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Statement of Environmental Effects

Increase Student Population, Construction and Identification of New
Car Parking Spaces

St. Augustine's College – 37-43 Federal Parade, Brookvale

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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 of their student population and construction of new car parking spaces at St Augustine's College (the School), known as 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 School's current approved student population cap of 1,200 students to 1,500 students;
- Construction of a new 15 space, at-grade car park within the existing school site; and
- Identification (line marking) of additional car parking spaces within the existing school site, creating a total of 137 spaces on the 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 June 2020.

- Northern Beaches Council Pre-DA Meeting Minutes
- Site Survey¹ - *LTS*
- Traffic Impact Assessment – *GTA Consultants*
- Traffic and Parking Management Plan – *GTA Consultants*
- Civil, Stormwater and Landscape Plans – *Core Project Consultants*
- Landscape Design Statement - *Core Project Consultants*
- Geotechnical Investigation – *JK Geotechnics*
- Overland Flow Assessment Report - *Cardno*
- Waste Management Plan (Construction and Demolition) – *Core Project Consultants*

¹ Survey completed prior to allotment consolidation. Provided for information purposes

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 1,500 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 Figures):

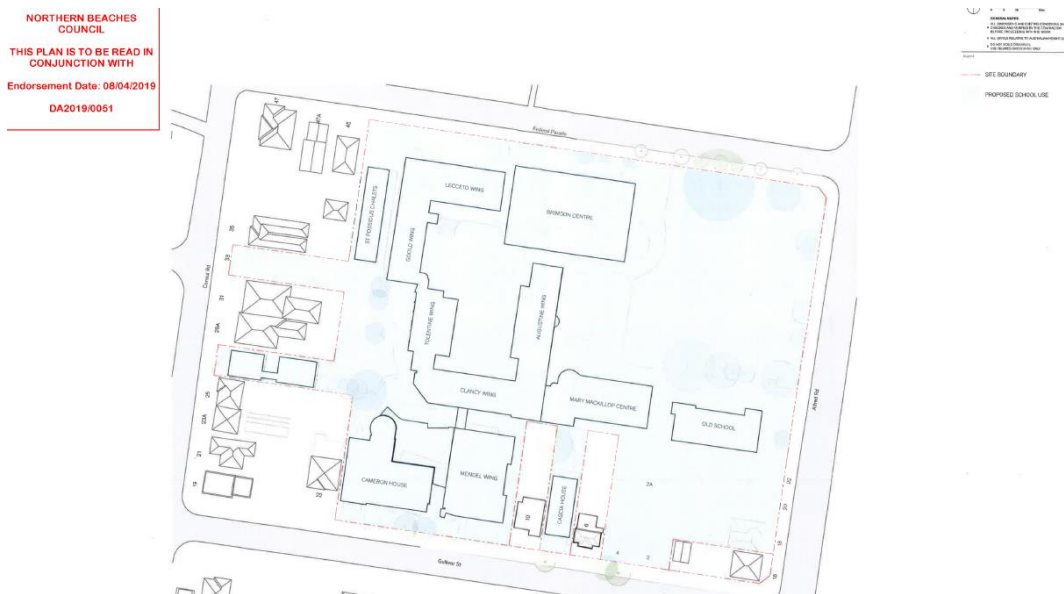


Figure 2 DA2019/0051 stamped approved plan

2.2 Pre-DA Meeting

A pre-DA meeting was held with Council on 25 June 2020. A copy of the minutes provided by Council accompany this report. The information contained within this report and within accompanying documentation is considered to adequately address the matters raised by Council.

3 Site Context

3.1 Location

The site is located at 37-41 Federal Parade, Brookvale. It comprises of two (2) allotments as seen in **Figure 3**.

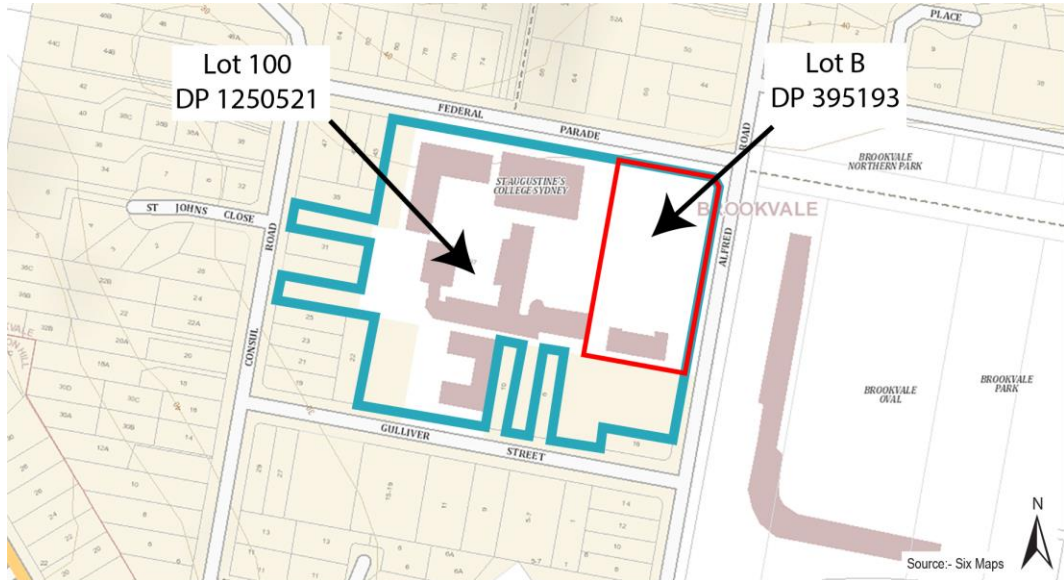


Figure 3 Site Location.

