaces are on the western side of the street. This means that children need to cross the street and are often unescorted. Sometimes there are siblings being picked up, meaning that loading into the back seat behind the driver requires opening of doors into the passing traffic. Increasing the traffic in the street by adding a Centre with 46 students and 10 staff (with 12 parking spaces) must have some impact on the traffic in Halloran St.

The report goes on to advise:

No congestion due to bus movements nor their parking was observed. There was no double parking or blocking of intersections nor driveways. In Halloran Street, buses took advantage of the No Parking zone (2b in Figure 5) on the approach to the bus zone, as necessary (only observed once). Not more than one bus stopped at the Blamey Street stop at any one time

The photos above and below shows that this is not true. This bus is almost opposite the proposed entrance to the new centre.



Looking south



Looking north

The parked buses on the corner of Blamey St, east of Halloran, outside the school are, in fact, illegally parked as the rear end is too close to the prolongation of the Halloran St K&G and obstructs sight distance for turning cars and pedestrians.

Traffic Impacts. The author states:

Traffic impacts. ° There will be no negative impacts on street network operation.

While I have not done a thorough assessment, it is hard to imagine how there will not be negative impacts from the traffic generated from the new development with 56 students and staff with only 12 parking spaces on-site. This traffic is being added to the traffic generated by over 400 school students and staff.

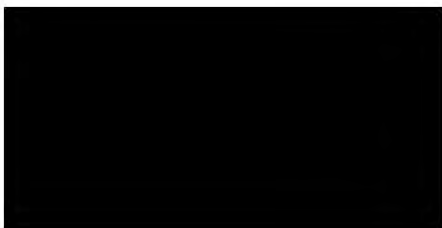
Concluding Statement

To be fair to the developer, the traffic generation from the Child Care Centre may be fairly small and often "staggered" in arrival and departure when compared to the Public School. Also, most of the vehicular and pedestrian safety issues result from the management of students at the primary school. Over many years, this has been difficult to improve and many attempts have been made. The situation that I observed represents many of the worst aspects of school safety at break up time.

I observed students running, unattended while crossing the road, playing with balls and mingling with moving cars and buses.

The school is one of the largest in Wagga Wagga with over 400 students and staff. There are at least 15 bus routes servicing the school. The decision makers, who are to consider the suitability of the subject development, must consider the likely impact on the safety of all children frequenting the area.

In act judiciously; they deserve to be presented with a comprehensive statement of the Traffic Impacts.



From: [REDACTED]
Sent: Tue, 23 Aug 2022 07:11:17 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: ATTN Robyn Bradley - Application No. DA22/0460



Dear Robyn,



I have read the proposal in detail and wish to lodge my concerns about the development.

Halloran Street is a narrow street with Turvey Park school located on the street.

My concern is regarding the traffic flow and on street parking which will increase from the child care centre.

The street is actually quite busy and the centre will exacerbate this. The 12 car park spaces will be used by staff rather than parents/carers dropping off and collecting children. There will be additional traffic for these activities along with cleaning, visiting professionals etc.

I do not believe Halloran Street is an appropriate location for this Centre.

Thank you



Att: Robyn Bradley, re: application DA22/0460

Dear Robyn,

I am writing to you today to oppose the request for development of a daycare centre at 32 Halloran St. Please find below my reasoning behind my rejection of the proposal:

[REDACTED]

- This is a very peaceful area with many elderly and retired occupants but the addition of new traffic to an already busy enough area during school drop off/pick up times would be an inconvenience and disturbance to our residents.

[REDACTED]

Thank you for your time in reading my letter.
Have a great day.

[REDACTED]

From: [REDACTED]
Sent: Wed, 31 Aug 2022 16:43:48 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>; "Grp - Councillors" <Grp-Councillors@wagga.nsw.gov.au>
Subject: Objection to DA22/0460 - Halloran St, Turvey Park

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Att: Robyn Bradley

RE: DA22/0460 - Two Storey Childcare Centre (46 Places), demolition of existing structures, carparking areas, fencing and retaining walls ([Wagga Wagga City Council Online Services - Application Details - Wagga Wagga City Council \(nsw.gov.au\)](#))

Good afternoon Robyn,

I would like to lodge an objection to the proposed development – DA22/0460.

I do not believe this development is in the interest of the surrounding community.

[REDACTED] this area is already an extremely busy area traffic wise, with locals and school commuters/parents stretching the street parking around the area both morning and night, with two-way traffic often impeded due to the volume of cars parked along the street.

I also do not believe a two-story building is conducive to the neighbourhood, nor in keeping with the look of the existing buildings.

[REDACTED]

As far as safety for children that would attend this development, a play area on the western side of the building, even if a shade sail is utilised, will be a very hot place for kids to be playing in a Wagga summer.

Kind Regards,



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Wagga Wagga City Council

PO Box 20

Wagga Wagga NSW 2650

Attention: Robyn Bradley

RE: Development Application by

DA22/0460

Applicant: Money Aint Got No Owners Pty Ltd

Proposal: Two Storey Childcare Centre (46 places)

Location: 32 Halloran Street, Wagga Wagga, NSW 2650

I refer to the above application and herewith tender my objection to this development proposal for the following reasons:

 I strongly object to this development application.

the safety of the other students, teachers, staff and the elderly residents with the increased traffic load that this development will cause. Drop off and pick up in Halloran is already a nightmare. Cars and buses constantly coming and going it what is already a very narrow street.

There is definitely not enough room for two cars to pass going down this street.

The location of the proposed development is near an intersection directly opposite the school. Vehicles have to stop in the middle of Blamey Street to allow others to move out of Halloran Street. I have been caught here on a couple of occasions myself.

The car park entry is straight opposite a school bus stop. This is going to cause problems with buses coming and going, and cars lining up to access the car parking area of the proposed centre, which is too small, not to mention the little children that just jump off the bus without looking. From the design included in the application there is not enough room to access the two parks closest to the building without driving onto a shared area. Surely this dangerous and illegal.

Vehicle numbers will be increased in this already busy area this is wrong and dangerous. The parking outside the school is already taken with employees at the school. The application states there is twelve employees at the child- care centre and only twelve car parks. Where will everyone park? How will there be enough room for 46 more children to be dropped off?

The number of parking spaces available during the day is severely diminished on Council rubbish collection days. The number of cars in the street is dramatically increased on days when it is wet. Where will the loading zone be that the development will require for drop off of supplies and their waste removal?

The design of the proposed building is not in keeping with the neighbourhood. It will de value the house around it, It is ugly and looks like boxes stacked on each other with a roof. It has no eaves and is pushed back way past the building set back of the area.

The neighbourhood already has seven child minding businesses available. Fernleigh Road, Mount Austin Avenue, Urana Street, Macleay Street, Coleman Street, Shaw Street and Station Place are all available close by. I do not think it is necessary to have another one, particularly one that is two stories high.

This application / development is definitely not in the best interest of the community, Turvey Park Primary School or the existing residents. This development will put children and elderly resident's lives at risk.

I appreciate being given an opportunity to state my views. I strongly object to this application believe this is not the location for this development.

Regards,

A solid black rectangular box used to redact the signature of the person writing the letter.

From: [REDACTED]
Sent: Thu, 8 Sep 2022 19:18:57 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Cc: "Grp - Councillors" <Grp-Councillors@wagga.nsw.gov.au>
Subject: DA 22/0460 - 32 Halloran Street
Attachments: DA Submission.zip

Hello Robyn,

Please find attached our submission in relation to Development Application 22/0460 – 32 Halloran Street.

Thanking you,

Regards,



[REDACTED]

Wagga Wagga City Council
Cnr Morrow and Baylis Streets
Wagga Wagga, NSW, 2650

[REDACTED]

Contact: Robyn Bradley
Application No: DA 22/0460
File No: D/2022/0460

Applicant: Money Aint Got No Owners Pty Ltd
Proposal: Two Storey Childcare Centre (46 Places)
Property: 32 Halloran Street, TURVEY PARK, NSW 2650, Lot 29 Sec B DP 37333

Dear Robyn,

[REDACTED] by the applicant "Money Aint Got No Owners Pty Ltd" and include the following attachments and statements for your perusal in relation to this matter.

We have serious concerns in relation to this development and we 'Strongly Object', to the proposed development in our established residential community. We would object to any two storey development, child care or not.

[REDACTED]

We thank you for taking the time to read over our concerns. We pray that the decision made on this development is in keeping with what is right for the immediate residents, the children attending school at TPPS and the Turvey Park community as a whole.

Thanking you,

Regards,

[REDACTED]

Conclusions

Whilst it is fair to say that a Child Care Centre is 'permissible' in an R1 residential area, there are many extenuating factors, that make the proposal for the development at 32 Halloran Street, 'not permissible'.

The applicant's submission is incomplete, meets only the very barest of minimum requirements, does not address the interests or concerns of the immediate or wider community and is totally inconsistent with the existing streetscape and development in the suburb of Turvey Park.

[REDACTED] states the proposed centre only meets minimum requirements for space by the Early Childhood and Care Regulations and this includes the upstairs play area of the proposed development which is exposed to the extreme weather we experience in Summer and Winter. It is also stated that children thrive in more open and spacious areas. The development is on a narrow block and is not in the best interest of the children that will attend.

The proposed development will increase the collection of storm water from the site. Currently, both existing premises are less in size than the proposed building. (220m² against 250m²). The hardstand car park area is more than one third of the total block. (380m²). This will cause an inundation of storm water to an already challenged Rear of Block Main behind our properties.

The demolition and construction will bring a great deal of unwanted activity to the neighbourhood. This activity is amplified by the size of this Commercial Development and has a far greater impact than would a Residential Development on the immediate community. The road network of Halloran Street is damaged on the Eastern side and is only from the heavier buses that use it. The Western side is generally of good condition and does not show any signs of fatigue as it only carries the light residential traffic. Sustained heavy vehicle movements from such a development can only mean the demise of yet another road infrastructure in Wagga Wagga.

The bus, traffic, delivery and pedestrian movements in the area are already a huge problem. Introducing another host of vehicles and pedestrians to the immediate area will amplify the problem greatly. The proposed location of the access is flawed. Cars waiting to turn in from North and South in Halloran Street at the same time, cars sitting across the footpath waiting to exit the centre and buses stopped at the school will cause gridlock at the location. Even if a bus is not stopped, there is still not enough room in our narrow street to accommodate the movements of the proposed centre. There is not enough parking allowed for the centre, (even though it meets guidelines) and will be an imposition on the surrounding parking of the area. The driveway location of the proposal will take away two existing parking spaces itself which cannot be replaced. I have included some photographs of three other Day Care facilities in the immediate area, showing the parking facility required by their staff and the impact to their surroundings.



Fernleigh Road Child Care staff are using the car park of the church at Heath Street

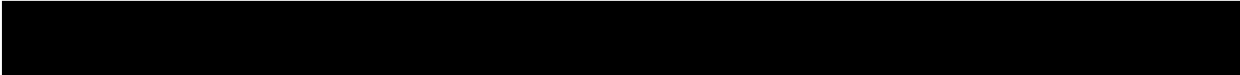


Kookaburra Preschool are using the wider Coleman Street for the staff to park.




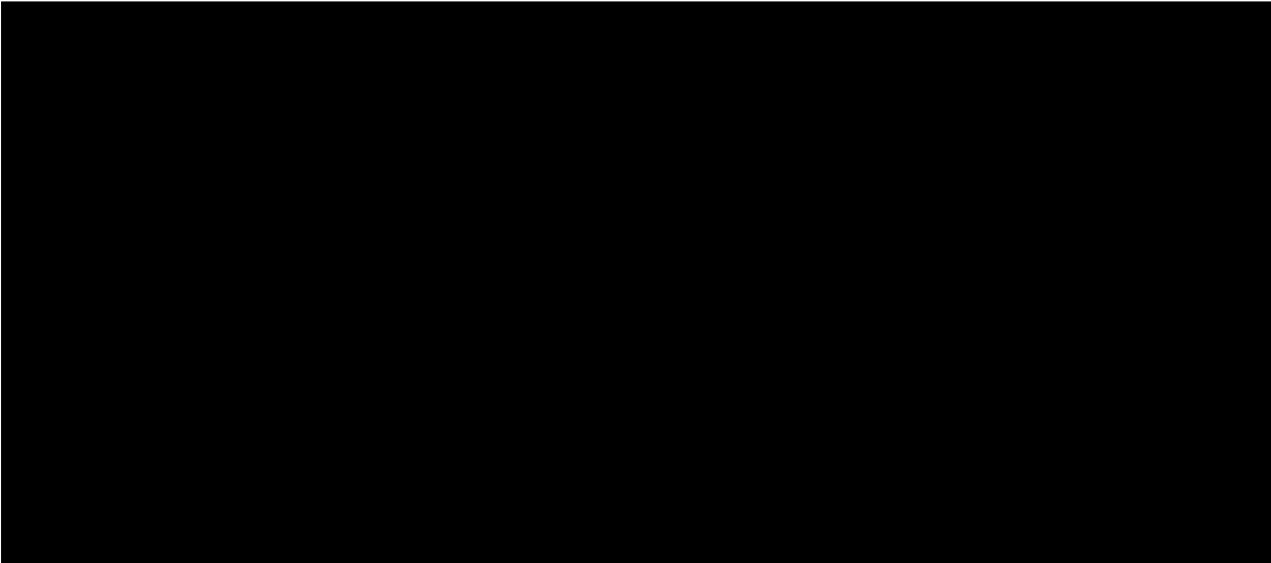
Urana Street Child Care staff are using Wade Street and Urana Street as on street parking.

Once again, the development report does not address the traffic and parking problems of the area. There traffic report is incomplete and inaccurate. I would urge you to read the report attached,



The disruption and noise from this proposal will begin the day of the demolition. It will continue with the construction of the commercial facility and with it's day to day functioning. It has no place in the residential area as proposed. It takes in no consideration for the residents and surrounding community it will impact. The loss of privacy to the residents surrounding the development is simply devastating. No one wants this kind of attention. They just want to go about their lives with no inconvenience or fear of being watched. The development is simply a "money grab" from an, "out of town developer", who cares nothing of our community and its requirements. We are a "close knit" little suburb in Turvey Park. Most of the people who live here are long term residents, or they grew up in the area and have made their way back here in later life. The past few weeks has only bought our community even closer together, in the complete rejection of the proposed development.

The Developer speaks of landscaping to soften the look of the proposed building. We would reject the proposal for these enormous trees they want to plant , killing our established trees and damaging the foundations and assets we have worked so hard to construct. Once again, they have not considered the impact on existing residents, just so they can get their development over the line.




Thanking you.



STORM WATER

The stormwater main along the rear of the Dalton Street properties is only 150mm diameter from Blamey Street downstream to the pit at the rear of 23 Dalton. Here it changes to 225mm and flows through the boundary between 19 and 21 Dalton out into the storm water main on Dalton Street itself.

Since the construction of this Rear Of Block main, there have been another two dwellings built in Blamey Street which now drop storm water into this main as well as development on properties down Dalton and Halloran Street. (Figure 8). My concerns of the capacity are founded as I have seen the pits along this main surcharge out into yards and flow overland, down between the residences of Dalton and Halloran Street.



The storm water main in Dalton Street that this rear of block main connects to, runs back up Dalton Street and along Blamey Street, into Gissing Oval, but continues up toward Bluett Crescent. There is a huge amount of water which spills from Gissing Oval in heavy storms down onto Blamey Street where there is two Side Entry Pits. These pits cannot handle the water. (Figures 1 and 2).



Figure 1



Figure 2

There is another grated pit in Blamey Street at the park, (Figure 3). This pit also surcharges in heavy rain. The storm water system ultimately collects water from Houses and off the streets as far as Fernleigh Road to the south. Up to Heath Street, Mair Street, Heydon Avenue and Bluett Crescent to the East. All of Bluett Crescent, and Dalton Street to the West. It Also collects all house run off and road run off in Halloran Street. The catchment to this main is extensive.



Figure 3

Ultimately, all the storm water fills the kerb, overflows to the footpath and runs into 2/34 Halloran Street. The house here has been flooded on 3 occasions. It now sports a concrete retaining wall across the front and a raised driveway to stop this water. (Figures 4 and 5). I feel now it will have nowhere to go but down the side of 55 Blamey Street and once again continue overland

