planning consultants

Statement of Environmental Effects

Increase Student Population and Additional Car Parking

St. Augustine's College

37-43 Federal Parade and 60 Federal Parade, Brookvale

Prepared for: St Augustine's College
December 2021

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1 Introduction

1.1 Commission

DFP has been commissioned by St Augustine's College to prepare a Statement of Environmental Effects (SEE) for the proposed increase in the student population and construction of new staff car parking areas at St Augustine's College (the College). The College is located at 37-43 Federal Parade, Brookvale (the site).

This SEE accompanies a development application (DA) to Northern Beaches Council (Council) for the proposed development which comprises:

- An increase to the current approved student population cap of 1,200 students to 1,600 students;
- Demolition of the existing building and construction of a new 24 space at grade car park on 60 Federal Parade; and
- Construction of a new 30 space at grade car park (including one accessible parking space) on the south-eastern corner of the College site.

1.2 Purpose of this Statement

The purpose of this report is to provide Council and relevant NSW State Government Agencies with all relevant information necessary to assess the subject development proposal and to determine the DA in accordance with section 4.16 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and the *Environmental Planning and Assessment Regulation 2000* (the Regulation).

1.3 Material Relied Upon

This SEE has been prepared by DFP based on information referred to herein and/or appended to this report and a site inspection undertaken on 18 October 2021.

- Minutes of Northern Beaches Council Pre-DA meetings held 1 June 2021 and 17 November 2021.
- Site Survey - *LTS*
- Traffic Impact Assessment – *Stantec Traffic Consultants*
- Traffic and Parking Management Plan – *Stantec Traffic Consultants*
- Civil and Stormwater Plans – *Core Project Consultants*
- Landscape Plans – *Space Landscape Designs*
- Arborist Assessment – *RainTree Consulting*
- Acoustic Impact Assessment – *E-Lab Consulting*
- Waste Management Plan (Construction and Demolition) – *ADG Project Managers*

2 Background

2.1 Previous Development Consents

2.1.1 DA2013/1336 and Student Enrolment Background

To place the proposed development into context, it is important to discuss the School's prior development consent DA2013/1336. Development Consent DA2013/1336 (as modified) was originally granted by the NSW Land and Environment Court on 19 June 2014 for:

> *'Alterations and additions to an Educational Establishment (St. Augustine's College)'*

Condition No. 45 of DA2013/1336 states the following:

> ***'45. Maximum Enrollment*** **[sic]**
>
> *The school/college campus site is limited to a maximum student enrolment of 1200 students. Reason: To manage impacts on the locality.'*

In February 2020, Council issued correspondence to the School advising that they were aware of the School having a student enrolment in excess of 1,200 students. The School acknowledged in formal correspondence to Council that their current student enrolment exceeded the maximum 1,200 student cap under DA2013/1336 (as modified) and informed Council of their intention to seek formal approval for a student population increase.

Accordingly, the School is now seeking development consent to increase the maximum student cap from 1,200 students to 1,600 students. The student increase, and this DA, does not require any additional floor area increase on the site.

2.1.2 Change of Use Development Consents

The School has purchased multiple allotments adjoining the St Augustine's College campus which now form part of the School. Purchased allotments all have a change of use development consent in place for use as an *educational establishment*. The relevant development consents are summarised below.

DA2018/1804 – Use of land as part of an educational establishment (St Augustine's School)

DA2018/1804 approved the use of the following former allotments for use as an educational establishment (see **Figure 1** also):

- Lot 8 DP 11209, 22 Alfred Road;
- Lot 51 DP 839828, 2 Gulliver Street;
- Lot 52 DP 839828, 2 A Gulliver Street;
- Lot 1 DP 1220407, 37 - 43 Federal Parade (former 33 Consul Road was already consolidated into this allotment); and
- Lot 7 DP 11209, 20 Alfred Road.

2 Background

Figure 1 DA2018/1804 stamped approved plan – all areas shaded blue are approved for educational establishment use

DA2019/0051 – Use of Premises as an Educational Establishment

DA2019/0051 approved the use of former Lot 6 in DP 11209, (known as 18 Alfred Road) for use as an *educational establishment* (see **Figure 2** below in comparison to **Figure 1** – see change in the bottom right corner of **Figure 2**, identified in dashed red):

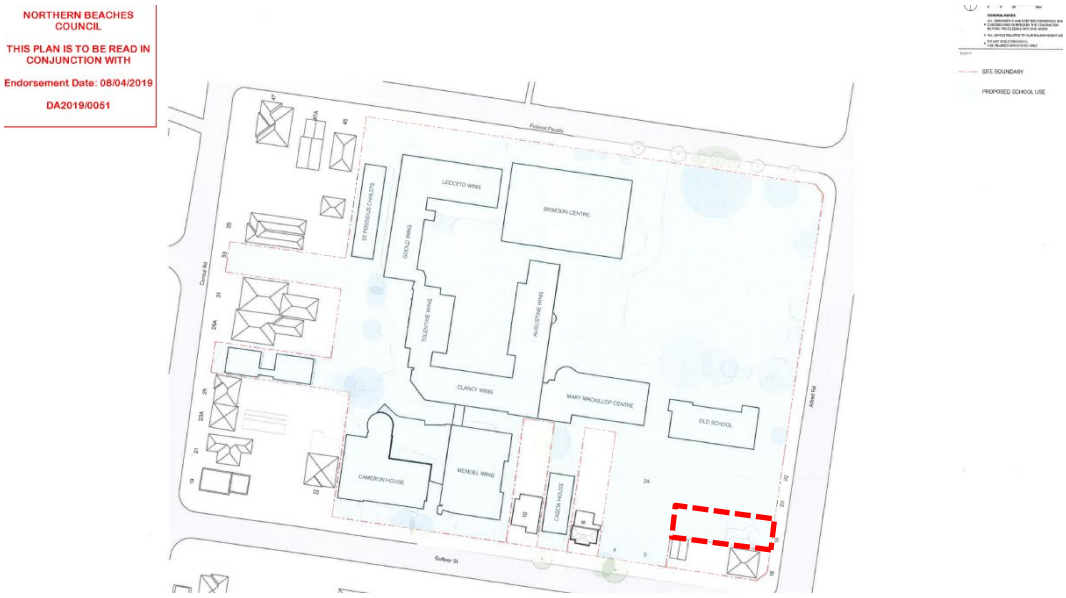

Figure 2 DA2019/0051 stamped approved plan

DA2020/1406 – Use of Premises as an Educational Establishment (Ancillary Administration)

DA2020/1406 approved the use of the existing dwelling on 60 Federal Parade as ancillary administration/office space associated with the school. This building is not being used by the College as all administration/office functions are currently able to be accommodated within existing facilities on the main campus.

2.2 Previous Development Applications

DA2020/1514 was lodged with Northern Beaches Council on 27 November 2020. The DA sought approval for:

2 Background

Alterations and additions to an existing educational establishment to accommodate an increase of student numbers

Approval for an increase in student numbers to a maximum enrolment of 1,500 students was sought. The DA also included an at grade car park with 15 car parking spaces on land formerly known as 33 Consul Road.

DA2020/1514 was withdrawn on 15 March 2021. Following assessment of the DA, Council issued a request for further information letter, which, among other things, outlined Council's objections to the layout of car parking area on 33 Consul Road. A number of submissions objecting to the application were also received.

2.3 Development Control Order

A Development Control Order (EPA2020/0174) under Part 1 of Schedule 5 of the Environmental Planning and Assessment Act 1979 (EP&A Act') was issued by Northern Beaches Council on 26 March 2021.

EPA2020/0174 relates to a breach in a condition (condition 45) of the development consent (relating to student numbers) issued in relation to DA2013/1336.

Following discussions with Council's compliance officers, it was agreed that no action in relation to EPA2020/0174 would be taken subject to submission of a development application to address the number of students enrolled at the College. The DA to which this SEE relates addresses the student number cap.

2.4 Pre-DA Meetings

A pre-DA meeting was held with Council on 1 June 2021. The proposal that was submitted for discussion at that pre DA meeting was different to that which is now proposed as part of this DA. Specifically, the previous proposal still included car parking on 33 Consul Road, as well as car parking on 60 Federal Parade (but with reduced setbacks) and 16 car parking spaces on the south eastern part of the College site.

Council raised the following issues in relation to that proposal:

- Use of 33 Consul Road as a car parking area is not supported.
- The location of additional car parking on 60 Federal Parade was not supported by Council on a number of grounds including potential acoustic impacts, pedestrian safety and light spillage.
- The design of the car parks needs to consider impacts to neighbouring properties, opportunities for landscaping and other attenuation treatments required to minimise visual and acoustic impacts to neighbouring properties. Streetscape impacts will need to be considered and addressed.
- A minimum 2m landscaped setback is required to be provided to adjoining residential boundaries.
- CPTED and wayfinding needs to be resolved.
- Opportunities to minimise the potential heat island effects associated with the hard stand car parking areas should be incorporated.
- Compliance with Council's DCP with respect to stormwater management will be required.
- A Traffic Management Plan will be required.
- Council's preference is for a more comprehensive master planning of the site to integrate additional car parking within the school grounds proper rather than on 'satellite' properties. In this regard, Council questioned whether this response to car parking provision was an interim approach and what the ultimate solution might be.

2 Background

The College advised that the option of locating car parking under the playing field (on the north eastern corner of the College site) has been explored but that this is not financially possible (estimated cost of over $50m).

- Consideration of options that could be implemented to reduce car parking demand.

At the conclusion of that meeting, Council recommended that a follow up pre DA be held.

The follow up meeting was held on 17 November 2021. At that meeting, the parking scheme which is submitted as part of the DA to which this SEE relates was presented for discussion.

At that meeting the following matters were discussed:

- The revised proposal responded to the feedback provided by Council in response to the previous proposal considered on 1 June 2021 particularly in relation to providing as much parking as possible on the College site and providing generous landscaped setbacks to adjoining residential boundaries. The setbacks provide opportunities to plant canopy trees which will shade areas of the car parks.
- Council advised that the location of the car park on 60 Federal Parade was not favoured given the separation from the main school campus. In this regard it was indicated that the car park would only be used by staff members.
- Council advised that there were no objections to the civil design response. Any stormwater management will need to have regard to Council's controls with respect to water quality.
- Council requested information regarding any lighting to be provided within the car parks be submitted with the DA.
- Council requested that the methodology used to assess acoustic impacts be included in the development application.
- Management of the car parking areas was discussed. Council raised the concern that staff looking for a parking space would contribute to traffic impacts around the school as a result of them 'circling the block'. It was confirmed that staff would be allocated a space to avoid this outcome. This will be detailed in the revised Traffic and Parking Management Plan to be submitted with the DA.
- Details of management practices adopted by the College to kerb the number of students driving to school will also be detailed in the Traffic and Parking Management Plan.
- Council also recommended that the College consult with residents adjoining the proposed car parking areas. This has been undertaken.

