

11 November 2022
Our Ref: 21160E.6ER_RFI#2



planning consultants

The General Manager
Northern Beaches Council
Dee Why Council Chambers
725 Pittwater Road
Dee Why NSW 2099

Attention: **Anne-Marie Young**
annemarie.young@northernbeaches.nsw.gov.au

Dear Anne-Marie

**Further Request for Additional Information - DA2021/2567
60 Federal Parade and 37-43 Federal Parade, Brookvale**

1.0 Introduction

DFP is assisting St Augustine's College (the College) with respect to a development application (DA) for demolition works, construction of two new car parking areas and an increase in student numbers at the College.

By letter dated 5 July 2022, DFP provided a response to Council's initial request for further information (RFI). That response was in relation to issues raised by Council's Urban Designer. The matters raised by Council's flooding and development engineers was subject to further investigations by the project engineer who was in consultation with Council's experts. Additional flood and stormwater documentation was uploaded to the planning portal on 23 August 2022.

This letter responds to the issues raised by Council in their email dated 15 September 2022 and relevant matters raised in submissions received during public notification of the DA in January and October 2022.

2.0 Site description

As confirmed by email on 19 September 2022, the DA applies to three (3) properties, though physical works are only proposed on two of those properties. The subject properties are:

- 37-43 Federal Parade, Brookvale - Lot 100 DP 1250521;
- 60 Federal Parade, Brookvale - Lot 13 DP 568333; and
- Lot B DP 395193 (this parcel does not have a street address) – no physical works.

3.0 Submissions

Based on our review of the public submissions, it appears the main issues of concern as they relate specifically to the proposed development are:

- Traffic
- Parking

- Pedestrian and resident safety concerns
- Reduction in green space for car parking
- Change of use of a residential property to a car park
- The aesthetics of a car park
- The periodic expansion to date and future development of the school

Some submissions also identified that the College has been operating contrary to conditions of consent with respect to the number of students enrolled at the College. As noted in the Statement of Environmental Effects (SEE) submitted with the DA, this DA is seeking to address the issue of student numbers and at the same time, provide additional parking to assist in mitigating current traffic and parking issues being experienced in the surrounding area.

One submission also raised questions regarding the sites to which the DA applies. The SEE, and in particular Section 3 of the SEE, clearly details the land to which the DA applies.

3.1 Traffic and Parking and Safety

The majority of public submissions related to traffic and parking issues. Many submitters indicated that during the afternoon peak pick up time in particular, the surrounding street network becomes congested due to queuing associated with the College's Gulliver Street on site drop off/pick up area.

A revised Traffic and Parking Management Plan prepared by Stantec which has been updated in response to the concerns expressed in the submissions received in response to the first notification of the DA, particularly with respect to the queuing of vehicles was submitted with our letter of 5 July 2022.

Section 2.2.3 of the revised Traffic and Parking Management Plan dealt specifically with the operation of the Gulliver Street car park and the management of the pick up/drop off arrangements for students. With respect to the management of this activity the revised Traffic and Parking Management Plan noted as follows:

A traffic warden will also be present to manage the Gulliver Street car park entry in the afternoon prior to the school bell. They will be in place a minimum 15 minutes prior to the school bell. This will ensure any such queuing is manageable and does not extend onto Gulliver Street. Any vehicles arriving after the queue extends to Gulliver Street will be asked to continue east on Gulliver Street and either park on-street in the vicinity or return after the school bell has rung. Communication with the school community around these management measures will change behaviour, ensure compliance is maintained and minimise impacts on traffic unrelated to the school.

It is anticipated that by requiring vehicles to drive off where they are unable to queue on site, behaviours of parents using this service will alter over time such that they will not arrive before the end of school time in which case congestion on the surrounding streets will be reduced.

The recommendations of the revised Traffic and Parking Management Plan were implemented during Term 3, 2022. The College has reported that the parent community has responded positively to the new traffic management plans and travel arrangements during the peak pick up time have changed. The following improvements have been observed:

- The staggered pick up, commencing with Year 5 from 3.20 pm, followed by Year 6 from 3.30 pm, has seen traffic congestion reduced, with no queuing along Gulliver Street since its commencement;
- Some parents have been observed arranging to pick up students in areas away from the College which has had a positive impact on reducing congestion; and

- Primary school students now have their own afternoon bus area and gate located on Alfred Street, allowing them entry onto buses first. This has increased their confidence in catching buses when school finishes. The College's traffic marshals have observed many more boys catching buses than before this change was implemented.