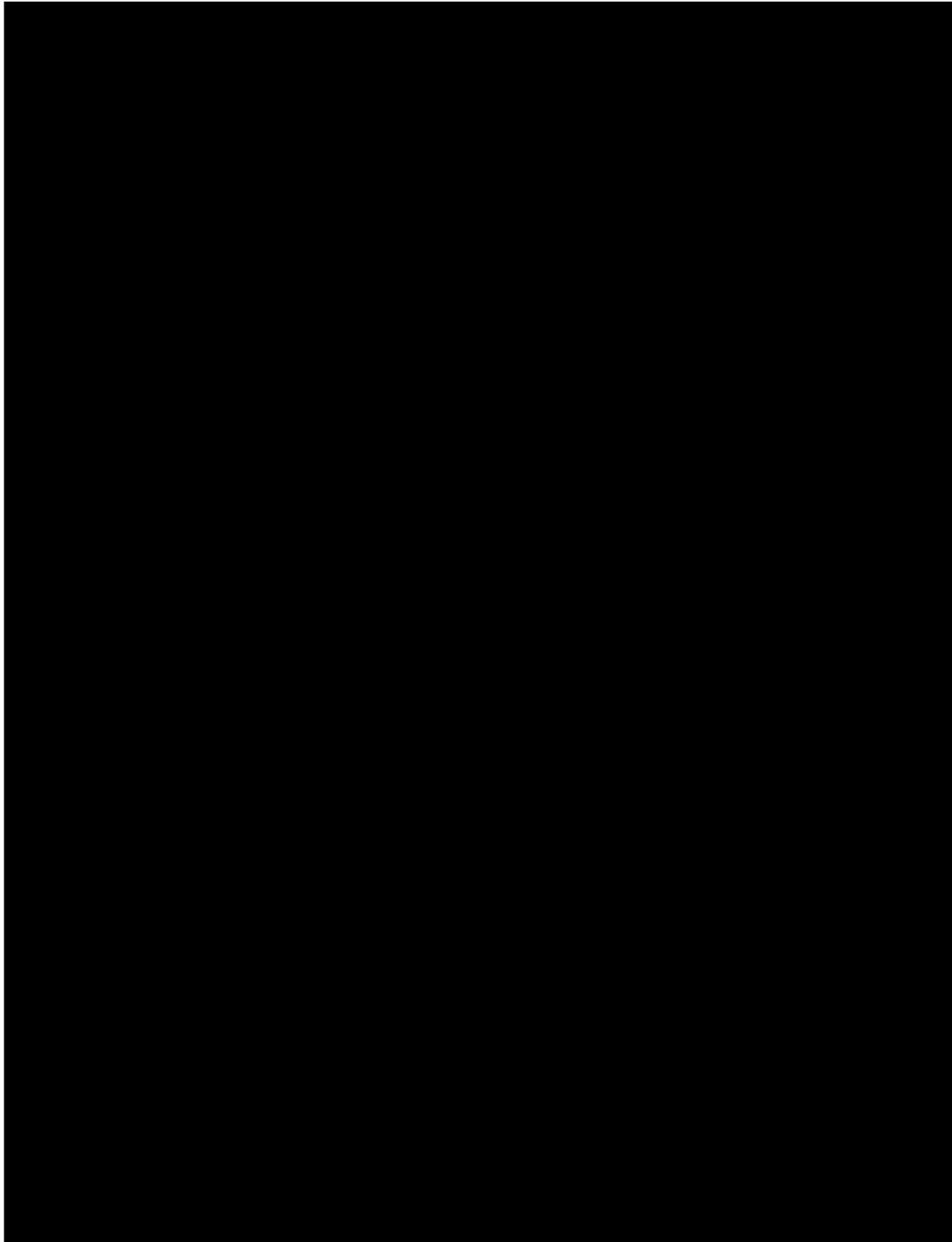


Figure 4

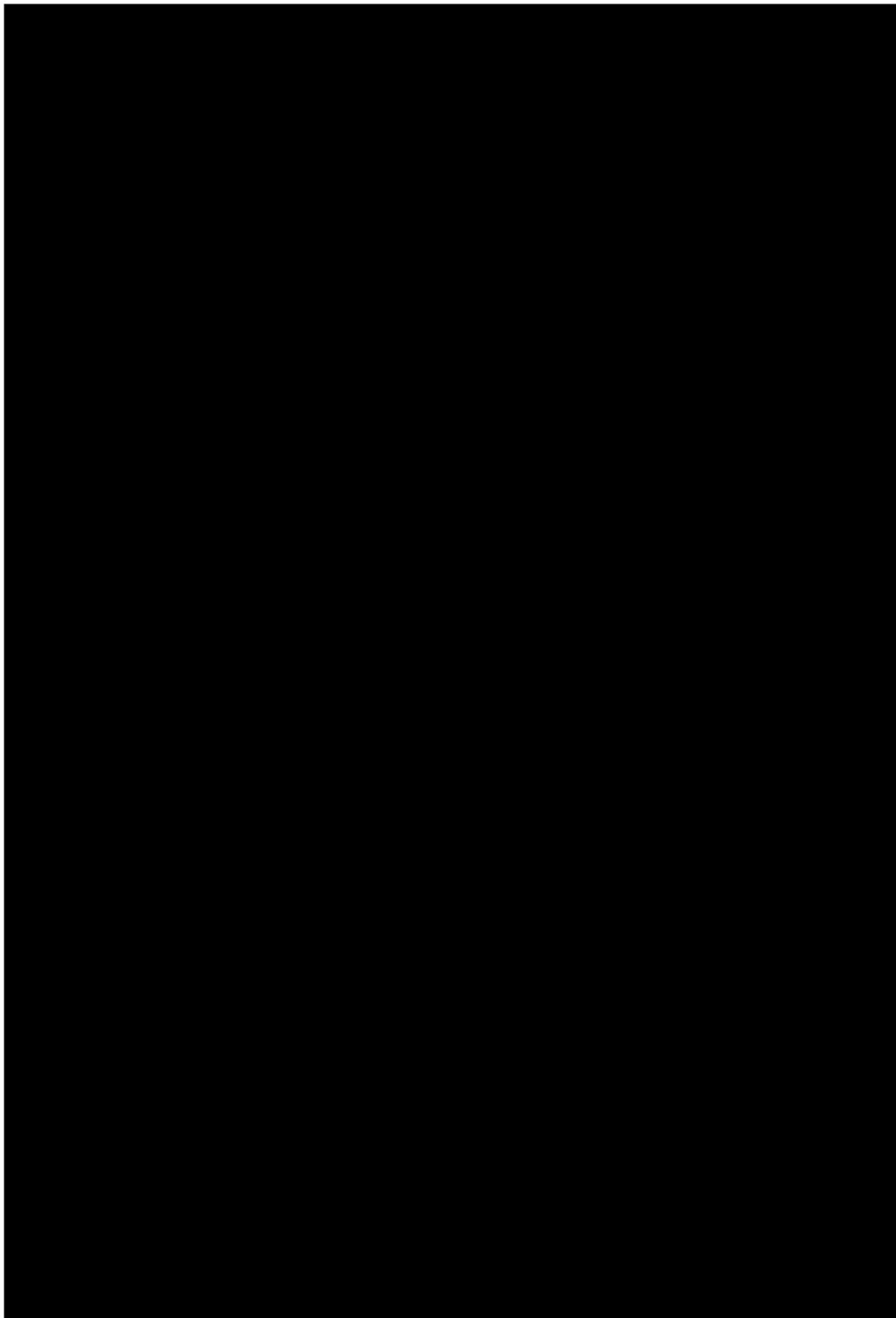


Figure 5

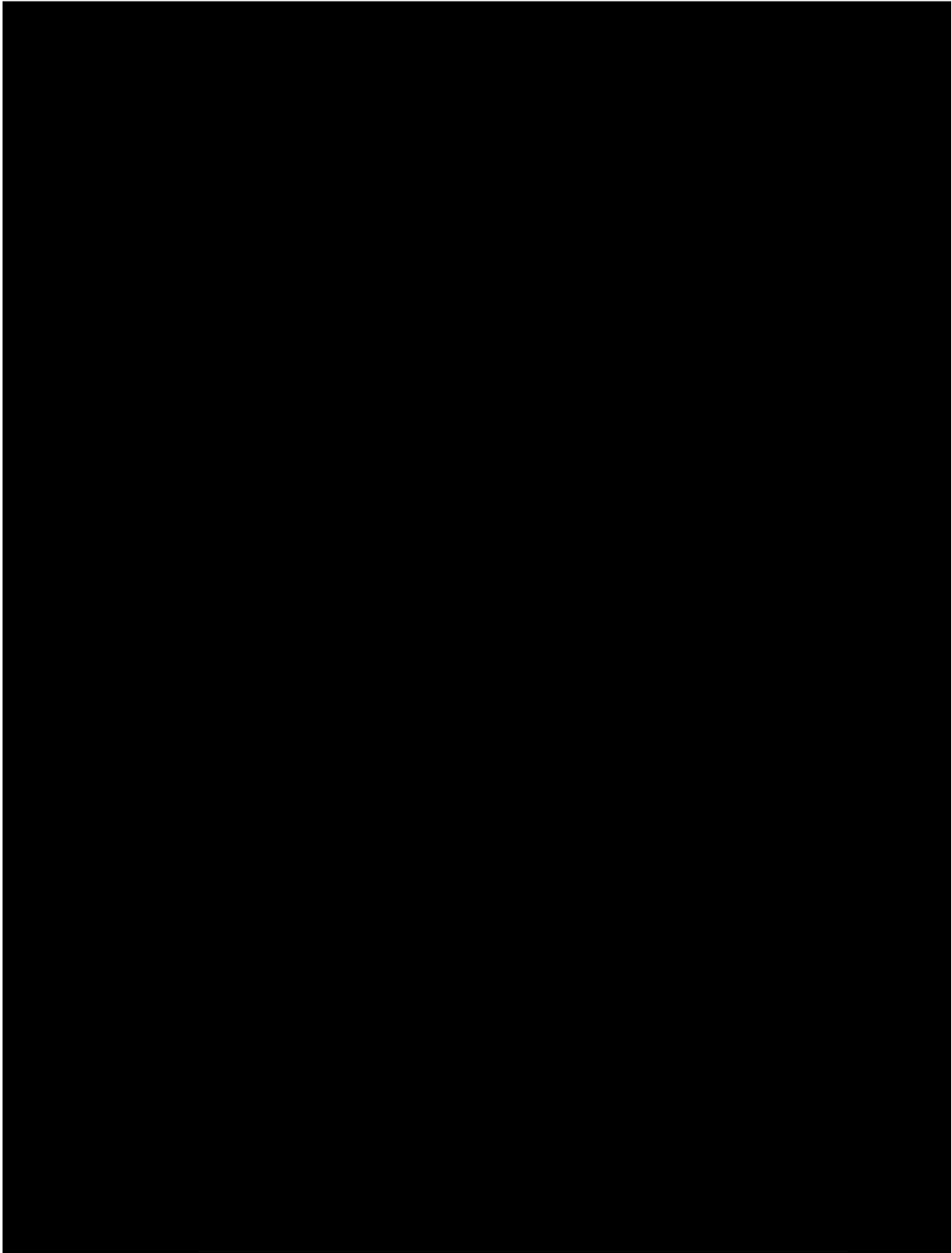

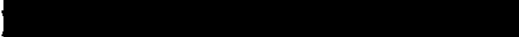
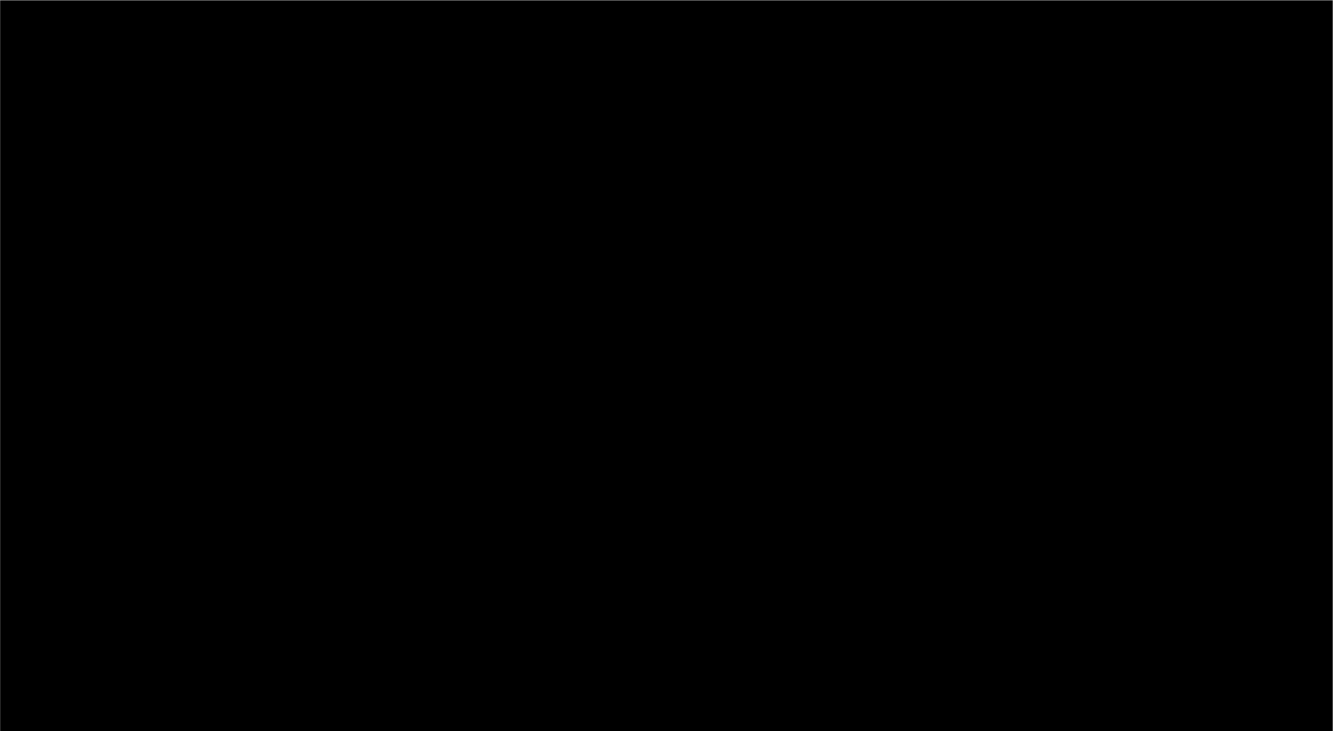


Figure 6

The proposed development has a hardstand carpark at the front that is more than one third of the block plus paths around the building (approximately 380m²). This will collect a lot of storm and overland water that is going to end up in the rear of block main. The roof area of this development is over 250m² with 14 downpipes that will spill to the main. The play area at the rear also has a pit to collect ground water. The already overloaded main cannot handle this influx of water from the site.



Another concern I have is their proposal to plant trees across the rear of the development. (obviously to alleviate the hot summer sun and winds). This will be to the detriment of the council assets (sewer and storm water mains) 





City of
Wagga Wagga

CUSTOMER REQUEST - DETAIL
CR No: CRStm21/0051

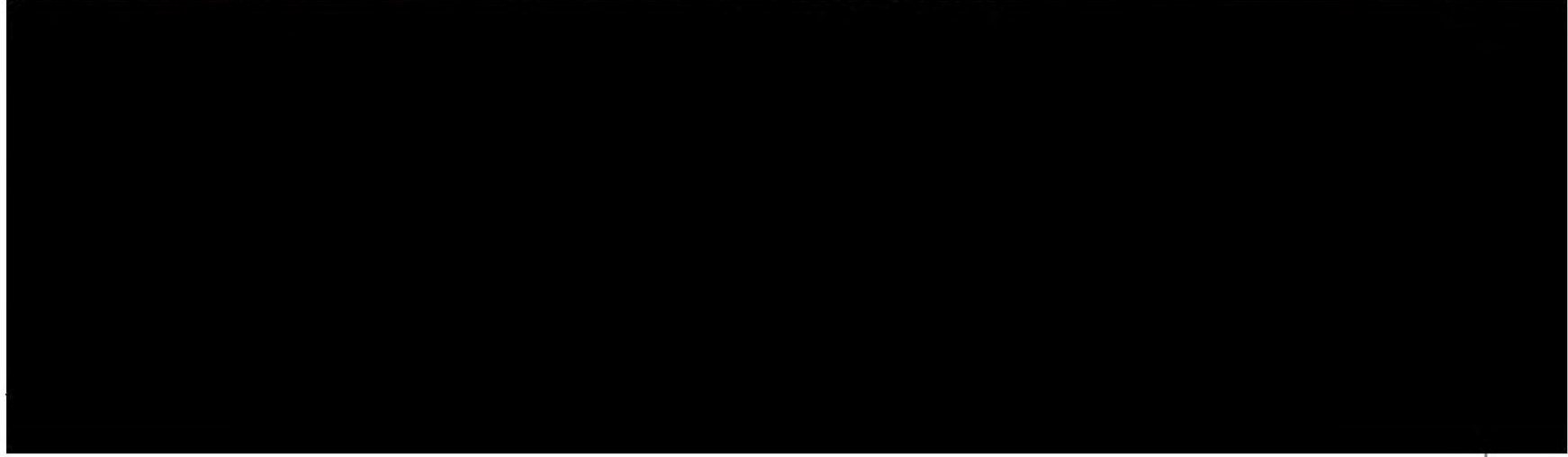


Figure 7

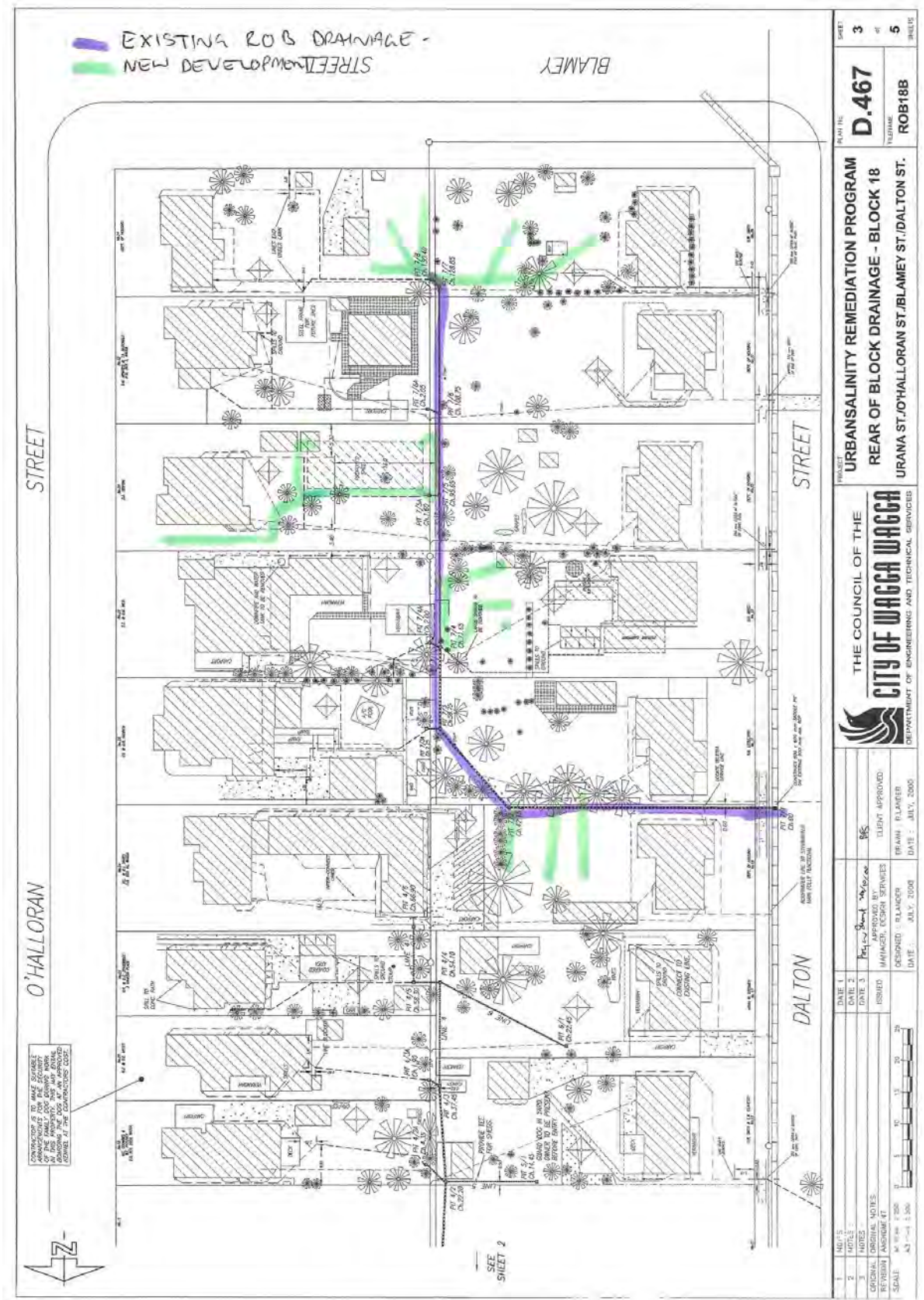


Figure 8

Site Demolition and Construction

I have serious concerns about the vehicle and machinery movements associated with this development and the demolition.

The demolition will involve large excavators and tip trucks to remove the rubble from the site. (Not how it has been stated in the Waste Management Plan). This will create a lot of heavy vehicle movements, including the delivery of these excavators on low loaders. These vehicles will be unloaded on the street. Tip truck movements and steel track excavators will damage the existing bitumen and stone seal. There is already evidence in the street, of damage from the bus movements alone (Figures 9,10, 11 and 12).

The tip trucks cannot turn on site. They will have to either reverse in or reverse out of the site. This will have adverse effects on pedestrian traffic, (many children) and vehicular traffic trying to access the school. Damage to the existing footpath from the heavy machinery will cause trip hazards to pedestrians outside of working hours.

To achieve the height, they require for their proposed floor level, there will have to be a quantity of cut and fill. Council has a “no vibratory machinery” policy in urban areas with roadworks because of the damage it causes on neighbouring houses. To achieve the compaction necessary to bring the floor level up 500mm at the rear of the building, I am wondering how they propose to do this without “vibrating equipment”. The houses of the neighborhood, [REDACTED] do not have enormous foundations under them. Vibrating equipment would be detrimental to house foundations and to the ornate cornices within the premises.

The number of trades needed to complete such a proposal is enormous. Where will they park? Again, there will be a huge number of heavy vehicles delivering materials to site. These vehicles all have restricted vision. Because the overhead powerlines sit so far into the footpath alignment, it will leave no choice but to set cranes on the existing footpath alignment to lift materials to site. Concrete pumping booms will be the same. Materials being moved by this equipment will need to sit on the footpath and road reserve, to be unloaded.