3 Site Context

3.1 Location

The main part of the College site is located at 37-41 Federal Parade, Brookvale. It comprises of two (2) allotments as seen in **Figure 3**. DA2020/1406 approved the use of 60 Federal Parade, Brookvale (Lot 13 DP 568333) as an educational establishment (ancillary administration) associated with the College. The location of 60 Federal Parade in relation to the main College campus is shown in **Figure 3**. **Figure 4** is an aerial photograph of the main campus, including 60 Federal Parade.

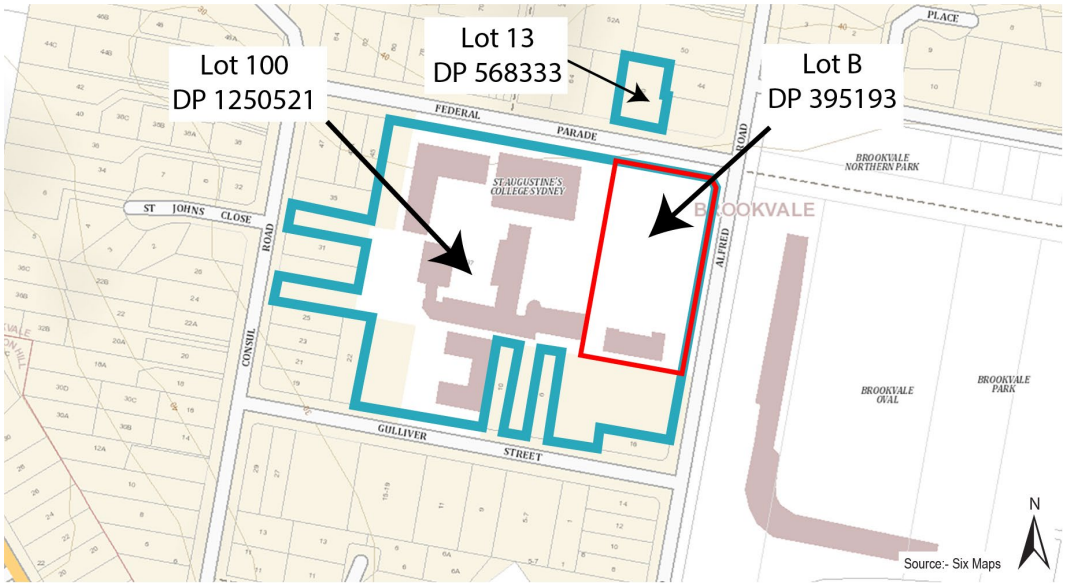

Figure 3 Site Location.

Figure 4 St Augustine's College Campus showing both allotments which comprise the site.

3.2 Site Description

The main part of the College site is legally described as Lot 100 in Deposited Plan (DP) 1250521 and Lot B in DP 395193. The real property description of 60 Federal Parade is Lot 13 DP 568333. An aerial image showing the configuration of the College's overall campus is shown in **Figure 5**, which also demonstrates how the College campus has expanded through the purchase of adjoining allotments.

3 Site Context

Figure 5 Aerial view of the site.

The main campus is bound by Federal Parade to the north, Alfred Road to the east, Gulliver Street to the south and Consul Road to the west. There is residential development to the north, west and east of 60 Federal Parade.

The main campus contains a range of buildings of varying size and scale with the majority of the College's open space located on the eastern side of the site.

3.2.1 60 Federal Parade

There is an existing dwelling on 60 Federal Parade with a detached garage. Approval for the use of this dwelling as ancillary administration offices associated with the College has been granted (DA2020/1406). The dwelling and the garage will be demolished to facilitate the proposed development.

The property itself is relatively general with a fall of approximately 2m from north (rear) to south (Federal Parade). The land to the west of the site rises steeply – refer photograph at **Figure 8**.

There are currently seven (7) trees located on the property however approval for the removal of two (2) trees adjacent to the rear boundary (and behind the garage) has been granted by Northern Beaches Council (Refer Tree Permit TA2021/0730). Two (2) other trees (palms) are exempt species and are also proposed to be removed. The other trees will be retained.

There is existing Council owned stormwater infrastructure located on 60 Federal Parade. This will be retained.

The fencing along the northern and part of the eastern boundary comprises a brick fence which is proposed to be repaired and retained – refer photograph at **Figure 7.** The brickwork will also be increased in height to accord with the recommendations of the acoustic report.

The remainder of the eastern boundary fence comprises a lapped and capped timber fence on a concrete footing – refer photograph at **Figure 6**.

The western boundary fence is a timber paling fence which will be required to be replaced.

3 Site Context

Figure 6 Existing building (with detached garage) located on 60 Federal Parade [Source: Google Streetview]

Figure 7 View towards dwelling located on 50 Alfred Road, Brookvale from rear yard of 60 Federal Parade

3 Site Context

Figure 8 Looking west towards rear yard of dwelling on 62 Federal Parade

3.2.2 Site of Car Park on South-Eastern Corner of Main College Site

The south-eastern corner of the main College site is currently a grassed playground area for students – refer photograph at **Figure 9**. The land is relatively level but is raised approximately 0.5m above the Gulliver Street footpath. A rock retaining wall is located around the southern and eastern edges of the playground.

The College site 'wraps' around an existing residential allotment – 16 Alfred Road, Brookvale – which is located on the north western corner of Gulliver Street and Alfred Road. **Figure 13** is a view from Alfred Road towards No. 16 Alfred Road.

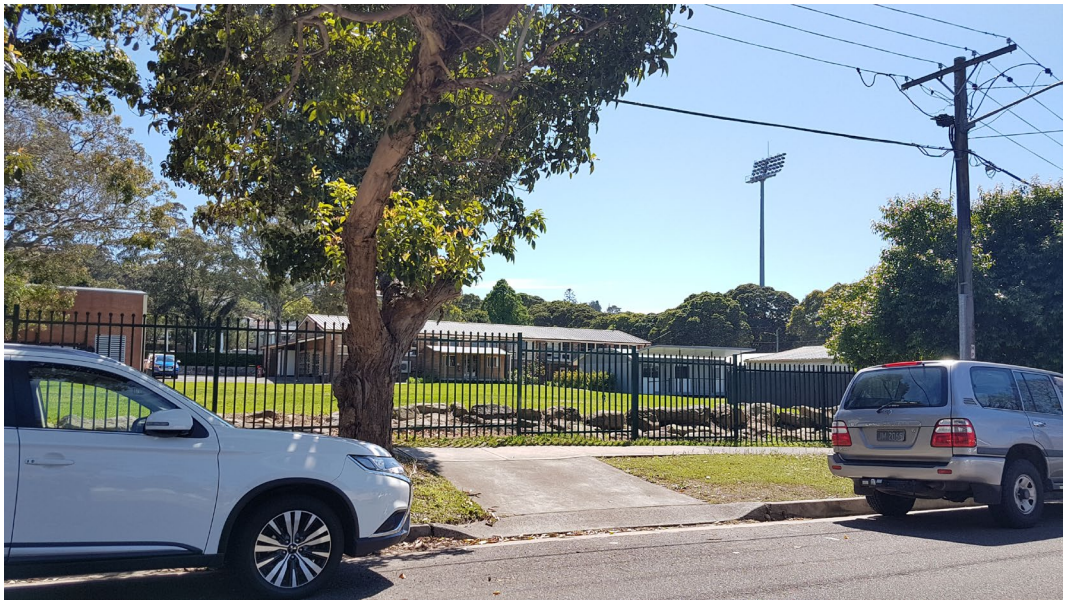

Figure 9 Looking towards SE corner of College site from Gulliver Street

There are street trees on Gulliver Street which will be retained. There is an existing vehicular crossing to Gulliver Street from this part of the school site. As demonstrated in **Figure 7**, the existing crossing (to be retained and used as the egress from the car park) is immediately adjacent to a street tree. The approximate location of the crossing is marked the red arrow in **Figure 8**.

3 Site Context

Figure 10 Looking south from site of proposed car park on SE corner of the College site towards Gulliver Street and residential development opposite

Other than turf, there is no vegetation on this part of the College site.

Along the Gulliver Street frontage of this part of the College site is a metal palisade fence. This is proposed to be retained. Where this part of the site adjoins residential development (to the west (refer **Figure 11**) and east/south (refer **Figure 12**) there is timber fencing along the common boundaries.

To the immediate west and east of this part of the College site are privately owned residential dwellings – refer **Figures 11** and **12**.

The proposed driveway entry from Alfred Road will located adjacent to the northern boundary of 16 Alfred Road – **Figure 13**.

Figure 11 Looking towards existing dwelling on 5 Gulliver Street (adjoining site to the west)

3 Site Context

Figure 12 Adjoining property – 16 Alfred Road, Brookvale with College reception area to the north (RHS of photograph) [Source: Google Streetview]

Figure 13 Looking south east from existing playground area towards rear of College reception buildings and dwelling on 16 Alfred Road

3.3 Surrounding Development

The College is located at the interface of the Brookvale industrial precinct and the Brookvale residential area.

Established residential land uses are located to the north, west and south of the site. Further south is Brookvale Public School. Opposite the site to the east is Brookvale Oval with the Brookvale industrial precinct located approximately 200m to the south east.

Figure 14 is an aerial photograph of the main College site and surrounding development.

3 Site Context

Figure 14 Surrounding Development

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4 Proposed Development

4.1 Summary of Proposed Development

The proposed development comprises:

- An increase in the College enrolment from the current approved maximum student population of 1,200 students to a maximum of 1,600 students. 152 full time equivalent (FTE) staff will be required to support a student enrolment of 1,600 students.
- Demolition of the existing buildings on 60 Federal Parade and construction of a new 24 space, at-grade car park, together with associated civil works and landscaping.
- Construction of a new 30 space at-grade car park on the south-eastern corner of the main College site at 37-41 Federal Parade, together with associated civil works and landscaping.

The following subsections provide a more detailed description of the proposed development.

4.1.1 Student Increase

A cap of 1,200 students applies to the College pursuant to Condition No. 45 of DA2013/1336 (as modified). Due to demographic changes in the areas serviced by the College and a resulting increased demand for places at the College, a student population increase of an additional 400 students is proposed, resulting in a total maximum student population 1,600 students.