3.2 Site Description

The site is legally described as Lot 100 in Deposited Plan (DP) 1250521 and Lot B in DP 395193 (see **Figure 4**). An aerial image showing the configuration of the School's overall campus is shown in **Figure 5**.



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

3 Site Context



Figure 5 Aerial view of the Site.

The site is bound by Federal Parade to the north, Alfred Road to the east, Gulliver Street to the south and Consul Road to the west.

The site contains a range of buildings of varying size and scale with the majority of the School's open space located on the eastern side of the site. **Figure 5** also demonstrates how the School campus has expanded through the purchase of adjoining allotments.

3.3 Surrounding Development

The School's location can be described as being located on the edge of area and on the outer fringe of the Brookvale industrial precinct, separated by Pittwater Road.

Established residential land uses are located to the north, west and immediately 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.

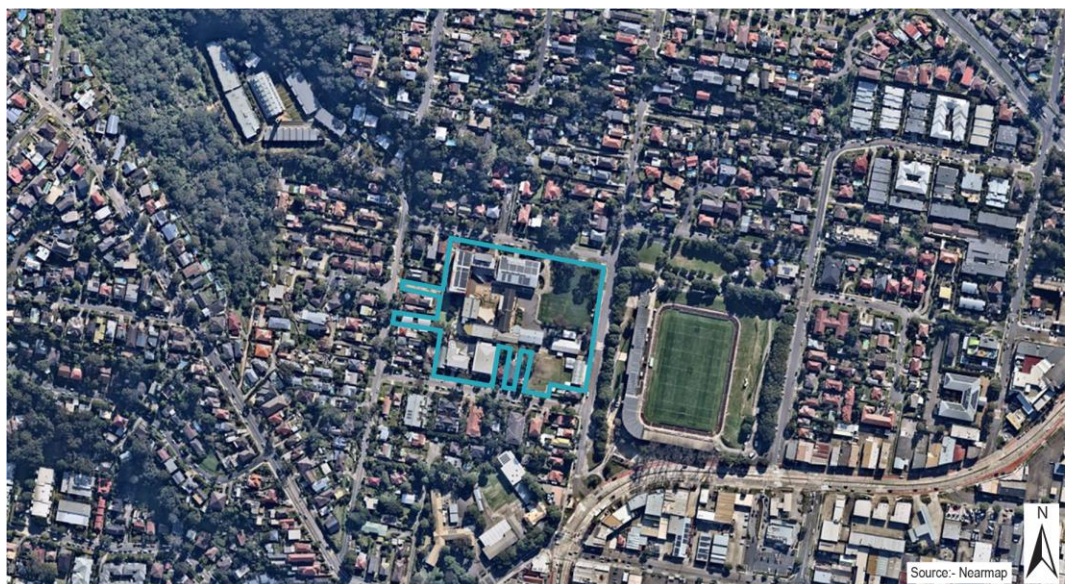


Figure 6 Surrounding Development.

4 Proposed Development

4.1 Summary of Proposed Development

The proposed development is summarised as follows:

- An increase to the School's current approved maximum student population of 1,200 students to a maximum of 1,500 students;
- Construction of a new 15 space, at-grade car park within the existing school and associated landscaping; and
- Identification (line marking) of additional car parking spaces throughout the School, creating a total of 137 spaces on the site.

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

4.1.1 Student Increase

Currently a cap of 1,200 students applies to the School pursuant to Condition No. 45 of DA2013/1336 (as modified). Due to demographic changes in the Northern Beaches Local Government Area and a resulting increased demand for places at the School, a student population increase of an additional 300 students is proposed, making a total cap of 1,500 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 ~~1,200~~ 1,500 students.

Reason: To manage impacts on the locality.'

4.1.2 Construction of New Car Park and Landscaping

Due to the proposed student population increase and the subsequent parking demand which results from additional staff being required for 1,500 students compared to 1,200 students², the proposed development entails the construction of a new 15 space at-grade car park.

The car park is proposed to be constructed upon a currently vacant portion of the site formerly known as 33 Consul Road. **Figure 7** below shows the proposed location of the car park. **Figure 8** shows the current condition on the site.

² 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 School with this quantum not required (nor planned) to change to support the proposed 1,500 students.

4 Proposed Development



Figure 7 Proposed car parking site



Figure 8 Former 33 Consul Road. Photo looking west from eastern end of the site

The proposed car park provides for 15 spaces along the southern boundary of the former 33 Consul Road allotment (part of the School's Campus). Access to the car park will be taken from the existing layback off Consul Road with the front and side boundary setbacks provided with soft landscaping.

4 Proposed Development

Civil, stormwater and landscape designs/plans for the proposed car park, prepared by Core Project Consulting, accompany this report. An extract from Core Project Consulting's design showing the car park layout and landscaping elements can be seen below in **Figure 9**.

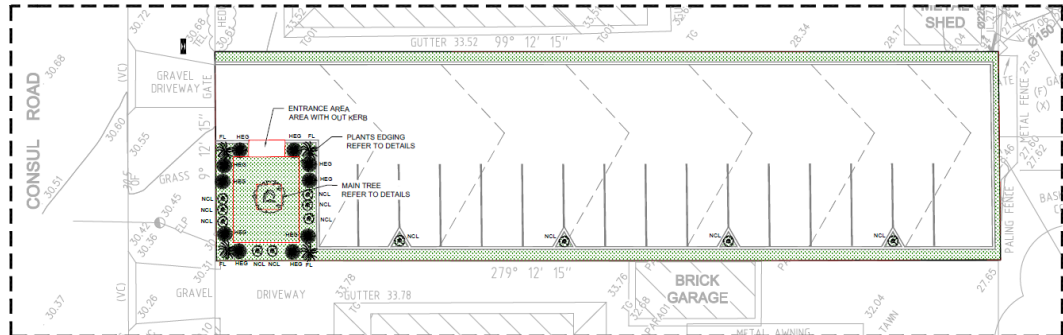


Figure 9 Proposed car park layout

4.1.3 Additional Parking Spaces

The Traffic Impact Assessment prepared by GTA Consultants which accompanies this report has identified that the School requires a total of 135 car parking spaces (proposing 137) as a result of the proposed student (and subsequent staff – see footnote 2) increase. The School currently provides 106 spaces on site, combined with the additional 15 spaces proposed (as discussed in **Section 4.1.2**) an additional 16 on-site parking spaces will be provided (lined marked) on the School's campus. **Figure 10** provides an overview of the 137 spaces on site. Traffic and parking related matters are discussed further in **Section 5.2.11**.