Construction will create so much noise. Ongoing, for months and months. Construction will produce a lot of waste. This cannot be removed with council collection. Again, more heavy vehicles with restricted vision, and all near the school and a congested area.

[REDACTED]

We don't believe this commercial building has any place in a residential neighborhood nor does its commercial construction. Construction associated with residential works is not anywhere the scale of a commercial construction of this size.

There are serious safety concerns associated with the pedestrian and public vehicle movements for this process of the development. The development will be detrimental to council assets and is not in the best interest of the rate payers and residents of Turvey Park.



Figure 9



Figure 10



Figure 11



Figure 12

Site Analysis

(Figure 13) – Amended diagram from the development application shows true weather patterns for the Wagga Wagga region.

- Temperate North Easterly winds on diagram are really hot North Westerly winds in summer. The majority of Wagga Wagga's weather is associated with the Northwest.

- Temperate South Easterly winds on diagram are actually freezing cold South Westerly winds in winter. The temperature at any time of the year will decrease dramatically with the influx of South Westerly winds. In Summer, they are welcomed to relieve the heat but are extremely rare.

- South Westerly winds are actually Southeasterly. any weather from the East produces heavy rain and thunderstorms.

The play areas on the back of the development are compromised. The play area on the first floor of the development is going to expose children to the worst weather of the Wagga Wagga region. A glass filled area in Summer with the heat and the winds! Are they planning to "cook" these children?

In the Winter, the playground areas are exposed to cold Southwesterly winds. The shading created by our boundary fence in Winter is enough to reduce our Kikuyu Lawn to mud. The shading of the proposed development will not allow lawns to grow on the Southern side of the development during the Winter months. We would suggest, there is not going to be many outside activities with this development given the diverse weather conditions encountered in our region.

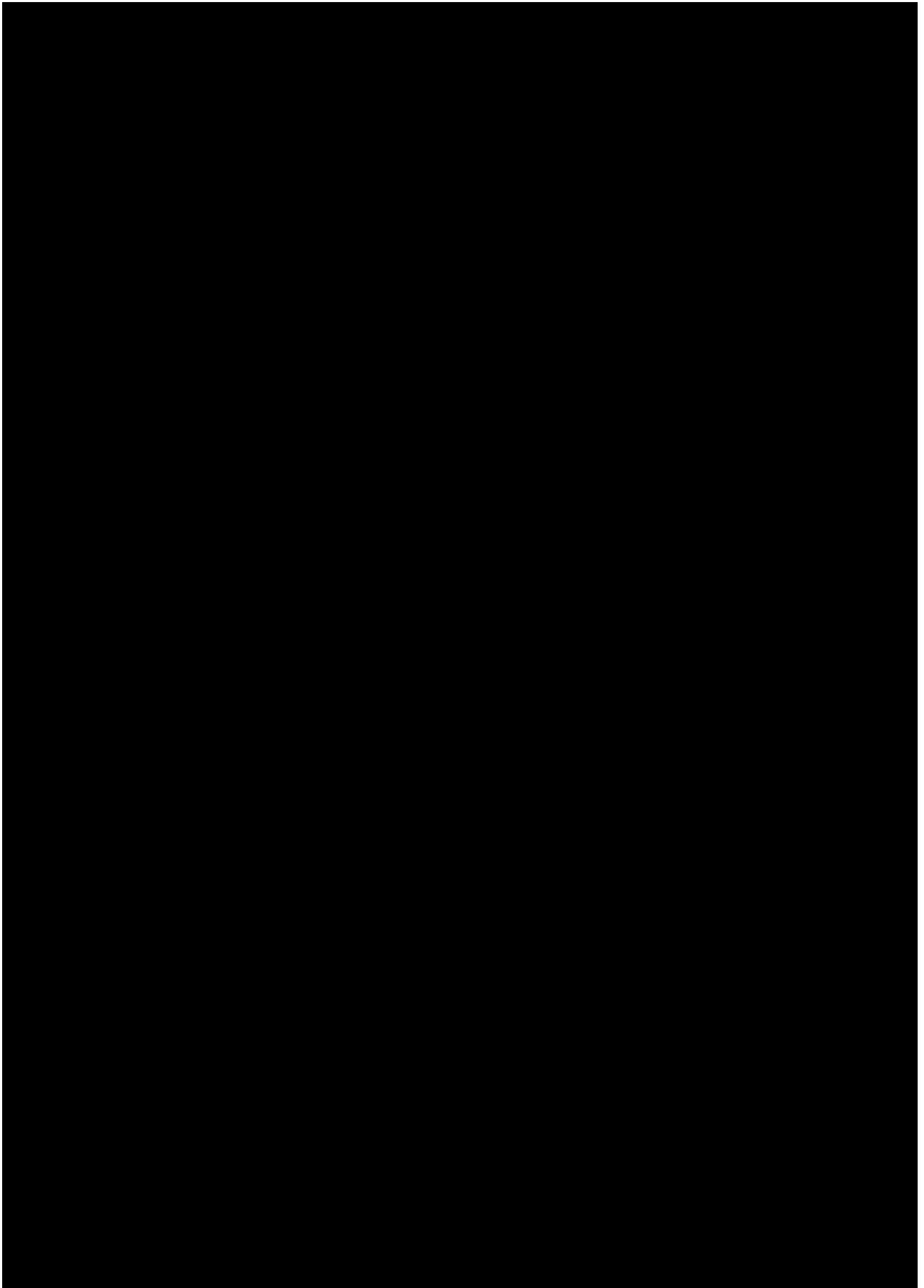


Figure 13

Traffic Concerns

The report prepared by TEF does not reflect the true vehicle movements and statistics associated with a rural situation and in particular, Wagga Wagga. It is convenient the report would table statics from a TfNSW study that displays their peak drop off and pick up times just outside the schools operating hours. Maybe in a metropolitan area, but certainly not in the regions.

The report shows the surrounding streets, labelled with parking lanes and two-way traffic. This is not true. The streets are narrow and cannot handle the traffic they carry in peak periods now. The report also fails to identify Mair Street on the Eastern side of the school, that is a narrower street again (only 8.3m) and overflows with pick up as well.

The parking zones are not documented properly. There is a section on the Eastern side (approx. 6 car spaces) that is a “No Stopping” zone. This area cannot be utilized at any time of the day or night, 7 days a week.

The report, at no stage, addresses the influx of vehicles on wet days. Vehicle movements are close to double on days of rain. The report, also, makes no reference to the parking spaces lost because of council rubbish collection on Thursday’s. Bins go out Wednesday night and cars cannot park in front of the bins and impede their collection.

The report also fails to identify the amount of parking required for school functions that occur, or the bus movements associated with excursions, swimming and athletic carnivals. Functions such as NAIDOC Week, Book Week, School Fete attract more than 100 vehicles to the immediate area.

The report suggests the site is satisfactory because it is near a corner. This is not a fair statement. The driveway to the development is in a dangerous location. It is only 28 metres from the intersection, barely enough room for four cars to stop and wait to access the proposed development, which then causes vehicles to block the intersection at Blamey and Halloran Streets. Add a bus in, using the bus stop, and we have a serious problem.

Cars accessing the car park from the North, will be required to blindly turn right from behind a bus stopped at the school. This creates another serious situation. (Figure 20).

The parking survey talks of an abundance of car parks within 150 and 250 metres of the Centre. However, all these parks are on narrow streets. Again, 2 parking lanes and one single lane through. This means more congestion. I really don’t think a young mum is going to park hundreds of metres away, and lug their child, and a day bag all that distance. It is unrealistic. They’ll want to park as close to the development as possible. Once again, parking problems.

Because this is a commercial development, (as stated in section 4.4 of the waste management plan), and because of the vehicle movements to and from the car park of such development, surely there will have to be a “No Parking” zone either side of the driveway, so vision is not restricted coming out of the carpark. This will mean even more parking spaces lost.

Vehicles delivering supplies will have to enter the proposed carpark for drop off. The car park cannot accommodate the delivery vehicles turning circles, so they will be forced to reverse out onto the street.

To say that the loading and unloading spaces for goods on site are not applicable to a Child Care Centre of this size are ludicrous. The Centre, regardless of its size still must be supplied and still needs to remove refuse.

The proposed location for this Centre is poorly chosen. Although the extra vehicles seem small in quantity, there is a detrimental, and flow on affect to the already documented traffic problems of this area. The location does not suit the requirements of a corner block, but compounds problems because it is one block in from the corner. For TEF to state – “There will be no negative impacts on street network operation”, “the carpark access and design comply with the relevant standards” and “the proposed development is supportable on traffic and parking grounds” are all unfounded. Included are some photos taken recently of the traffic movements around the proposed development. (Figures 15, 16, 17, 18, 19 and 20)



Figure 15

Looking to Blamey Street
intersection



Figure 16

Looking to Blamey Street
intersection



Figure 17

Looking down Halloran Street from
Blamey Street intersection



Figure 18

Waiting to get out of Dalton Street
to turn toward Bourke Street



Figure 19

Looking down Blamey Street to
Halloran Street

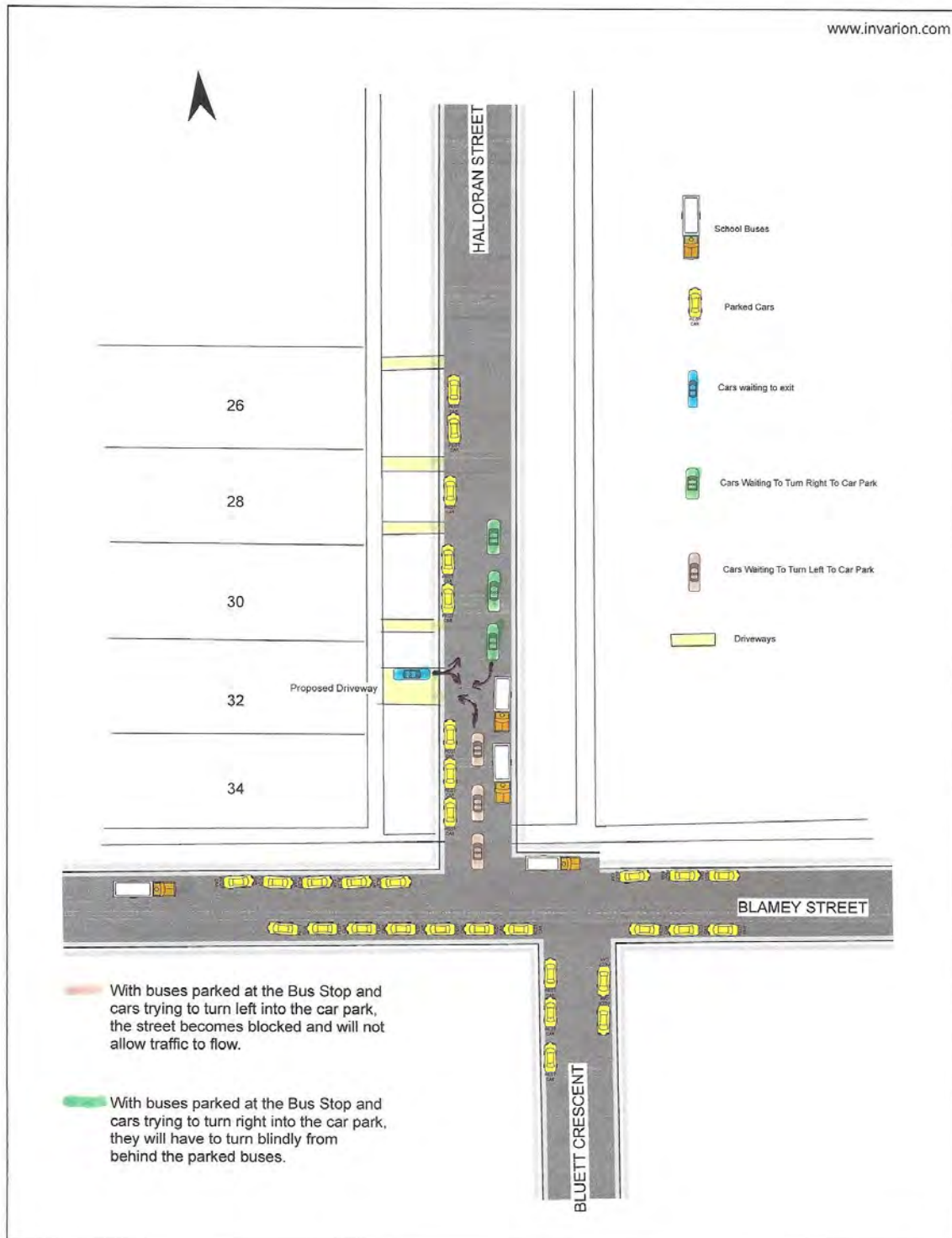


Figure 20

Noise from Development

The proposed development will generate more noise than would be usual for the neighborhood.

- Demolition noise (and Dust) – Heavy machinery used to remove existing buildings and footings. Amplified ground vibrations.
- Construction noise – this will be constant for months and months. Construction will be six days a week, taking away our peaceful weekends. Again, ground vibration from rollers, excavators can damage the foundations [REDACTED]

- [REDACTED]
- Operational noise – to state that the Centre noise will be contained by the acoustic fences proposed is not true. Firstly, we reject the proposed height of the fences. These fences take away from the look and feel of the neighborhood. They propose some of these fences to be the same height of the ceilings in a house. [REDACTED]
- [REDACTED]

The noise will radiate out from the play areas to the side and rear, plus noise from the upstairs area. It is in close proximity to seven neighboring properties. This is unacceptable.

- Cleaning and maintenance – after conferring with two other childcare Centre managers, it is apparent that the Centre cleaning is done outside of their operating hours. It was also noted that the mowing and grounds maintenance was conducted on weekends only. Rubbish removal was on the council collection day, but the excess was collected in a skip bin on a Saturday as well.

In conclusion, we are aware that the school opposite the proposed site generates a certain amount of noise. However, the noise is limited to drop off, recess, lunch and pick up. In between these times it is relatively quiet and peaceful. There is 12 weeks of the year we have no noise, because of school holidays. The noise from the school is metres away, as the school is stand alone. The noise from the proposal is [REDACTED] way too close.

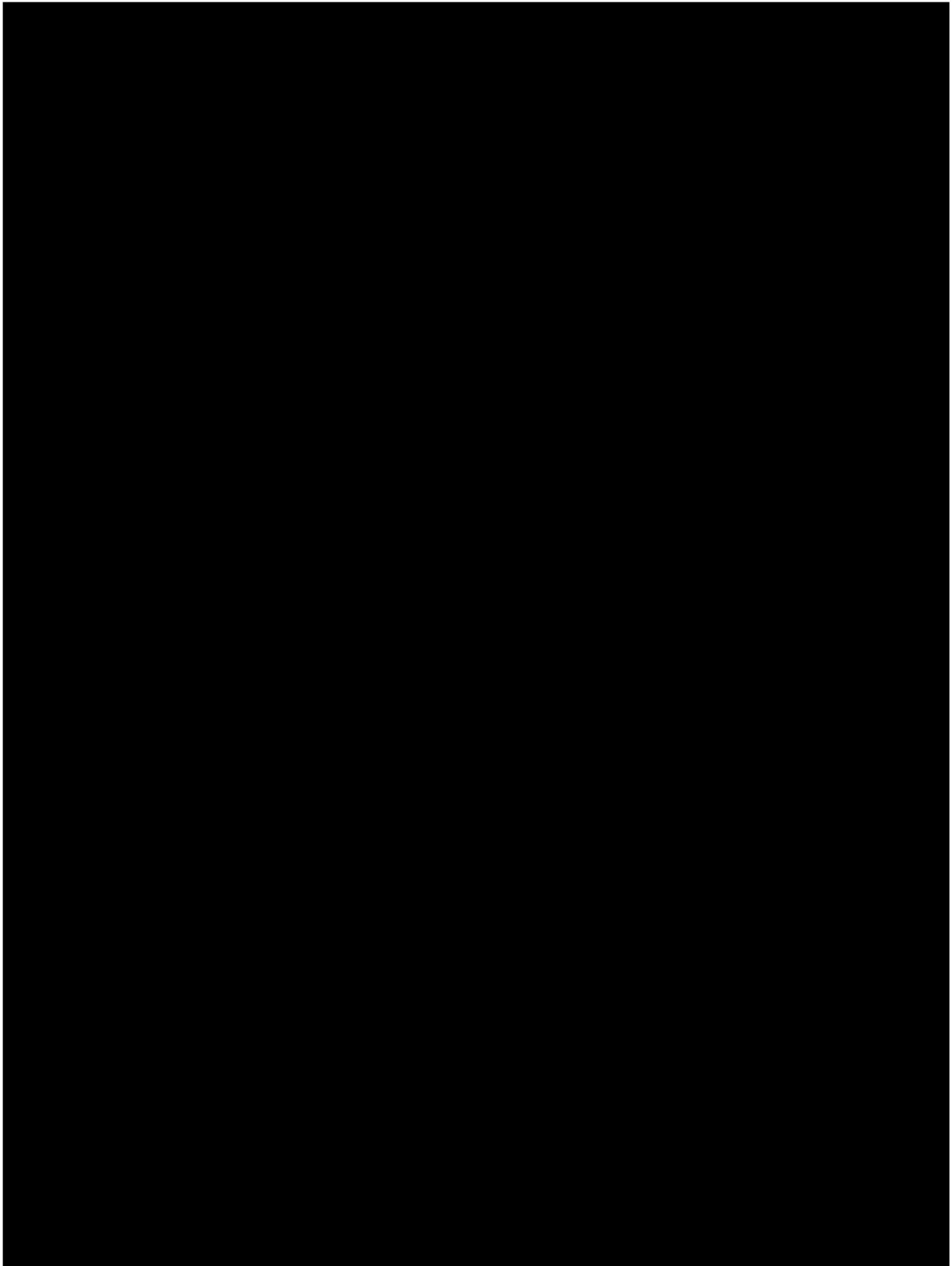


Figure 14

Privacy

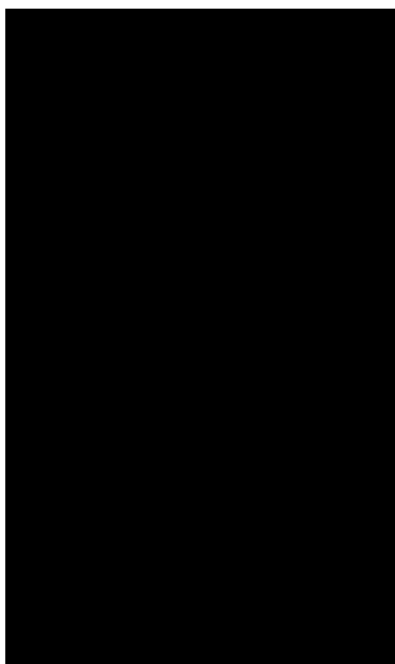
The proposed two storey development at 32 Halloran Street does not belong in the location it has been set down for. It is between three residential dwellings and directly affects another eight.

The height of the building overlooks directly into the yards of eleven (11) surrounding neighbours. [REDACTED]

Attached are photos taken from [REDACTED]. Remember the development is approximately five metres higher than [REDACTED] giving a more enhanced view of the affected premises.

