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**Sent:** 22/05/2020 6:17:54 AM

**Subject:** Submissions: Amended Plans Mod2019-0627 and DA2019-1420 John Colet School

**Attachments:** John Colet School Amended Plans DA2019-1420.pdf; John Colet School Amended Plans DA2019-1420.pdf;

ATT Nick England

Attached please find my submissions for Amended Plans Mod2019/0627 (DA2015/0558) and DA2019/1420 for John Colet School, Belrose.

Regards,

Clare McElroy

Clare McElroy  
5 Wyatt Ave  
Belrose NSW 2085  
20 May 2020

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

Attention: Nick England

**AMENDED PLANS DA2019/1420**  
**Lot 1**  
**Lot 1 DP 601101 and Lot 101 DP 874509 6 & 8 Wyatt Ave BELROSE**  
**Alterations and Additions to an existing school**

Thank you for the opportunity to provide a submission on this latest amendment to DA2019/1420 from John Colet School.

I have already submitted an objection to this DA on 02/02/2020. My objection still stands. I ask that council add this submission, which specifically relates to the amendments, to my previous comments on the overall proposal.

Regardless of any amendments, DA 2019/1420 does not comply with consent conditions for DA2015/0558. The application is still incomplete and lacking details and documents that are required under the WLEP2000. These amended plans do not address issues or provide an adequate response to concerns raised by council officers in their referral responses for DA2019/1420.

There are significant changes when compared to the 2015 concept plan and it is inappropriate for council to accept an incomplete DA that is reliant for approval on a simultaneous Modification (Mod2019/0627 - DA2015/0558). We must now add to this mess with amended plans for these previous proposals.

- A Consent Condition (Condition 5) for DA2015/0558 states that additional DAs need to be submitted for future works (Stages F-Q) and that these development applications for construction of future stages F to Q are to be consistent with the concept plans and drawings submitted for these stages under DA2015/0558.

This consent condition has not been satisfied. The amended plans do not address this, in fact the amendments are a further departure from the concept plan.

- A Consent Condition (Condition 6) for Stage 1 of DA2015/0558 required an amended parking/access plan to be provided in applications for future stages of the masterplan. A letter showing amended parking and access has now been submitted by the applicant but it does not satisfy all the specifications described in Consent Condition 6.

- DA2019/1420 seeks to change the last stages of the applicant's 2015 Masterplan to fast track a building construction (stage Q), enlarge and modify the building from the original plan, reduce boundary setbacks, and modify landscaping and open space management. The amended plans do not address these changes or show how further stages will be incorporated.
- The Open Space Management Plan from 2015 is now obsolete due to changes to the original masterplan. The amended plans do not address these changes. A previous Consent Condition requires the school to review and adapt the OSMP whenever construction work impacts on availability of open space on site; this has not been done.
- Consent Condition 13 - Bushland Management – Existing Positive Covenant.  
Under this instrument the school is bound, in perpetuity, to manage and protect the bushland area containing the population of endangered *Grevillea caleyi*, in accordance with an associated Bushland Management Plan. The management of this area is discussed in my previous submission but, in summary, the applicant has failed to comply with the conditions outlined in the plan to monitor and protect the health of *Grevillea caleyi* on site. In addition, there is a requirement for no grevillea species to be used in landscaping to limit hybridisation. This condition has not been complied with in the amended landscape plans.
- Landscape Plan. The amended landscape plans do not comply with previous consent conditions regarding plant species and provenance. The amended plans do not show any of the 16 replacement Eucalypts that were proposed as offset plantings to justify removal of over 40 trees approved for Stage 1 of DA2015/0558.
- The amended plans show two structures, labelled "Cool Room" and "Shipping Container" within the 10m side setback area on the eastern boundary. In earlier DAs the shipping container was referred to as "Shed" and aerial photos show it has been there since at least 2009. These structures do not appear to have any council approvals and they do not comply with boundary setbacks or building standards for fire prone land. Why are they there?
- The demountable classroom on the western boundary was ordered to be removed by the RFS in 2009 as part of a former development consent. The structure does not comply with standards for building on fire prone land. This demountable has been used for the last ten years in breach of previous consent conditions. Removing this structure should not be dependent on approval of a DA for another building. Why is it still in use?

