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**Sent:** 6/02/2020 5:38:29 PM  
**Subject:** Belrose Rural Community Association Submission MOD2019/0627  
**Attachments:** BRCA submission MOD2019 0627.docx;

Attention:  
Nick England, NBC Planning Officer.

Please find attached our submission for MOD2019/0627



Secretary: PO Box 224 Belrose West, NSW 2085

6<sup>th</sup> February 2020

Northern Beaches Council  
Attention: Nick England, NBC Planning Officer.

**MOD2019/0627**  
**John Colet School**  
**6-8 Wyatt Ave Belrose**

Dear Sir,

We thank you for this opportunity to provide a submission on this development application.

Our members are very concerned about this application and we submit our objections as detailed below.

This is an application to make modifications to staged developments in DA2015/0558 and the application only contains some details about the changes. There is no information on how these modifications relate to the whole school and the application does not address the consent conditions for DA2015/0558.

In considering the details submitted and other details that should have been included in the application, we make the following comments:

#### **Student and staff numbers**

The application does not include any staff and student applications associated with the proposed large building. Nor does the application contain the Maximum number of student and staff for the whole school.

The application states that the modifications are required to accommodate larger class sizes. Therefore it is necessary to provide the numbers for this modification.

Further the approval for DA2015/0558 includes a consent condition to provide further information about student and staff numbers associated with future stages.

It is essential that the application contain the details as required in the previous approval and in this application so that a proper assessment can be made on the application.

We object to any increase in the existing number of students and staff as extra students will result in additional adverse impacts and as stated above the, the site cannot contain any further onsite parking the application should be refused.

### **Daily use of Wyatt Reserve**

The school uses Wyatt Reserve each school day for daily school activities. This shows that there is insufficient open space of the school site for these daily school activities. This application will result in the use of Wyatt Reserve being be used all day every day

It is inappropriate for public facilities to be used each day to support a private school which does not have sufficient onsite useable outdoor areas for the general school activities.

This is unacceptable; the application should be refused.

### **Bushland Setting**

The application makes no reference the amount of Bushland and landscaping required for Locality C8. Under the heading 'Bushland Setting' A minimum of 50%of the site area is to be kept as natural bushland or landscaped with local species.'

The Locality C8 consists of over 50% of bushland on privately owned undeveloped lots. To maintain the integrity of the flora and fauna in these native bushland areas it is essential for this requirement in this Locality to be enforced and included as a consent condition as well as shown on the approved plans

The bushland areas on the subject are shown on previously approved plan documents for the existing developments; these plans show where the bushland needs to be protected. Instead these bushland areas are gradually being eroded through school activities, clearing and the dumping of rubbish. The School property has a Positive Covenant on it to protect and maintain the bushland, vegetation in the Conservation area. This must be taken into account and upheld.

Any further expansion with more students and a large building will result in further destruction of these bushland/landscaped areas which includes threatened species and Duffy's forest ecological community.

This is unacceptable and again shows that the site is already overdeveloped.

The application for a further large building and an increase of students should be refused.

### **High Impact and High Intensity**

The proposed very large bulky building will result on a high impact on the streetscape.

The proposed building encroaches into the 10 metre setback requirement by 5 metres.

The requirements in Locality C8 makes it very clear that this set back area should have no structures.

The proposal will cause an extremely large impact which means that the proposal is not consistent with the Desired Future Character statement. Therefore, the application should be refused.

The proposed extra students' activities traffic and parking will result in a very high intensity use development with associated adverse impacts on local residents. This is inconsistent with the desired Future Character Statement. Therefore, the application should be refused.

### **side set back**

The proposal of 5 metres is 50% lower than the minimum rear and side building setbacks.

Locality C8 states, "Development is to maintain minimum rear and side building setbacks". This lead-in statement makes it very clear regarding the setback requirement.

The statement continues, "The minimum rear and side setback is 10 metres." The proposal is only 5 metres. Further the Statement continues, "The rear and side setback areas are to be landscaped and free of any structures, carparking or site facilities other than driveway and fences."

It is very clear that the proposed development involves a structure within the 10 metre setback area and does not comply with the standard requirement in Locality C8.

### **Build Height**

The proposed building height is 11 metres; the requirement is a maximum of 8.5 metres, this is another major variation to the standard requirement in locality C8.

The proposal will be a very large bulky building that will significantly add to the impact of the existing bulky buildings on the site. This will be an extremely high impact development and therefore it is not consistent with the Desired Future character Statement for Locality C8

### **Front set back**

Locality C8 states, "The minimum setback to all roads is 20 metres."

While the argument by the applicant to reduce the setback to 17.2 metres to line up the building with the existing buildings may be acceptable, the setback requirement continues, "The minimum front building setback area is to be densely landscaped using locally occurring species of canopy trees and shrubs and to be free of any structures, car parking or site facilities other than driveways, letter boxes and fences."

The existing front set back along the whole frontage of the site does not comply with this requirement and the proposal does not comply. This does not include densely planted local species. Most of the area is proposed for school activities.

The proposal is inconsistent with the Locality C8; therefore, the application should be refused.

### **Landform**- cut and fill.

This application contains further changes to the landform which is inconsistent with the **Desired Future Character Statement**.

### **Conclusion.**

- The proposal is unacceptable.
- The Proposed Development is **OUT OF CHARACTER.**
- The application should be refused as it is inconsistent with the Desired Future Character.
- As shown in the information detailed above, this proposed development will cause unacceptable impacts on the Local Community.
- The proposed development is a Category 3 development in Locality C8 WLEP2000. This type of development requires a rigorous application and assessment to ensure that it is consistent with ALL requirements in Locality C8 North Belrose WLEP2000.
- The application is attempting to justify variations to the requirements in Locality C8 and does not include all the details required in a development application.
- It is not consistent with the Desired Future Character statement and other controls in Locality C8.

The application should be refused in its entirety

Yours Sincerely

Conny Harris, President Belrose Rural Community Association