Pursuant to Section 4.17(1)(b) of the EP&A Act, any development consent granted by Council is able to impose a condition to modify DA2013/1336 (as modified), as below:

> ***'45. Maximum Enrolment***
>
> *The school/college campus site is limited to a maximum student enrolment of ~~1200~~ 1,600 students.*
>
> *Reason: To manage impacts on the locality.'*

The increase in students will necessitate an increase in staff numbers. It is anticipated that a total of 152 FTE staff will be required for a student population of 1,600 students.

Due to the proposed student population increase and the subsequent parking demand resulting from additional staff required for 1,600 students compared to 1,200 students[1], the proposed development entails the construction of new car parking areas as detailed below.

4.1.2 Construction of new car park and landscaping on 60 Federal Parade

The car park is proposed to be constructed on land which was recently approved for use as an educational establishment (ancillary administration).

The car park will provide 24 at-grade car parking spaces with the paved area of each space measuring 2.4m x 4.8m. A 600mm overhang into the landscaped setback is proposed to minimise the amount of hard stand area. Therefore, the overall length of each space will be 5.4m. An aisle width of 5.8m is proposed. A motorcycle parking space with dimensions of 1.2m x 2.5m is proposed in the north western corner of the car park.

Landscaped setbacks will be provided to the front, rear and side boundaries as follows:

- Front setback – 2.4m
- Western side setback – 4.4m
- Rear setback – 2.3m
- Northern part of eastern side setback – 4.4m
- Southern part of eastern side setback – 6.2m

[1] There is no cap on staff numbers for the School under the development consent. There are currently 150 Full Time Equivalent (FTE) staff at the College with this quantum to increase to 152 FTE staff to support the proposed 1,600 students.

4 Proposed Development

The setbacks have been designed to provide separation between the car parking area and adjoining properties, and to retain existing trees[2].

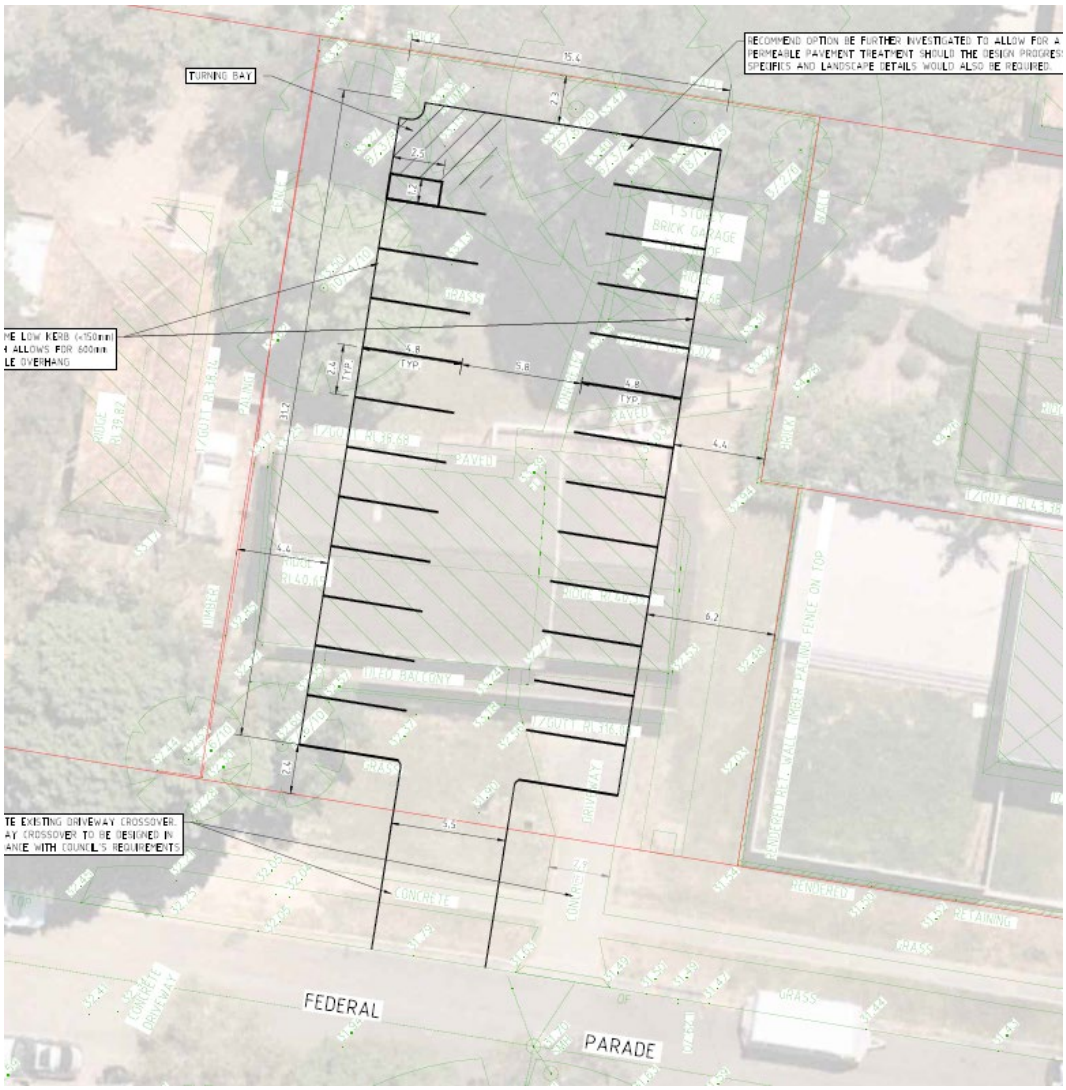

Figure 15 Proposed car parking layout on 60 Federal Parade

There is Council owned stormwater infrastructure traversing the site from north west to south east. The car park has been designed to avoid any impacts on existing infrastructure on site.

The hatched area in **Figure 7** is a turning area. This has been designed to facilitate an on site 3 point turn for a B85 vehicle.

The car parking layout has been designed by Stantec Traffic Consultants to comply with the relevant provisions of AS 2890.1:2004 and plans of the car park and swept path are submitted with the DA. The car park will be surfaced with an all weather material.

The car park design will require the provision of a new vehicular crossing to Federal Parade. This has been shown on the civil design and stormwater management plans prepared by Core Project Consulting. A copy of these plans is submitted with the DA. The existing vehicular crossing will be removed and the kerb and guttering will be 'made good', together with returfing of the nature strip/road verge.

[2] A tree removal permit (TA2021/0730) for the removal of two trees adjacent to the northern boundary of 60 Federal Parade was granted by Northern Beaches Council on 15 October 2021. Other trees have been identified as exempt species and will be removed.

4 Proposed Development

The existing brick fence/wall along the northern and part of the eastern boundary will be retained and repaired (where required). The height of the wall may need to be increased to satisfy the recommendations of the acoustic consultant – refer **Section 5.2.6** of this SEE.

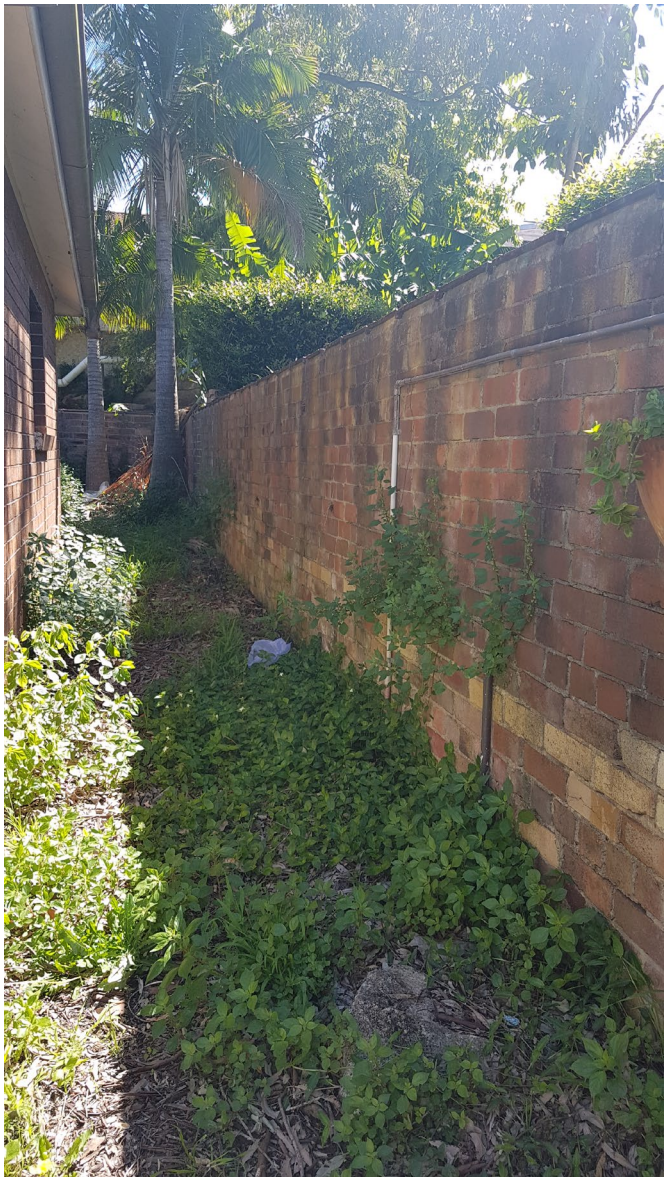

Figure 16 Existing brick wall located along northern part of the eastern boundary of 60 Federal Parade

Other boundary fencing will be required to be replaced with an acoustic barrier that satisfies the recommendations of the acoustic consultant. The front fence will comprise a metal palisade fence to match the existing fencing around the main College campus. A sliding gate will be provided at the front entry.

In terms of operation, the gate will be opened each school day morning at 7am by school maintenance staff and remain open until 9am. It will then be closed. A swipe card or remote control will be issued to staff members parking in this car park and they will be able to open the gate to leave at the end of each school day. The car park will not be used after hours or on weekends. More details in relation to the use and operation of the car park are provided in the Traffic and Parking Management Plan (TPMP) accompanying the DA.

The front, rear and side setbacks will be landscaped in accordance with the landscape plan prepared by Space Landscape Designs. A copy of the landscape plans accompanies the DA. The landscaping response includes retention of the existing Brush Box tree (on the western

side of the site) and 13 additional canopy trees which will provide shade to the cars and car park surface. In addition to these trees the understorey will comprise a mix of shrubs and groundcovers.