## **Traffic and parking**

When the JRPP approved Stage 1 of the Masterplan for DA2015/0558, the approval was subject to Consent Condition 6: provision of an amended parking/access plan in subsequent applications relating to the staged consent, demonstrating that:

- a) All car spaces have dimensions to satisfy provisions of the relevant Australian Standards; (specifically stacked spaces 3-8 and 25-30 to be 5.5m long as a consent condition for Stage 1 and any future stages of the masterplan)*

- b) *A passing bay can be provided on-site that eliminates any potential queuing of vehicles entering the site from Wyatt Avenue;*
- c) *One-way road system for the road north of the staff common room;*
- d) *Re-design of vehicle spaces 18, 19 and 20 to facilitate adequate vehicular movements consistent with relevant Australian Standards. (DACPLBOC2)*

In addition, the DA2015/0558 response from Council's Traffic Engineer, in relation to provision of parking:

*"On-site parking is to be provided for the maximum number of staff on-site at any one time"*

- No amended parking/access plan was initially submitted with this DA. We now have a letter of design compliance from McLaren Traffic Engineers to accompany the Modification on which this DA depends for approval (Mod2019/0627 – DA2015/0558).
- This letter shows an amended parking plan with parking spaces 15-25 now crammed into an area that was designated as open space/playground. This further reduces the already insufficient landscape quota and playground areas on site.
- A computer program was used to demonstrate that "key" parking spaces are actually navigable; however, this is an "ideal", not real life, demonstration of parking access. These are extremely tight spaces ringed by a tight, narrow road that is below minimum width requirements.
- The amended parking/access arrangements do not satisfy Consent Condition 6(b) for a passing bay. The report from McLaren concedes that, at multiple locations along the circulation roadway, paved sections are less than 3m wide and do not meet the minimum width requirements of AS2890.1:2004. The report goes on to state that, as there are grassed and gravel areas adjacent, vehicles can *"successfully circulate the site using the existing paved roadways and surrounding trafficable areas "*. Driving off road is not an acceptable or safe solution to the school's lack of space. In the past, staff were driving and parking throughout the site, causing erosion, compaction and damage to native vegetation. As a result, the school was required to protect bushland edges with fencing and implement a formal parking and access plan. Although the barrier fence has now been removed, the suggestion that unpaved areas are "trafficable", and can compensate for a non-compliant access road, is regressive and not in accordance with previous consent conditions.
- The school has still not demonstrated that it can satisfy consent conditions for parking and access without encroaching on open space/playground areas and requiring vehicles to drive off road to circulate the site or pass other vehicles. The site is too small for the proposal and this application should be refused
- Traffic congestion continues to disrupt the neighbourhood and residents trying to go about their business. This week, the after-school queue of cars stretched several hundred metres, through the Cotentin Rd intersection to the western end of Wyatt Ave. Council has recently approved a 60 place childcare centre directly opposite Cotentin Ave and this approval incorporates changes to give way signs and construction of a median strip at the intersection with Wyatt Avenue. This is going to be unworkable and unsafe with the

present queuing of cars and illegal U turns at the intersection. The school needs a better plan to manage its traffic than an endless drop off/pick up zone with some signs on the school fence. The neighbourhood cannot sustain this endless push for growth.

## **Desired Future Character**

The school is a Category 3 development in the C8 Belrose North locality, deferred land administered under the WLEP2000. Category 3 is development that is generally inconsistent with the desired future character for the locality which is described in the WLEP2000 as:

*“The present character of the Belrose North locality will remain unchanged except in circumstances specifically addressed as follows.*

*The natural landscape including landforms and vegetation will be protected and, where possible, enhanced. Buildings will be grouped in areas that will result in the minimum amount of disturbance of vegetation and landforms and buildings which are designed to blend with the colours and textures of the natural landscape will be strongly encouraged.*

*Development will be limited to new detached style housing conforming with the housing density standards set out below and low intensity, low impact uses.”*

As the proposal is not detached style housing, the proposal needs to demonstrate that it is a low impact, low intensity use to demonstrate consistency with the DFC.