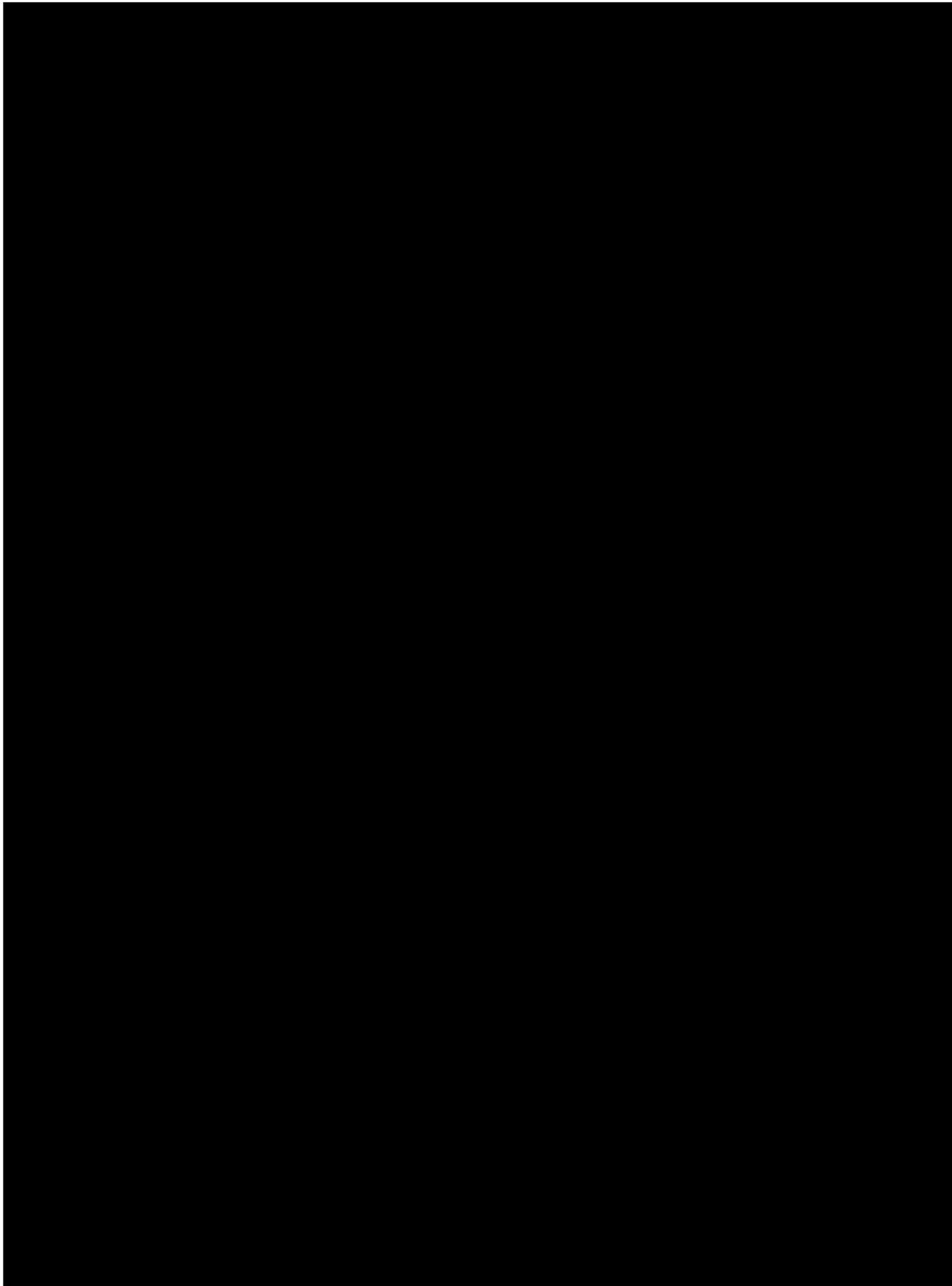
The addresses affected are as follows:

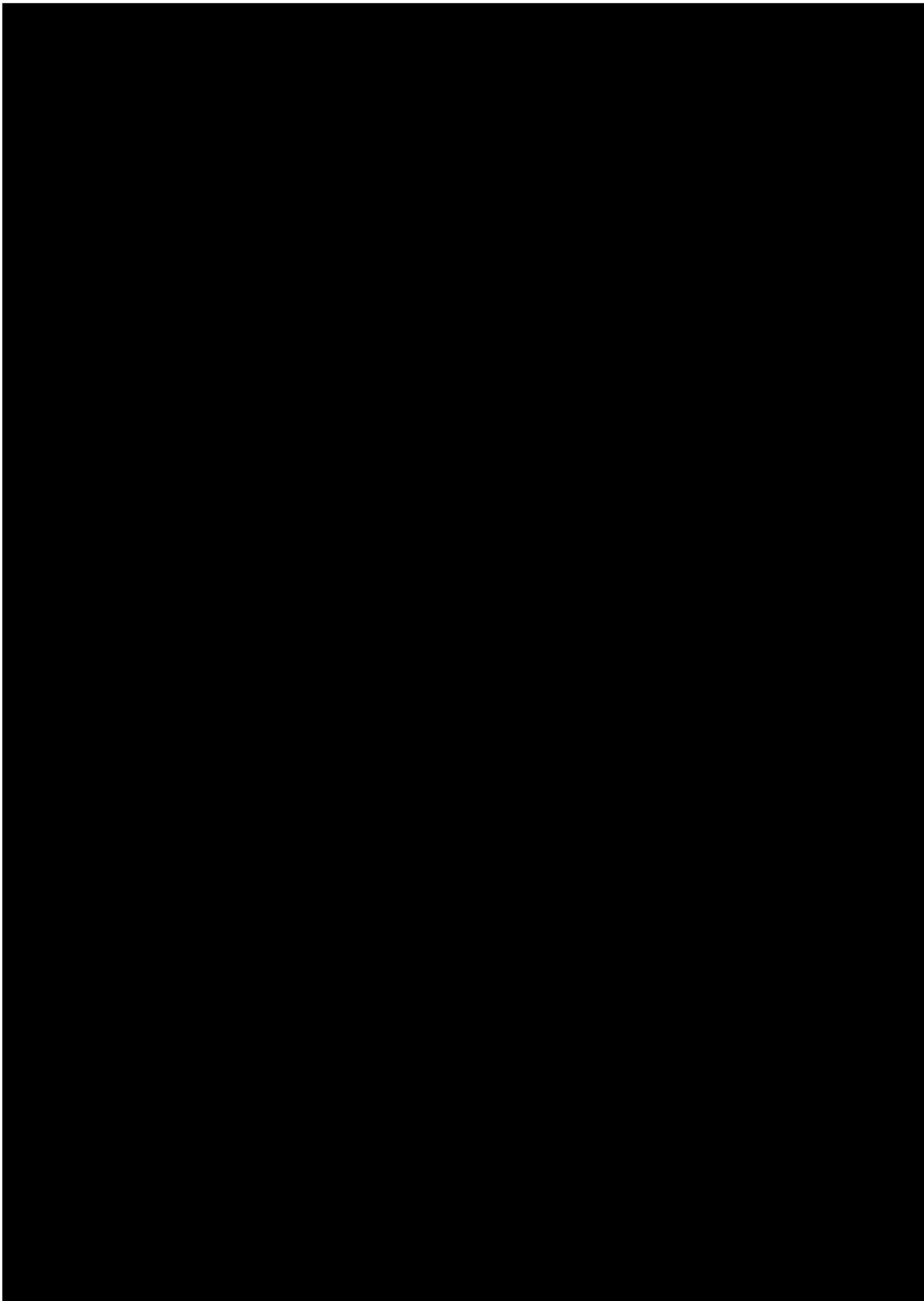
26 Halloran Street
28 Halloran Street
30 Halloran Street
34/1 Halloran Street
34/2 Halloran Street
55 Blamey Street
29 Dalton Street
27 Dalton Street
25 Dalton Street
23 Dalton Street
21 Dalton Street

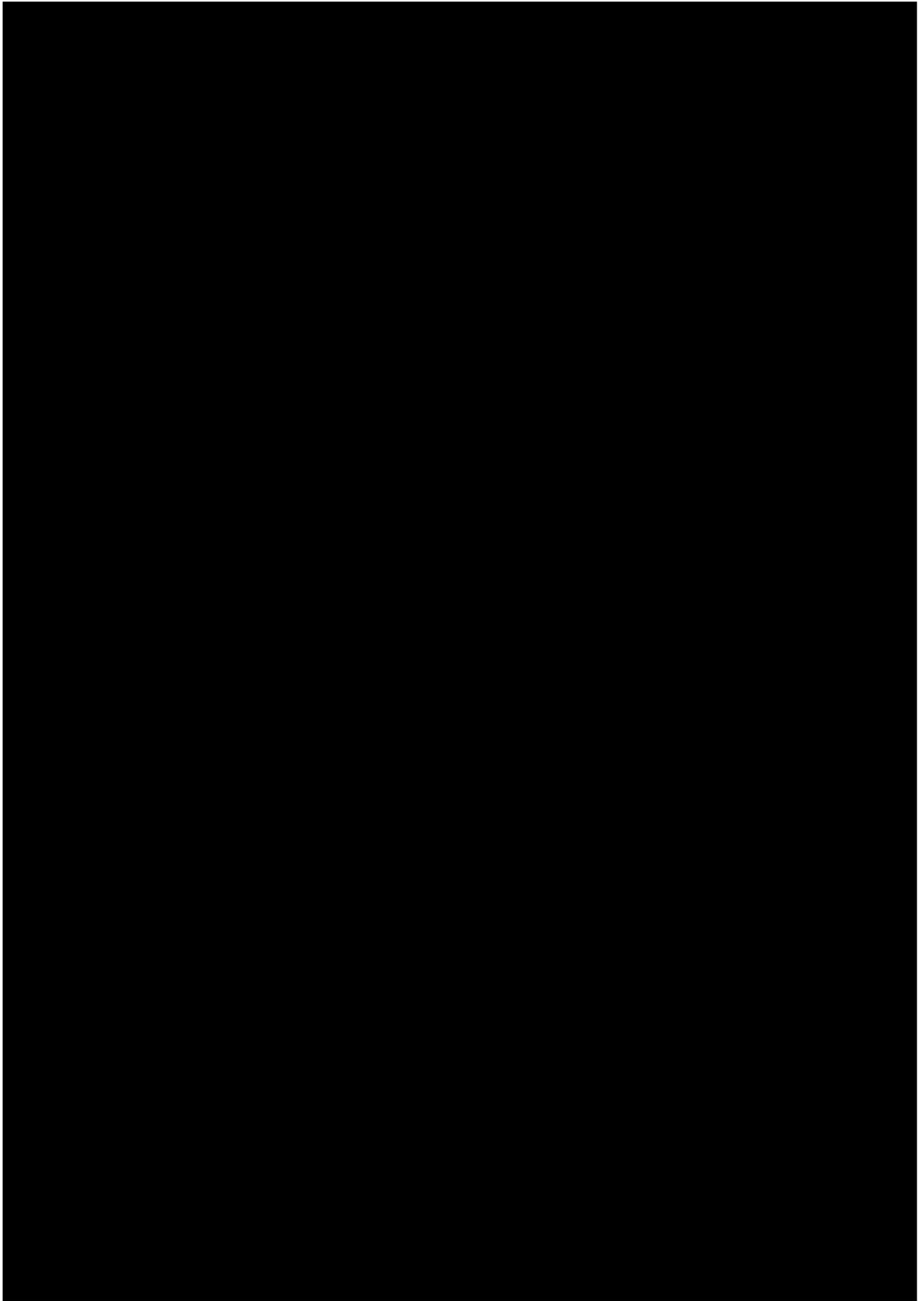


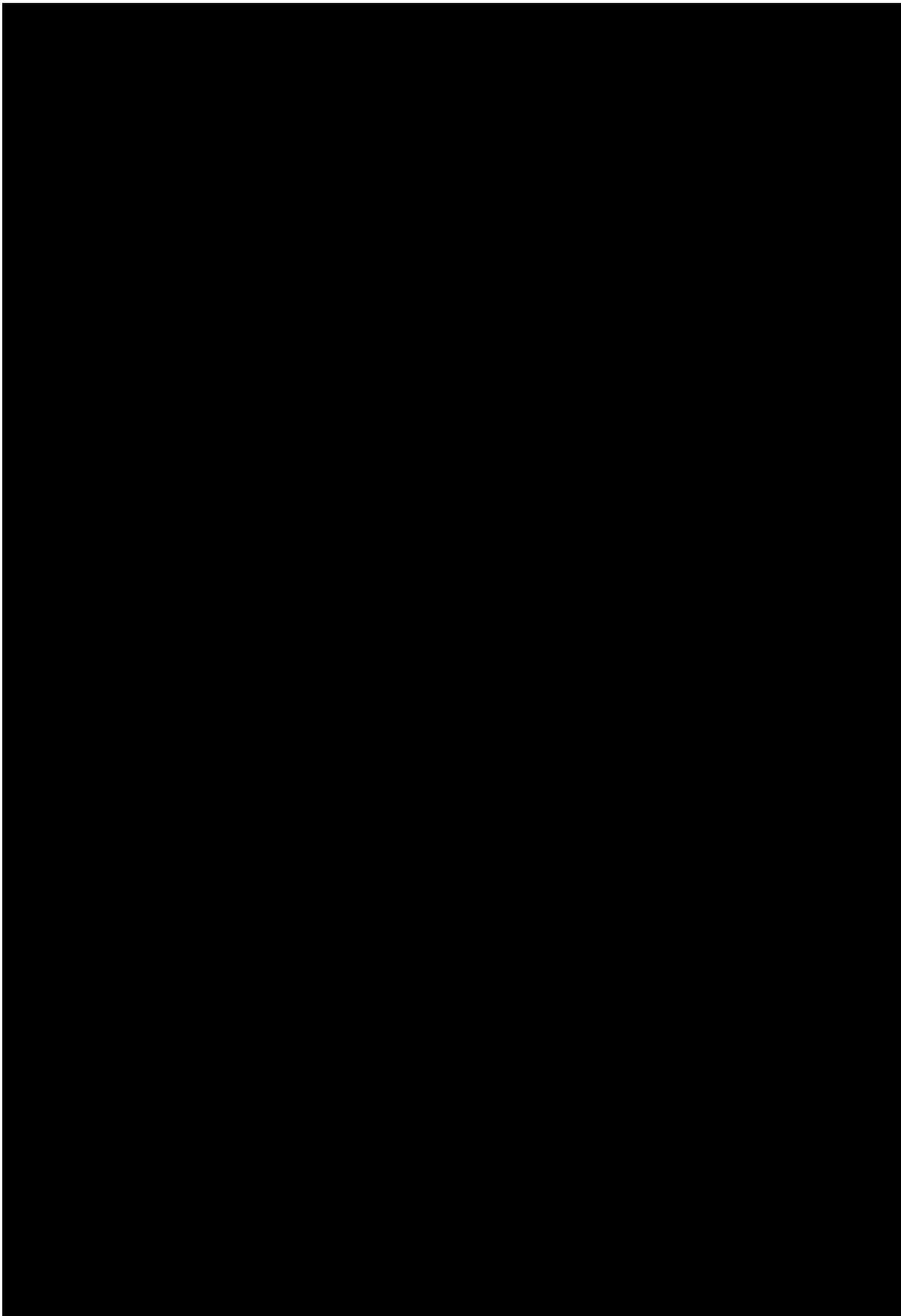
There is a real concern the development if completed will be vulnerable to break in and graffiti as happens quite regularly at the school. It is just another attractant to an undesirable crowd that the residents in the immediate area would like to avoid.

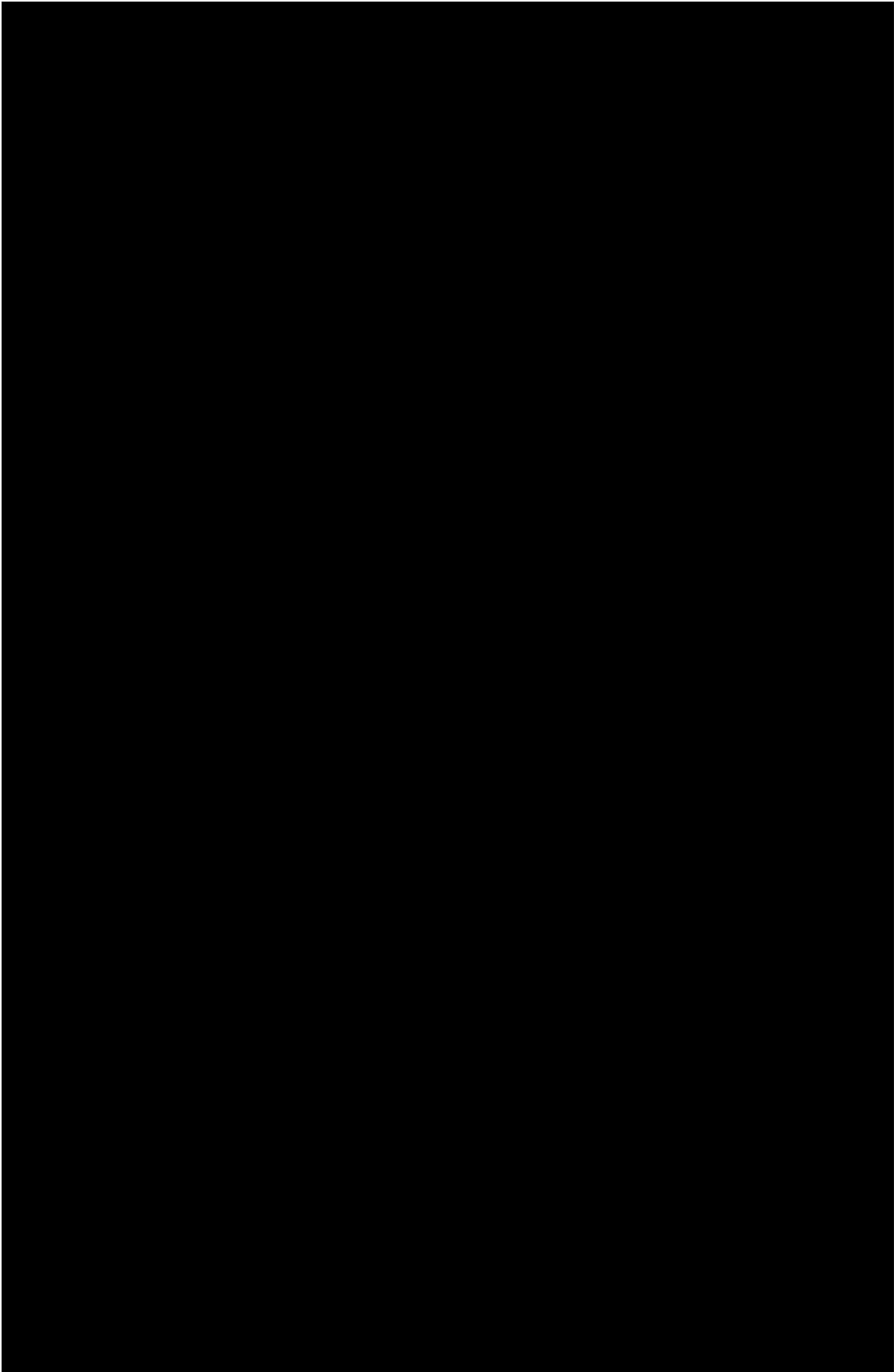
This development is not in the best interests of the community' nor the residents that it's construction will directly affect.