New stormwater infrastructure, including an in ground on-site detention tank (OSD) with a capacity of 30.927m^3 and water quality infrastructure, is proposed. The existing Council owned drainage assets located on this site will be retained and will not be impacted by the proposed works or operation of the car park. The proposed stormwater infrastructure is detailed on civil plans prepared by Core Project Consulting which accompanying the DA submission.

4.1.3 Construction of new car park and landscaping on south eastern part of the main College campus

A 30 space at-grade car parking area is proposed on the south-eastern part of the main College campus site. This part of the school site is currently used as grassed playground space. In order to facilitate the development of this car park, the turf will be required to be removed and an existing storage shed will be required to be relocated. Landscaping along Alfred Road will also be required to be removed.

Figure 17 is an extract from the car park layout plans prepared by Stantec Traffic Consultants. Copies of the plans accompany the DA submission.

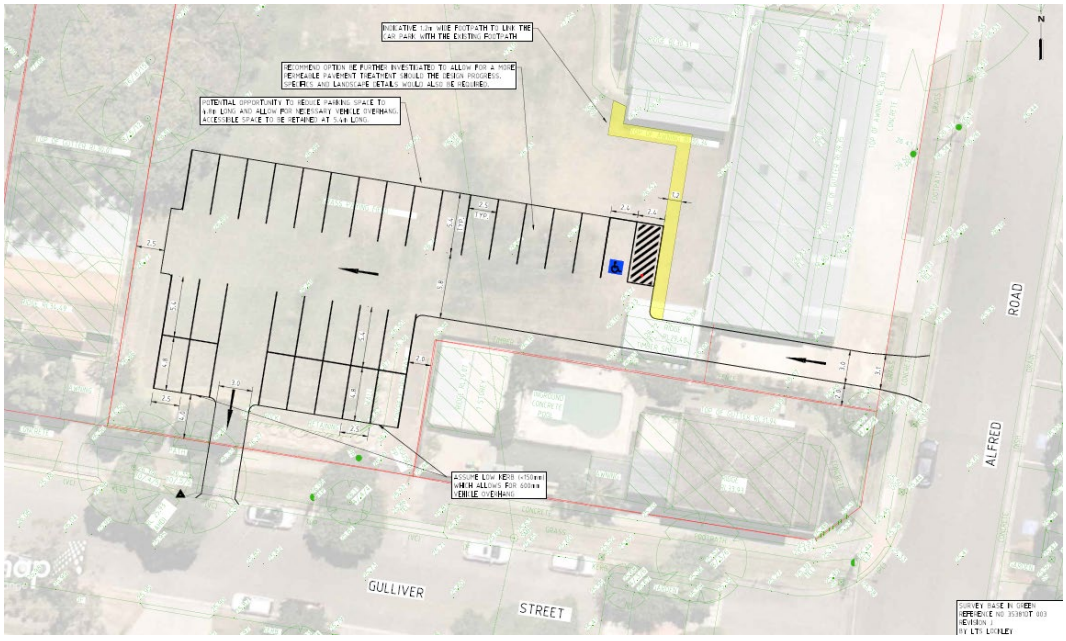

Figure 17 Proposed car park in SE corner of College site

The proposed car park provides a total of 30 spaces, including one accessible space, with 7 of these spaces provided as tandem spaces. As detailed in the Parking Management Plan, the tandem spaces will be allocated to staff members who arrive early and leave late. A new accessible pathway linking the car park with other accessible pathways located on the College site will also be provided.

Each tandem space will have paved dimensions of 2.5m x 4.8m. A 600mm overhang into the landscaped setback is proposed to minimise the amount of hard stand area. Therefore, the overall length of each tandem space will be 5.4m. The other spaces will have dimensions of 2.5m x 5.4m. A 5.8m aisle is proposed.

The car park will be accessed from Alfred Road via a 3m driveway, with a 2m wide landscaped area to be provided adjacent to the southern side of the driveway. A new driveway crossing to Alfred Road will also be required.

4 Proposed Development

Vehicles will egress the car park via Gulliver Street, via an existing driveway crossing. Upgrades to this crossing to ensure it is compliant might be required but any upgrades will ensure the adjacent street tree is protected.

The paved area of the car park will be setback from the boundaries as follows:

- Front (Gulliver Street) – 4m
- Western side – 3.5m, reducing to 2.5m to facilitate a turning area.
- Eastern side and southern (driveway) – 2m

The western boundary and eastern and southern boundaries adjoining 16 Alfred Road will be fenced with acoustic barriers in accordance with the recommendations of the acoustic consultant. The existing metal palisade fencing along the Gulliver Street frontage will be retained. Sliding gates (to match the existing metal palisade fencing) will be provided along the access driveway (adjacent to the rear of the existing administration/reception buildings) and on the Gulliver Street egress. The gate on the entry driveway is set back into site to allow sufficient area for up to three (3) vehicles to queue along the access driveway.

The gates will be operated by remote control or swipe cards which will be allocated to staff members parking with this car park. This car park may occasionally be used by staff after hours or on weekends. More details in relation to the use and operation of the car park are provided in the Traffic and Parking Management Plan accompanying the DA.

The northern edge of the car park (adjoining the retained playground area) will be fenced with a metal palisade fence to match the existing fencing around the main College campus site.

Landscaping is proposed along the Gulliver Street frontage and on the boundaries adjacent to the adjoining residential developments. The proposed landscaping comprises a mix of trees, shrubs and ground covers. A total of 20 trees are proposed, including 6 Water Gums to be located along the northern boundary of the car park. The trees will provide shade to the cars and much of the paved surface of the car park, thereby reducing the urban heat island effect, being a concern previously raised by Council.

New stormwater infrastructure, including an in ground on-site detention tank (OSD) with a capacity of 23.1m^3 and water quality infrastructure, is proposed. The proposed stormwater infrastructure is detailed on civil plans prepared by Core Project Consulting which accompanying the DA submission.

4.2 Car Parking Summary

The additional 54 car parking spaces proposed under this scheme will increase the car parking provision for the College to a total of 143 spaces. The Traffic and Parking Impact Assessment prepared by Stantec Traffic Consultants addresses car parking demand based on current usage patterns.

Figure 18 provides an overview of the 143 spaces to be provided. Traffic and parking related matters are discussed further in **Section 5.2.1** of this SEE.

4 Proposed Development

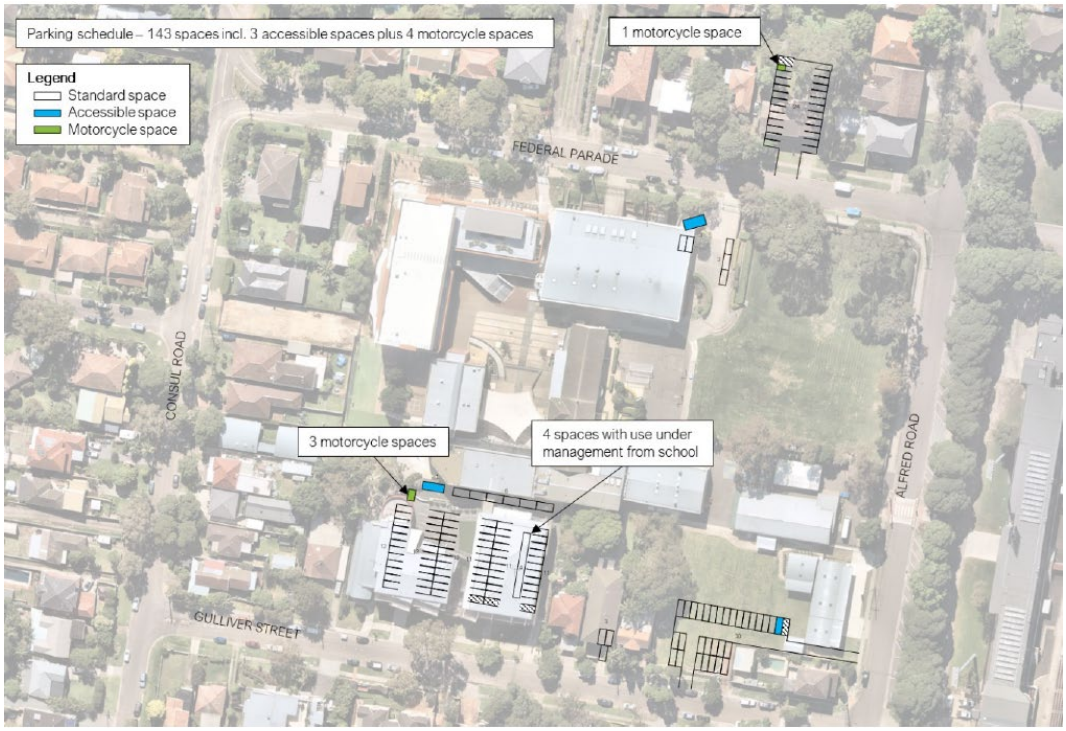

Figure 18 Extract from Stantec TIA showing location of car parking spaces on St Augustine's College site

5 Environmental Planning Assessment

This section provides an environmental assessment of the proposed development in respect of the relevant matters for consideration under section 4.15(1) of the Environmental Planning and Assessment Act, 1979 (EP&A Act).

5.1 Planning Controls

The following subsections assess the proposal against the relevant provisions of applicable Environmental Planning Instruments (EPIs), Draft EPIs, Development Control Plans (DCPs), Planning Agreements and matters prescribed by the Regulation in accordance with section 4.15(1)(a) of the EP&A Act.

5.1.1 State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)

The proposed development does not involve a change to the use of the sites. SEPP 55 matters have been previously considered in prior development applications relating to the sites and the *residential accommodation* to *educational establishment* development applications which have changed the use of the land (see **Section 2.1** for development consent history).

It is considered that no further assessment of the proposed development under clause 7 of SEPP 55 is required.

5.1.2 State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Education SEPP)

Clause 35 *'Schools—development permitted with consent'* provides that development for the purpose of a school may be carried out by any person with development consent on land in a prescribed zone.

Both the main College campus and 60 Federal Parade are zoned *R2 Low Density Residential* under the Warringah Local Environmental Plan 2011 (see **Section 5.1.5** below). The R2 zone is a prescribed zone for the purposes of the Education SEPP. The development is therefore proposed pursuant to Clause 35(1).

Clause 35(6)(a) of the Education SEE requires the determining authority to take into consideration the design quality of the development against the design quality principles in Schedule 4 of the SEPP. Each of the design principles are addressed below.