Impact and intensity of use are defined in the NSW Land and Environment Court (LEC) judgement in *Vigor Master v Warringah Council [2008] NSWLEC 1128*.

Intensity (part) *“low intensity would constitute a development which has a low level of activities associated with it”*

Impact: *“Impact – is commonly used in planning to identify the likely future consequences of proposed development in terms of its surroundings and can relate to visual, noise, traffic, vegetation streetscape, privacy, solar access etc. Therefore, low impact would constitute a magnitude of impacts such that was minimal, minor or negligible level and unlikely to change the amenity of the locality”*

This development does not comply with the locality statement nor low impact, low intensity uses. The building is tall, bulky and visually intrusive with reflective glass and finishes that do not blend with the surroundings. Together with the other bulky buildings on the site, the appearance is one of a continuous, dominant built form along Wyatt Avenue. Assuming the proposed building has lighting that is consistent with the other buildings on site, the school's appearance will dominate the Wyatt avenue frontage with uninterrupted night lighting.

The application proposes further disturbance to the site's landform and vegetation, including a large area of cut-and-fill and construction of a retaining wall above a natural drainage line. The native canopy trees approved for clearing in Stage 1 are not being compensated for in this later stage and the few replacements are not comparable species e.g. exotic *Fraxinus* (Ash) and Pine species. More than half of the site's endangered vegetation has already been cleared since 2000, including the entire western boundary that was cleared of its endangered Duffys Forest Ecological Community without approval. This area is now a play area and

classroom space, with further modifications proposed in this DA – this is not a low impact/intensity use of what was previously natural bushland.

In these days of climate awareness and native species loss, it is extremely disappointing to see a school not supporting the conservation of our unique natural heritage.

The APZ on the northwest boundary is being actively eroded and compacted through use as a playground. This was once a biodiversity conservation area that is not being protected or enhanced. There is dumping and weed invasion in the *Grevillea caleyi* reservation area at the rear of the school. This is not a low impact activity.

If we use 2000 as the baseline for assessing the Desired Future Character of the C8 Belrose North locality, given that this is the date of the applicable LEP, then this proposal does not comply with the character statement at all.

A primary school is not a low impact, low intensity use of the site, given that the surrounding neighbourhood is comprised of detached residential dwellings and rural acreages with an associated low level of activity and vehicle movements. The Wyatt Avenue neighbourhood is not comparable to others in the C8 Belrose North locality where those neighbourhoods comprise large businesses and retirement facilities. Unlike John Colet, all other schools in the area have large grounds and multiple road frontages, allowing activity associated with those schools to be spread over a larger area and not concentrated into a single residential street.

It is residents who are best placed to decide if a development impacts them and submissions on the school's relentless DAs over the years, show that neighbours are significantly impacted by noise, traffic, loss of visual amenity, use of public open space and other issues.

### **Building bulk, height and setbacks**

The proposal does not comply with provisions in the WLEP, including:

Clause 66 Building Bulk, which states:

- *“Buildings are to have a visual bulk and an architectural scale consistent with structures on adjoining or nearby land and are not to visually dominate the street or surrounding streets unless the applicable locality statement provides otherwise”.*

The Desired Future Character statement for C8 Belrose North (as described previously) does not provide for buildings to visually dominate the street. The scale of the proposed building extension does not reflect the detached residential dwellings in the surrounding streets or on the adjoining land, which comprises rural acreages and bushland.

- *“Side and rear setbacks are to be progressively increased as wall height increases”*

This application proposes a reduction in front and side setbacks and an increase in building height.

Under local planning controls, the maximum permissible building height is 8.5m. The proposed building height is 11m. This is a 30% increase over the maximum. At 9.6m, even the minimum height of the proposed building exceeds the maximum by 1.1m or 12%.

