
Sent: 12/05/2023 8:47:52 AM
Subject: URGENT DA 2021/2567 St Augustines College

We provide this further comment on the assessment of DA 2021/2567 to Memorandum dated 11 May 2023. We note that we nor our clients, the owners of No 31 Consul Rod Brookvale have been advised of the further memo.

1. The memo references the site as 60 Federal Parade Brookvale. This is an error that has been perpetuated through the assessment of the DA, requiring renotification of the application. The application is not for the construction of carparks but rather the increase in the student population from 1200 to 1600 for which additional parking is a requirement.
2. The additional information is not made public by way of uploading to the portal. The information is publicly available on the Council DA Tracker but this requires vigilance in checking. The referral responses have not been made public as is Council's usual practice.
3. We make the following response to the matters raised in the 11 May Memo
 - a. **Increase in student numbers – impacts on traffic, acoustic and amenity**

The DA documents and Assessment do not provide an assessment of the additional school population needs and the likely impacts of that additional student population. For example, there is no details of classrooms provided, library facilities, toilet facilities, staff and administration areas and the playground area plan does not form part of the proposed approved plans. The increase in the student population has occurred without Council approval, and CDC works have been undertaken to address changing requirements. The adjoining residents do not have the benefit of an approved masterplan nor certainty of the form of the development adjoining their boundaries. The determination of the this application enables an opportunity to address the ad-hoc growth and development of the school which is lost if the DA is approved as recommended.
 - b. **Use of 33 Consul Road as a playground.**

We support the imposition of a condition preventing the use of 33 Consul Road as playground area. As noted in the 11 May Memo, "DA2018/1804 approved the change of use of 33 Consul Road from residential to Educational (Ancillary Administration)". The memo fails to address that the site is now vacant the dwelling house used for administration purposes having been demolished for construction access to the CDC Goold Building works. As the current DA applies to the site and 33 Consul Road is included within the site area, it is requested that the site be stabilised having been left as a construction access and located within the overland flow path of Greendale Creek to prevent silt runoff until such time that a further application is lodged.
 - c. **Flood drainage impacts**

The Flood Impact Assessment Report only addresses the proposed carpark construction areas. The impact of flooding within the remainder of the School premises, the location of playground areas, the impacts of CDC approved works on the overland flows and the risk to students has not been adequately assessed. We have raised this matter in numerous submissions
 - d. **Acoustic Report**

The proposed condition is assessment that should be undertaken prior to the granting of consent. There is no consequence to the condition should compliance not be achieved.
 - e. **Noise Modelling**

Impacts of development should not be left to conditions of consent for assessment. This is matter which requires assessment under s. 4.15 of the Environmental Planning and Assessment Act prior to the granting of the consent. This is required for certainty of the consent for both applicants and adjoining residents. Our objections to deferring the consideration of these matters to later is similar to those to the report to the Northern Beaches Planning Panel seeking to issue a deferred commencement consent.
 - f. **PA System**

The PA System details should be assessed prior to the granting of consent.
 - g. **Band Rehearsals**

Operational matters should be included within the Plan of Management and potential acoustic impacts assessed. Band rehearsals also involve the arrival of students at school prior to 7am for which acoustic impacts are not assessed. We maintain the proposed condition 59 suggested at d) and the Memo of 11 May is unsatisfactory.

h. Plans is TPMP

To enable clarity of the development all documents should be consistent and indicate the proposed operations for which approval is sought.

In summary, we maintain that the DA currently before Council and the Northern Beaches Planning Panel does not provide for sufficient certainty to support an Approval. The ad hoc manner in which the increase in School numbers has been undertaken, the lack of a masterplan, the inconsistencies in an application which has been with Council for 16 months and the lack of detail supporting the proposed increase school population does not warrant approval. The School management have not engaged in any direct consultation with their residential neighbours and the impact upon the residential amenity is ongoing. The approval of an additional 400 students over the 1200 cap warrants greater certainty as to the likely impacts and an assessment that the school premises meets the needs of the students so that further development of the site under the exempt and CDC provisions does not result in ongoing impacts on the residential amenity of the adjoining properties.

Regards

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