



planning consultants

6 April 2023  
Our Ref: 21160E.7ER\_Response to NBLPP

The Chair  
Northern Beaches Local Planning Panel  
Northern Beaches Council  
725 Pittwater Road,  
Dee Why NSW 2099

**Attention:** **Anne-Marie Young**  
[Anne-Marie.Young@northernbeaches.nsw.gov.au](mailto:Anne-Marie.Young@northernbeaches.nsw.gov.au)

Dear Anne-Marie

**60 Federal Parade Brookvale  
Deferment of DA2021/2567 by Northern Beaches Local Planning Panel**

DFP is assisting St Augustines College in relation to DA2021/2567 for an increase in student numbers and two car parking areas.

DA2021/2567 was considered by the Northern Beaches Local Planning Panel (NBLPP) at a meeting held on 15 February 2023. At that meeting, the NBLPP deferred further consideration of the DA pending submission of additional information as set out in the minutes of that meeting. The minutes of the NBLPP in relation to this DA and how that matter has been addressed are set out below:

<b>a) Transport and Parking Management Plan</b> <b>The Transport and Parking Management Plan (TPMP) is to be updated and incorporate measures to reduce the traffic and parking impacts of the existing and proposed school operations including:</b>	
<b>Requirement</b>	<b>Response</b>
(i) A plan showing the location of existing car spaces (89) and proposed car spaces (54) and traffic management operations, including drop off and pick up areas, bus zones, and on street student parking, etc, as per the details in the diagram presented to the NBLPP dated 15 February 2022	Refer updated plan at Appendix A to TPMP and Table 1 in TPMP
(ii) As a minimum, details and management operations for pick up and drop off shall include: <ul style="list-style-type: none"><li>• locations and duties of before and after school traffic and parking marshals;</li><li>• the drop off/pick up area, including internal areas;</li><li>• the Gulliver Street queuing area;</li></ul>	Refer Table 1 in TPMP

a) <b>Transport and Parking Management Plan</b> <b>The Transport and Parking Management Plan (TPMP) is to be updated and incorporate measures to reduce the traffic and parking impacts of the existing and proposed school operations including:</b>	
<b>Requirement</b>	<b>Response</b>
<ul style="list-style-type: none"> <li>• the Federal Parade and Alfred Road “No Parking” and “Bus Zone” areas; and</li> <li>• the Pittwater Road Bus Zone areas.</li> </ul>	
(iii) Details of a mechanism for reporting and taking action in respect of illegal or inappropriate parking/driving behaviour by students and parents/guardians.	<p>Student Drivers – Refer Section 3.4 of TPMP</p> <p>Community Liaison – Refer Sections 3.9 and 3.12 of TPMP</p> <p>Section 7 of the Operational Plan of Management also addresses the mechanisms for addressing inappropriate driving and parking behaviours by both students and parents/carers.</p>
(iv) Specify that proposed parking areas in Alfred Road and Federal Parade are primarily for staff use with the hours of use restricted to between 7:00am and 6:00pm Monday to Friday.	<p>Refer discussion following Table.</p> <p>The College is seeking approval for the occasional use of these car parks until 10pm.</p>
(v) Incorporate staggered start and finish school times for different year groups with 10 minute gaps between year group arrivals and departures (noting that no more than 2 year groups shall start or finish at the same time) designed to reduce queuing and illegal parking.	<p>Refer Section 1.7 of Operational Plan of Management and Section 2.2.3 of TPMP.</p> <p>Year 5 students are dismissed at 3.15 pm. Year 6 students are dismissed at 3.25pm.</p> <p>The College has advised that it is impractical to implement staggered start/finish times for high school students for the following reasons:</p> <ul style="list-style-type: none"> <li>• Co-ordination by Transport for NSW of bus drop off/pick up times.</li> <li>• Many high school students attend before and after school activities/training etc. This results in a quasi staggering of start/finish times for high school students.</li> <li>• Timetabling and staffing would be overly complex.</li> <li>• Some Senior classes are timetabled to commence prior to Period 1 (Period 0) and after Period 6 (Period 7) which staggers arrival and departure for these students.</li> <li>• A large proportion of students are involved in sporting teams and other extra-curricular activities. Many of these operate before and after the standard school times. This effectively staggers the start/finish times across the school day.</li> </ul> <p>Only Y5 and Y6 students are able to be picked up on site. The only exception to this is those Y5 and Y6 students who have older siblings in which case the older students are able to be picked up on site. In those instances parents will not be able to park in the Gulliver Street pick up zone pending the older student/s finishing for the day. Parents would need to delay pick up until the older student/s are at the designated pick up area in the Gulliver Street car park. Alternative, off site pick arrangements could also be made.</p> <p>The majority of students either walk or cycle or catch buses to/from the school. Therefore incorporating staggered finish times would only be applicable to a minority of students.</p>