The minimum side setback is 10m. The application proposes a 5m setback on the western boundary – a 50% reduction.

This will make the building appear even more dominant and will limit the area available for screen planting.

- *“Large areas of continuous wall planes are to be avoided by varying building setbacks and using appropriate techniques to provide visual relief”*

Under local planning controls, the minimum front setback is 20m. The applicant proposes a 17.2m setback, arguing that this will be consistent with adjacent buildings. This will mean four multi-storey buildings presenting a solid and continuous façade across the Wyatt Avenue frontage. This will be further exacerbated by a modification to the building design, which originally showed an elevated structure with open space underneath. In the new design, the ground floor area is partly filled in, further adding to the building bulk. At the eastern end, the recessed façade of the administration building has also been filled in as part of Stage 1, so that there is no visual relief at all along the entire Wyatt Ave frontage.

For the western façade, the textured aluminium panels proposed by the applicant aren't fooling anyone and will not cause the building to visually retreat when it is 11m tall and within 5m of a boundary.

- *“Appropriate landscape plantings are to be provided to reduce the visual bulk of new buildings and works.*

The landscape plan shows only a couple of trees along the western façade – species that are not closely spaced and neither of which, given that I have had both in my own garden for close to 20 years, are likely to achieve a height and width capable of visually obscuring this building. The reduced, 5m wide, western boundary setback must also accommodate a retaining wall, leaving little scope for a dense screen of vegetation. The remaining plants along the western boundary are low shrubs and a lily species, neither of which will be effective at screening a tall building

Council's Urban Design Referral Response has been to support the non-compliant building setbacks and height by reasoning that the building will appear to be consistent with existent buildings on the site and thus the proposal represents an orderly and coherent development. The existing buildings also exceed the height limit and do not comply with front setbacks or the C8 Desired Future Character statement.

I don't agree that adding another bulky, imposing building on an already overdeveloped site is worthy of approval. It makes the situation worse; we now have an unbroken wall of four imposing buildings instead of three. The applicant is using these oversized buildings along the Wyatt Avenue frontage to buttress their application and leverage further non-compliance in the name of “consistency”.

## **Open Space Management**

- The Open Space Management Plan submitted for DA2015/0558 is obsolete. It does not recognise the changes to outdoor play areas with subsequent development/modification applications, for example, the “Top House Playground” and “Top House Learning Area” are now a car park and road. The location of play structures has changed. The footprint of the proposed building has increased. There is an overall reduction in useable outdoor space for students and the figure quoted for sqm of outdoor space per student is invalid.

- In the Open Space Management Plan for DA2015/0558, the useable open space area for 285 students shows areas that are out-of-bounds for play, such as the driveway and skip bin area in the setback at the front of the school and other spaces that are clearly not fit for the purpose of student recreation (JC/IN/DA/DWG 1502). This has not been amended.
- No new Open Space Management Plan was submitted for DA2019/1420 or with the amended plans, despite the changes to the site and the increase in student numbers granted for Stage 1.
- Open Space Management Plan submitted for DA2015/0558 states:

*“(f) Periodic Review of Open Space Management Plan (refer Council Condition 8(e) The School reviews its open space management plan as the need arises. The sport coordinator and other members of staff are involved in this review. This plan will be reviewed and adapted whenever there is construction work on the site that impacts on the availability of open space on site.”*

The plan has not been reviewed or adapted despite the substantial earthworks and building construction proposed for the site. This work will render the western half of the school grounds unusable, likely for many months.

- Additionally, the OSMP states:  
*“The intensity of the use of off-site facilities will not change as a result of the staged DA.”*  
During previous construction works, the school used Wyatt Reserve all day, every day for tea breaks, lunches and all outdoor play and sports. It is inevitable that the school will intensify its use of off-site facilities such as Wyatt Reserve during construction stages if this DA is approved. Use of Wyatt Reserve by the school has been the foundation of many community complaints and locals have the right to an honest answer about when and how public space will be further monopolised by the school if building works are approved and student numbers continue to increase.