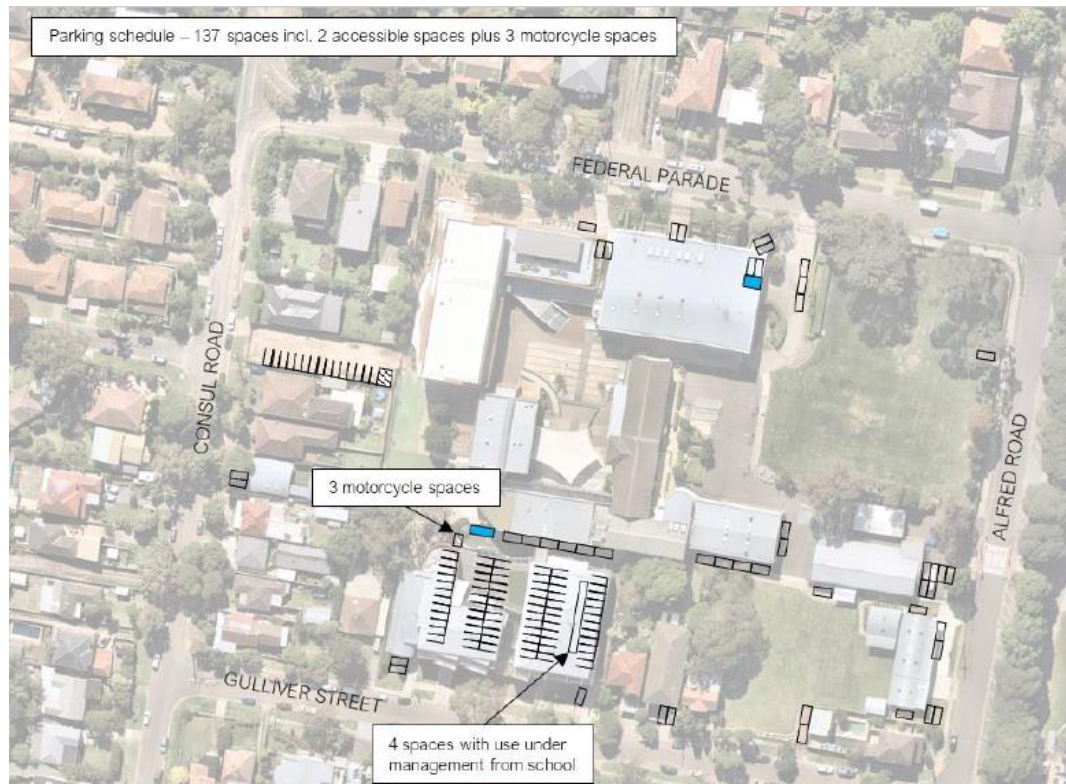


Figure 10 Proposed on-site parking

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 the use of the site. SEPP 55 matters have been previously considered in prior development applications relating to the site 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). Furthermore, the prior use of the 33 Consul Road site as *residential accommodation* is not a contaminating use.

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.

The site is located within the *R2 Low Density Residential Zone* (the R2 zone) 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 works are therefore being proposed pursuant to Clause 35(1).

Clause 35(6) 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 park will be provided with high-quality landscaping which compliments the School’s established setting, built form and landscape elements. The landscaping will also harmonise the at-grade car park into the streetscape setting of Consul Road, with no structures forming part of the proposal, the development will integrate well into the locality and not create any visual impacts.

Principle 2—sustainable, efficient and durable

The proposed development will facilitate future student demands and will generally result in a positive environmental, social and economic outcome, as discussed throughout this report.

Principle 3—accessible and inclusive

Please refer to the Traffic Impact Assessment which accompanies this report and addresses the provision of two (2) accessible parking spaces within the School’s campus.

Principle 4—health and safety

The proposed development does not to have any foreseen potential health and safety impacts within the School grounds or within the public domain. The School’s existing infrastructure (buildings, outdoor space/playground space) provide sufficient capacity to accommodate the additional 300 students proposed as part of this DA.

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Principle 5—amenity

The landscaping proposed as part of the new at-grade car park provides a high-degree of integration into the established residential character of Consul Road. The increased student numbers and additional parking provided throughout the School campus will not impact on the current levels of amenity enjoyed by residents in the locality.

Principle 6—whole of life, flexible and adaptive

Increasing the approved student population from 1,200 students to 1,500 students and constructing/providing additional car parking spaces takes into consideration the future needs of the School and the future needs of residents in the LGA. The use of the former 33 Consul Road site, in consideration of its characteristics, constraints and opportunities is an efficient and economic use of the site.

Principle 7—aesthetics

As addressed throughout this report, the at-grade and landscaped car park proposal on the former 33 Consul Road site will be an aesthetically pleasing development and will have a positive impact on the established residential character of the locality.

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 at **Section 5.1.6**.