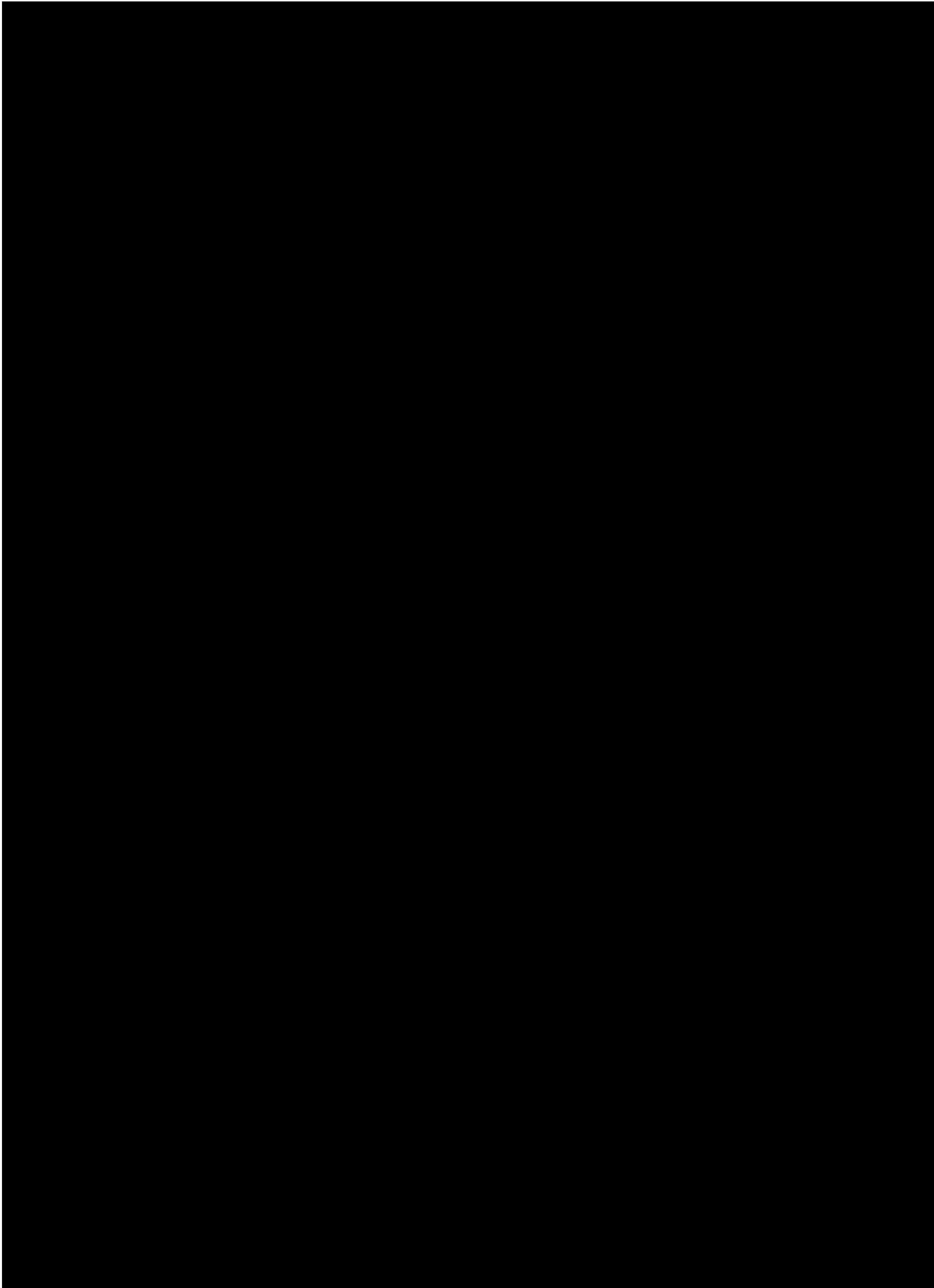




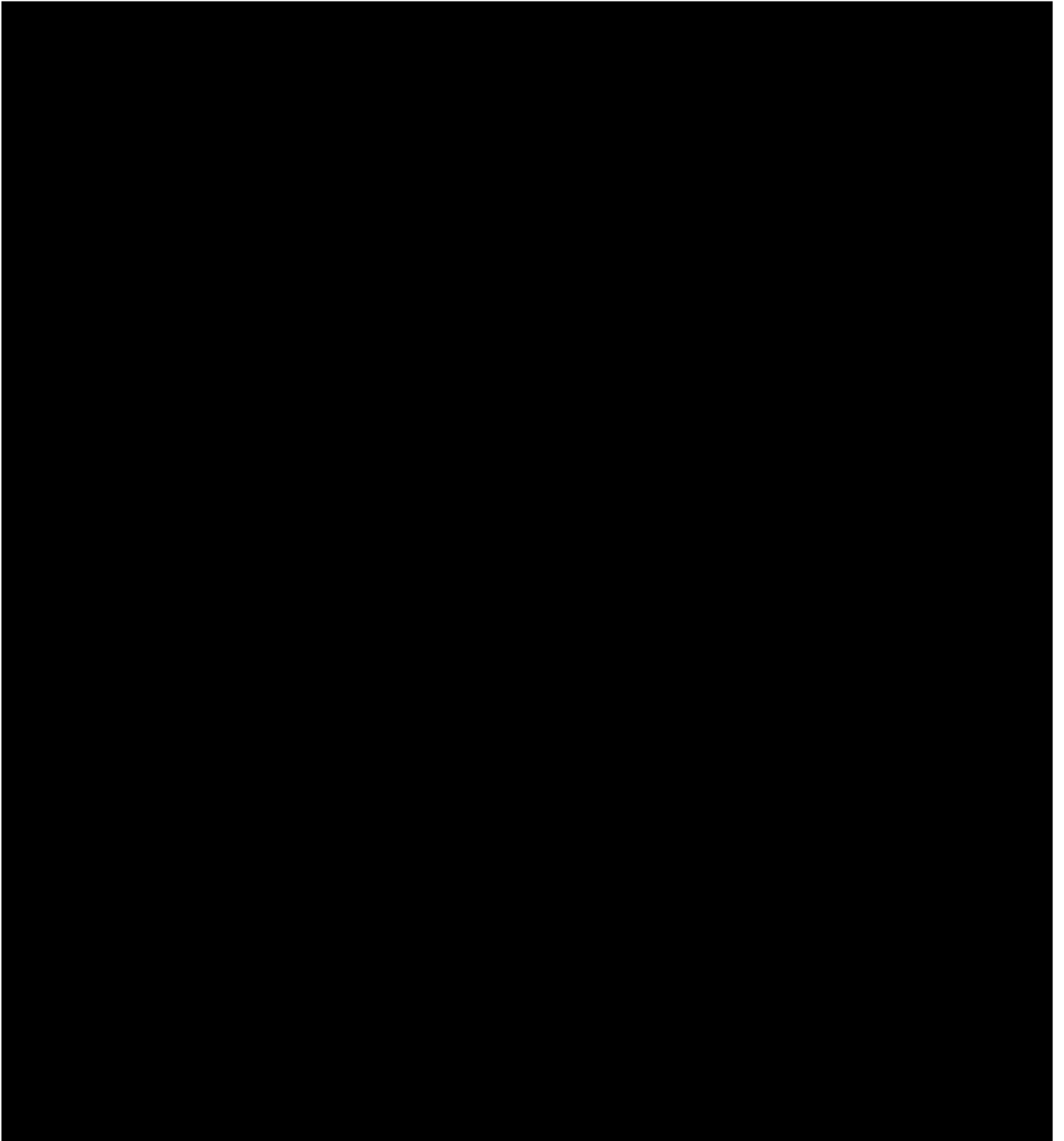








Landscaping

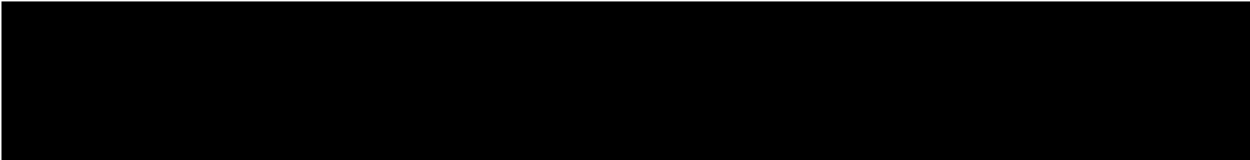


Waste Management Plan

The waste management plan provided in this application, 2.4 demolition – is so far from reality it is ludicrous. Do these developers honestly think that people would believe the nonsense they have placed in this section of the report.

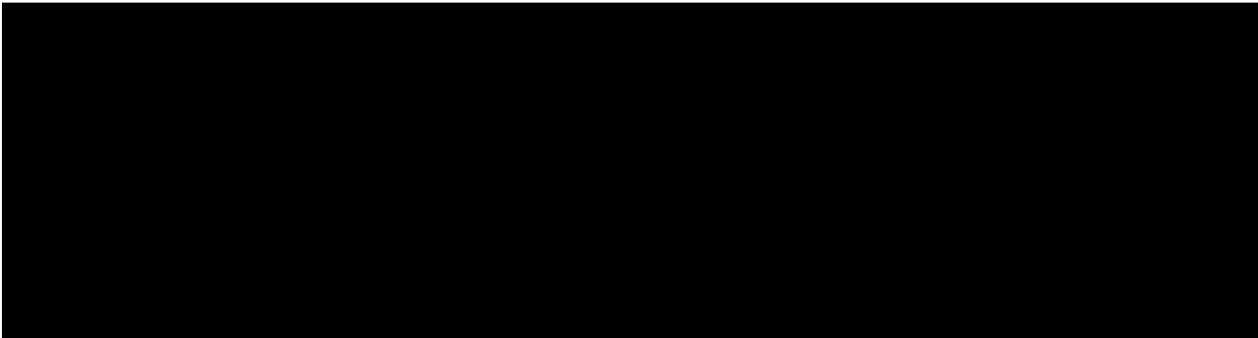
The site is not large enough to store all the recycled materials they have stated and continue with construction. The report states that broken bricks and concrete is to be crushed and reused on site. Imagine the noise and the dust created by a crushing plant in a residential area.

For the developer to state they are going to hold 750m³ of soil on site, 105m³ of green waste on site, that they are going to clean and reuse 60m³ of bricks from demolition is totally unbelievable. To state that they will, on site, crush 180m³ concrete, that they will re-use dried Cyprus Pine for form working, that you couldn't drive a nail into with a sledgehammer, is just ridiculous. These developers need to start smelling, what they are shoveling at our community. It is not even close to believable.



Did the developer just cut and paste this into their application. The whole construction waste report is degrading to the intelligence of the reader. I'm sure Kurrajong Recycling does not want the materials they have stated.

As for the report – Part 4 – ongoing use, we have contacted several childcare facilities, all around 60 children and asked about their refuse. It has been stated that 3 bins a week of refuse for 46 children is not realistic.





Regional Transport Planning

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Mob. 0439 656769

Email garudagaff@yahoo.com.au

29 August 2022

Proposed Child Care Centre Halloran St Wagga Wagga Review of TIAR

Regional Transport Planning was recently approached by residents of Halloran St to assist them to appreciate the traffic situation which might result from increased traffic at the southern end of Halloran Street after the opening of a proposed Child Care Centre

I have briefly read the TIAR prepared by a Sydney based traffic engineer TEF. I also met on-site with several concerned residents of Halloran Street and Bluett Cr and observed the traffic situation outside the public school at school break up time. I listened to the concerns of the residents.

Having formed the opinion that the proposed development will occur in a place where there are serious traffic risks to children, and that the Child Care Centre could make the situation worse, **I could not walk away**. As an experience Traffic Engineer with 30 plus years of experience, (including chairman of the Wagga Wagga Traffic Committee), I strongly felt that I should write an opinion. I offered to do this "Pro Bono" and allow the residents to use my opinion to support any submission that they might make to Council.

I have also practiced as a Consultant Traffic Engineer in this city for over 15 years and have written many TIARs.

I feel that the TIAR prepared by TEF does not adequately describe the existing situation and therefore the resultant detrimental threat that the development might have on Child Safety.

It is the purpose of the TIAR to accurately and clearly set out the existing situation and the likely impacts of a proposed development on traffic and safety.

I will set out briefly, some comments on the TIAR after my brief reading of it. I only highlight these to illustrate that the report is inadequate. It is not a comprehensive critique of the report. This would take more time that I have to offer.

Consultation

It seems that the consultant has not carried out interviews with the relevant stakeholders. There is no mention of the opinions of the School Principal, the P and C, the bus operators, the pick-up parents and carers, or the residents in the location. In my brief consultation and observations, I believe that the existing traffic conflicts and concerns of stakeholders would have been worthy of inclusion in the TIAR.

Road Width Description

Most of the local streets in the area are 9 metres of width. In Wagga Wagga, and elsewhere, this width is regarded as having 3 lanes – two parking lanes and one two way travelling lane. Oncoming vehicles, (where the parking lanes are occupied), must wait and weave into parking spaces to pass oncoming vehicles. This works well in lightly trafficked streets. Where it doesn't work the remedy is to restrict parking. It is misleading for the Traffic Engineer to describe the 9 m street as having 4 lanes – two for parking and two for opposing traffic. See page 3 of the TIAR. This is a fundamental issue in understanding the traffic impacts.



This photo illustrates how the narrow streets operate.

Both sides of the street are parked including on one side by a large bus. There were 4 oncoming northbound vehicles and the south bound vehicle needs to wait in behind the bus. I measured slightly more than 4 metres between the parked vehicles.

The Traffic Engineer has either made a serious error or does not understand Wagga conventions.

Parking Spaces and congestion.

The congestion in the area at school breakup time has been minimised in the TIAR. The report states:

The survey results indicated that there were at least 20 spaces vacant throughout the day (to a maximum of 43) in the survey area during the times of operation of the proposed child care centre. • There are ample parking opportunities within walking distance from the site.

My observations, (that were confirmed by residents) were that there are seldom vacant spaces for parent pick-up in the afternoon. Some parents park up in Bluett Cr and walk down to Blamey St and cross at a “staggered” intersection

amid turning traffic and moving buses. Some carers actually illegally park on the nature strip on the western side of Halloran St in the PM pick-up. Many parents arrive quite early to get close to the school. Unfortunately the majority of close parking spaces are on the western side of the street. This means that children need to cross the street and are often unescorted. Sometimes there are siblings being picked up, meaning that loading into the back seat behind the driver requires opening of doors into the passing traffic. Increasing the traffic in the street by adding a Centre with 46 students and 10 staff (with 12 parking spaces) must have some impact on the traffic in Halloran St.

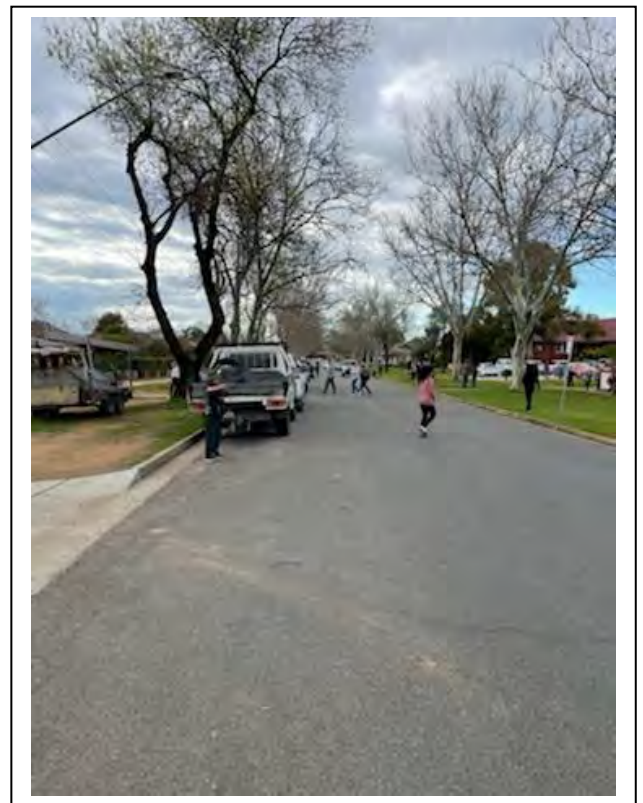
The report goes on to advise:

No congestion due to bus movements nor their parking was observed. There was no double parking or blocking of intersections nor driveways. In Halloran Street, buses took advantage of the No Parking zone (2b in Figure 5) on the approach to the bus zone, as necessary (only observed once). Not more than one bus stopped at the Blamey Street stop at any one time

The photos above and below shows that this is not true. This bus is almost opposite the proposed entrance to the new centre.



Looking south



Looking north

The parked buses on the corner of Blamey St , east of Halloran, outside the school are, in fact, illegally parked as the rear end is too close to the prolongation of the Halloran St K&G and obstructs sight distance for turning cars and pedestrians.

Traffic Impacts. The author states:

***Traffic impacts.** ° There will be no negative impacts on street network operation.*

While I have not done a thorough assessment, it is hard to imagine how there will not be negative impacts from the traffic generated from the new development with 56 students and staff with only 12 parking spaces on-site. This traffic is being added to the traffic generated by over 400 school students and staff.

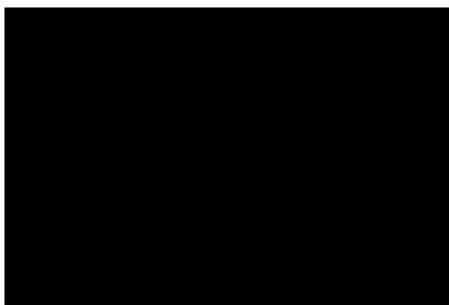
Concluding Statement

To be fair to the developer, the traffic generation from the Child Care Centre may be fairly small and often “staggered” in arrival and departure when compared to the Public School. Also, most of the vehicular and pedestrian safety issues result from the management of students at the primary school. Over many years, this has been difficult to improve and many attempts have been made. The situation that I observed represents many of the worst aspects of school safety at break up time.

I observed students running, unattended while crossing the road, playing with balls and mingling with moving cars and buses.

The school is one of the largest in Wagga Wagga with over 400 students and staff. There are at least 15 bus routes servicing the school. The decision makers, who are to consider the suitability of the subject development, must consider the likely impact on the safety of all children frequenting the area.

In act judiciously; they deserve to be presented with a comprehensive statement of the Traffic Impacts.



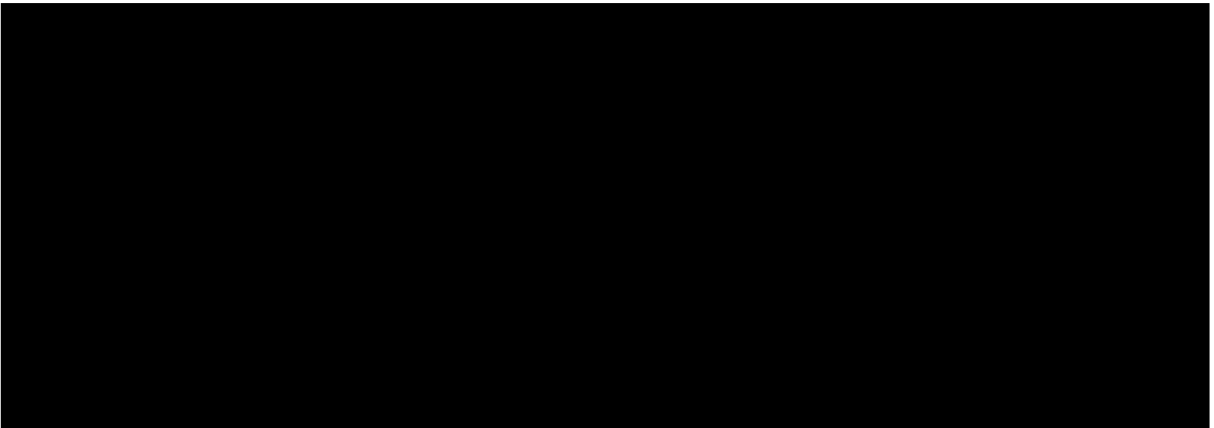
The General Manager
Wagga Wagga City Council
council@wagga.nsw.gov.au

1 September 2022

Dear Sir

RE: OBJECTION TO DA22/0460 Two Storey Childcare Centre (46 Places), Demolition of Existing Structures, Carparking Areas, Fencing and Retaining Walls 32 Halloran Street, TURVEY PARK NSW 2650

Introduction



The Environmental Planning & Assessment Act, 1979 Clause 4.15, contains the matters for consideration for a consent authority considering a development application. One of the matters most relevant to this application is *“the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality”*.