Principle 1—Context, built form and landscape

The proposed car parks will be provided with high-quality landscaping which complements the established setting, built form and landscape elements of the College site.

In this regard, the existing development on the College site, whilst not residential in nature or scale, sits comfortably within the generally low density residential character of the neighbourhood in which the College is located.

The landscaping within the front setbacks of the car parks will harmonise with the respective streetscape settings, and the landscaped side and rear (in the case of the car park on 60 Federal Parade) will provide a buffer between adjoining residences and the car parks.

It is considered that the development will integrate well into the locality and will not create any adverse visual impacts.

Principle 2—Sustainable, efficient and durable

The proposed development will facilitate sustainable growth of the College to meet current and future demand and will generally result in a positive outcome in terms of environmental, social and economic impacts.

As detailed in the Traffic and Parking Management Plan, the car parks will be managed in such a way to avoid unnecessary vehicular movements and circulation in the area.

Principle 3—Accessible and inclusive

The development will provide one (1) accessible car parking space resulting in a total of three (3) accessible parking spaces across the College campus.

Principle 4—Health and safety

It is not anticipated that the proposed development will result in health and safety impacts within the College grounds or within the public domain.

The car parking area on 60 Federal Parade will be used solely by staff members. The use of this site for school purposes has already been approved (refer DA2020/1406).

The existing infrastructure (buildings, outdoor space/playground space) provide sufficient capacity to accommodate the additional 400 students proposed as part of this DA.

Principle 5—Amenity

The landscaping proposed as part of the new car parking areas will provide a high-degree of integration into the generally residential character of the surrounding area. The increase in student numbers and additional parking can be managed in such a way that impacts on the amenity of nearby and adjoining residents will be minimised.

Whilst the car park on 60 Federal Parade will 'sit' within mainly low density residential setting, its use as a car park can be managed in such a way that will not result in adverse amenity impacts for adjoining residents. Relevantly, the car park will only be available for use by school staff who will arrive in the morning and leave in the afternoon. The car park on 60 Federal Parade will not be used during school holidays or weekends and therefore, the intensity of use will be limited to school day mornings and afternoons only. The car park on the south-eastern corner of the College site may occasionally be used by staff out of standard school hours, however, subject to the implementation of the recommendations of the acoustic consultant, implementation of the management measures as detailed in the Traffic and Parking Management Plan and provision of landscaping as detailed on the landscaping plans submitted with the DA, it is unlikely that the car parking areas and their operations will impact on the amenity of surrounding residents.

Principle 6—Whole of life, flexible and adaptive

The College has identified an increase in demand in enrolments and the proposed increase in the student cap will facilitate sustainable growth to a maximum of 1,600 students. This is the optimal maximum number of students that can be accommodated on the site and the optimal number from a pastoral care perspective.

Should the car parking areas become redundant in the future, these areas can easily be converted to an alternative use, either one associated with the College or, in the case of 60 Federal Parade in particular, a residential use (if the site is no longer required by the College).

Principle 7—Aesthetics

As addressed throughout this SEE, the proposed car parking areas will be landscaped and will have a positive impact on the established residential character of the locality.

The car parking area on the south eastern part of the College site will integrate with other infrastructure on the main College campus. The retention of the metal palisade fencing along the Gulliver Street frontage and street trees along Gulliver Street and the

provision of landscaping along that setback will result in a streetscape outcome not dissimilar to that which is existing.

Clause 35(6)(b) of the Education SEE requires the determining authority to take into consideration whether the development enables the use of school facilities to be shared with the community. No community use of the proposed car park facilities is proposed.

Clause 57 of the Education SEPP sets out provisions relating to traffic generating development. As the proposal entails an increase in capacity of more than 50 additional students, the development is a 'traffic generating development' in accordance with this clause and Transport for NSW will be required to be consulted. The Traffic Impact Assessment prepared by Stantec Traffic Consultants has considered potential traffic related impacts associated with the proposal.

Clause 38 and Schedule 1 of the Education SEPP provide that at grade car parking can be undertaken in connection with an existing educational establishment as exempt development. Notwithstanding, as the increase in car parking is linked to the proposed increase in student numbers (and the consequential increase in staff), it is considered appropriate that the car parking areas be assessed as part of the same development application seeking approval for the increase in student enrolments, rather than these components being carried out as exempt development.

5.1.3 State Environmental Planning Policy (Coastal Management) 2018 (Coastal SEPP)

The Coastal SEPP commenced on 3 April 2018 and combines into one policy the following now repealed state environmental planning policies:

- SEPP 14 (Coastal Wetlands),
- SEPP 26 (Littoral Rainforests), and;
- SEPP 71 (Coastal Protection).

Clause 3 of the Coastal SEPP specifies that:

> *'The aim of this Policy is to promote an integrated and co-ordinated approach to land use planning in the coastal zone in a manner consistent with the objects of the Coastal Management Act 2016, including the management objectives for each coastal management area, by:*
>
> *(a) managing development in the coastal zone and protecting the environmental assets of the coast, and*
>
> *(b) establishing a framework for land use planning to guide decision-making in the coastal zone, and*
>
> *(c) mapping the 4 coastal management areas that comprise the NSW coastal zone for the purpose of the definitions in the Coastal Management Act 2016.'*

The maps accompanying the Coastal SEPP indicate that:

- There are no littoral rainforests or wetlands on, or within the vicinity of the site; and
- The nearest wetland is approximately 2.1km to the north-east of the site.

On this basis there will not be any impacts arising on environmental assets and the proposed development is considered to be consistent with the aims of the SEPP.

5.1.4 State Environmental Planning Policy (Koala Habitat Protection) 2019 (Koala SEPP)

Whilst the site is greater than 1Ha in area, it is not identified on the 'Koala Development Application Map'. There is no impact to native vegetation as a result of the proposed development. Therefore, no impact to koala habitat will arise as a result of the proposal taking place.

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5.1.5 Warringah Local Environmental Plan 2011 (WLEP)

Table 1 provides a summary assessment of the proposed development against the relevant provisions of the LEP.

Table 1 Assessment against Relevant Provisions of LEP

Provision	Assessment	Consistent
2.2 – Zoning of land to which Plan applies 2.3 – Zone objectives and Land Use Table	As shown in **Figure 19** below, the site is zoned R2 Low Density Residential The proposed development is permissible within the R2 zone (albeit the proposal is made pursuant to the Education SEPP, see **Section 5.1.2**) and overall is consistent with the zone objectives, in particular the following: *'To enable other land uses that provide facilities or services to meet the day to day needs of residents.'*	Yes
4.3 – Height of buildings	N/A – At grade car parking only	Yes
5.10 – Heritage conservation	The site does not contain any items of environmental heritage, nor is it located within a heritage conservation area. There are three (3) items of environmental heritage located within the vicinity of the site, however there are no impacts on these items arising from the proposed works - refer to **Section 5.2.4**	Yes
6.2 – Earthworks	The construction of the car parks entails earthworks as described in the Civil and Stormwater design documentation prepared by Core Project Consulting. The earthworks are considered to be relatively minor and where backfilling is required, existing topsoil will be utilised and any excess spoil will be appropriately disposed of at a licenced landfill. The likelihood of disturbing relics is minimal (see **Section 5.2.4**). No adverse impacts to the natural environment are anticipated. The car parking area on 60 Federal Parade has been designed to retain the existing Brush Box tree located on the site and the works will not impact the existing tree on the adjoining property. Overall, earthworks required are not considered to have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land.	Yes
6.4 – Development on Sloping land	Whilst the site is mapped as an 'Area A' site on the landslip risk mapping, it is not considered that the properties on which the car parking areas are proposed will be subject to a landslip risk. Notwithstanding, the proposed car park works have been designed by an appropriately qualified and practicing civil engineer to satisfy relevant geotechnical requirements.	Yes

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Figure 19 Extract from Warringah LEP Land Use Zoning map

5.1.6 Warringah Development Control Plan 2011 (DCP)

Table 2 provides a summary assessment of the proposed development against the relevant provisions of the DCP.

Clause 35(9) of the Education SEPP states the following:

> *(9) A provision of a development control plan that specifies a requirement, standard or control in relation to development of a kind referred to in subclause (1), (2), (3) or (5) is of no effect, regardless of when the development control plan was made.*

The proposed development is a kind of development referred to in subclause (1). Therefore, the provisions of a Development Control Plan have no effect in relation to this proposal.

Notwithstanding, an assessment of the proposal against the relevant provisions of the Warringah Development Control Plan 2011 is provided below.

Table 2 Assessment against Relevant Provisions of DCP

Provision	Assessment	Consistent
Part B – Built Form Controls		
B5 – Side Boundary Setbacks	The DCP side boundary setbacks map indicates that both 60 Federal Parade and the south-eastern corner of the main College campus are subject to a 900mm side boundary setback. Both car parks have been provided with minimum setbacks of 2m to the adjoining property boundaries	Yes
B7 – Front boundary Setback	Both sites are subject to a 6.5m front setback. The objectives of the front setback controls are: • To create a sense of openness. • To maintain the visual continuity and pattern of buildings and landscape elements. • To protect and enhance the visual quality of streetscapes and public spaces. • To achieve reasonable view sharing. The front setback areas to both car parks are proposed to be landscaped. The proposed car parking areas achieve the objectives of the control.	No – Justifiably inconsistent

Table 2 Assessment against Relevant Provisions of DCP		
Provision	**Assessment**	**Consistent**
Part C – Siting Factors		
C2 – Traffic, Access and Safety	A Traffic Impact Assessment (TIA) prepared by Stantec Traffic Consultants accompanies the DA submission. The TIA demonstrates that the proposed development incorporates appropriate measures to minimise traffic impacts within the locality. The proposal provides adequate off-street parking for the proposed numbers of student and staff whilst minimising visual impacts on the locality and streetscapes. The objectives of clause C2, C3 and C3(A) are considered to be satisfied. Refer also discussion in **Section 5.2.1** of this SEE.	Yes – consistent with clause objectives.
C3 – Parking Facilities		
C3(A) – Bicycle and End of Trip facilities	Bicycle parking and end of trip facilities are provided on site.	
C4 – Stormwater	Refer **Section 5.2.2** of this SEE.	Yes
C5 – Erosion and Sedimentation	Erosion and sediment control plans prepared by Core Project Consultants are included in the civil plan set that accompanies the DA submission	Yes
C6 – Building over or adjacent to Constructed Council Drainage Easements	The car park on 60 Federal Parade is located over Council stormwater infrastructure. The proposed does not involve a building and the existing infrastructure will not be impacted by the proposed works.	Yes
C7 – Excavation and landfill.	Refer to the clause 6.2 assessment in **Table 1**. The proposed works will not have an adverse effect upon the visual and natural environment or adjoining and adjacent properties.	Yes
C8 – Demolition and Construction	Please refer to **Section 5.2.13** of this report.	Yes
C9 – Waste Management		

5.1.7 Draft State Environmental Planning Policy (Remediation of Land)

The Department of Planning and Environment (now Department of Planning, Industry and Environment) exhibited the draft SEPP between 31 January 2018 and 13 April 2018.