Clause 57 of the Education SEPP sets out provisions relating to traffic generating development. As the proposal entails more than 50 additional students, the development is a 'traffic generating development' in accordance with this clause. Notice of the proposal to the RMS is required. Please refer to the Traffic Impact Assessment prepared by GTA Consultants accompanying this report which has considered all traffic related impacts associated with the proposal.

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.'*

Upon review of the Coastal SEPP maps, as there are no littoral rainforests or wetlands on, or within the vicinity of the site, and with the nearest wetland approximately 2.1km to the north-

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east, there will not be any impacts arising on environmental assets. Accordingly, the 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' and there is no impact to native vegetation as part of the proposed development. Therefore, no impact to koala habitat will arise as a result of the proposal taking place.

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 11 below, the site is located within Zone R2 Low Density Residential (the R2 zone). 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: <i>'To enable other land uses that provide facilities or services to meet the day to day needs of residents.'</i>	Yes
4.3 – Height of buildings	No structures proposed, only an at-grade car park.	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. please refer to Section 5.2.5 further in this report.	Yes
6.2 – Earthworks	The construction of the car park on the former 33 Consul Road part of the site entails earthworks as described in the Civil and Stormwater design documentation prepared by Core Project Consulting accompanying this report. The earthworks are considered to be relatively minor and where backfilling filling is required, existing topsoil will be utilised from the site and any spoil will be appropriately disposed of at a licenced landfill. The likelihood of disturbing relics is minimal (see Section 5.2.4 further in this report) and there are no impacts to the natural environment arising. 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 site where the car park is proposed to be constructed 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. See also the Geotechnical Investigation report accompanying this application.	Yes

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Figure 11 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.

As discussed previously in this report, pursuant to clause 35(9) of the Education SEPP the provisions of Warringah Development Control Plan 2011 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 shows the former 33 Consul Road portion of the site as being subject to a 900mm side boundary setback. A minor variation to the 900mm minimum is proposed for the northern and southern boundaries to accommodate the proposed car park (600mm and 660mm proposed respectively), this is discussed in further detail below. Overall, the minor variation is considered acceptable considering there are no buildings/structures proposed. The proposal satisfies the objectives of clause B5 (see below at the end of this Table).	Yes – consistent with clause objectives. See further discussion below
B7 – Front boundary Setback	The 6m setback required by this clause is provided by the proposed car park development on the former 33 Consul Road portion of the site. The setback area is proposed to be landscaped with soft landscape elements. Please refer to Section 5.2.7 further in this report.	Yes
Part C – Sitting Factors		
C2 – Traffic, Access and Safety	A detailed Traffic Impact Assessment prepared by GTA Consultants accompanies this report. The report demonstrates that the proposed development incorporates appropriate measures to minimise traffic impacts within the locality. The proposal also provides adequate off-street parking for the proposed numbers of student and staff whilst not creating any visual impacts on the locality or streetscapes. The objectives of clause C2, C3 and C3(A) are considered to be satisfied. Please see Section 5.2.11 further in this report.	Yes – consistent with clause objectives. See further discussion in this report
C3 – Parking Facilities		
C3(A) – Bicycle and		

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Table 2 Assessment against Relevant Provisions of DCP		
Provision	Assessment	Consistent
End of Trip facilities		
C4 – Stormwater	Please refer to Section 5.2.2 of this report.	Yes
C5 – Erosion and Sedimentation	Please refer to the Erosion and Sediment control plans prepared by Core Project Consultants which accompanies this report.	Yes
C6 – Building over or adjacent to Constructed Council Drainage Easements	Please refer to Section 5.2.2 of this report.	Yes
C7 – Excavation and landfill.	Please refer to the clause 6.2 assessment in Table 1 previously. 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		

B5 Side Boundary Setbacks

As discussed in **Table 2** above, a minor variation to the 900mm side boundary setback provision is proposed for the northern and southern boundaries of the former 33 Consul Road portion of the site (600mm and 660mm proposed respectively) where the at-grade car park is proposed to be constructed (see circled in blue at **Figure 12** below).

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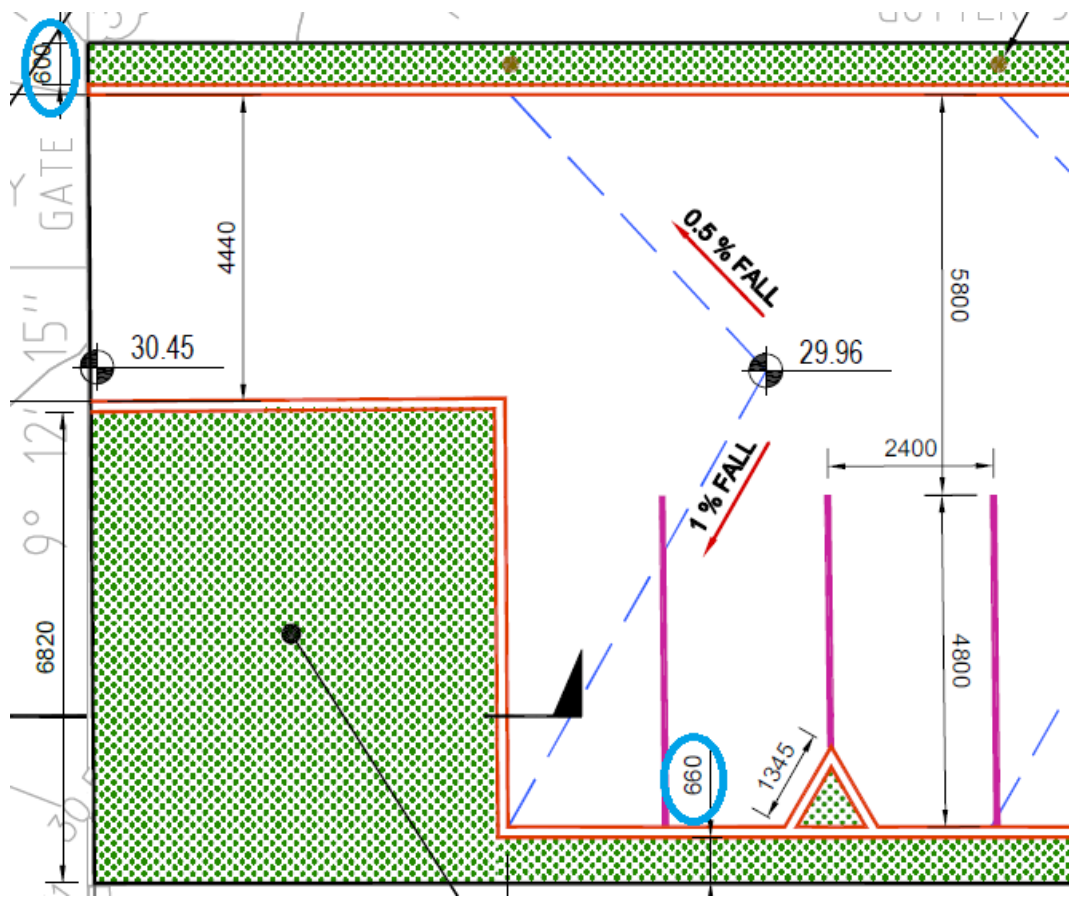