## **Landscape Plan**

The amended landscape plan has failed to correct the deficiencies of the previous one. The new plan does not comply with the 2015 consent conditions regarding plant species and provenance nor does it recognise the referral response from Council’s Biodiversity Officers, namely:

- *“Prevention of the use of grevillea species in landscaping and rehabilitation to limit the likelihood of hybridisation”*  
At least ten hybrid grevilleas have recently been planted along the Wyatt Avenue frontage. *Grevillea* “Honey Gem” remains on the landscape plan for the western fence line and two have been planted in the last month on the south western site frontage.
- *“Replacement of non-local plant species with native plants grown from local provenance seed and cuttings”*  
*Trachelospermum jasminoides* (Star Jasmine) is an exotic species with invasive potential along the fenceline on the western boundary. *Lomandra hystrix* is a non-local species with potential to invade bushland areas and displace local *Lomandra longifolia* (as has happened



from adjacent garden in the DFEC, *Grevillea caleyi* remnant along Forest Way near Oates Place). The *Fraxinus* and *Pinus* species are also exotics. All The native species listed are cultivars and generic landscape species that will not be of local provenance because, with the exception of Blueberry Ash, those species do not naturally occur in the local area.

- “Provision of a native plant schedule based on characteristic species of the Duffys Forest vegetation community and local species listed in current and previous ecological assessments.”

None of the proposed plant species satisfy this condition. *Callistemon citrinus* “Endeavour”, *Correa alba*, *Grevillea* “Honey Gem”, *Syzygium luemanii*, *Doryanthes excelsa*, *Lomandra hystrix* and the exotics are not found in the Duffys Forest Ecological Community nor in adjacent vegetation communities such as Sandstone Heath and Bloodwood-Scribbly Gum Woodland.

- Over 40 Eucalypts have been removed from the site for Stage 1 of the masterplan. 16 Eucalypts were originally proposed as canopy replacements to offset this loss. There are now no Eucalypts on the landscape plan at all. Not one. Having felled a large percentage of the site’s trees, on the promise of future compensation, the applicant is now seeking to use a reduced number comprising exotic, deciduous, or non-local trees. This is unacceptable considering the high conservation values of this location.
- The plants proposed for screening are mostly low shrubs and there is insufficient setback for screening of the proposed 11m tall building on the western boundary.
- The planting of deciduous trees does not comply with RFS guidelines “Planning for Bushfire Protection” which states “Planting of deciduous species is avoided which may increase fuel at surface/ ground level (i.e. leaf litter)”.

## Conclusion

It is concerning and exasperating to see that after decades of ad hoc proposals and amendments, the applicant is still unable to navigate the approvals process and present a coherent vision for the site that is consistent with their concept Masterplan from 2015 and which complies with local planning controls.

The whole point of the staged Masterplan was for the school to provide clarity to a concerned community about future development and intensification of activity on the site, and to allow for the impact of each stage to be assessed. Instead, the applicant is demanding “flexibility” at the expense of an ordered, coherent plan and we are back to the confusion of ad-hoc DAs and amendments.

The proposal is an unacceptable overdevelopment of the site. It does not comply with the Desired Future Character statement or local planning controls. The school has not complied with previous consent conditions and currently cannot operate within the physical constraints of the site, relying on daily use of public open space and car parks to conduct their operation.

The amended plans do not satisfy concerns previously raised and the application is still incomplete.

I urge Council to reject this incomplete DA for a non-compliant development.

Yours sincerely

Clare McElroy

Clare McElroy  
5 Wyatt Ave  
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Clause 66 Building Bulk, which states:

- *“Buildings are to have a visual bulk and an architectural scale consistent with structures on adjoining or nearby land and are not to visually dominate the street or surrounding streets unless the applicable locality statement provides otherwise”.*

The Desired Future Character statement for C8 Belrose North (as described previously) does not provide for buildings to visually dominate the street. The scale of the proposed building extension does not reflect the detached residential dwellings in the surrounding streets or on the adjoining land, which comprises rural acreages and bushland.