The new land remediation SEPP will:

- Provide a state-wide planning framework for the remediation of land;
- Maintain the objectives and reinforce those aspects of the existing framework that have worked well;
- Require planning authorities to consider the potential for land to be contaminated when determining development applications and rezoning land;
- Clearly list the remediation works that require development consent; and
- Introduce certification and operational requirements for remediation works that can be undertaken without development consent.

The draft SEPP retains elements of SEPP 55 and adds new provisions to establish a contemporary approach to the management of contaminated land. The overarching objective of SEPP 55 is to promote the remediation of contaminated land to reduce the risk of potential

harm to human health or the environment. This objective remains relevant and is replicated in the draft SEPP. To this end as the proposed development has been found to be generally consistent with SEPP 55 (see **Section 5.1.1**) it is also considered to be consistent with the objectives of the draft SEPP.

5.2 Likely Impacts of the Development

The following subsections assess the likely impacts of the development in accordance with section 4.15(1)(b) of the EP&A Act.

In assessing the likely impacts of the proposed increase in student number, reference has been made to Planning Circular PS 17-004 'Regulating expansion of schools' and specifically the circumstances wherein a 'cap' in student numbers might be warranted.

Like any school, St Augustine's College is subject to fluctuations in staff and student numbers for a variety of reasons. Flexibility to accommodate additional students is required in order to meet anticipated demand and maintain the high quality of education for students.

PS 17-004 states the following with regard to caps on staff and students:

> *'If caps on student or staff numbers are to be applied, they are to be based on clear evidence that the operational capacity of the school should be limited according to the environmental constraints of the site and/or the surrounding locality.*
>
> *Conditions imposing caps should not be arbitrary or based on matters unrelated to planning impacts. The maximum number imposed in the consent condition should be based on what the evidence suggests the site and surrounding area can cope with. Application of the upper limit of these measures is recommended in any consent conditions, so as to avoid unnecessarily limiting the usability of the site.'*

To this end, the proposed student population cap of 1,600 is considered acceptable as the College has sufficient operational and environmental capacity to accommodate this number of students. Specifically, implementation of the recommended Traffic and Parking Management Plan (TPMP) will ensure that the road network in the locality will not be adversely impacted. Further, provision of additional car parking will ensure that adequate parking will be provided. The existing infrastructure of the College (buildings and outdoor space/playground space) provides sufficient capacity to accommodate the additional 400 students proposed as part of this DA.

5.2.1 Traffic and Parking

A detailed Traffic Impact Assessment (TIA) dated 17 December 2021 has been prepared by Stantec Consultants. The TIA forms part of the DA submission. The TIA has analysed the existing traffic and parking conditions of the site and the surrounding road network. The analysis included consideration of the approved student cap (1,200 students) for the College, its current student population (approximately 1,400), proposed student population (1,600) and staff numbers connected with these student numbers. Key matters discussed in the TIA are discussed below.

In order to understand potential impacts associated with an increase in student numbers (and a consequential increase in staff numbers) particularly in terms of traffic generation and parking demand, a travel survey to assess the typical travel patterns of existing staff and students was conducted. The questionnaire considered the travel characteristics of students and staff in Term 4 2019 and the travel patterns in August 2020 during the Covid lockdown period.

The results of the survey are discussed in detail in the TIA. In summary the survey indicated that:

- In 2019, 90% of staff drive to school. This rose slightly (by 2%) during the Covid lockdown period.

- Approximately 2/3 of students travel by bus to school, whilst 26% were driven to school. More students were recorded as being dropped-off and picked-up in a private car and less students recorded catching the bus in 2020 when compared with the 2019 data.
- Overall, there is an average of one staff per car (confirming all drive alone) and 1.4 students per car.
- The majority of staff arrive at school around 7.30am, whilst the majority students arrive at 8.00am.
- In the afternoons, over 60% of students leave school at 3.30pm whilst the majority of staff do not depart until after 4.30pm.

Traffic

A traffic generation assessment has been undertaken. This assessment considered staff and student travel patterns based on surveys conducted by the College.

The assessment considered the likely change in traffic generation for the College between the existing approved student numbers and current conditions (based on the current student population of approximately 1400 students), as well as the anticipated change in traffic generation as a result of the increase in enrolments from the current enrolled students to 1,600 students.

The proposed increase in enrolments to 1,600 students is expected to generate an additional 131 vehicle trips in any peak hour from the existing approval, and an additional 56 vehicle trips in any peak hour compared to current conditions. The SIDRA modelling results indicate that there are only negligible differences to intersection operation from current conditions as a result of the additional traffic movements.

Based on this, Stantec has concluded that there is adequate capacity in the surrounding road network to cater for the traffic generated by the additional students.

Parking

As previously discussed, the proposed development will increase parking available to College staff from the current approved106 spaces to 143 spaces. The layouts of the proposed parking areas are provided at **Figures 15** and **17** of this SEE.

The location of the 143 spaces is shown in Figure 3.1 of the Stantec TIA. Figure 3.1 is is reproduced in **Figure 18** of this SEE.

The DCP requires educational establishments to provide on site parking at a rate of one space per staff member in attendance. Based on 152 full time equivalent (FTE) staff numbers at the School, this results in a requirement of 152 parking spaces.

Based on the travel survey results not all staff drive to the College on a daily basis. As such, a merit-based approach to the provision on parking on the site has been undertaken.

The TIA demonstrates that, based on the typical staff travel patterns, approximately 90% of staff drive to/from the College. Based on the 152 FTE staff, and applying the merit based assessment rate of 90%, this equates to a demand for 137 parking spaces.

The proposed development includes a 24 space car parking area (and one motorcycle parking space) on 60 Federal Parade and a 30 space car park (including one accessible parking space) on the south-eastern corner of the College campus. The provision of these parking areas will increase the number of spaces to 143.

The proposed parking layout is generally consistent with the dimensional requirements as set out in the Australian/New Zealand Standard for Off Street Car Parking (AS/NZS2890.1:2004 and AS/NZS2890.6:2009) and is considered appropriate under the day to day management of the College.

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The proposed 60 Federal Parade car park has been designed as a Class 1A facility, while the south-east car park internal to the College has been designed as a Class 2 facility. Both include appropriate setbacks from adjacent properties.

The proposed development increases the total parking supply for the College from 106 spaces to 143 spaces, including three (3) accessible parking space, and four (4) motor cycle parking spaces.

The provision of 143 car parking spaces exceeds the expected parking demand of 137 spaces. In addition, the provision of four (4) motorcycle parking spaces will supplement the car parking provision.

By way of comparison, the previous Parking and Traffic Review Report prepared by Brown Consulting in 2013 (submitted as part of DA2013/1336) indicated a parking provision of 106 spaces based on an anticipated parking demand of 109 spaces was supportable. This represented a technical shortfall of three (3) spaces. The proposed 143 parking spaces would deliver a theoretical surplus of six (6) spaces based on the expected demand while also adding motorcycle parking. Overall, the proposal represents a definitive improvement over the current approved operational conditions.

The car parking area in the south-eastern corner of the College campus includes seven (7) tandem parking spaces. In addition, there are two (2) tandem spaces located on 8 Gulliver Street which were approved as part of an earlier DA. These spaces equate to six per cent of the total parking provision. These spaces will be designated to specific staff based on work schedules and managed accordingly to avoid access complications.

In addition, operational management measures have been implemented to control the use of four spaces in the main College campus car park that were approved as part of the previous application. Management strategies relating to these spaces includes a traffic warden directing staff where to park in this area once all the formal car parking spaces are fully occupied in the Gulliver Street car park.

Access to the car parking areas provided will be managed to avoid the potential for queuing onto adjoining roads. In this regard, all access gates will remain open during the peak arrival times for staff. Out of these times, access will be controlled by way of a swipe card or remote control.

In terms of the parking provision, Stantec has concluded that the proposed parking strategy is supported for the following reasons:

- The proposed on-site parking supply will exceed the anticipated staff parking demand.
- The College has confirmed any tandem parking will be appropriately managed as part of daily operations with allocated staff parking as necessary.
- Access to the car parks will be managed by the College so that entry gates remain open during arrival periods and to minimise any potential queuing.

Student Drivers

While some students are licensed and have the ability to drive, students are encouraged by the College to utilise other means of transport when travelling to/from the school. This is consistent with the assumptions adopted in the previous Parking and Traffic Review Report by Brown Consulting. Any student who wishes to drive must first make application to the College. In this regard, Stantec has advised that:

> *There is sufficient on street parking capacity along the site frontages of the College to accommodate the minor demand generated by student drivers.*

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Student Pick-Up and Drop-Off Management

The College is serviced by three (3) set-down/pick-up areas. There are two (2) on-street facilities, one on Federal Parade and the other (recently approved) on Alfred Road. The main set-down/pick-up area is located on the College grounds to the immediate north of the main car park with access/egress via Gulliver Street.

The Federal Parade set-down/pick-up area is in the form of a 'no parking' zone, with restrictions in place between 8am and 9am, and between 3pm and 4pm school days. The zone can accommodate up to six vehicles at any one time.

The Alfred Road set-down/pick-up area has recently been implemented. This area comprises a 37m long zone which is sign posted 'No Parking' between 8am and 9am, and between 3pm and 4pm on school days.

Each of these set-down/pick-up areas are managed by staff.

The on-site set-down/pick-up area with access via Gulliver Street can facilitate seven (7) vehicles at any one time with additional storage for up to eight (8) vehicles within the car park (on College grounds) on approach to the area. This set-down/pick-up area is managed by staff and operates well. Notwithstanding, occasionally this set-down/pick-up area shows signs of constraint with respect to queuing back onto Gulliver Street (and to a lesser extent onto Consul Road). As is typical of schools across Sydney, the peak period is immediately prior to the end of the school day when parents/ carers arrive early and wait. Once school ends, the queues quickly dissipate (typically within five minutes).