3.2 Pedestrian Safety

With respect to pedestrian safety, the revised Traffic and Parking Management Plan included a plan showing the indicative locations at which traffic wardens will be stationed. The role of the traffic wardens is to manage traffic movements associated with the on site drop off/pick up zone in the Gulliver Street car park as well as the zones on Alfred Street and Federal Parade, and to manage students catching buses on Alfred Road and manage pedestrian movements across Alfred Road. Another staff member will be located at the intersection of Pittwater Road and Alfred Road to manage school related/pedestrian activity at this intersection.

Traffic wardens have been operating through Term 3. Two traffic wardens have been in position, one at the entrance of the Gulliver Street carpark and one at the kiss and drop zone within the College grounds. Traffic wardens also ensure that students are safe when being picked up. Pedestrian safety has also been improved by the reduction in traffic congestion and vehicle queuing which is documented above.

3.3 Reduction in Play Space for Car Parking

The proposed car park at 60 Federal Parade is not currently accessed by students and accordingly, the proposed car park on this lot does not reduce the amount of available play space for students.

The car park proposed at the corner of Gulliver Street and Alfred Road replaces some play space in this corner of the site. This will create a buffer between play space accessed by students and the residential property at 16 Alfred Street. Complaints have previously been received from this property with respect to amenity impacts associated with ball-play next to their property boundary. The provision of a staff car park (which will generally only be operational in the morning and afternoon times) between this property and the active play areas should result in improved amenity for residents of 16 Alfred Street.

The proposal will result in a total 15,999m² of open space. This area includes hard stand play areas (including basketball courts) as well as soft landscaped areas such as the ovals and other landscaped areas 15,999m² of open space equates to 9.99m² per student when the full complement of 1,600 students is present. A plan showing the provision of open space on the school site following introduction of the car parking areas is attached to this letter. Open space calculations are provided as an attachment to this letter.

Section D1 - Landscaped Open Space and Bushland Setting of the Warringah DCP requires a minimum of 40% of the site to be provided as landscaped open space. A landscaped area calculations plan is attached to this letter. It shows that a total landscaped area (including deep soil play areas and non-accessible deep soil areas) of 9,452.76m² is provided which represents 32.58% of the total site area.

The first objective of the DCP control is to enable planting to maintain and enhance the streetscape. Both proposed car parks provide soft landscaping within the front setback with feature trees to enhance the streetscape.

The second objective seeks to conserve and enhance indigenous vegetation, topographical features and habitat for wildlife. The third objective is to provide for landscaped open space with dimensions that are sufficient to enable the establishment of low lying shrubs, medium high shrubs and canopy trees of a size and density to mitigate the height, bulk and scale of the building. The proposed works involve the removal of four exempt non-prescribed species which do not require approval for removal, and two trees which have been assessed as being

structurally defective and not viable to be retained for safety reasons. These trees are being removed under a separate tree removal permit.

It is proposed to provide 13 new canopy trees in addition to an understorey planting comprising a mix of shrubs and groundcovers as part of the proposal. The proposed works will result in an increase in the number of trees within both areas compared to the current situation and low level planting will screen the car parks from the street.

The fourth objective is to enhance privacy between buildings. No buildings are proposed as part of the application. Notwithstanding, landscaping comprising shrubs and trees is proposed along the sides and rear of the car parks which will provide a buffer between the car parks and existing adjoining buildings.

The fifth objective is to accommodate appropriate outdoor recreational opportunities that meet the needs of the occupants. While the site does not satisfy the 40% soft landscaping control, most of the site is provided as open space, including areas of play space for students and landscaping setbacks. The open play space alone represents 55% of the total site. It would not be appropriate for all this open play space to be soft landscaping as this would not provide areas that could be used during inclement weather and would preclude recreation activities including basketball and handball.

The final objective of the control is to facilitate water management, including on-site detention and infiltration of stormwater. An appropriate stormwater management strategy including on-site detention have been prepared by Core Consulting Engineers and has been submitted with the development application.

Section D1 of the DCP states “there is a minimum of 40% landscaped open space for a typical residential allotment”. Being an educational establishment, the subject site is not a typical residential allotment and therefore this control is not appropriate for a school site.