We submit that the proposed development would have adverse impacts on the built environment and negative social impacts in the locality.

Objection to Proposal – impacts on the built environment

Streetscape and Character We concede that the development site is not within a heritage conservation area therefore protection of the streetscape is not a statutory consideration. We do note, however, that a walk around the neighbourhood reveals a consistent development pattern and architectural character of Inter-War, single storey dwellings on relatively large lots. Uniformity and rhythm are important aspects of the streetscape. Apart from the 2 storey Turvey Park Public School opposite the site, there are very few 2 storey developments in the immediate vicinity. 2 storey development is more common upslope of the site, where development on sloped sites incorporates additional levels.

The car parking area at the front of the site combined with the building's setbacks creates a large inappropriate void in the streetscape. The proposed building does not respect the prevailing streetscape in terms of its setback.

Interface The proposed child care centre has not been designed with reference to the existing development in the vicinity.






Figure 1 Flagged poles indicating proposed building height

The proposal to construct acoustic barriers around the development site may protect neighbours from adverse noise impacts however this will be to the detriment of the aesthetic appearance of the boundaries. High solid fencing will affect the residential character and provide an unattractive outlook for adjoining properties. We note that the acoustic barrier heights recommended in the supporting acoustic report are for *minimum* heights and range from 1800mm to 2400mm. We object to this height of fencing.

Materials The building materials likewise do not reflect the development in the vicinity, which characterised by red Willis bricks, with some rendering. The charcoal brick, charcoal stria cladding and Pilbara brick do not reflect the predominant colours in the vicinity and the modern design is also inconsistent with surrounding development.

Stormwater and Drainage We note that the existing stormwater infrastructure servicing the development site and surrounding lots is inadequate, with frequent blockages and overland flow in rainfall events. 

 Other residents have constructed concrete bunding

to protect their homes from inundation. Rear of block drainage was installed in the early 2000s to address urban salinity however this has resulted in properties in Halloran and Dalton Streets discharging to the same line, which is clearly not adequate for the load. With the subdivision of 2 lots in Blamey Street, there are now an additional 2 dwellings discharging into the system. The extensive hardstand areas proposed by this development will contribute to an exacerbation of this situation. We therefore request that a stormwater masterplan be developed for the area regardless of the outcome of this application.

Objection to Proposal – social impacts

Non-Residential Uses In Residential Areas The development requires the demolition of 2 dwellings, forcing the relocation of 2 families from the site. The introduction of a non-residential use in a predominantly residential neighbourhood, albeit a permissible land use, contributes to the erosion of community.

Loss of Privacy

Hours of Operation The application seeks approval of operating hours from 7am to 6pm Monday to Friday however states that staff will be in attendance before and after these times. As staff preparation, and end of day procedures form part of the operation of the centre and therefore the *operating hours*, the application should clarify this aspect of the development. 6:30am is considered too early for a non-residential land use in a residential area and will reduce amenity for neighbouring properties. It is also inconsistent with the Child Care Planning Guideline, which recommends a start time from 7am in residential areas.

Objection to Proposal – Traffic Impacts

The subject site is located opposite Turvey Park Primary School. Halloran Street is not a wide street and is restricted in the provision of on street parking to allow for bus parking on the eastern side of the street outside the school buildings. When there are cars parked along the western side of the street, there is only room for one vehicle to pass.

Peak times for traffic congestion on the street are school start and finish times, with the afternoon period more congested. During the day, there are often school events that generate traffic, such as excursions, Book Week, parent teacher interviews and similar events. There is also a marked increase in traffic on wet days. Garbage collection day adds a further level of congestion on a weekly basis. We have witnessed vehicles parking illegally on the corner, across driveways and on the nature strip. The proposed childcare centre, with up to 46 children and 12 staff each school day will generate up to an additional 58 vehicles (116 trips) in the peak times. We note the provision of 12 spaces on the site and that council is unable to require parking in addition to DCP requirements.

We are concerned that the parking spaces shown on the plans will not be practical once constructed. The front 2 spaces are 2400mm wide, with the 3 spaces behind being wider at 2600mm then the last spaces closest to the building are reduced to 2400mm. The access to the rear spaces will be difficult if the carpark is full and relies on vehicles swinging wide of the

allocated space. The accessible space does not appear to be easily accessible to a larger vehicle, such as a van or adapted wagon. An increase in the width of the rear spaces would be required to ensure their useability by the average driver.

Objection to Proposal – Noise Impacts

The proposed development will increase noise at sensitive receptors through a combination of traffic, parking, parents and staff attending the site, children playing at the site and equipment (play and mechanical) in use at the site. The acoustic report makes recommendations for the construction and operation of the centre that will ensure it can operate within the NSW EPA's, Association of Australian Acoustical Consultant's Guideline and Wagga Wagga City Council's general noise requirements. We object to the attenuation measures which will create a high solid wall around the development site and adjoining residential sites and the management solutions of restricting the hours and numbers of children outside, which will require the surrounding residents to monitor and report any breaches.

Consistency With Child Care Planning Guideline

The Child Care Planning Guideline was issued by the NSW Department of Planning & Environment to guide development and take precedence over DCP provisions for a consistent approach across the state. The guideline is referenced in the Child Care provisions of the Transport and Infrastructure SEPP.

The matters addressed within the guideline are briefly addressed below:

Site Selection & Location – the site is within a residential area that has a primary school opposite. The acoustic and privacy impacts of the proposed development on the residential properties, the setbacks and siting of buildings within the residential context and traffic and parking impacts of the proposal on residential amenity are considered unacceptable by the Kenyons.

Local character, streetscape and the public domain interface - The objective to ensure that the child care facility is compatible with the local character and surrounding streetscape has not been achieved as outlined earlier in this submission.

Building orientation, envelope and design – the development is not consistent with objectives to protect privacy of neighbours, avoid overshadowing of properties, build to a height consistent with other buildings in the locality and respond to the scale and character of the street. Setbacks proposed for the front and sides are not consistent with the prevailing setbacks. The 2 storey design and contemporary materials do not respond to the physical context of the site. The submitted landscape plan is conceptual only.

Visual and acoustic privacy -The 2 storey design with first level play area does not minimise impacts on privacy of adjoining properties. Private open space areas of several neighbouring properties will be overlooked by the development. The installation of acoustic barriers will contribute to acoustic privacy at the expense of an open outlook.

Hours of operation – proposed hours are outside the core hours of 7am – 7pm recommended for residential areas.

Traffic, parking and pedestrian circulation – the traffic impact on the adjoining street is considered unacceptable by the Kenyons.

We have not addressed the National Regulations as these will be considered by the child care regulator and these matters are not what concerns the Kenyons about the development.

Consistency With WWDCP 2010

We note that development for childcare centres is largely regulated under the SEPP, overriding

the DCP however the objectives of the DCP need to be considered in the assessment of this proposal.

Section 2 contains controls for all developments.

We do not consider that the proposal is consistent with the objectives for vehicle access and movements as it will potentially reduce the safety and efficiency of urban roads adjacent to the development.

The application does not detail the signage proposed for the development. As a non-residential development in a predominantly residential area, the design, location and any illumination of signage is an important matter for consideration.

The residential chapter of the DCP applies to residential development however provides a guideline, in the absence of any other control over the design of child care centres, to developing in the residential zone. The principles include:

- *Achieve a density and scale that reflects the zone*
- *Building siting, footprint, scale and bulk should be compatible with adjoining development and the established or intended built form.*
- *Respond to the issues highlighted in the site analysis. Take advantage of natural features, minimising potential impacts to neighbours and achieving compatibility with neighbourhood character.*
- *Visual and acoustic privacy are important for good residential amenity. When designing new developments care should be exercised to ensure that impacts on the privacy of adjoining developments is minimised to ensure the privacy of occupants of the new development.*

As outlined in this submission, we do not consider that the development as proposed is responsive to these principles.

The DCP Objectives for child care centres are:

O1 Encourage child care centres to be located on corner sites and sites [where] parking and access to the centre can be easily managed.

The proposal is not consistent with this objective as the development site is not on a corner and is located on a middle block opposite a school in an already congested street. We dispute that parking and access to the centre can be easily managed.

O2 Protect the amenity of adjoining land uses through good site planning, landscaping and layout.

The proposed design and location of the child care centre will have an adverse impact on the amenity of adjoining residential land uses because it will introduce substantial noise from 60 people on site, traffic noise and congestion, reduction in visual privacy from the 2 storey design and increase overland flow through adjoining sites.

O3 Enhance the streetscape and provide a visually attractive buffer between the street and building/ car park.

The proposed design is a modern architectural style with contemporary materials which do not relate to existing historic development in the vicinity. The 2 storey design will stand out in the predominantly single storey townscape. There is no detailed landscape plan for us to comment on the attractiveness of the buffer between building/car park and the street. In a development with impacts as we have identified, we consider it important for the landscaping to be detailed prior to any approval. As the vehicles leaving the site will be crossing a footpath frequented by unaccompanied children, the selection of vegetation is important to ensure good vision. The plant selection should be provided upfront to enable thorough assessment for safety.

O4 Provide children with learning and educational opportunities through landscaping initiatives such as flower beds and vegetable gardens.

We consider this to be a programming matter for the child care operators but concede that the development appears to be consistent with this objective.

The proposed development does not satisfy the following controls:

C4 Design and locate outdoor activity areas to maximise the natural site features, including climate considerations such as avoiding afternoon sun but take advantage of cooling breezes in summer. All playgrounds must be capable of supervision at all times.

The first floor play area faces west and is enclosed by a high Perspex acoustic fence. With the prevailing hot winds coming from the west in summer, we assume this area will not be useable in summer therefore does not satisfy this control.

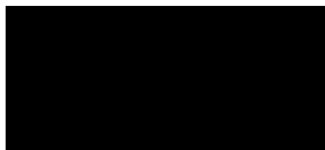
C9 Locate play equipment such as cubby houses, trampolines and slides not to overlook neighbours properties. Shade structures should not be located where they will be elevated in relation to boundary fences where they could cause visual or shadow impacts.

This development places a playground at first floor level, which will overlook not only the adjoining properties but properties further away from the development. This control is not satisfied by the development.

Conclusion

We acknowledge that child care centres are permissible in the zone with consent. The proposed child care centre is not sufficiently respectful of surrounding residential development, taking into account the cumulative adverse impacts on its neighbours to the north, west and south. Non-residential land uses should not be permitted at the expense of neighbour amenity. The development does not adequately address the impacts on traffic, parking, noise, privacy or neighbourhood character as addressed within the Wagga Wagga LEP 2010, The Wagga Wagga DCP 2010, nor the *Child Care Planning Guideline*. We therefore OBJECT to the application and advocate that Council refuse the application on these grounds.

Yours sincerely



From: [REDACTED]
Sent: Thu, 1 Sep 2022 16:52:58 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Cc: "Grp - Councillors" <Grp-Councillors@wagga.nsw.gov.au>
Subject: OBJECTION - DA22/0460 -Two Storey Childcare Centre [SEC=OFFICIAL]



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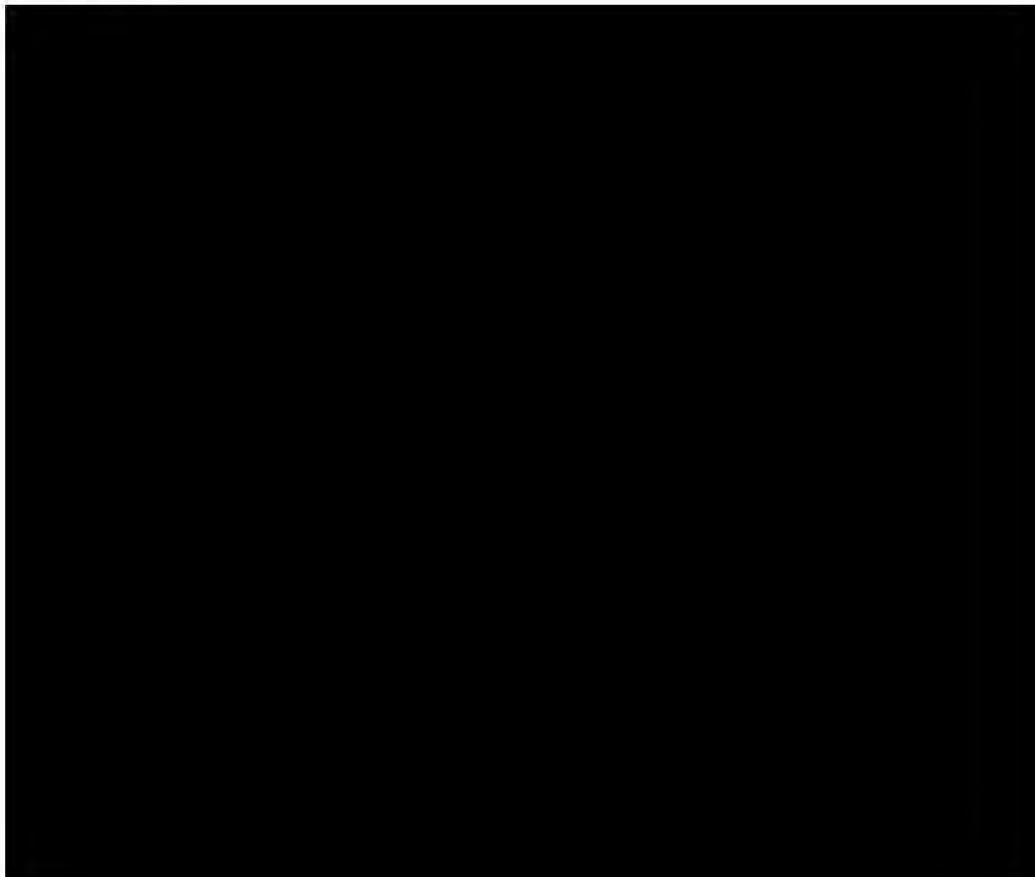
OFFICIAL

ATTN: Robyn Bradley

Re: DA for a two storey childcare centre on Halloran St.

I would like to submit my objection to the above titled DA based on traffic safety concerns with the school traffic and building design – two storey is not in keeping with the appearance of the neighbourhood, not to mention the western facing outdoor play area which I imagine would be redundant during the warmer months.

Regards,





From: [REDACTED]
Sent: Wed, 24 Aug 2022 20:24:35 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: Fwd: OBJECTION LETTER - MARK 2!

----- Forwarded message -----

Attention: Robyn Bradley
Re: DA 22/0460 File No. D/2022/0460

We are writing to object to the proposed development of the two- storey Childcare Centre in Halloran St

Our main concern is the safety of students , teachers and parents of both the Childcare Centre and Turvey Park Primary School, particularly during dropoff and pickup times. There is much congestion due to the narrowness of the street and the inadequate availability of parking.

[REDACTED] and often have cars parked in our street during those busy times. Blamey St and Bluett Crescent are also impacted. Each of these streets is quite narrow, and there is little room to proceed due to cars parked on both sides of the road.

We have, over the years, been quite concerned about some peoples' impatience, leading to near misses! With the addition of several extra cars - there could be up to 30 additional vehicle movements each morning and afternoon - we are worried about the potential of accidents.

Another consideration is the fact that there could be, on a fairly regular basis, delivery vehicles to the centre, and also large commercial waste vehicles. As we mentioned before, there is little room for 2 vehicles to pass let alone trucks of this size. We feel that our reasonably quiet residential area could become a chaotic 'commercial' area

[REDACTED]

Wagga Wagga City Council
Cnr Bayliss & Morrow Streets
Wagga Wagga NSW 2650



18th August 2022





Attention: Robyn Bradley

RE: Application No: DA22/0460 File No: D/2022/0460

I am writing to express my views regarding the proposed development at 32 Halloran Street, Turvey Park.

I have made no political donations in the previous two years.

I object to this proposal. The grounds of my objection to this development are threefold:

1. This development is likely to interfere with the quiet enjoyment  due to the increased traffic and noise that will begin in the early morning and continue into the evening, due to staff movements of the proposed childcare centre, and parents dropping off and picking up their children.
2. When cars are parked on both sides of the road, there is only enough room for one vehicle to proceed in either direction. In the mornings and afternoons there are many cars, buses and pedestrians on the street with parents dropping off and picking up their children causing congestion. It is our view that at these times Halloran Street does not have capacity for further traffic. We further believe that the traffic that will be generated is likely to exacerbate safety risks for school children who are leaving the school grounds and crossing the road.
3. This type of land use is not appropriate. Halloran Street is usually a quiet suburban residential street, apart from school pick up and drop off times. We believe that this commercial development is wholly inappropriate and unsuitable  which apart from the primary school, is residential in nature. We are concerned that this precedent will mean further commercial business will invade  and degrade  privacy and quality of life.

From: [REDACTED]
Sent: Mon, 22 Aug 2022 17:08:03 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: DA 22/0460 Response

OFFICIAL

Dev App – DA22/0460
File D/2022/0460

Dear Cameron Collins and Robyn Bradley,

[REDACTED] and I am very concerned about the proposal to establish a Child Care Centre in the street.

I am opposed to the commercial venture...

1. because of the potentially increased traffic volume in the street; plus

[REDACTED]

Halloran Street is a small tree lined street bounded at each end by 'T' intersections leading onto busy roads.

Both ends are continuously impeded by school buses and traffic comprised of school staff, school parents dropping off children and the local children (at least two block radius) themselves walking to and from school.