Implementation of the recently provided Alfred Road set-down/ pick-up together with delivery of improved communication with parents, Stantec has concluded that the set-down/ pick-up activities will be able to be better managed across the College campus. This will minimise the potential for queuing onto Gulliver Street to occur and hence, reduce impacts on through traffic unrelated to the College, and local residents generally.

Traffic and Parking Management Plan

A Traffic and Parking Management Plan (TPMP) dated 15 December 2021 has been prepared by Stantec Consultants to address the management of the set-down/pick-up areas and the new car parking areas. This TPMP replaces one prepared for the College in 2014 and has been prepared to reflect current and future conditions at the College.

The TPMP objective of the TPMP is to control and manage traffic associated with the College and its activities.

The TPMP addresses the following:

- Management and safety of students arriving and departing to/ from the College.
- Provision of on-site parking for staff.
- Principles relating to students who drive to/ from the College.
- Provision of parking for visitors and delivery vehicles to the College.
- Management of traffic to minimise impact on local residents both during normal school days and for special events at the College.
- Encouragement of use of active and public transport options to access the College, as well as carpooling.
- Provision of bicycle parking.
- Bus management.
- Pedestrian management and safety

The College commits to implementing the TPMP with a view to ensuring the impacts of traffic movements and parking associated with the school are managed in a manner that mitigates impacts on surrounding residents and other users of the local road network.

Construction Traffic Management

A detailed Construction Traffic Management Plan will be prepared once a building contractor is appointed.

Notwithstanding, Section 5.4 of the TIA has considered potential impacts of construction traffic on the local road network.

Section 5.4.2 of the TIA summarises the initiatives and principles which will be adopted in the preparation of the detailed CTMP. Generally, the CTMP will include information to address the following principles:

- Minimise the impact on pedestrian and cyclist movements;
- Maintain appropriate public transport access;
- Minimise the loss of on-street parking;
- Minimise the impact on adjacent and surrounding buildings;
- Maintain access to/ from adjacent buildings;
- Restrict construction vehicle movements to designated routes to/ f rom the site;
- Manage and control construction vehicle activity near the site; and
- Carry out construction activity in accordance with approved hours of works.

As part of the detailed CTMP, a traffic control plan (TCP) will also be prepared in accordance with the principles of the Traffic Control at Work Sites manual.

TIA Conclusion

Overall, Stantec has concluded that the proposal to increase the student enrolment to 1,600 students can be supported from a transport perspective.

5.2.2 Stormwater Management and Civil Design

Stormwater Management

Detailed civil and stormwater designs prepared by Core Project Consultants accompany the DA submission. Surface water run-off from the proposed car parks will be collected via a series of drainage pipes and stormwater pits. Stormwater will pass through a silt arrestor and into on-site detention (OSD) tanks to be located within each car park. The system will then connect to Council's stormwater infrastructure.

The stormwater drainage system has been designed to achieve Council's water quality targets and the provision of OSD tanks will manage the flow of stormwater drainage into Council's system.

Core Project Consultants have also prepared erosion and sediment control plans for both car parking areas. The measures detailed on the plans will be implemented prior to commencement of works and maintained until the disturbed areas are landscaped or otherwise stabilised.

There is existing stormwater infrastructure located on 60 Federal Parade. This infrastructure traverses the site from north-west to south east. The at-grade car park on 60 Federal Parade and the associated stormwater management system has been designed in consideration of this existing infrastructure.

Civil Design

Designs for both car parking areas have been prepared by Core Projects Consultants. These plans accompany the DA submission.

The car parks will be surfaced with asphalt with a kerb edging which will function as a wheel stop for the majority of the parking spaces. Line marking plans are included in the civil plan set.

With respect to the car park on 60 Federal Parade, the existing driveway and crossing will be demolished and a new vehicular crossing and driveway to the car park will be provided. The area of the existing driveway will be restored to turf and footpath and new kerb and guttering will be provided in the location of the existing crossing.

A new driveway crossing will be required to be provide access from Albert Road to the new car park located on the south-eastern corner of the College campus. An existing driveway and crossing to the immediate west of 16 Alfred Road will be required to be removed and 'made good'. The driveway to the car park will be extend Another existing driveway and crossing located approximately mid way along Gulliver Street between 16 Alfred Road and 6 Gulliver Street will be repurposed as the car park egress.

A low retaining wall (ranging from 150mm in height to approximately 300mm in height) will be provided adjacent to the northern edge of the ingress driveway from Albert Road.

5.2.3 Landscaping

Detailed landscaping plans prepared by Space Landscape Designs are submitted with the DA.

The landscaping response for both car parking areas includes a variety of trees (including canopy/shade trees), shrubs and ground covers. Where works within the street verge are required, the nature strip will be returfed.

The landscaping response will ensure the car parking areas result in an appropriate streetscape outcome, having regard to the generally residential character of the surrounding area. The side and rear (in the case of 60 Federal Parade) setbacks of the car parks and driveway (in the case of the car park located in the south eastern corner of the College campus) are proposed to be landscaped to provide a buffer between the adjoining residential properties and the car parks.

The proposed landscaping also provides the long-term benefit of mitigating the urban heat island effect resulting from large areas of hard-stand surfaces. Tree canopy coverage will reduce the heat absorbed by the car park surface.

5.2.4 Heritage

The potential for the proposed works to disturb relics or any related impacts to Aboriginal Cultural Heritage is considered unlikely in light of the highly disturbed nature of both the main College campus and 60 Federal Parade, given its long-established use for residential accommodation, and now a school. Notwithstanding, during works contractors will be required implement appropriate unexpected finds protocols and cease work should any relics, artefacts or the like be discovered and/or disturbed.

The site does not contain any items of environmental heritage, nor is it located within a heritage conservation area under the WLEP. There are three (3) items of environmental heritage (listed in Schedule 5 of the WLEP) located within the vicinity of the site. These are identified as:

- *Former Premises relating to Austral Brickworks* – Item of local significance located 90m to the north-west of the College;
- *Brush Box and Camphor Laurel Trees surrounding Brookvale Park* – Item of local significance located opposite and to the east of the College site; and

- *Brookvale Public School* - Item of local significance located 75m to the south of the College.

The minor nature of the proposed works which are not readily visible from any of the above-mentioned local heritage items, are unlikely to impact on the significance of these items.

5.2.5 Tree Removal/Retention

The proposed car park on the College campus is to be constructed on a cleared site, free of any vegetation (with the exception of exotic grass/lawn) or potential fauna habitat and no tree removal is required.

It is proposed to utilise an existing driveway crossing to Gulliver Street and the egress from this car park. There is an existing street tree immediately adjacent to this driveway – refer photograph at **Figure 9**. This tree will be able to be retained.

There are eight (8) trees on 60 Federal Parade and one tree on the adjoining site to the west (62 Federal Parade) which have been assessed having regard to the proposed car park works.

Of the eight (8) trees on 60 Federal Parade, the project arborist, Rain Tree Consulting, has advised that:

- Trees T2, T4, T7, T8 and T9 are classified as exempt, non-prescribed species by Northern Beaches Council and are able to be removed without approval.
- Trees T5 and T6 (both Sydney Blue Gums) have been assessed as being structurally defective and not viable to be retained for safety reasons. Approval for the removal of these trees has recently been issued by Northern Beaches Council.
- Tree T3 is a Brush Box which has been assessed as viable for retention. This tree will be retained within the western side setback of the car park.

Tree T1 is located within the front setback of 62 Federal Parade. This tree is immediately adjacent to the western boundary of 60 Federal Parade. This tree is proposed to be retained and the arborist report submitted with the DA details the tree protection measures that will be required to be implemented in relation to this tree.

As previously noted, the proposed landscaping response includes 13 trees on 60 Federal Parade and 20 trees associated with the car parking area located on the south-eastern part of the College site. Therefore, the proposed works will result in an increase in the number of trees within both areas compared to the current situation.

5.2.6 Acoustic Impacts

A noise and vibration impact assessment has been prepared by E-Lab Consulting. A copy of this assessment is submitted with the DA.

The assessment report has considered the potential acoustic and vibration impacts associated with:

- Traffic noise generation associated with the new car parks.
- Noise impacts associated with the operation of the new car parks.
- Noise impacts on nearby sensitive receivers from the increase in students.

The methodology and assumptions in relation to the noise impact assessment are detailed in the E-Lab assessment report.

Figure 20 is an extract from the E-Lab Noise and Vibration Assessment Report (Figure 1 in that report) showing location of sensitive receivers (RC1 – RC5) in relation to the College campus and the proposed car parks.

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Figure 20 Extract from E-Lab Noise and Vibration Assessment Report showing location of sensitive receivers

Car Parks

Subject to the implementation of recommended treatments, comprising 1.8m high acoustic barriers to adjoining residential boundaries, the acoustic impacts of the use of these areas as at-grade car parks have been assessed as being within acceptable limits. The car parks will be used on school days only and generally during normal school hours. T

The 1.8m high acoustic barriers will also provide privacy to the adjoining dwellings. Landscaping elements proposed will also assist with providing visual screening.

The proposed development will provide staff car parking which will have peak periods of use during the day period, i.e. cars enter and park in daylight hours prior to the commencement of school and leave at the end of the school day. Vehicular movements are limited to certain times of the day and are therefore unlikely to result in a significant increase in the current levels of acoustic privacy enjoyed by residents of the locality.

Increase in Student Numbers

This application seeks approval to increase the number of students to a maximum of 1,600.

The proposal does not include new school-use related spaces with a high level of activity/noise and no new outdoor activity areas are proposed. In addition, school activities will be restricted to the daytime periods and weekend, public and/or school holiday use of the site is unlikely.

To assess the potential noise impact to surrounding receivers as a result of this increase (and notwithstanding that enrolments currently stand at approximately 1,400 students), E-Lab compared noise emissions based on 1,200 and proposed new capacity of 1,600.

Based on the noise emission modelling of both student capacities, E-Lab concluded that predicted noise levels at surrounding residential receivers will increase by 1 - 2dB(A) as a result of an additional 400 students. A difference of up to 2 dB(A) will not be discernible by the average listener and is therefore considered acceptable.

Demolition and Construction Noise Impacts

A Construction Noise Management Plan (CNMP) will be prepared prior to the commencement of works once a contractor has been appointed and a program of construction activities for the car park is confirmed. The CNMP will outline recommendations for construction noise management and mitigation measures to minimise the impact of the works on neighbouring properties.