Figure 12 Side setback proposed outlined in blue – extract from plans prepared by Core Project Consulting

As can be seen, the proposed setbacks of 600mm to the northern boundary and 660mm to the southern boundary are minor shortfalls of 300mm for the northern boundary and 240mm for the southern boundary. The proposed at-grade car park and its minor side boundary setback shortfall is considered to create minimal impacts and satisfy the objectives of clause B5 as discussed below:

'To provide opportunities for deep soil landscape areas.'

Assessment: The proposal includes landscape setbacks. Please refer to the landscape design prepared by Core Project Consulting which accompanies this report. The landscaping proposed is considered to 'soften' the proposed car park and integrate the development proposal into the residential character of the locality.

'To ensure that development does not become visually dominant.'

Assessment: As no structures are proposed and the car parking will be provided/screened with high-quality landscaping, the development will not be visually prominent and will not dominate the locality.

'To ensure that the scale and bulk of buildings is minimised.'

Assessment: With no structures proposed, there are no bulk and scale related impacts.

'To provide adequate separation between buildings to ensure a reasonable level of privacy, amenity and solar access is maintained.'

Assessment: As no buildings or structures are proposed there are minimal privacy, amenity and solar access impacts arising. Staff will park in the proposed new car park during normal school hours with use of the car park generally limited to school days only. See also **Section 5.2** further in this report.

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'To provide reasonable sharing of views to and from public and private properties.'

Assessment: As discussed in **Section 5.2** further in this report, there is no view loss arising from the proposed development.

As can be seen, the proposed development satisfies the objectives of B5 of the DCP.

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 (some of which have been discussed throughout this report). Flexibility to accommodate additional students is required in order to ensure the best level of education for students can be delivered.

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 1,500 is considered acceptable as the School has sufficient operational and environmental capacity to accommodate the increase in student numbers. 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

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parking will be provided. The School's existing infrastructure (buildings, outdoor space/playground space) provides sufficient capacity to accommodate the additional 300 students proposed as part of this DA.

5.2.1 Natural Environment

There will be minimal impacts arising on the natural environment. The proposed car park is to be constructed on a cleared site, free of any vegetation or potential fauna habitat and no tree removal is required. The balance of proposed parking spaces are to be located on existing hardstand areas throughout the School's campus/properties.

5.2.2 Stormwater Management

Detailed civil and stormwater designs prepared by Core Project Consultants, dated 12/09/2020 accompany this report. Surface water run-off from the proposed car park will be collected via a proposed stormwater pits at its eastern end. Stormwater will then be conveyed to a silt arrestor and into an on-site detention (OSD) tank. The system will connect to Council's stormwater infrastructure via an existing stormwater pit on the north-eastern corner of the site.

An easement to drain water traverses through the very north-eastern corner of the site (overland flow). The at-grade car park and its stormwater management system has been designed in consideration of the easement by a qualified professional Engineer (Core Project Consultants) and has addressed/considered the requirements of the existing report Overland Flow Assessment, prepared by Cardno, dated 4 July 2018 which accompanies this report.

5.2.3 Air Quality

Some dust is anticipated during the construction period, this impact however 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.

5.2.4 Aboriginal Cultural Heritage

The disturbance of relics or any related impacts to Aboriginal Cultural Heritage is considered unlikely in light of the highly disturbed nature of the site and its long-established use for residential accommodation, and now a school. Notwithstanding, during works contractors will follow the latest unexpected finds protocol as per the Biodiversity and Conservation Division of the Department of Planning, Industry and Environment should any relics, artefacts or the like be discovered and/or disturbed.

5.2.5 European and Built Heritage

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, they are identified as:

- *Former Premises relating to Austral Brickworks* – Item of local significance located 90m to the north-west of the site;
- *Brush Box and Camphor Laurel Trees surrounding Brookvale Park* – Item of local significance located opposite the School to the east of the site; and
- *Brookvale Public School* - Item of local significance located 75m to the south of the site

The minor nature of the proposed works which are not visible from any of the above-mentioned local heritage item, will not impact on their significance. In turn the proposal will not have any heritage related impacts.

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5.2.6 Visual and Acoustic Privacy

The at-grade, landscaped car park will not create any adverse visual privacy impacts. Staff will park in the new car park during normal school hours with use of the car park generally limited to school days only. The northern and southern boundaries (side boundaries) of the former 33 Consul Road site are well fenced with timber paling fences, affording privacy to the existing dwellings located on 31 and 35 Consul Road. Landscaping elements proposed will also assist with providing visual screening, particularly on the southern boundary.

