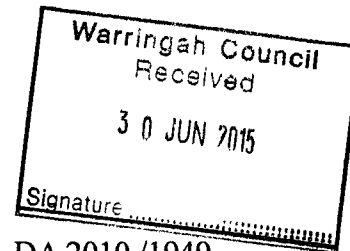
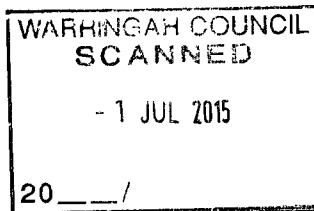


29th June 2015

The General Manager,
Warringah Council,
Civic Centre
Pittwater Road
DEE WHY NSW 2099



Dear Sir,

Re: Modification 2015/0078 of Consent No. DA 2010 /1949
To increase student enrolment at Covenant Christian School
212 Forest Way, Belrose

Thank you for the opportunity to comment on the abovementioned modification proposal.

In short the proposal is to amend condition No. 41 of DA 2010/1949 granted on 20 December 2011 which states:

Maximum Enrolment

“The maximum allowable enrolment of the Covenant Christian School on the subject site shall not exceed 900 students.”

To -

“The maximum allowable enrolment of the Covenant Christian School on the subject site shall not exceed 1,100 students.

The proposed increase amounts to a 22.22 % increase in the school population, a sizable increase.

Our members consider that this is not a ‘minor’ modification and although the application states that the proposed student population can be accommodated in existing buildings, the assessment in accordance with the requirements of LEP2000, may require extra facilities. These may not be able to be provided therefore this application should be a new Development Application.

Despite the increased number increasing over five to ten years, “the proposal does not provide for additional on-site parking.” The proposal relies on the local non urban streets to provide the additional parking. It needs to be noted that LEP2000 requires that all teachers and staff are to be provided with onsite parking. The report states that there is existing 92 full time staff which are well in excess of the existing onsite parking spaces.

The Report states “that there is a significant amount of parking space is available in the immediate vicinity of the school.” While this may be theoretically true if a parent is willing to park more than 70 metres from the school. However, in reality, parents want to park as close as possible to any gate.

The Report notes that the new Preschool in Bundaleer Street has underground parking but again the reality is that not all their parents use that facility, many preferring to park on Bundaleer Street. The

Preschool is now operating.

The drop-off habits of many of the parents has been noted, as not always safe, legal or neighbourly.

The ARC Traffic Report states on page 16, that there will be "approximately 60 additional students drop off and pick up trips in the AM and PM respectively."

The Report does suggest that additional right angle parking could be provided on the north side of Walden Road. This is theoretically a good idea, one that the Rugby Club would appreciate. However, these spaces are a long way from the school gate.

Putting this matter in context, this school is theoretically in a non urban area. LEP 2000 Locality C8 calls for low intensity and low impact uses. Whilst it would appear that no new buildings are required as part of this proposal, the impact on the local non urban streets is not low impact as presently proposed.

We consider that Council's Traffic Engineer needs to view the existing traffic conditions in the streets surrounding the school rather than rely on the traffic and parking report included with the application. This viewing and reporting should occur on a numbers of school term days immediately before and after school operating times.

What further could be done?

The Association believes that there is a need to attempt to reduce the number of parents needing to park their vehicles in the local streets.

- We suggest a 'kiss and drop zone', on the south side of Bundaleer Street opposite the school access ramp.
- Additional on-site parking to the west of the on-site bus sweep could possibly be achieved by relocating the demountable uniform shop.
- Investigating how to attract more students to the existing school special busses and if necessary require the school to purchase another mini-bus, to bus students to the school.

In addition to traffic and parking issues:-

There is no mention in the application regarding the treatment of waste water. We understand that there is an existing onsite treatment plant. It is essential that there is a good onsite system to treat the waste water from the existing school population and any possible extra students or other events and activities that occur at the school.

The size of the outside play areas and any covered areas need to be addressed to ensure that there are suitable areas available for any extra students.

LEP2000 also requires considerable areas of Local Native bushland particular around the boundaries.

The C8 Locality states in part under "Bushland setting"

A minimum of 50% of the site area is to be kept as natural bushland with local species

This needs to be assessed as **this site** now has very little natural bushland with local species left and no longer complies with the LEP.

The Association believes that the proposed addition of 200 to the maximum student enrolment to be too great unless appropriate measures are taken to address the additional vehicle impact on the local streets and to access all the facilities essential for this school.

Yours Sincerely,



Ron Patton

Vice President

Belrose Rural Community Association