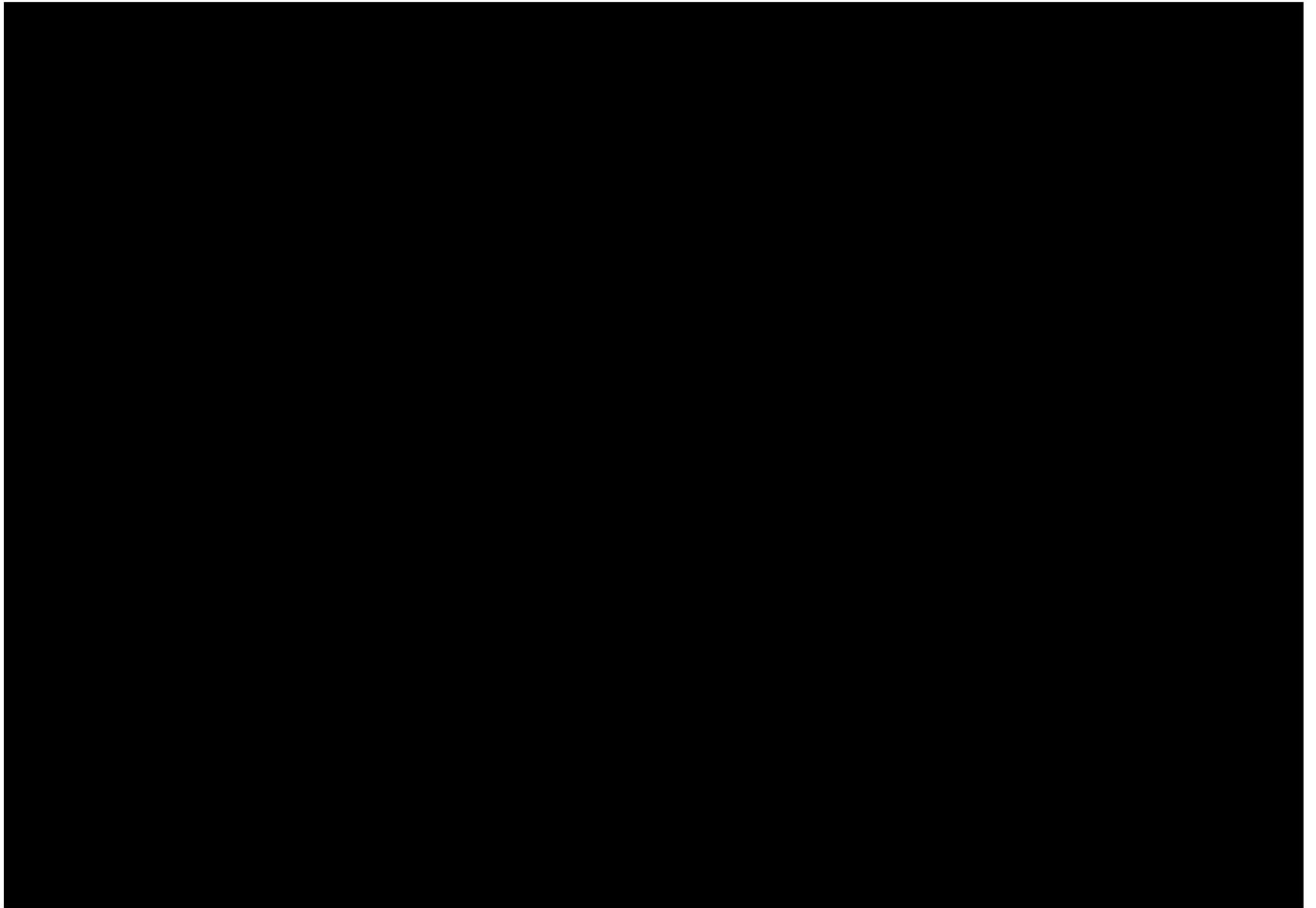
The Southern end is always congested, especially considering the offset junction with Bluett Cres feeding straight into the school bus zone and confusing the Halloran Street traffic.

The narrower Northern end comes onto another busy road which bus drivers continuously struggle with (both accessing and egressing) because of the school traffic turning into the street or 'Giving Way' while stopping right on top of the intersection. It is also structurally impeded by the refuge island placed awkwardly on the busy Urana Street only 10 metres to the East of the 'T'.

Plus, diagonally opposite, there is yet another offset junction with Turner Street creating the same compounded issues.

If traffic volumes in [REDACTED] street were increased any further, I am afraid it will inevitably end in a tragedy.

I cannot justify the additional inconvenience, nor the elevated risks associated with establishing the new commercial organisation in the residential street. I feel it is extremely inappropriate and dangerous to have any additional traffic diverted through Halloran as there are too many children, too many cars and the street is not capable of handling the proposed additional traffic volumes.



From: [REDACTED]
Sent: Sun, 28 Aug 2022 18:34:43 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>; "Grp - Councillors" <Grp-Councillors@wagga.nsw.gov.au>
Subject: Proposed DA22/0406



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DA22/0460

I am writing this email with some concerns with the development proposal of the 2 store childcare complex at 32 Halloran st Turvey Park. [REDACTED]

- with introducing this child care center with 12 staff and up to 46 children i think that could bring up to a further 116 more cars into the area daily, with the public school across the street and no pedestrian or school crossings nearby. There will be a 12 car space car park at the day care but this does not seem adequate.

[REDACTED]. There are cars parked illegally every day from the lack of parking facilities already i can only imagine how bad it would get with a day care across the road. (We already have one problem in wagga at the fast lane coffee shop in chaston st we really don't need to repeat that mistake)

-Also introducing garbage trucks and delivery trucks to a residential area with a already congested narrow street. With hundreds of children attending school across the road.

- with a 6 meter wide driveway coming off a narrow street does not seem wide enough for cars to move though with out congesting the traffic that is already on Halloran st.

- The proposed 2 storey building is not in accordance with the rest of turvey park.

Even just in the process off building the proposed child care the amount of trades coming and going would create a massive disruption to not only the traffic and the nearby residents but the hundreds of kids trying to get a education across the road. [REDACTED]

child in a highly congested area personally I think this sort of service needs to be in a free flowing area of wagga wagga like all of the other child care facilities around.

Thanks for taking the time to read this email.

[REDACTED]

From: [REDACTED]
Sent: Mon, 5 Sep 2022 08:59:15 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Cc: [REDACTED]
Subject: DA22/0460-

TO; Robyn Bradley

[REDACTED] hereby lodge my objection to the above DA that being a Childcare Centre at 32 Halloran Street Turvey Park NSW 2650.

My Objections are as followed;

1. The increase of traffic flow to the street particularly at morning and afternoon drop off and pick up times with Turvey Park School across the road. The street is very congested at these times .
2. The lack of parking in the street and surrounding streets this will create for residents with staff parking in streets and parents picking up and dropping off children .
3. The increase in delivery vehicles to the centre .
4. The potential for accidents increasing particularly as there are no designated crossings for students parents etc on any streets surrounding the school or proposed childcare centre .

- [REDACTED]
6. There are already 6 childcare centres located in the Turvey Park suburb .
 7. The extra noise levels to surrounding residents for the centre particularly as it is two storey and playground area will spread noise wider as it is on second level.
 8. The two storey development is not in keeping with the street scape of the area and would detract from the ascetic street scape of Halloran Street .
 9. I have discussed the centre with a Childcare centre owner who informed me that a centre of just 46 places would not be viable profitably so I ask the question is this the true motive for the development ?

I hope you take my concerns into consideration for this development and I strongly urge you to reject it.

[REDACTED]



Wagga City Councillors
Council Administration Centre
Morrow Street
Wagga Wagga
NSW 2650

Application No :DA22/0460. File No:D/2022/0460

Dear Councillors,

In regards to the development of the property at 32 Halloran Street Turvey Park 2650 Lot 29 Sec B DP 37333: Two Storey Childcare Centre proposal I wish to submit the following objection. The grounds for objection are as follows:


1/ The surrounding residential blocks house single storey dwellings; the proposed two storey building would not fit with the current streetscape. It would cast shadows on the two adjacent residences affecting their natural access to light. It would also change the amount of sunlight that at present falls within their front and backyards. This would affect their current garden planting and current use of the backyard including recreational areas.

2/ The noise and traffic pollution has been assessed by the council to be within recommended standards. This doesn't take into consideration that these properties were purchased and lived in for many years without having to contend with added noise.

Air conditioner units will run all day; a continuous annoying sound. Trucks reversing into the driveway to make deliveries or taking recycling and rubbish away have beeping sounds to alert others to their movement, this would be at any time of the day or will it be in consultation with residents next door to development to determine limited access. Parents drop off and pick up hours extend beyond school traffic times increasing noise and street congestion. This will add noise and unwanted fumes from cars moving in and out of the parking area.

Outside playtime is directly above the residents backyard areas so noise during these times will directly affect the surrounding residents. Are they not entitled to the peace and quiet expected in a residential zone?

3/ The local school which is opposite Lot 29 has been on site for the past 70 years. As travel arrangements for students have changed greatly over the past 20 years, an increase in bus and car travel has already impacted the local residents. Previously the majority of students walked to school. Now bus and car transfers cater for approximately 60- 70 percent of students attending the school.



Parents pull up on the opposite side of Halloran street just in front of the proposed childcare site. Call their children over. It's an accident looking to happen.

Cars try to overtake stationary buses without clear sight of oncoming cars from Blamey and Bluett crescent. Added traffic from the Childcare Centre will only add to the current problem. The further down Halloran Street and Blamey Street doesn't improve the situation. Limited parking and parents thinking their child is older enough to cross a congested road is mayhem. Now you add the Childcare pickup and drop off.

In your traffic and parking assessment it states that parking is available in Halloran, Blamey and Bulett Crescent. These spots are 150 m to 250 m from the proposed childcare center. It is unreasonable to think that a mother with a baby or toddler or both plus the daycare bag, would be able to logistically navigate this distance and cross roads safely. Complacency or distraction often lead to an accident.

The twelve designated short term parking spots at the front of the complex help, However, where do the staff park? Are they also jostling for the limited street parking that more than half the Turvey Park Public School Staff are utilising already five days a week from 8 am to around 4.30/ 5 pm.

Add the school parents who drop and pick up students for appointments or to take home because of illness throughout the day. Or add the extra buses that arrive for regular excursions or sporting events. The addition of Parents who want to park for kindergarten orientation , grandparents day, Easter hat parade, weekly assemblies, book week parade , sports assemblies, parent teacher afternoons/ evenings etc. The list goes on. School administration and stationery supplies ,canteen supplies, maintenance crews all access Halloran Street and use the driveway nearly opposite the new site or the one less than 50 m down near the school off street parking that caters for 10 staff.

Halloran Street, Blamey Street, Mair Street and Bluett crescent are utilised regularly. Halloran Street is NOT a quiet street nor are the surrounding residential streets as indicated in the report. Go sit for a couple of weeks from 8am to 5 pm to have a more accurate report.

These are only a few points I make in regards to the proposed property development.

The siting of a childcare facility in a residential, narrow street that already accommodates a lot of school specific traffic is unfathomable. That you would even consider this a reasonable proposal seems mind boggling. It is already chaotic ! No submission from the school or P&C so far has been successful to have a designated crossing with a traffic supervisor in any adjacent street including Urana street, indicates how reading impact reports never provides the whole situation and doesn't clearly identify the ongoing problems in a residential area that already has children age 5 to 12 years moving unsupervised around narrow streets, congested with traffic. I understand we have a need to support childcare in Wagga, however this is definitely the wrong site.

██████████ it seems incredible that we would think a double storey site would be ideal. Wagga has many areas where a decent site could be established. We as a community should be looking at providing facilities that include a large outdoor area with plenty of space to play and hopefully interact with animals, water play, areas to ride a little trike. Have we gone so far, the dollar is more important than the fantastic experiences we can provide to our 'country kids' than their city cousins. No wonder children are attached to their iPads and have so many issues even at the age of starting school.

I believe it's worth each Councillor visiting the site, watching the chaos and thinking about the adjacent residents who will live next door. Does it sit well with you? Is it really the best scenario or just convenient for the company who purchased this site because it's economical to put a centre that should be on twice to three times the land area than on this very small block. We don't live in inner Sydney or Melbourne.

Who makes the profit at the expense of residents, the school community, and the new generation of infants that will be cared for in a double storey box?

Regards



City of Wagga Wagga
Council of the City of Wagga Wagga
PO Box 20 Wagga Wagga NSW 2650

1 September 2022

Attention: Robyn Bradley

RE: DA objection to Wagga Childcare Centre - (Application No: DA22/0460 File No:D/2022/0460)

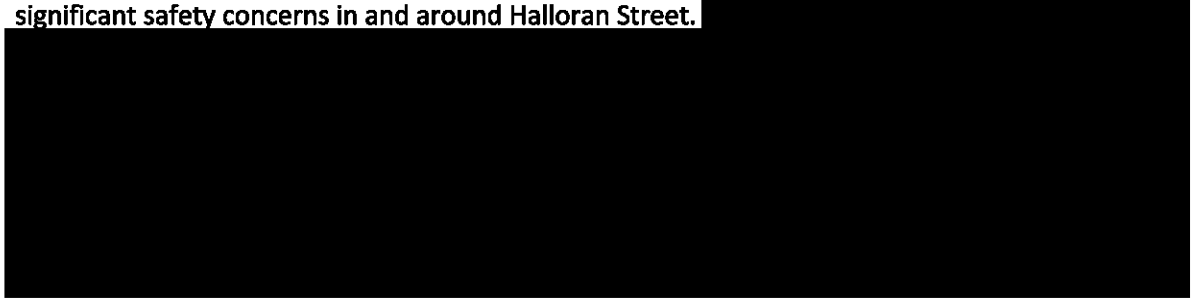
Dear Ms Bradley.

I write to express my vehement and most strenuous objection to the aforementioned application currently lodged with Wagga Wagga City Council for 32 Halloran St TURVEY PARK NSW 2650, Lot 29 Sec B DP 37333.

[REDACTED] the families and most importantly the students who currently are supported by the Turvey Park Public School. I offer the following specific reasons as evidence for my objection:

1. **Surrounding aesthetics:** A quick drive and a quick glance at the immediate Halloran Street reveals there are almost no residential buildings that are two story in height. The only two story buildings are located in the Turvey Park Primary School, so to approve such an application would break with long standing precedent within the street. **I reiterate, Halloran Street is a residential areas and to approve a commercial two story building would destroy the residential streetscape. Wagga City Council have a responsibility to maintain and preserve the historical significance and charm.**
2. **Privacy consideration:** As noted, there are no two story buildings in Halloran Street, and the introduction of a commercial two story premises would expose the immediate neighbours to unwanted encroachment on their privacy. The unsolicited visibility into the neighbours backyard will expose private residents to unwanted attention and, moreover, **the added noise pollution will pose an avoidable issue for them.** Presumably, the childcare centre would have heating and air conditioning that will also contribute to **avoidable noise and environmental pollution.**
3. **Precipitating traffic congestion:** The current traffic challenge of each school morning and afternoon creates total gridlock within Halloran St and the immediate surrounding streets. Halloran street is incredibly narrow already with limited parking so to approve an application that **will clearly be a significant contributor to traffic seems like a counterintuitive move on behalf of Wagga City Council.** I welcome Wagga City Council to offer an explanation as to how they could possibly justify such an approval.

4. Road safety factors: In addition to the traffic congestion, the approval would add to the already significant safety concerns in and around Halloran Street.

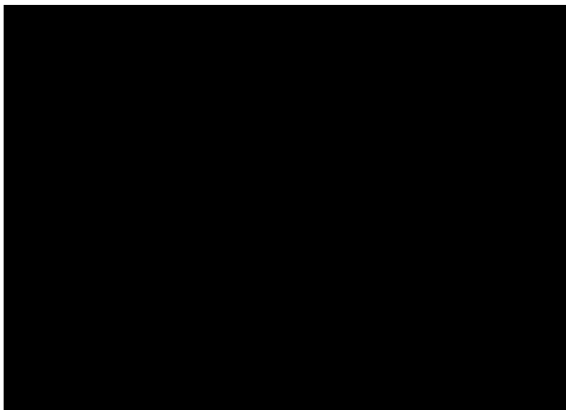


5. Value in property prices: The presence of a childcare centre in Halloran Street is completely incongruent with the street scape and would irrevocably impact on the devaluation of prices. [redacted] but also the flow on effect to Dalton Street.

6. Pre-existing childcare centres: There is already a glut of childcare centres in the Turvey Park with six currently accessible by families. There is also an additional approval for a child care centre to be built in Coleman St making seven. The excessive and unnecessary nature of another request would suggest motivation is driven by fiduciary means rather than actual demand for services. **It would be irresponsible for Wagga City Council to approve this application given the current service supply within the Turvey Park and broader Wagga region.**

Thank you for your time to consider my concerns and I welcome further discussion on this matter. I can be contacted via the details listed below I look forward to continuing the discussion and preservation of Turvey Park standards.

Regards,



[REDACTED]

30/08/2022

Dear Robyn,

Thank you for providing written notification of the following application proposal:

- **Applicant:** Money Aint Got No Owners Pty Ltd
 - **Application:** DA22/0460
 - **File:** D/2022/0460
 - **Proposal:** Two Storey Childcare Centre (46 places)
 - **Attention:** Robyn Bradley
- [REDACTED]

We are writing to submit our **objection** to this proposal for the following reasons:

Traffic Impacts and Congestion

At both school drop-off and pick-up times there is already significant parked and slow-moving traffic on both sides extending the full length of Halloran Street. Vehicles traversing Halloran Street during these periods cannot pass one another and must pull as far aside as possible to give way to oncoming traffic. The notion that this street is wide enough to allow parking on both sides and two lanes of moving traffic as outlined in the proposal is incorrect.

[REDACTED]

Many school buses also use this street to drop and collect children from the school bus zone which is directly opposite the proposed entrance to the Childcare Centre. The school buses which turn into Halloran Street from Urana Street regularly exhibit difficulty in entering the street as cars are already parked too close to the intersection with Halloran Street to accommodate long vehicles which require a broad turning circle, such as these.

During these peak periods Halloran Street is not the only street affected. Recent COVID restrictions have meant that the school requires some children/parents enter and exit via Mair and Blamey Streets too. Mair Street exits into Heydon Avenue which itself narrows into a single lane to meet Heath Street. This contributes to congestion in the surrounding areas. Urana Street and Blamey Street can all become backed-up from the school zone to the nearest major crossroad of Bourke Street.

[REDACTED]

Damage to the street in the form of potholes has also been noticeable with one particularly large and deep pothole (>50cm wide, ~20cm deep) recently being filled on the easterly side of Halloran Street just within the no parking zone.

The proposed car parking spaces for the Childcare Centre in the planning documents appear to be too few and too small. Most of the spaces will be required by staff alone, leaving only two spaces, including the accessible parking space, for parents. This equates to a single additional parking space for non-permitted vehicles. All other parents will be significantly adding to the existing street congestion during peak drop-off and pick-up times.

The width of the parking spaces and the driveway as set out in the planning diagrams appear too narrow to accommodate vehicles parking simultaneously, and the accessible parking space looks to be one of the narrowest and most difficult to park in, as indicated by the way the vehicle must overlap the pedestrian footpath when turning into and out of the space. It should be noted that wheelchair accessible vehicles are often larger, with a longer wheelbase, and larger turning circle, making them more cumbersome navigating tight spaces. The selection of this spot for the sole accessible parking indicates a lack of proper care and thought.



Figure 1 This photo illustrates how the narrow streets operate.

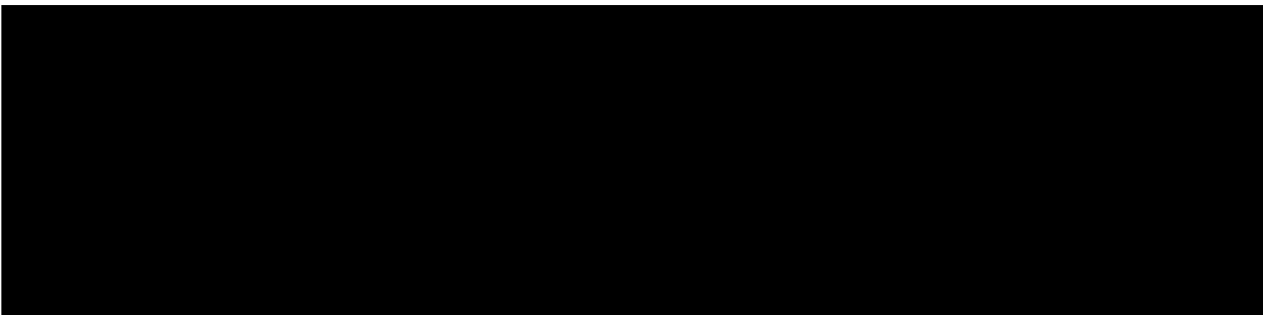
Acoustic Impacts and Noise

The proposed Childcare Centre will cater for up to 46 children during the hours 6:30am to 6.30pm, Monday to Friday. The proposal indicates that it has been designed for visual and acoustic privacy but does not indicate the material it will be using for its fencing.