The proposed development will provide for new on-site parking which will have peak periods of use i.e. cars enter and park in daylight hours prior to the commencement of school and leave at the end of the school day. These vehicular movements are limited to certain times of the day and the additional car parking spaces distributed across the School campus will not create a significant impact of the current levels of acoustic privacy enjoyed by residents of the locality.

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.

Overall, the student population increase, is not anticipated to result in a significant change in terms of acoustic impacts in the locality.

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

Overall, it is considered that acoustic privacy for neighbouring potentially sensitive receptors will not be adversely affected.

5.2.7 Neighbourhood and Landscape Character

The only works associated with the proposed development is the at-grade car park, to be located on a currently vacant portion of the site formerly known as 33 Consul Road. With no structures proposed and the setbacks areas to be landscaped, the proposal will make a visual contribution overall to the Consul Road streetscape. **Figure 13** below provides an extract from the Landscape Design prepared by Core Project Consulting. A Landscape Statement from the designer also accompanies this application.

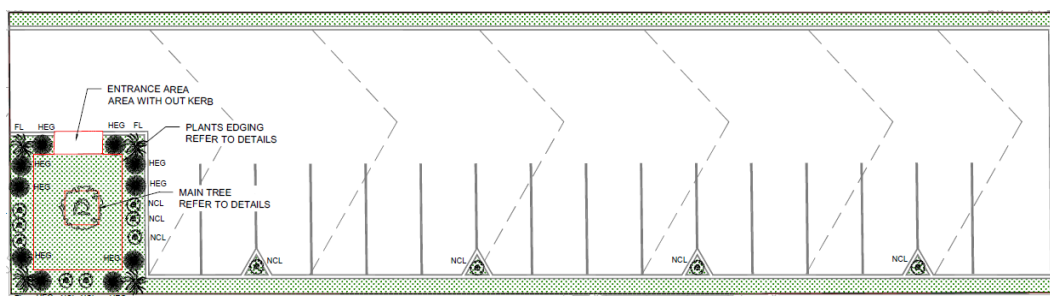


Figure 13 Landscape plan extract

The generous 6m front setback, with its mature soft elements and grassed area will specifically complement the landscape and residential character of the locality. A *Tristaniopisi Laurina* (Water Gum) (example in **Figure 14** below) is proposed as the 'main tree' for the front setback.

The evergreen Water Gum will be a key landscape feature of the site, complementing the semi-formal residential landscape setting of Consul Road which contains a variety of native

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and exotic species of varying scale. Street trees are typically native however a mix of native and exotic species (such as pines, formal/maintained hedges and palms) can be found in adjoining and nearby allotments.

The Water Gum will provide good shade from the westerly sun and will act as a visual screen, providing filtered views across the car park into the School. The tree combined with lower scale (500mm maximum height), low water use evergreen/semi-evergreen perennials will be a welcomed addition to the landscape setting of Consul Road, providing visual interest across the site and streetscape without adverse impact to adjoining land.

The southern side of the car park is provided with four (4) landscaping 'bays' to further soften the car park's visual appearance. The bays will be provided with 'Nodding Chocolate Lilies' which have a 500mm x 500mm height and spread. The side setback areas (northern and southern boundaries) will be provided with turf/grass, this allows for a soft element within the setbacks which can be easily maintained without being impacted by vehicles within the car park.

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Figure 14 Water Gum. Source: Sheet C301, Landscape Design by Core Project Consulting

5.2.8 Lighting

Light bollards are proposed within the northern boundary setback. These lights will provide opportunity for increased passive surveillance and security (particular in winter months with less daylight hours) and will be placed on a timer to ensure there is a sustainable approach to energy use and no light spill impacts within the locality. An example of the type of light bollard to be used is provided below in **Figure 15**.

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Figure 15 Example of lighting bollards to be installed

5.2.9 Solar Access

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

5.2.10 Views

There are no prominent views or vistas in the locality which will be compromised by the proposal.

5.2.11 Traffic and Parking

A detailed Traffic Impact Assessment (TIA) prepared by GTA Consultants dated, 9 October 2020 accompanies this report. The TIA has analysed the existing traffic and parking conditions of the site and the surrounding road network. This analysis also includes consideration of the School's approved student cap (1,200 students), its current student population (approximately 1,400), proposed student population (1,500) and staff numbers connected with these student numbers. Key points from the TIA's detailed parking and traffic assessment are provided below.

Traffic

An traffic generation assessment has been completed based on staff and student travel patterns to understand the likely change in traffic generation for the School 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 approximate 1,400 students to 1,500 students.

The traffic impact of the proposed increase in student population from existing has been assessed using SIDRA. Overall, the TIA has found that the surrounding road network is currently operating satisfactorily and is generally expected to continue to operate satisfactorily following the proposed increase of student enrolments to 1,500 students.

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Parking

As previously discussed, the proposed development will increase on-site parking provided by the School from 106 spaces to 137 spaces. The proposed parking layout can be found in Appendix D of the TIA (as also seen previously in **Figure 10** of this report).

The car parking requirements for different development types as per the DCP requires educational establishments provide parking at a rate of one space per staff member in attendance. Based on 150 full time equivalent (FTE) staff numbers at the School, this results in a requirement of 150 parking spaces. This provision is considered highly conservative, mostly due to the knowledge that 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 an assessment has been completed based on the typical staff travel patterns (based on a travel questionnaire survey). Approximately 90% of staff drive to/from the School. Based on the 150 FTE staff, this equates to a requirement of only 135 parking spaces being required.

