
Sent: 23/05/2020 4:06:26 PM
Subject: MOD 2019/0627 John Colet School
Attachments: pattonrc submission 20th May 2020.docx;

Dear Sir/Madam,
Please find attached our submission for MOD 2019/0627 John Colet School.
Yours Faithfully,
Ron and Cynthia Patton

Ron and Cynthia Patton
18 May 2020

Northern Beaches Council
Attention: Nick England
Planning Officer

MOD 2019/0627
Modification of development consent for DA2015/0558
John Colet School
6-8 Wyatt Ave Belrose NSW
Amended Plans

Dear Sir,

Thank you for the opportunity to make a submission on MOD 2019/0627.

We object to this proposal for a new 2 storey building and associated facilities over the whole site, including the location of many of the onsite car parking spaces. This is another inappropriate development proposal.

We make this submission in addition our previous submission which is also to be considered in regard to this proposal.

Further the details in this submission are to be read in conjunction with the details in our submission on the amended plans for Mod2019/0627 – DA2015/0558.

The proposals in this application will severely add to the existing adverse impacts on us and others in this residential neighbourhood.

The amended plans do not meet many of the planning controls and will severely increase the adverse impacts on us and other people living in this residential neighbourhood. This proposal will severely increase the adverse impacts on this bushland site.

As the proposal does not meet many of the planning requirements for Locality C8 and General Principles in WLEP2000 the application should be refused.

The Proposals for this site are an overdevelopment of the site as all of the proposed facilities cannot be contained within the areas that can be used for buildings and other facilities, as detailed below.

Category 3

Primary Schools are Category 3 developments and require a more rigorous application and assessment to show how the proposals are consistent with the Desired Future Character Statement of the Locality and other planning controls in WLEP2000.

WLEP 2000 Part 2 Control of Development states in part:

“Clause 12.3.(b)Category 2 or 3; the consent authority must be satisfied that the development is consistent with the desired future character statement.”

The notes under this clause state in part: “category 3 development is development that is generally inconsistent with the desired future character statement of the Locality.”

Clause 15.(1) states: “consent may be granted to development classified as Category 3 only if the consent authority has considered a statement of environmental effects that includes the items listed in schedule 15, Statement of Environmental Effects.”

The application in December 2019 has provided some details, however the details do not address all the information required in WLEP2000.

Therefore, without all the full details this application should be refused.

Desired Future Character Statement

The Desired Future Character Statement for Locality C8 WLEP2000 states in part, "The present character of the Belrose North Locality will remain unchanged except in circumstances addressed as follows."

As this LEP was implemented in 2000, the "present character" refers to the character that existed in 2000. Therefore, it is not consistent with the DFC, where the applicant is proposing a building based on the character that has been developed since the implementation of LEP2000.

In 2000 there were no large 2 storey buildings and other facilities on the site. The school operated out of 3 residential buildings on the site prior to the development of any of the existing 2 storey buildings, which were constructed after 2000.

One of the existing 2 storey buildings was constructed during the GFC crisis with funding from the State Government and without considering any of the local planning controls.

To provide another 2-storey building that is **not** consistent with the planning controls is unacceptable and should be refused.

Two Storey Building

The proposal is not contained within the height requirements and the front set back distance is 17 metres where the planning requirement is 20 metres.

Also, the planning requirements need this set back area is to be densely planted with local species. The proposal is not consistent with either of these standards.

The side set back distance in the plans is 5 metres where the planning requirement needs a minimum of 10 metres which is to be densely planted with native species and free of any structures. Again, the proposal is not consistent with the planning requirements.

The proposed two storey building will result in a continuous high wall of four large buildings along the Wyatt Ave frontage.

This is not in character with the detached dwellings in this neighbourhood.

This will cause a high visual impact along the streetscape and is inconsistent with the Desired Future Character Statement in the planning controls, which requires low impact.

This proposal is not consistent with many of the requirements in Locality C8 WLEP2000 and the General Planning Requirements in WLEP2000. The applicant has not shown that the development is consistent with the desired future character statement, Therefore, the application should be refused.

Student and Staff Numbers

The application with the previous plans did not provide any details about the student and staff numbers. The amended plans do not have any written details associated with these plans.

This means that this application cannot be fully assessed.

Although the numbers of existing students and staff are not provided with the applications, it is evident that the existing development does not meet the planning requirements. There are many staff vehicles parked on street each day, with the majority parked in the spaces for Wyatt Reserve.

In WLEP2000 the onsite car parking requirements are to be based on the total number of staff on site and can only be determined if these numbers are provided in the application. Please do not assume the numbers of either the Staff or the number of students when trying to make a decision on this Development Proposal.

The total number of full-time staff and part time staff need to be provided in the application to enable the application to be assessed. This information has been ignored by the applicant a number of times; this application should be refused.

Parking

The Statement of Environmental Effects dated December 2019 in section 5.6.3 Traffic and Parking states, "The proposed modification to future Stage Q will not result in any increase in the intensity of activity at

the school and no alteration to existing traffic or parking requirements. Therefore, the proposal will have a negligible impact on traffic and parking.”

The current amended plans show extra proposed parking spaces. There is no written information from the applicant to explain why these details have changed.

Although a total of 19 car parking spaces have been approved for previous applications, the addition of the extra spaces will not satisfy the existing developments as there is many more staff vehicles parked on street and in the Wyatt Reserve parking area each day. These extra spaces will certainly not meet the requirements for staff numbers that will be needed for this proposed additional large building together with the existing developments on the site.