<b>a) Transport and Parking Management Plan</b> <b>The Transport and Parking Management Plan (TPMP) is to be updated and incorporate measures to reduce the traffic and parking impacts of the existing and proposed school operations including:</b>	
<b>Requirement</b>	<b>Response</b>
(vi) Include details of measures to encourage and incentivise staff and students to travel by carpooling, public transport, walking or cycling.	Refer Sections 3.8 and Section 4 of TPMP
(vii) Outline measures to promote public transport use and include the following: The College shall commence liaison with Transport for NSW with regard to the provision of more buses specifically serving St. Augustines. In addition, a note should also be added that students will be encouraged to always Tap on and Tap off the bus so that accurate Opal data is recorded relating to school travel	Refer Section 3.8 and Section 4 of TPMP
(viii) Measures to require stacked parking spaces to be assigned to staff who will arrive early and leave late.	Refer Section 3.5 of TPMP
(ix) The Federal Parade and Alfred Road car park shall not be used during sports and special events. These carparks should be locked at 6pm on weekdays and on weekends.	Refer discussion following Table.  The College is seeking approval for the occasional use of these car parks until 10pm.
(x) Section 3.11 of the TPMP, which outlines arrangements for deliveries, shall be amended to state that deliveries will not be accepted during pick up and drop off times.	Refer Section 3.11 of TPMP
(xi) Section 4.2.4 of the TPMP, which makes reference to the operation of a shuttle bus service for staff shall be amended to also explore a bus service for student travel noting many students travel from outside the local area	Refer Sections 3.8 and 4 of TPMP
(xii) Should the implementation or effectiveness of the TPMP be impacted by unforeseen changes in school operations, including the use of newly acquired sites or as a result of surrounding major development, the TPMP measures and controls are to be revised accordingly and submitted to Council for approval	Refer Sections 3.13 and 4.3 of TPMP
A copy of the approved TPMP is to be kept onsite at all times and made available to staff and students for their information and to the accredited certifier or Council on request.	Noted and will comply