The proposed development increases the on-site parking supply from 106 spaces to 137 spaces. This includes two accessible spaces and exceeds the expected parking demand of 135 spaces. In addition, three (3) motorcycle parking spaces will be provided in the main Gulliver Street car park to better reflect the known parking demands for the School. Comparatively, the prior Parking and Traffic Review Report completed by Brown Consulting in 2013 (submitted as part of DA2013/1336) indicated the current approval considers a parking provision of 106 spaces based on an anticipated parking demand of 109 spaces. This represented a technical shortfall of three (3) spaces. The proposed 137 on-site parking spaces would deliver a surplus of two (2) spaces based on the expected demand while also adding motorcycle parking. Overall, the proposal represents a definitive improvement over the approved operational conditions.

While some students are licensed and have the ability to drive, students will be encouraged and managed 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. Notwithstanding, if students do drive, there is adequate capacity along the frontage streets to accommodate the minor demand. Please also refer to section 2.6 of the TIA which provides details of on-street parking supply and demand, including an on-street parking plan showing parking restrictions.

Student Pick-Up and Drop-Off Management

The School is serviced by three set-down/pick-up areas. There are two 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 College grounds and immediately north of the main car park with access 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 informally over a trial period through consultation with Council. The trial period involved reserving the on-street parking spaces adjacent to the administration building during the peak school arrival and departure times, with this zone managed by staff.

Please refer to Appendix B of the TIA which provides an extract of Minutes of the Northern Beaches Council Local Traffic Committee Meeting, where the 'no parking' zone was approved. Appendix C shows a plan of the 'No Parking' zone and its signage.

The on-site set-down/pick-up area with access via Gulliver Street can facilitate seven (7) vehicles at any one time. It is managed and operates well, with additional storage for around

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eight vehicles within the car park and on College grounds on approach to the area. This main College set-down/pick-up area also shows signs of constraint with respect to queuing back onto Gulliver Street (and to a lesser extent Consul Road). As is typical of schools across Sydney, the key 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). With the Alfred Road set-down/ pick-up formally adopted by Council, and with improved College communication and day to day management, the balance of set-down/ pick-up activity will be able to be better managed across the College. This will limit queuing on Gulliver Street and hence, reduce impacts on through traffic unrelated to the College, and local residents generally.

A Traffic and Parking Management Plan (TPMP) prepared by GTA Consultants, dated 13 October 2020 which is proposed to be implemented can be found accompanying this report. The TPMP provides further specific information on the School's procedures for student pick-up and drop-off management, including but not limited to:

- Bus management
- Car pick-up and drop-off; and
- Traffic Wardens.

Overall, student pick-up and drop-off management is considered to be adequately managed and addressed by the School.

Construction Traffic Management

At this time, it is difficult to prepare a detailed Construction Traffic Management plan without input from the principal building contractor. As such, once the principal building contractor for the proposed development is appointed, a comprehensive final CTMP will be prepared which will incorporate the builders preferred operational methods.

Notwithstanding, section 5.4 of the TIA provides a summary of the initiatives and principles which will be adopted in the preparation of the future CTMP. Generally, the future 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/ from 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. The TCPs primarily show where construction signage will be located (such as uncontrolled intersections) along the approved truck routes to warn other road users of the increase in construction vehicle movements.

Conditions of any subsequent consent are able to enforce the preparation of the CTMP in accordance with the TIAs principles and recommendations. The CTMP will form part of any future Construction Certificate documentation when submitted to a certifying authority for approval.

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TIA Conclusion

The following is an extract from the conclusion of the TIA:

'To accommodate the increase in students, the College seeks to improve existing parking and traffic conditions both internal to the College and on the surrounding streets. This can be achieved through the following measures:

1. *A DA is to be lodged seeking to increase the student enrolment from the currently approved 1,200 students to 1,500 students at St Augustine's College Brookvale.*
2. *Providing additional and dedicated on-site parking for use by College staff only to achieve a total supply of 137 spaces. This will be realised by:*
 - *constructing a new 16-space formal car park at 33 Consul Road*
 - *linemarking additional on-site spaces*
 - *implementing and updated Plan of Management for the College.*
 - *Managing four parking spaces within the existing undercroft staff car park to improve capacity and alleviate constraints associated with the previous approval.*
 - *Implementing the approved formal 37 metre long no parking zone between 8am and 9am, and between 3pm and 4pm school days along the Alfred Road frontage. This will allow improved management measures to be implemented and to better distribute set-down/ pick-up demand across the College.*
 - *Providing three dedicated on-site motorcycle spaces, where none are currently provided.*
 - *Delivering an improved communication strategy to ensure parents/ carers arrive and depart the College in the correct manner (general anti-clockwise circulation around the College) when dropping-off/picking-up to improve traffic flow efficiency, balance the effects and limit impacts on through traffic and local residents.*
3. *The travel survey was completed by College staff and students to understand existing travel patterns and to forecast the likely parking and transport impacts of the proposal.*
4. *The proposal is expected to generate a parking demand of 135 parking spaces, with this demand associated with the 150 FTE staff.*
5. *The College proposes to increase the on-site parking supply from 106 spaces to 137 spaces. This exceeds the demand for 135 spaces by four spaces and represents a distinct improvement when compared with the existing approval (undersupply of three spaces).*
6. *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.*
7. *The proposed 33 Consul Road car park is designed as a Class 1A car park with setbacks for landscaping and a turnaround bay at the eastern end.*
8. *The proposal will not increase loading demands, with existing delivery arrangements via the administration building on Alfred Street to be maintained.*
9. *It is recommended that 40 bicycle parking spaces be provided on-site to meet anticipated demand, while also allowing for additional capacity for any increase in demand as a result of ongoing green travel initiatives that continue to be implemented by the College*
10. *The proposal for 1,500 students is expected to generate an additional 97 vehicle trips in any peak hour from the existing approval, and an additional 23 vehicle trips compared to current conditions.*
11. *There is adequate capacity in the surrounding road network to cater for the traffic generated by the additional students, with SIDRA modelling results indicating negligible differences to intersection operation from current conditions.*
12. *SIDRA modelling results for the 1,500 students is also consistent with the conclusions outlined in the Parking and Traffic Review (Brown Consulting, 2013) prepared for the previously approved 1,200 students.*

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13. Overall, the proposal to increase the student enrolment to 1,500 students can be supported from a transport perspective.
14. Construction traffic impacts would be minor, limited to the construction of the new car park at 33 Consul Road, and readily managed on the adjacent road network. A detailed Construction Traffic Management Plan would be prepared by the appointed contractor.'