Notwithstanding, No.60 Federal Parade is separated from the remainder of the college site by Federal Parade and is scaled as a typical residential allotment. The lot has an area of 902.7m² and a total landscaped area of 382.89m² is proposed, representing 42% of the lot, compliant with the DCP control.

3.4 Change of Use of Residential Property to Car Park

Submissions in relation to this issue related to 60 Federal Parade.

Approval for use of 60 Federal Parade as an Educational Establishment was granted by Northern Beaches Council on 10 December 2020. The approved development is for use of the existing building (dwelling) for the purposes of accommodating school administration staff.

Therefore, the property at 60 Federal Parade is no longer a residential property.

The use of 60 Federal Parade as a car park associated with the school is a use that could be undertaken as exempt development pursuant to section 3.17 and Schedule 5 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* (SEPP TI). Relevantly, Schedule 5 of SEPP TI provides 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.

3.5 Aesthetics of Car Parks

The front and side setbacks of the car parks to both Federal Parade and Gulliver Street will be landscaped with trees and shrubs which is an improved outcome compared to that which is existing for both sites.

The 'built form' associated with the car parks creates a sense of openness within both the Federal Parade and Gulliver Street streetscape which is consistent with the DCP front setback objectives.

Amended landscape plans showing acoustic fencing details have been provided with this letter.

The plans detail a brick fence around two sides of 60 Federal Parade that will be repaired and increased in height to comply with the requirements of the submitted Acoustic Report.

The existing timber paling fence will be maintained along the western boundary of 60 Federal Parade. Front fencing will comprise a metal palisade fence to match the existing fencing around the main College campus.

At the Gulliver Street car park acoustic barrier fencing with a minimum height of 1.8 metres will be provided between the car parks and adjoining residential boundaries. With consideration of the proposed fencing, the acoustic and amenity impacts of the use of at-grade car parks have been assessed as being within acceptable limits.

3.6 Future Development of the School

As Council would be aware, the College has purchased a number of residential properties which immediately adjoin both the main College site and 60 Federal Parade.

No approval for the use of these sites for the purposes of an *Educational Establishment* has been sought and therefore their use remains residential only.

The application under assessment by Council is the only proposal currently being considered by the College. At present the College has no plans beyond regularising its student enrolment numbers and improving parking and traffic management.

4.0 Student Enrolments

St Augustine's College has provided the following information with respect to student enrolments in the 2020 and 2022 school years

2020		2022	
Year 5	112	Year 5	112
Year 6	85	Year 6	112
Year 7	231	Year 7	234
Year 8	226	Year 8	234
Year 9	219	Year 9	234
Year 10	195	Year 10	234
Year 11	191	Year 11	200
Year 12	155	Year 12	200
TOTAL	1414	TOTAL	1560

The additional students span across year levels: Years 5 and 6 each have 112 students, Years 7-10 each have 234 students and Years 11 and 12 each have approximately 200 students based on anticipated attrition from Year 10.

The application under assessment by Council seeks approval for a maximum of 1,600 students.



5.0 Operational Plan of Management

St Augustine's College is currently preparing an Operational Plan of Management (OPoM) which includes the information requested by Council. A copy of the OPoM will be provided to Council under separate cover as soon as possible. The OPoM should be read in conjunction with the revised Traffic and Parking Management Plan that was submitted with the response to Council's initial request for further information on 5 July 2022.

6.0 Community Consultation

St Augustine's College have approached adjacent residents to open and maintain a dialog with these residents. The particular names and addresses of residents approached are not contained in this letter as it may be made public by Council. Consultation was undertaken with particular residents over the past 12 months. The College has sought to communicate development plans that potentially impact these residents. While some have been supportive of the College and its plans, others have been unapproachable, and communications have broken down.

7.0 Conclusion

We trust the information contained in this response and in the attached Operational Plan of Management is sufficient to enable Council to complete its assessment of the DA. We look forward to your advice as to when this application is to be referred it to the Northern Beaches Local Planning Panel for determination.

Should you require any additional information to complete your assessment, please do not hesitate to contact Piers Hemphill of DFP on 9980 6933.

Yours faithfully

DFP PLANNING PTY LTD

A handwritten signature in black ink that reads 'Hemphill' in a cursive style.

PIERS HEMPHILL
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Reviewed: A handwritten signature in black ink that reads 'P. Hemphill' in a cursive style, positioned above a horizontal line.

Attachments:

1. Open space calculations plan
2. Landscaped area calculations plan
3. Amended landscape plans