<b>b) Acoustic Report</b> <b>The acoustic report shall be amended to incorporate and address the following:</b>	
<b>Requirement</b>	<b>Response</b>
(i) Section 6.1 of the report, which details carpark mitigation measures, shall be amended to delete reference to the operation of the car parks from 6.00pm to 10.00pm for special events. The report shall specify that the car parks are not to be used or special events, including sports events or on weekends.	Refer discussion following Table.  The College is seeking approval for the occasional use of these car parks until 10pm.
(ii) The report shall be amended to include an assessment of noise generated by automatic (electric motor driven) gates or barriers.	Refer Section 5.2 of updated Acoustic Assessment
(iii) The Public Address (PA) system shall be assessed with mitigations measures recommended as necessary. All PA speakers are to be directed to the centre of the College and the PA system to be monitored and reviewed annually.	Refer Section 5.4 of updated Acoustic Assessment. There will no changes to the existing PA system as a result of the increase in student numbers.
(iv) Reference shall be made to the Gulliver Green playground not to be accessible to students before 8.40am.	Refer Section 5.3 of updated Acoustic Assessment. It is noted that the original Operational Plan of Management incorrectly noted that the Gulliver Green play area was not used before 8.40am. This has been rectified in the amended Operational Plan of Management.  The Gulliver Green play area will be reduced in size as a result of the construction of the new Alfred Road car park. Therefore there will be a greater separation distance between the play area and residential receivers. There are no acoustic impacts associated with the use of the Gulliver's Green playground from 8.00am.
(v) Teachers are required to be present to monitor student behaviour in all playgrounds.	This has been included the Operational Plan of Management – refer Section 3.3 of updated Operational Plan of Management
(vi) All dust, bathroom, kitchen/canteen fume extractors are on timers and only operate between 7.00am and 5.00pm.	Refer Section 5.5 of updated Acoustic Assessment and Section 3.2 of updated Operational Plan of Management. All extractor fans – dust, bathroom, kitchen/canteen – are on timers and currently operate between 7.00am and 5.00pm unless there is a function or event after hours or, for example, senior students are completing major works for HSC. On these occasions, the extractor fans might operate beyond 5.00pm but would always cease by 10.00pm.
(vii) Dust extractors being monitored by the Facilities and Maintenance Team using the acoustic measurement app 'Decibel X'. These are monitored annually at the time of service or as required.	Refer Section 3.2 of updated Operational Plan of Management
(viii) The carpark cleaning/blowing will not be permitted before the approved carpark operating hours.	Refer Section 6.1 of updated Acoustic Assessment

<b>b) Acoustic Report</b> <b>The acoustic report shall be amended to incorporate and address the following:</b>	
<b>Requirement</b>	<b>Response</b>
(ix) The acoustic report shall be included as an appendix to the Operational Plan of Management.	The updated Acoustic Assessment is included at Appendix 3 to the Operational Plan of Management.
(x) Should the implementation or effectiveness of the acoustic report be impacted by unforeseen changes in school operations, including the use of newly acquired sites or as a result of surrounding major development, the acoustic mitigation measures and controls are to be revised accordingly and submitted to Council for approval.	Acoustic assessment has been updated to include a recommendation that it be updated if circumstances change from those assessed in the report.
A copy of the approved acoustic report is to be kept onsite at all times and made available to staff and students for their information and to the accredited certifier or Council on request.	Noted and will comply

<b>c) Operational Plan of Management</b> <b>The Operational Plan of Management (OPM) shall be amended to incorporate and address the following:</b>	
<b>Requirement</b>	<b>Response</b>
(i) The OPM shall include a provision for the College to be responsible and include details of a mechanism for reporting and taking action in respect of illegal or inappropriate parking/driving behaviour by students and parents/guardians.	Student Drivers – Refer Section 3.4 of TPMP Community Liaison – Refer Sections 3.9 and 3.12 of TPMP A copy of the TPMP is appended to the Operational Plan of Management
(ii) The applicant shall amend the OPM to include the updated TPMP and acoustic report as appendices to ensure consistency between reports.	The Operational Plan of Management is consistent with the recommendations of both the TPMP and updated Acoustic Assessment
(iii) Should the implementation or effectiveness of the OPM and the accompanying TPMP and acoustic report be impacted by unforeseen changes in school operations including the extension of the school, the measures and conditions in the OPM and supported reports are to be revised accordingly and submitted to Council for approval.	Refer Section 8 of updated Operational Plan of Management
A copy of the approved OPM is to be kept onsite at all times and made available to staff and students for their information and to the accredited certifier or Council on request.	Noted and will comply
An annual review of the OPM and associated TPMP shall be carried out simultaneously and submitted annually. The traffic review and acoustic review	Refer Section 8 of updated Operational Plan of Management

<b>c) Operational Plan of Management</b> <b>The Operational Plan of Management (OPM) shall be amended to incorporate and address the following:</b>	
<b>Requirement</b>	<b>Response</b>
shall inform any changes to the OPM. The annual review of the OPM shall be submitted to Council with an overview report prepared, for Council's review and records.	

