
From: [REDACTED]
Sent: 19/04/2024 7:03:49 PM
To: Reeve Cocks; Council Northernbeaches Mailbox
Cc: [REDACTED]
Subject: TRIMMED: Attn Reeve Cocks - Comments Regarding DA2024/0155 - 35 Consul Road Brookvale

Attn Reeve Cocks - Comment relating to DA2024/0155

We have undertaken a review of the information provided in the online portal for 35 Consul Road, Brookvale – DA2024/0155, and at this stage are unable to make a full and informed response to the DA due to inconsistencies, incorrect and lack of information. We would seek the DA package be corrected and relodged with the correct information, so that a fair and reasonable assessment can be made.

We make the following comments.

1. Proposed Use and Site Reclassification

The proposed and future use is unclear. The request is for the ancillary use argument to convert the residential dwelling to an office, however the change in use is requested to be for educational purposes. See the extract from the SEE below.

*The development application relates to 35 Consul Road, Brookvale (the site) for change of use from a dwelling house to an **Educational Establishment** and seeks approval for the change of use from a residential premises to an administration office ancillary to the educational establishment St Augustine's College, Brookvale (the proposal) together with minor internal and external alterations.*

The SEE whilst addressing the administrative uses, fails to address the long-term use of the site once reclassified as educational, and the potential consolidation into the parent parcel of the school (60 Federal Parade). This has been the case for the other previously zoned residential parcels, like the one next door (Formerly No 33 Consul Road.) and to the south of No 35. These piecemeal expansions do not allow the community to understand the full extent of the change and what is being approved long term. Whilst similar issues were raised by the community in the recently approved DA to increase the student numbers by 33% (DA2021/2567) it appears that the displaced administration facility that was once on the new carpark required for this expansion was not adequately addressed in the previous DA. This piecemeal approach shows the previous DA did not adequately address all of the impacts of the expansion. Can the applicant please make it clear to the community and Council what the long-term use of this land will be, confirm whether it will or will not be consolidated into the parent parcel and if it can't be confirmed, assume it will and notify all properties fronting to or adjacent to the school lot of this DA, as per the previous school related DA's. It appears only properties adjacent to or opposite No 35 have been notified to date. Current Plan of Management of the School prepared for DA2021/2567 does not mention this property even though it was owned at the time of preparation of the POM. This will need to be addressed in the approval, including reconciliation of carparking spaces. This proposal needs to be clear on car parking numbers especially the stacked parking below the flood level (refer below)

2. Survey Plan

The detailed survey plan fails to pick up the correct site levels on the northern boundary, adjacent to the carport. The top of wall and levels on the adjoining properties to the north (Lots 6-8 in DP 12815) would assist in understanding the flooding characteristics of the site better. Additionally, earthworks have recently been undertaken by the School (July/August 2023) on what was formerly No 33 Consul Road (immediately to the south) increasing fill levels within the floodway. The combined effect of these works, with the encroachment of the Gould Building and western podium into the floodway have caused a narrowing and displacement of volume, which will increase flood levels upstream and onto

the adjoining properties. Initial enquires made to Council at the time indicated a 200-300mm impact on this upstream properties, not allowed for in the Greendale Street Flood Model due to the timing of the works. These more recent works have not been adequately addressed in the applicants Flood Study which will be discussed below.

3. Flooding

The Flood Study (which is incorrectly notated on your website portal as 'Risk'), reports that the flood impact is minor due the existence of a brick wall on the northern boundary adjacent to the driveway and carport. For the majority of the site, this wall does not extend above the adjacent upstream ground level, especially in the south east corner of lot 6 in DP 12815, (on the corner of Federal Parade and Consul Roads). The retaining wall in this area is flush or below the adjacent ground level allowing the flood waters in the Greendale Creek Floodway to pass over this wall at up to 740mm deep in the 1% AEP (according to Table 18 on page 46 of the Greendale Creek Flood Study) . This flooding will commence at the 20% AEP according the the same table (ID D03 - Consul Road).

The nett effect of this flooding will be the filling up of the lower level of the building to the adjacent ground level at a minimum (1.2m) and will be further under water, up to 2.7m deep in flood events, creating a bathtub effect on the lower level of the building. There are no details on how the cars parked in this vicinity, nor the building and its occupants will be protected. This is indeed a high-risk area that needs to be addressed fully in an updated flood study and concise risk report.

I note the Council referral response notes the 1%AEP in this vicinity to be 29.63, with a FPL of 30.13 . My reading of the Flood Study for Node H03 – Consul Road (Table 17 on Page 45) indicates the 1% AEP to be 30.68,making the FPL 31.18. I seek clarification on this matter. Notwithstanding in either event, the car port and lower level is in somewhere between 1.88- 2.93 metres deep in flood waters. It would be 0,5m deeper to the FPL.

The Applicants Flood Risk report makes this error in assumption, and has reproduced this error throughout the report, and up into the SEE. The Applicant states on page 9 of the flood risk report,

Regarding the high risk narrow area in north of the site, this affectation is not connected to a continuous high risk flowpath (Figure 10), and is localised to a small, narrow area. Instead, this is an isolated patch of high risk area that has been formed due to the trapped low point of the driveway creating high velocity runoff down this small area of steep paved slope.

This statement is incorrect and will need to be corrected throughout the applicant's Flood Risk report. Notwithstanding the impact of a wall (if increased) the volume displaced is likely to back up on the adjoining properties to the north and west, flowing around the wall at the top of the driveway on Consul Road, resulting in the same 'bathtub' effect. The report will need to be updated to change all reference to low risk to **high risk** in this vicinity.

4. Recommendations

In order for the community and Council to make a better and reasonable assessment of this proposal, we suggest the following additional information is provided to the portal.

1. Updated Survey to reflect site conditions on No 35 and adjacent properties, particularly in relation to the land features within the Greendale Creek Floodway, north, south, and east of the property.
2. Presentation of a School Redevelopment Masterplan showing short and long terms uses for the site and those sites owned by the school that adjoin.
3. Confirmation as to wether this site is to be amalgamated with the school and renotification of all properties across or adjacent to the school.
4. Update of the Flood Report to include 2D modelling, to adequately report on the recent changes to local landform south and east of No 35 and any impacts on surrounding properties, due to these recent or any proposed works.
5. Correction of the flood regime and risk report in relation to the wall that does not currently exist, above ground adjacent to the carport. Flood Risk to be assessed as **High**.

6. Traffic consultant report into the safety and adequacy of the trapped stacked parking 1 to 2m below the 1% AEP
7. The relationship to these flood levels and the depth of ponding in the carport and lower level of the building, and a building report on how this area will be waterproofed, with or without the proposed retaining wall extension.
8. Assessment of the structural stability of the lower-level walls to withstand the differential pressures of the flood waters should the lower level be sealed from flooding.
9. Suitability of this site for the proposed educational purposes – not just administration.
10. Update of the SEE to correctly address the change of use to Educational, and also correctly reflect the **high flood risk**, including any proposed treatment to the building and its surrounds.

Once this information is updated and provided to correct the factual errors and to address the constraints of the site, I will be in a better position to make a more formal response.

Please contact me if you would like me to clarify any of the matters above.

Kind Regards

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