Conclusion

Subject to the implementation of the following measures, E-Lab considers that the acoustic amenity of neighbouring sensitive receptors will not be adversely affected by the operation of the car parking areas or the proposed increase in student numbers:

- 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).
- Carpark boundaries adjacent to residential receivers to have an acoustic barrier as shown in Figure 4 and Figure 5 of the E-Lab Acoustic Impact Assessment.
- The acoustic barriers are to be minimum 1.8m in height and all gaps are to be minimised.
- The acoustic barriers are to comprise a material and constructed to have a minimum surface density of 16kg/m^2.

5.2.7 Air Quality

Some dust is anticipated during the demolition and construction phases, however this can be managed through measures such as wetting down work areas/stockpiles, stabilising exposed areas, preventing material tracking out onto public roadways, covering loads on all departing trucks and working to weather conditions. The proposal is otherwise not expected to give rise to any long term or adverse impacts on local or regional air quality.

5.2.8 Neighbourhood and Landscape Character

Both car parking areas provide generous setbacks to Federal Parade and Gulliver Street, being the respective front setbacks of each car park.

The frontage of each car park will be fenced with metal palisade fencing to match the existing College fencing – refer **Figure 9**. – and a sliding gate

The front setback areas will be landscaped with a mix of trees, shrubs and groundcovers.

The setback area along the frontage of 60 Federal Parade will include:

- 3 x *Corymbia Ficifolia 'Summer Red*
- *Lomandra Longifolia 'Tanika"*

Along the Gulliver Street frontage of the car park located in south-eastern corner of the College site landscaping will include:

- 4 x *Corymbia Ficifolia 'Summer Red*
- *Lomandra Longifolia 'Tanika"*

Figure 22 demonstrates the existing treed character along Federal Parade. In this image, the College is on the left hand side of the photograph. No. 60 Federal Parade is in the foreground on the right hand side of the photograph. The College dominates the streetscape along the

southern side of Federal for a distance of approximately 200m from the Federal Parade and Alfred Road intersection.

Along the northern side of Federal Road (west of Alfred Road), the topography of the land rises dramatically such that residences on properties to the west of No. 62 Federal Parade are elevated above the footpath and carriageway of Federal Parade. As a result the streetscape on the western end of Federal Parade is completely different to that at the eastern end (in the location of 60 Federal Parade)

The proposed landscaping will complement the existing residential landscape setting along the northern side of this section of Federal Parade.

Figure 21 Existing character of Federal Parade, looking west from outside No. 60 Federal Parade {Source: Google Streetview]

The setting of the car park located on the south eastern corner of the College site is somewhat different to that along Federal Parade. The northern side of Gulliver Street is dominated by the College and College buildings with some residential dwellings. The streetscape along southern side of Gulliver Street in the vicinity of the proposed car park comprises residential dwellings with landscaped front setbacks. **Figure 23** is an image looking west along Gulliver Street. The College site is in the foreground on the right hand side of the photograph.

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Figure 22 View looking west along Gulliver Street [Source: Google Streetview]

Street trees along both Gulliver Street and Federal Parade are typically mature native trees and along both streets there is an eclectic mix of front fencing typologies. The street trees along the Gulliver Street frontage of the proposed car park will be retained.

It is considered that the provision of an at grade car park on 60 Federal Parade and the conversion of playground space in the south eastern corner of the College site to an at grade car park, can be undertaken in a manner that will integrate with the existing character of the area. The proposed landscaping will complement the existing streetscapes and is an appropriate and considered response to the use of the land for car parking purposes.

5.2.9 Lighting

Light bollards are proposed within both car parking areas. These lights will provide low level lighting and will be operated on a timer to ensure there is a sustainable approach to energy use and light spill impacts within the locality are minimised. An example of the type of light bollard to be used is provided below in **Figure 24**. All lighting will comply with the requirements of Australian Standard AS4282-2019 *Control of the obtrusive effects of outdoor lighting.*

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Figure 23 Example of lighting bollards to be installed

5.2.10 Solar Access

The at grade car park will not impact on solar access within the locality for adjoining properties.

5.2.11 Views

There are no prominent views or vistas in the locality which will be compromised by the proposed car parking areas.

5.2.12 Construction Management

A detailed Construction Management Plan (CMP) will be prepared following appointment of the building contractor. The CMP will incorporate environmental site management measures, including but not limited to:

- Neighbourhood communications
- Construction and traffic/parking management
- Pedestrian circulation
- Dust management
- Demolition noise and vibration management
- Working hours
- Temporary site amenities
- Construction Noise management
- Erosion and sediment control
- Demolition and construction waste management.

The final CMP will form part of any future Construction Certificate documentation. Conditions of any subsequent consent can be incorporated in the final CMP.

5.2.13 Waste Management

A separate demolition and construction waste management plan will be prepared prior to commencement of works.

There will be no change to the existing operational waste management storage and processes as a result of the increase in student numbers.

5.2.14 Social and Economic Impacts

The proposal will provide for construction industry employment which will result in a temporary economic benefit during the construction period.

Due to changes in the demographics of the Northern Beaches Local Government Area (LGA) in recent years and changing preferences, there has been an increased demand for enrolments in non-government schools which has driven demand for places at St Augustine's College.

An increase in the student cap will enable the College to cater for this increased demand and the educational needs of the locality. The student number increase flows into an overall positive economic impact for the LGA by contributing to quality education services to the community and creating employment opportunities. Overall, the economic impacts of the proposal are positive.

5.2.15 Crime and Safety

Crime Prevention through Environmental Design (CPTED) provides that if development is appropriately designed it can reduce the likelihood of crimes being committed. In this regard, the proposed car parking areas have been designed having regard to the relevant CPTED principles and this will assist in minimising the incidence of crime and contribute to perceptions of increased public safety.

The proposal has been designed to take into consideration of the following CTPED principles:

Surveillance: This principle provides that crime targets can be reduced by effective surveillance, both natural and technical. In this regard, both car parking areas have direct surveillance from the public domain and surrounding residential land uses. Low level bollard lighting will also increase surveillance and deter anti social and unlawful behaviour in the car parks in evening hours. Security patrols by the College's preferred security contractor after school hours will also provide additional surveillance.

Access Control: This principle provides that barriers to attract/restrict the movement of people minimises opportunities for crime and increases the effort required to commit crime. Like all schools, the site is, and will remain to be, secured with a fence and gate at the vehicular entry points. The car parking areas will only be available to school staff. Overall access control to the site is considered to be appropriate.

Territorial Reinforcement: This principle provides that well-used places reduce opportunities for crime and increase risk to criminals. During school days and hours, the car parks will be occupied. After hours and during school holiday periods, access to both car parking areas will be secured with fencing and a gate and security patrols will be undertaken by the schools preferred security contractor also providing for additional surveillance during these periods.

Space Management: This principle provides that space which is appropriately utilised and well cared for reduces the risk of crime and antisocial behaviour. Strategies to implement this principle include, site cleanliness, rapid repair of vandalism and graffiti, the quick replacement of broken light fixtures/globes and the removal or refurbishment of decayed physical elements.

Presentation of the school is managed by the College property maintenance staff and accordingly, any required repairs and maintenance occurs promptly. The proposed landscaping will be maintained to an appropriate standard.

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5.3 Suitability of the Site for Development

The proposed car parking areas are located on land which is approved for use as an educational establishment. The car parking areas are an adjunct to the existing educational establishment – St Augustine's College.

Pursuant to clause 38 and Schedule 1 of the Education SEPP, the car parking areas could be undertaken as exempt development 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 is considered appropriate that the matters are considered together.

No additional buildings or playspace are required for the proposed increase in student numbers. The existing school facilities have sufficient capacity to accommodate up to 1.600 students.

The proposed car parking areas are considered to fit well within the locality. Consideration of the compatibility of the proposal and its surroundings can be undertaken with regard to the Land Environment Court Planning Principle on "compatibility with context" *in Project Venture Developments v Pittwater Council [2005] NSWLEC 191*. In order to test whether a proposal is compatible with its context, the following two questions can be asked:

Are the proposal's physical impacts on surrounding development acceptable? The physical impacts include constraints on the development potential of surrounding sites.

The proposed car parking areas will not create any significant impacts on adjoining or surrounding residential uses. The school is a long-term use within the locality.

The only physical works proposed are at-grade car parks and there will be no overshadowing, acoustic or privacy impacts and the current level of amenity enjoyed by neighbouring land will be maintained.

The development is considered to respect and enhance the character of the area through the introduction of soft landscape elements along both street frontages.

Is the proposal's appearance in harmony with the buildings around it and the character of the street?

As discussed in **Section 5.2.8**, the proposed car parks and associated landscaping will 'sit' comfortably with the existing streetscapes. The proposed landscaping will soften the appearance of the car parks and contribute to the residential amenity of the locality.

The site is capable of accommodating the proposed development without impacting on the natural or built environment. The site is not subject to natural hazards or acid sulfate soils, and all relevant essential services and infrastructure are available.

5.4 Public Interest

In accordance with section 4.15(1)(e) of the EP&A Act the consent authority to consider the public interest. The public interest is an overarching requirement, which includes the consideration of the matters discussed in this report. The proposed development is considered to meet the provisions of relevant environmental planning instruments and Council's DCP objectives, subsequently as these instruments and plans have been created having regard to the objects of the EP&A Act following community consultation, they are considered to express planning controls that seek to protect the public interest. The proposed development creates benefits for the local community by providing additional (and much needed) student capacity.

Accordingly, it is considered that the proposal is not prejudicial to the public interest.

6 Conclusion

The proposed development at St Augustine's College has been assessed in accordance with the requirements of the EP&A Act and other relevant legislation.

The development proposal seeks to:

- Increase to the current approved student population to 1,600 students; and
- Construct two new car parking areas with associated landscaping. A total of 58 additional car parking areas, together with an additional motorcycle parking space, will be provided.

Increasing the School's student population to 1,600 students will allow St Augustine's College to address demand and provide additional student places for families within the Northern Beaches region. The proposed additional car parking addresses Council's parking requirements. The transport and traffic analysis confirms that the additional students and staff (and associated increase in traffic generation) will not impact on the operation of the surrounding road network.

The proposed at-grade car parking areas will result in positive streetscape outcomes for both Federal Parade and Gulliver Street. The proposal also has been designed to maintain the residential amenity of the locality and the car parking areas can operate without adverse impacts on adjoining land.

Overall, the proposal has been assessed against relevant environmental planning instruments where it has been found to be generally consistent with applicable provisions and objectives. On balance, the potential adverse environmental planning impacts arising are considered to be minimal.

Accordingly, it is considered that the development is acceptable on environmental, social and economic grounds.