In deferring determination of the application, the NBLPP noted the following:

*The Panel notes that student numbers have increased without approval over time and that local residents are experiencing issues with traffic, parking and noise. The management and mitigation of these impacts needs to be clearly articulated in a Transport and Parking Management Plan and an Operational Plan of Management. For certainty, these documents need to be assessed prior to any consent to an increase in student numbers can be granted by the Panel.*

In relation to the submission of the additional information requested by the NBLPP, by email dated 22 March 2023, Northern Beaches Council advised that a two week extension for the submission of the amended reports and management plans was granted.

This letter, and the attached documentation, responds to the majority of deferment matters raised by the NBLPP as noted in the Table above. There are some matters however, about which St Augustines is requesting reconsideration by the Panel. These matters are set out below.

In relation to the amendments to the Traffic and Parking Management Plan (TPMP) and consequential amendments to the Operational Plan of Management, the Panel requested the following:

- (iv) *Specify that proposed parking areas in Alfred Road and Federal Parade are primarily for staff use with the hours of use restricted to between 7:00am and 6:00pm Monday to Friday.*

And

- (ix) *The Federal Parade and Alfred Road car park shall not be used during sports and special events. These carparks should be locked at 6pm on weekdays and on weekends.*

Section 5.2.6 (Acoustic) of the Statement of Environmental Effects (SEE) submitted with the development application noted the following with respect to use of the Federal Parade and Alfred Road car parking areas:

- *Standard carpark hours of operation are to only be after 7am and before 6pm, with operation of the car parks from 6pm to 10pm only permitted for special events (infrequently).*

The reference to the occasional use of the car parks until 10pm was consistent with the Acoustic Assessment submitted with the DA.



If these car parking areas are not able to be used after 6pm, this will inevitably result in an increase in on street parking by staff and attendees to these events. And as a consequence of this increase in on street parking, surrounding residents could be disadvantaged.

It is also noted that these car parking areas could have been undertaken as exempt development (pursuant to clause 38 and Schedule 1 of the (previous) Education SEPP), however, as the increase in car parking and management thereof is intrinsically linked to the increase in student numbers (and the consequential increase in staff numbers), it was considered appropriate that the matters are considered together. It is noted however, that there are no restrictions of the hours of use of car parking areas for schools undertaken as exempt development.

Given that use of the Federal Parade and Alfred Road car parks until 10pm is acceptable from an acoustic perspective, it is respectfully requested that the Panel reconsider the requirement for use of these car parking areas to cease at 6pm. Should the Panel maintain its position with respect to the hours of usage, the Traffic and Parking Management, Acoustic Assessment and Operational Plan of Management will be amended accordingly.

Draft Condition No.3 requires both the Federal Parade and Alfred Road carparks be fully constructed and operational prior to any increase in student enrolments, and within 6 months of the date of the operational consent. The applicant agrees and accepts that student enrolments should not be increased beyond current levels before both carparks are fully constructed and operational, and the applicant intends to construct both car parks as quickly as practicable. However, 6 months is insufficient to allow for the completion of a detailed design, procurement of a builder and construction of the two carparks. It is requested that this draft condition be amended to require the two carparks to be fully constructed and operational within 12 months of the operational consent.

On behalf of St Augustines College, we appreciate the Panel's consideration of this application. Should Council and/or the Panel have any questions specifically in relation to the additional information sought by the Panel, relevant College personnel or specialist consultants can be available.

Should you have any questions regarding this response and/or the attached amended assessments and management plans, please do not hesitate to contact either Piers Hemphill or Ellen Robertshaw of DFP on 9980 6933.

Yours faithfully  
**DFP PLANNING PTY LTD**

A handwritten signature in black ink, appearing to read 'ERobertshaw', written over a horizontal line.

**ELLEN ROBERTSHAW**  
**CONSULTANT PLANNER**  
erobertshaw@dfpplanning.com.au

Reviewed: A handwritten signature in black ink, appearing to read 'Piers Hemphill', written over a horizontal line.

**Attachments:**

1. Amended Traffic and Parking Management Plan
2. Amended Acoustic Assessment
3. Amended Operational Plan of Management