The planning controls require one space for each staff member on site. This is to provided for the maximum number of both full time staff and part time staff who are on site at any time.

This requirement cannot be reduced by attempting to calculate the equivalent full time staff numbers.

In considering the proposed location and layout of the car parking spaces there are many issues that make the location of these spaces unacceptable.

We note that the Applicant's Consultant's report (McLaren Traffic Engineering) dated 15 April 2020, includes a plan with **a total of 25 spaces**.

The Architect's plan DA/DWG 0000 Rev F dated 15 April 2020 shows a **total of 30 spaces** with 6 stacked spaces. **As the Architect is the applicant, the Consultant's report does not support the application.**

The proposed stacked spaces are not practicable, particularly where there is a number of part time staff. The internal access road does not provide sufficient manoeuvring area. This is probably why these spaces are not included in the Consultant's report.

In considering vehicle access to many of the proposed spaces, the Consultant's Report states that “vehicles can access the staff parking spaces with an acceptable number of manoeuvres”. **REALLY!**

We consider that this is unacceptable, as the staff will find it easier to park on street. This is already occurring with the existing staff vehicles.

Many of the proposed spaces are located at the rear of the property.

Further the access road in the one-way system around the rear of the property does not meet the width requirements and is some distance from the parking spaces. This will result in bushland being removed from the whole of this area including the access road, the area between the access road and the parking areas and the parking areas.

This is unacceptable.

The bushland area at the rear of the property is included in previous approvals to satisfy the planning requirement to provide a minimum of 50% of the site with bushland or planted with local species. A reduction of this bushland area this is also unacceptable.

Further, the proposed playground area at the rear of the proposed new large two storey building, cannot be included as part of this bushland area.

This does not meet the terms of the C8 Locality Statement and the Schedule for Car Parking requirements.

Therefore, this proposed rear car parking and the side car parking proposals should be refused.

Without sufficient onsite carparking spaces for the new building the application for this building should be refused.

Traffic

The existing development causes traffic chaos which results in unsafe traffic movements.

The applicant's consultants have not addressed **the current problems** and have **not provided any details for the new development**.

Pick up in the afternoons cause extensive queues along Wyatt Ave which extends through the intersection of Cotentin Ave and often further down Wyatt Ave, often as far as No 18 Wyatt Ave and sometimes to 26 Wyatt Ave.

Wyatt Ave is narrow which means that two-way traffic movements cannot operate with this queuing.

There are always illegal traffic movements at the intersection of Wyatt Ave and often buses have problems navigation along Wyatt Ave.

Parents/Carers cause safety issues at pickup times. Residents cannot access in or out of their properties because of U-turning manoeuvres in their driveways or cars are actually parked up their driveways.

This is a residential street/neighbourhood and should be treated as such.

Recently Council approved a 60 place Child Care Centre at 12 Wyatt Ave, located at the intersection of Wyatt Ave and Cotentin Road.

The queuing of vehicles extends along Wyatt Ave past this site for the Child Care Centre.

Together with this traffic there are pedestrian movements including school children and younger children. This traffic chaos is already causing unsafe situations; any increase in students and staff will cause more unsafe situations.

The combination of the traffic and pedestrians associated with both John Colet School and the Child Care Centre will cause many safety problems which is unacceptable. No assessment of the street movements has been provided.

Further the planning controls require that the drop off and pick up areas should be onsite.

As an onsite area has not been provided and the school has only one street frontage, these factors result in a very unacceptable situation with impacts on us and other residents in this residential neighbourhood.

Due to these unacceptable adverse impacts the proposal should be refused.

Bushland Setting

The planning requirements for Locality C8 WLEP require; '**Bushland Setting:**

Minimum of 50% of the site area is to be kept as natural bushland or landscaped with local species."

Approvals for existing developments provided the bushland area at the rear of the property to comply with this requirement.

The application does not provide any details to show that the current proposal will be consistent with this standard. In fact, the proposal shows car parking in some of this bushland area.

The school is not complying with an existing management plan for the bushland area which is resulting in much of the bushland being destroyed by maintenance activities by parents and activities by teachers and students. This management plan should be revised to ensure that a qualified person is in charge of the plan together with appropriate information explained and provided to the teachers and parents.

Working bees by parents without supervision by a qualified person/s is not in accordance with prior approvals.

The proposal does not show that there is 50% of the site preserved with bushland or planted with local species; therefore, the application should be refused.

Insufficient useable open space in the school grounds

The school uses Wyatt Reserve each school day for daily school activities. This shows that there is insufficient open space on the school site for these daily school activities.

This shows that the site is already overdeveloped and no further development should be permitted.

This is unacceptable to continue using Public Land for the school's daily classes; the application should be refused.

Existing Demountable classroom

The proposal shows the removal of this classroom.

The removal of this classroom should not be dependent of the approval of the current modification and development Application.

The approval for the first two storey building required the removal of this demountable classroom. The Rural Fire Service required the removal of this classroom as it is located very close to bushland.

Whether or not these current applications are approved or refused the Council should take appropriate action to have this demountable classroom removed from the site as soon as possible.

We respectfully request that you address all of the above issues in the assessment report.

Yours Sincerely
Ron and Cynthia Patton