Accordingly, the proposed development is considered to be supportable from a transport, traffic and parking impact perspective.

5.2.12 Construction Management

As with the CTMP discussed in **Section 5.2.11** above, it is difficult to prepare a detailed Construction Management Plan without input from the principal building contractor. As such, once the principal building contractor for the proposed development is appointed, a comprehensive final construction management plan (CMP) will be prepared which will incorporate the builders preferred operational methods and all environmental site management requirements, including but not limited to:

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

The final CMP will form part of any future Construction Certificate documentation when submitted to a certifying authority for approval. Conditions of any subsequent consent can also enforce this requirement.

5.2.13 Waste Management

Please refer to the 'Waste Management Plan (Construction and Demolition)' prepared by Core Project Consultants which accompanies this report. Please also refer to the waste management sheet in the Civil drawings prepared by Core Project Consulting which accompanies this report.

5.2.14 Economic Impact

During construction, the proposal will provide for construction industry employment which will result in a local economic benefit during the construction period.

Due to changes in the demographics of the Northern Beaches Local Government Area (LGA) over the past 2-3 years and changing parental preferences, there has been a subsequent increased demand for independent schools which has driven demand for places at St Augustine's College. Upon completion of the proposed development, the School will be able 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.

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5.2.15 Social Impacts

The improvements to St Augustine's College provide for a positive social impact within the area and more broadly across the Northern Beaches LGA. Increasing student numbers contributes to a high-quality and more accessible spread of education services across the LGA. The development proposal is seen to also respect and enhance the character of the area and will not impact on the quality of life for residents surrounding the site or in nearby residential precincts.

5.2.16 Crime and Safety

Crime Prevention through Environmental Design (CPTED) is a recognised model which provides that if development is appropriately designed it can reduce the likelihood of crimes being committed. By introducing CPTED measures within the design of the car park development, it is anticipated that 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, the development has frontage to Consul Road with direct surveillance from the public domain and surrounding residential land uses. Low level garden lighting will also increase surveillance and deter untoward behaviour in the car parking in evening hours. Security patrols by the schools preferred security contractor after school hours will also provide for 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 point. After school hours, access to the site 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 park will be occupied. After hours and during school holiday periods, the car park access will be secured with 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 school itself; the school employs a property maintenance staff and accordingly, any repairs and maintenance required on site occurs promptly when needed. The proposed works will assist in greatly improving the presentation of the premise (particularly when viewed from Consul Road), which will improve the amenity, casual surveillance and ultimately public safety and sense of security within the site and surrounding area.

5.3 Suitability of the Site for Development

In the assessment of site suitability, there are two (2) key questions to consider:

- *Does the proposal fit within the locality?*
- *Are the sites attributes conducive to the proposed development?*

These questions are considered and discussed below.

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Does the proposal fit within the locality?

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

As the only works proposed are an at-grade car park, potential overshadowing, acoustic and privacy impacts resulting from the proposal are considered to be non-existent or minimal at worst, as such the current level of amenity enjoyed by neighbouring land is considered to be maintained.

The development is considered to respect and enhance the residential character of the area by significantly improving the site’s contribution to Consul Road streetscape with the introduction of soft landscape elements which will screen the car park.

Overall, there will not be any reduction in the development potential of surrounding properties as a result of the proposal.

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

As addressed above and throughout this report, the proposed development’s improvements to the former 33 Consul Road allotment will significantly improve the site’s appearance in the Consul Road streetscape. The proposed landscaping will soften the appearance of the car park and contribute to the residential amenity of the locality.

Are the site’s attributes conducive to the proposed development?

The site is able to physically cater for the proposed development without detriment to the natural or built environment. The site is not subject to natural hazards or acid sulfate soils, with all relevant essential services and infrastructure existing and/or available to the site as required. The site’s attributes are therefore considered to be conducive to accommodating the proposed development.

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 School's current approved student population of 1,200 students to 1,500 students;
- Construct a new 15 space, at-grade car park with associated landscaping; and
- Identify (line marking) additional car parking spaces throughout the School, creating a total of 137 spaces on the site.

Increasing the School's student population to 1,500 students allows for St Augustine's College to address education demands in the LGA and provide additional student places for families within the Northern Beaches. The additional car parking proposed addresses Council's parking requirements, with transport and traffic analysis confirming the additional students and staff will not impact on the surrounding road network.

The proposed at-grade car park development (with its landscaped elements) will result in a positive visual outcome for the area through development of the currently vacant former 33 Consul Road site. The proposal also has been designed to maintain the residential amenity of the locality without any significant impact arising on adjoining land whilst contributing to the streetscape.

Overall, the proposal has been assessed against relevant environmental planning instruments where it has been found to be generally consistent with applicable provisions and their objectives. On balance, the potential adverse environmental planning impacts arising are considered to be minimal and outweighed by the positive social and economic impacts which will result in the locality and the LGA. This in turn translates to a development which is on balance considered to be in the public interest.

Accordingly, it is considered that the development is acceptable on environmental, social and economic grounds and to this end, Council's favourable consideration of the application is warranted.