The indicated play time is two hours of outside play. The indicated sound power levels for 17 children ranges up to 89 dBA.

The current environmental background noise on the street, as indicated on page nine of the assessment has a background noise of 37 dBA during 7am to 6pm. With the introduction of more operational sounds on Halloran Street this would be significantly and detrimentally increased.

Storm and Wastewater Management



The addition of several metres of paved walkways and parking at the front of 32 Halloran Street will only serve to exacerbate the problem of excess storm water having no clear, direct path of escape, adding to the torrent of water which runs down the street during heavy rains.

Surrounding Buildings and the Broader Environment

The proposed design of the Daycare Centre building is not in keeping with surrounding buildings in the area and does not indicate a design in sympathy with the location and orientation of the plot, Turvey Park, nor with Wagga Wagga's climate.

The height of the building is not in keeping with the scale of surrounding residences, overlooking and overshadowing nearby houses and standing out on the skyline of the street. The pitched roofs without eaves shows a lack of planning regarding runoff and passive cooling of the walls due to lack of shading.

The materials indicated in the document, ie. Pilbara and Industrial Char bricks with James Hardie cladding are more akin to industrial or shopping complex buildings and are not in keeping with the red brick and painted/rendered timber weatherboard used in the area. The large signage depicted on the front of the Daycare Centre is similarly not in keeping with a residential zone.

The rooftop outdoor play area with a large glass balcony, seems ill conceived, as it both elevates the sound of the children whilst playing above the rooftops to allow the acoustics to travel further within the neighbourhood and also faces directly West. Residents of Wagga Wagga understand how harsh and unforgiving the Western afternoon sun can be for most of Spring and all of Summer. A glass balcony, even if etched, will do little to protect both the children and the play equipment in this area from the scorching heat that will beat down on this unprotected area.

Lastly, the inner suburbs of Wagga Wagga are already well-served by a number of Childcare Centres with at least four already located within walking distance of the proposed site. Growing outer suburbs like Estella, Bourkelands, Tatton, Lloyd, Gobbagombalin, Boorooma, Springvale etc. have between zero and one each. Concentrating all the Daycare Centres of Wagga Wagga into a handful of central suburbs only serves to increase traffic and vehicle pollution city-wide as those in the outer suburbs are forced to travel to concentrated areas to access Childcare.

For these reasons, please reconsider allowing this proposal to proceed.





Regional Transport Planning

ABN 41 813 428-421

79 Kincaid Street Wagga Wagga NSW 2650

Mob. 0439 656769

Email garudagaff@yahoo.com.au

29 August 2022

Proposed Child Care Centre Halloran St Wagga Wagga Review of TIAR

Regional Transport Planning was recently approached by residents of Halloran St to assist them to appreciate the traffic situation which might result from increased traffic at the southern end of Halloran Street after the opening of a proposed Child Care Centre

I have briefly read the TIAR prepared by a Sydney based traffic engineer TEF. I also met on-site with several concerned residents of Halloran Street and Bluett Cr and observed the traffic situation outside the public school at school break up time. I listened to the concerns of the residents.

Having formed the opinion that the proposed development will occur in a place where there are serious traffic risks to children, and that the Child Care Centre could make the situation worse, **I could not walk away**. As an experience Traffic Engineer with 30 plus years of experience, (including chairman of the Wagga Wagga Traffic Committee), I strongly felt that I should write an opinion. I offered to do this "Pro Bono" and allow the residents to use my opinion to support any submission that they might make to Council.

I have also practiced as a Consultant Traffic Engineer in this city for over 15 years and have written many TIARs.

I feel that the TIAR prepared by TEF does not adequately describe the existing situation and therefore the resultant detrimental threat that the development might have on Child Safety.

It is the purpose of the TIAR to accurately and clearly set out the existing situation and the likely impacts of a proposed development on traffic and safety.

I will set out briefly, some comments on the TIAR after my brief reading of it. I only highlight these to illustrate that the report is inadequate. It is not a comprehensive critique of the report. This would take more time that I have to offer.

Consultation

It seems that the consultant has not carried out interviews with the relevant stakeholders. There is no mention of the opinions of the School Principal, the P and C, the bus operators, the pick-up parents and carers, or the residents in the location. In my brief consultation and observations, I believe that the existing traffic conflicts and concerns of stakeholders would have been worthy of inclusion in the TIAR.

Road Width Description

Most of the local streets in the area are 9 metres of width. In Wagga Wagga, and elsewhere, this width is regarded as having 3 lanes – two parking lanes and one two way travelling lane. Oncoming vehicles, (where the parking lanes are occupied), must wait and weave into parking spaces to pass oncoming vehicles. This works well in lightly trafficked streets. Where it doesn't work the remedy is to restrict parking. It is misleading for the Traffic Engineer to describe the 9 m street as having 4 lanes – two for parking and two for opposing traffic. See page 3 of the TIAR. This is a fundamental issue in understanding the traffic impacts.



This photo illustrates how the narrow streets operate.

Both sides of the street are parked including on one side by a large bus. There were 4 oncoming northbound vehicles and the south bound vehicle needs to wait in behind the bus. I measured slightly more than 4 metres between the parked vehicles.

The Traffic Engineer has either made a serious error or does not understand Wagga conventions.

Parking Spaces and congestion.

The congestion in the area at school breakup time has been minimised in the TIAR. The report states:

The survey results indicated that there were at least 20 spaces vacant throughout the day (to a maximum of 43) in the survey area during the times of operation of the proposed child care centre. • There are ample parking opportunities within walking distance from the site.

My observations, (that were confirmed by residents) were that there are seldom vacant spaces for parent pick-up in the afternoon. Some parents park up in Bluett Cr and walk down to Blamey St and cross at a “staggered” intersection

amid turning traffic and moving buses. Some carers actually illegally park on the nature strip on the western side of Halloran St in the PM pick-up. Many parents arrive quite early to get close to the school. Unfortunately the majority of close parking spaces are on the western side of the street. This means that children need to cross the street and are often unescorted. Sometimes there are siblings being picked up, meaning that loading into the back seat behind the driver requires opening of doors into the passing traffic. Increasing the traffic in the street by adding a Centre with 46 students and 10 staff (with 12 parking spaces) must have some impact on the traffic in Halloran St.

The report goes on to advise:

No congestion due to bus movements nor their parking was observed. There was no double parking or blocking of intersections nor driveways. In Halloran Street, buses took advantage of the No Parking zone (2b in Figure 5) on the approach to the bus zone, as necessary (only observed once). Not more than one bus stopped at the Blamey Street stop at any one time

The photos above and below shows that this is not true. This bus is almost opposite the proposed entrance to the new centre.



Looking south



Looking north

The parked buses on the corner of Blamey St , east of Halloran, outside the school are, in fact, illegally parked as the rear end is too close to the prolongation of the Halloran St K&G and obstructs sight distance for turning cars and pedestrians.

Traffic Impacts. The author states:

***Traffic impacts.** ° There will be no negative impacts on street network operation.*

While I have not done a thorough assessment, it is hard to imagine how there will not be negative impacts from the traffic generated from the new development with 56 students and staff with only 12 parking spaces on-site. This traffic is being added to the traffic generated by over 400 school students and staff.

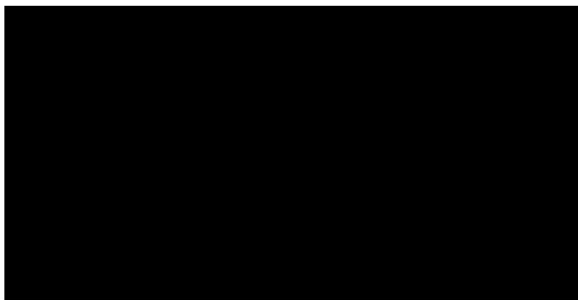
Concluding Statement

To be fair to the developer, the traffic generation from the Child Care Centre may be fairly small and often “staggered” in arrival and departure when compared to the Public School. Also, most of the vehicular and pedestrian safety issues result from the management of students at the primary school. Over many years, this has been difficult to improve and many attempts have been made. The situation that I observed represents many of the worst aspects of school safety at break up time.

I observed students running, unattended while crossing the road, playing with balls and mingling with moving cars and buses.

The school is one of the largest in Wagga Wagga with over 400 students and staff. There are at least 15 bus routes servicing the school. The decision makers, who are to consider the suitability of the subject development, must consider the likely impact on the safety of all children frequenting the area.

In act judiciously; they deserve to be presented with a comprehensive statement of the Traffic Impacts.





City of Wagga Wagga
Civic Centre
PO Box 20
Wagga Wagga
council@wagga.nsw.gov.au

30 August 2022

Re: DA 22/0460; 32 Halloran Street, Turvey Park - LETTER OF OBJECTION

ATTN: Ms Robyn Bradley

We are contacting you in relation to the development application by 'Money Aint Got No Owners Pty Ltd' that seeks to build a two storey childcare centre on Halloran St Turvey Park and wish to lodge an objection to the proposal based on the following points:

Traffic concerns

The proposed two storey childcare centre will significantly impact on the already heavily congested Halloran St. [REDACTED] traffic congestion with school buses and cars between Dalton St, Blamey St, Halloran St, Bluett Cres and have genuine concerns that this development will pose unnecessary safety risks with an increase in traffic to the area.

Most notably, the proposed child care site is directly opposite the Turvey Park Public School bus pick up point which becomes a chaotic intersection during school hours. Our experience is consistent with details outlined in a letter from Garry Gaffney, Regional Transport Planning, which reiterates the potential traffic risks for child safety should this development go ahead.

Building height

The proposed two storey height of the childcare centre is not in keeping with the appearance of the surrounding residential neighbourhood which we understand to be zoned as R1 General Residential. [REDACTED]
[REDACTED] two storey commercial development will drastically change the appeal of the neighbourhood, not to mention acoustics, with the addition of 46 children and staff.

Building features

[REDACTED]
availability of green space. There are ample opportunities for developers to work with the

natural features our regional city offers, it is disappointing this development minimises the natural outdoor experience for children. We also question the 'contemporary facility design' and ability to complement the surrounding area, notably the proposed (limited) car park at the front of the centre and landscaping. This is not in keeping with the appearance of the area or residential streetscape.

[REDACTED]

options for the Wagga Wagga community, however we are disappointed that this proposal does not take into consideration the character of the surrounding neighbourhood and most concerning, it poses a risk to safety due to increased traffic in an already congested area.

We do not believe this development is suitable for the chosen location, nor is it in the best interests of the surrounding neighbourhood. We strongly urge the City of Wagga Wagga to object to this proposal and consider suitable alternatives to addressing the current child care shortage in Wagga Wagga.

[REDACTED]

CC: councillors@wagga.nsw.gov.au



Regional Transport Planning

ABN 41 813 428-421

79 Kincaid Street Wagga Wagga NSW 2650

Mob. 0439 656769

Email garudagaff@yahoo.com.au

29 August 2022

Proposed Child Care Centre Halloran St Wagga Wagga Review of TIAR

Regional Transport Planning was recently approached by residents of Halloran St to assist them to appreciate the traffic situation which might result from increased traffic at the southern end of Halloran Street after the opening of a proposed Child Care Centre

I have briefly read the TIAR prepared by a Sydney based traffic engineer TEF. I also met on-site with several concerned residents of Halloran Street and Bluett Cr and observed the traffic situation outside the public school at school break up time. I listened to the concerns of the residents.

Having formed the opinion that the proposed development will occur in a place where there are serious traffic risks to children, and that the Child Care Centre could make the situation worse, **I could not walk away**. As an experience Traffic Engineer with 30 plus years of experience, (including chairman of the Wagga Wagga Traffic Committee), I strongly felt that I should write an opinion. I offered to do this "Pro Bono" and allow the residents to use my opinion to support any submission that they might make to Council.

I have also practiced as a Consultant Traffic Engineer in this city for over 15 years and have written many TIARs.

I feel that the TIAR prepared by TEF does not adequately describe the existing situation and therefore the resultant detrimental threat that the development might have on Child Safety.

It is the purpose of the TIAR to accurately and clearly set out the existing situation and the likely impacts of a proposed development on traffic and safety.

I will set out briefly, some comments on the TIAR after my brief reading of it. I only highlight these to illustrate that the report is inadequate. It is not a comprehensive critique of the report. This would take more time that I have to offer.

Consultation

It seems that the consultant has not carried out interviews with the relevant stakeholders. There is no mention of the opinions of the School Principal, the P and C, the bus operators, the pick-up parents and carers, or the residents in the location. In my brief consultation and observations, I believe that the existing traffic conflicts and concerns of stakeholders would have been worthy of inclusion in the TIAR.

Road Width Description

Most of the local streets in the area are 9 metres of width. In Wagga Wagga, and elsewhere, this width is regarded as having 3 lanes – two parking lanes and one two way travelling lane. Oncoming vehicles, (where the parking lanes are occupied), must wait and weave into parking spaces to pass oncoming vehicles. This works well in lightly trafficked streets. Where it doesn't work the remedy is to restrict parking. It is misleading for the Traffic Engineer to describe the 9 m street as having 4 lanes – two for parking and two for opposing traffic. See page 3 of the TIAR. This is a fundamental issue in understanding the traffic impacts.



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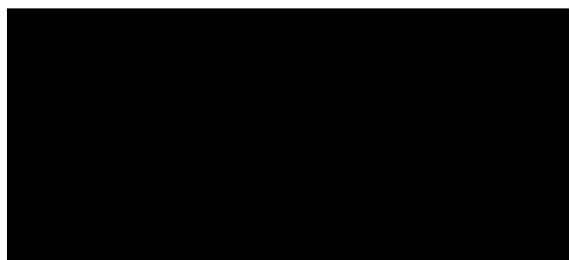
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In act judiciously; they deserve to be presented with a comprehensive statement of the Traffic Impacts.



From: [REDACTED]
Sent: Tue, 6 Sep 2022 14:56:05 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: Application ID DA22/0460 Contact Robyn Bradley



This message could be suspicious

- Similar name as someone you've contacted.
- This is a personal email address.

[Report this Email or Mark as Safe](#)

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I would like to voice my deep concerns regarding the proposed development for a day care centre in Halloran Street, Turvey Park.

I understand there is a great need for more child care centres in Wagga but this location is ludicrous.

[REDACTED]

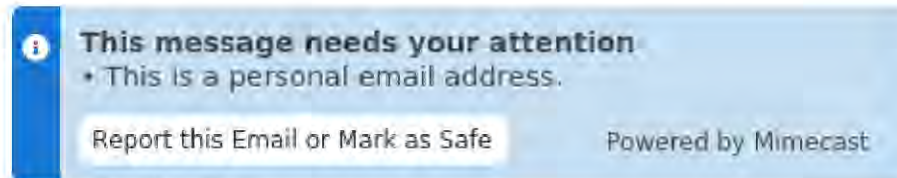
children from vehicles nearly every day. The street itself is narrow and with buses lining the street at drop off and pick up times there were many incidences of danger to children crossing with or without parental supervision. Now to add in a child care centre immediately opposite to the bus stops and minimal parking in the street, it's a recipe for disaster.

Please reconsider the location. A larger, less congested location would be a much better outcome for all concerned.

Regards

[REDACTED]

From: [REDACTED]
Sent: Sun, 4 Sep 2022 11:41:27 +1000
To: "Grp - Councillors" <Grp-Councillors@wagga.nsw.gov.au>; "City of Wagga Wagga" <Council@wagga.nsw.gov.au>
Subject: Objection to daycare facility . App- DA22/0460. Att:Robyn Bradley



To Robyn Bradley:

I am writing in regards to my opposition to the proposed day care facility at the property of 32 Halloran St, Turvey Park.

I would like to express my disappointment that residents of the greater Turvey Park community were not made aware of this proposed building development. We, on the most part, are a tight

[REDACTED]


Turvey Park is a wonderful suburb to live in, aesthetically pleasing, with most house's built post war, at a high standard. The proposed structure does not fit in with the aesthetics, in fact it seems to be in opposition with house structure and design. Most house's in Turvey Park are single story, again the proposed structure being double story, not only is a blight on Turvey Park's aesthetics, it will encroache on surrounding residence peace and privacy. I understand new development in Turvey Park is building at the old university site. Was it considered to build the proposed day care facility there, where it could aesthetically fit with new building structures?

Whilst limited parking is included on the proposed structure, the area is congested between 8.30-9.30am and 3-4pm. Not only is increased traffic a concern for residents, but also the safety of school children and bus access and parking.

The hours of use of the proposed structure being 6.30am to 6.30pm is not appropriate for a residential area. I have great concerns for residents in the general area that thier right to peace and privacy in thier own homes and yards have not been taken into consideration.

Turvey Park has maintained very stable property values, I have grave concerns for residents that the proposed structure will negatively impact property value.


Many Turvey Park residents, are avid dog walkers. I meet many walkers and dog walkers who use the early hours before work to partake in this activity. The wide footpaths and quite neighborhood have bought many enjoyable hours of leisure. With the increase in traffic and people in the early hours before work and hours after work will impact negatively on this activity.



Finally, in a time where there is a housing shortage, to demolish a house, of large proportion for a business venture is abhorrent. As previously mentioned, there are other sites where negative impact to the community could be avoided.

Again, I cannot express how disappointing it is that Wagga City Council has not informed a greater proportion of Turvey Park residents in regards to this proposed structure. Many residents will not have the opportunity to lodge thier opinions and have them heard on this matter.

I thank you for taking the time regarding my concerns of the proposal of the business at 32 Halloran Street, Turvey Park .



From: [REDACTED]
Sent: Thu, 25 Aug 2022 11:30:12 +1000
To: "City of Wagga Wagga" <Council@wagga.nsw.gov.au>

Subject: DA22/0460 File no: D/2022/0460 ChildCare Centre proposed for Halloran St
Importance: High

OFFICIAL

To whom it may concern,

I'm writing this email to strongly oppose the application above for a childcare centre to be erected in Halloran St. [REDACTED] I'm already concerned at the amount of traffic in the street during school hours and lack of parking and access. The bus traffic alone is hectic enough and creates visibility issues in such a tight space and narrow street, that I feel already presents a danger to foot traffic. To then put extra stress on this situation by having the pickup and drop-off of young children at the proposed childcare centre in this street, is a disaster waiting to happen. Especially as they enter and leave the facility. There are already parents and children having difficulty navigating to walk the street safely and negotiating crossing the road in Halloran street, due to the chaos of traffic in a tight space. I understand the need for childcare centres, [REDACTED] but they need to be constructed in streets that can accommodate this increase in traffic flow. Halloran Street is not able to do this! I welcome you to sit in the street in school hours to personally witness how busy it is, as I believe you would see that although this application may meet some WWCC criteria in the residential zone, this doesn't mean it's the right decision that ensures the safety and wellbeing of parents and their children and also the permanent residents living in the street. I implore you to reconsider the approval of this application and to encourage the owners of this project to look for a more fit for purpose site and location.

Thanks for your time and consideration

Regards

[REDACTED]