- *“Side and rear setbacks are to be progressively increased as wall height increases”*

This application proposes a reduction in front and side setbacks and an increase in building height.

Under local planning controls, the maximum permissible building height is 8.5m. The proposed building height is 11m. This is a 30% increase over the maximum. At 9.6m, even the minimum height of the proposed building exceeds the maximum by 1.1m or 12%.

The minimum side setback is 10m. The application proposes a 5m setback on the western boundary – a 50% reduction.

This will make the building appear even more dominant and will limit the area available for screen planting.

- *“Large areas of continuous wall planes are to be avoided by varying building setbacks and using appropriate techniques to provide visual relief”*

Under local planning controls, the minimum front setback is 20m. The applicant proposes a 17.2m setback, arguing that this will be consistent with adjacent buildings. This will mean four multi-storey buildings presenting a solid and continuous façade across the Wyatt Avenue frontage. This will be further exacerbated by a modification to the building design, which originally showed an elevated structure with open space underneath. In the new design, the ground floor area is partly filled in, further adding to the building bulk. At the eastern end, the recessed façade of the administration building has also been filled in as part of Stage 1, so that there is no visual relief at all along the entire Wyatt Ave frontage.

For the western façade, the textured aluminium panels proposed by the applicant aren't fooling anyone and will not cause the building to visually retreat when it is 11m tall and within 5m of a boundary.

- *“Appropriate landscape plantings are to be provided to reduce the visual bulk of new buildings and works.*

The landscape plan shows only a couple of trees along the western façade – species that are not closely spaced and neither of which, given that I have had both in my own garden for close to 20 years, are likely to achieve a height and width capable of visually obscuring this building. The reduced, 5m wide, western boundary setback must also accommodate a retaining wall, leaving little scope for a dense screen of vegetation. The remaining plants along the western boundary are low shrubs and a lily species, neither of which will be effective at screening a tall building

Council's Urban Design Referral Response has been to support the non-compliant building setbacks and height by reasoning that the building will appear to be consistent with existent buildings on the site and thus the proposal represents an orderly and coherent development. The existing buildings also exceed the height limit and do not comply with front setbacks or the C8 Desired Future Character statement.

I don't agree that adding another bulky, imposing building on an already overdeveloped site is worthy of approval. It makes the situation worse; we now have an unbroken wall of four imposing buildings instead of three. The applicant is using these oversized buildings along the Wyatt Avenue frontage to buttress their application and leverage further non-compliance in the name of “consistency”.

## **Open Space Management**

- The Open Space Management Plan submitted for DA2015/0558 is obsolete. It does not recognise the changes to outdoor play areas with subsequent development/modification applications, for example, the “Top House Playground” and “Top House Learning Area” are now a car park and road. The location of play structures has changed. The footprint of the proposed building has increased. There is an overall reduction in useable outdoor space for students and the figure quoted for sqm of outdoor space per student is invalid.



- In the Open Space Management Plan for DA2015/0558, the useable open space area for 285 students shows areas that are out-of-bounds for play, such as the driveway and skip bin area in the setback at the front of the school and other spaces that are clearly not fit for the purpose of student recreation (JC/IN/DA/DWG 1502). This has not been amended.
- No new Open Space Management Plan was submitted for DA2019/1420 or with the amended plans, despite the changes to the site and the increase in student numbers granted for Stage 1.
- Open Space Management Plan submitted for DA2015/0558 states:

*“(f) Periodic Review of Open Space Management Plan (refer Council Condition 8(e) The School reviews its open space management plan as the need arises. The sport coordinator and other members of staff are involved in this review. This plan will be reviewed and adapted whenever there is construction work on the site that impacts on the availability of open space on site.”*

The plan has not been reviewed or adapted despite the substantial earthworks and building construction proposed for the site. This work will render the western half of the school grounds unusable, likely for many months.

- Additionally, the OSMP states:  
*“The intensity of the use of off-site facilities will not change as a result of the staged DA.”*  
During previous construction works, the school used Wyatt Reserve all day, every day for tea breaks, lunches and all outdoor play and sports. It is inevitable that the school will intensify its use of off-site facilities such as Wyatt Reserve during construction stages if this DA is approved. Use of Wyatt Reserve by the school has been the foundation of many community complaints and locals have the right to an honest answer about when and how public space will be further monopolised by the school if building works are approved and student numbers continue to increase.

## **Landscape Plan**

The amended landscape plan has failed to correct the deficiencies of the previous one. The new plan does not comply with the 2015 consent conditions regarding plant species and provenance nor does it recognise the referral response from Council’s Biodiversity Officers, namely:

- *“Prevention of the use of grevillea species in landscaping and rehabilitation to limit the likelihood of hybridisation”*  
At least ten hybrid grevilleas have recently been planted along the Wyatt Avenue frontage. *Grevillea* “Honey Gem” remains on the landscape plan for the western fence line and two have been planted in the last month on the south western site frontage.
- *“Replacement of non-local plant species with native plants grown from local provenance seed and cuttings”*  
*Trachelospermum jasminoides* (Star Jasmine) is an exotic species with invasive potential along the fenceline on the western boundary. *Lomandra hystrix* is a non-local species with potential to invade bushland areas and displace local *Lomandra longifolia* (as has happened

from adjacent garden in the DFEC, *Grevillea caleyi* remnant along Forest Way near Oates Place). The *Fraxinus* and *Pinus* species are also exotics. All The native species listed are cultivars and generic landscape species that will not be of local provenance because, with the exception of Blueberry Ash, those species do not naturally occur in the local area.

- “Provision of a native plant schedule based on characteristic species of the Duffys Forest vegetation community and local species listed in current and previous ecological assessments.”

None of the proposed plant species satisfy this condition. *Callistemon citrinus* “Endeavour”, *Correa alba*, *Grevillea* “Honey Gem”, *Syzygium luemanii*, *Doryanthes excelsa*, *Lomandra hystrix* and the exotics are not found in the Duffys Forest Ecological Community nor in adjacent vegetation communities such as Sandstone Heath and Bloodwood-Scribbly Gum Woodland.

- Over 40 Eucalypts have been removed from the site for Stage 1 of the masterplan. 16 Eucalypts were originally proposed as canopy replacements to offset this loss. There are now no Eucalypts on the landscape plan at all. Not one. Having felled a large percentage of the site’s trees, on the promise of future compensation, the applicant is now seeking to use a reduced number comprising exotic, deciduous, or non-local trees. This is unacceptable considering the high conservation values of this location.
- The plants proposed for screening are mostly low shrubs and there is insufficient setback for screening of the proposed 11m tall building on the western boundary.
- The planting of deciduous trees does not comply with RFS guidelines “Planning for Bushfire Protection” which states “Planting of deciduous species is avoided which may increase fuel at surface/ ground level (i.e. leaf litter)”.

## Conclusion

It is concerning and exasperating to see that after decades of ad hoc proposals and amendments, the applicant is still unable to navigate the approvals process and present a coherent vision for the site that is consistent with their concept Masterplan from 2015 and which complies with local planning controls.

The whole point of the staged Masterplan was for the school to provide clarity to a concerned community about future development and intensification of activity on the site, and to allow for the impact of each stage to be assessed. Instead, the applicant is demanding “flexibility” at the expense of an ordered, coherent plan and we are back to the confusion of ad-hoc DAs and amendments.

The proposal is an unacceptable overdevelopment of the site. It does not comply with the Desired Future Character statement or local planning controls. The school has not complied with previous consent conditions and currently cannot operate within the physical constraints of the site, relying on daily use of public open space and car parks to conduct their operation.

The amended plans do not satisfy concerns previously raised and the application is still incomplete.

I urge Council to reject this incomplete DA for a non-compliant development.

Yours sincerely

Clare McElroy