

Northern Beaches Local Planning Panel

DA 2019/1420 6&8 Wyatt Ave Belrose
Alterations and Additions to John Colet School
Panel Meeting 14 April 2021 Item 3.3

Thank you for the opportunity to provide another submission objecting to proposal DA2019/1420 from John Colet School I do not feel that issues I have raised in previous submissions have been adequately assessed, and in some cases not at all.

1. The proposal is still inconsistent with the Desired Future Character statement and low impact, low intensity uses. The applicant argues that because the school is an existing use, continual expansion will have negligible impact. Over the years, the adding of large bulky buildings, traffic, parking, and additional students has most definitely had an impact on the site, the street, and the amenity of residents and will continue to do so with further expansion.

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.

2. It is incumbent on the applicant to demonstrate how the development complies with planning controls. This has not been done. There is no justification given for non-compliance with setbacks and height controls. There is no reason for an 11m tall building to come within 5m of the western boundary.
3. The applicant has a history of non-compliance with previous consent conditions relating to environmental management, landscaping, parking and unapproved site structures. These issues should be addressed before further development is permitted. These non-compliances have been extensively detailed in previous submissions.
4. **Parking.** Plans continue to show that staff parking cannot be accommodated in the school grounds as is required under previous consent conditions. 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 demonstrating compliance with relevant Australian standards and fixing other issues of safety. This has not been achieved.
 - The applicant has submitted two conflicting parking plans.
 - One parking plan is in the Letter of Advice from McLaren Traffic Engineers (15 April 2020). This shows 25 car spaces and a gravel car park at the rear of the school. 25 spaces are inadequate to provide one space per staff member in attendance. The school currently has 48 staff (from My Schools website) and 33.8 equivalent fulltime staff, requiring 34 car spaces. Even more spaces will presumably be needed in future.
 - The latest revision of the architect's masterplan (JC/IN-DA/DWG 1000 Rev G) dated 2/12/20 shows the old parking plan with 30 parking spaces. The stacked spaces numbered 3-8 and 25-30 are 5m long. These were refused by council previously. There is no passing bay as required.
 - JC/IN-DA/DWG 1000 REV G shows a rear netball court that is also a car park. When the court is in use, the staff vehicles must be moved to alternative locations. Alternative spaces 16, 17, 18 and 19 will be blocking or impeding vehicle access along the one-way, internal road. Alternative spaces 20 and 21 are encroaching on the bushland edge. Vehicles in spaces 15 and 23 will not be a safe distance from the netball court when in use.
 - Parking spaces 9-12 are in the 10m setback area on the eastern boundary. There is no recognition of this non-compliance in Council's assessment report.

- Condition 1(b), which arose from the independent panel hearing in November 2020, is unenforceable, as without navigable and adequate on-site parking, staff will continue to park on the street in front of residents' homes.
5. The **Open Space Management Plan** submitted for DA2015/0558, is obsolete. This was a requirement of the 2015 masterplan, to demonstrate how the school was providing for the outdoor needs of students. A new plan is needed to show the changes made to outdoor play areas. The grassed areas "Top House Playground" and "Top House Learning Area" are now a paved 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. The school relies on use of Wyatt Reserve during and after school hours. These times have recently changed (e.g. the school now has use of the entire reserve until 5pm on Tuesdays). A previous Consent Condition requires the school to review and adapt the OSMP whenever changes occur. This has either not been done, or not made available for comment with new applications.
 6. **Landscape Plan.**
 - The amended landscape plans do not comply with the 2015 consent conditions regarding plant species and provenance, nor does the plan recognise the referral response from Council's Biodiversity Officers regarding species selection to prevent compromise of the endangered *Grevillea caleyi*.
 - Over 40 native canopy trees were approved for clearing in Stage 1 with the provision that the loss would be offset with replacements in later stages of the masterplan. This has not happened, and the number of promised replacement trees has continued to decline with each new amendment.
 - The proposed 16 replacement eucalypts have been substituted with exotics and non-eucalypt species. This is not an acceptable outcome for a high conservation area, given that more than half of the site's endangered vegetation has already been cleared since 2000.
 7. **Bushland.** Under local planning controls, 50% of the site is to be retained as bushland or landscaped with local native species. This does not include grassed or playground areas. The site has well below this figure, despite claims to the contrary and council's assessment of "51%" (an increase that is not possible). The percentage of vegetation needs to be ground-truthed and measured on site as aerial photographs are deceptive and it is not possible to see cleared areas beneath canopy trees. Previous plans also showed silly areas that did not qualify, such as a driveway hedge, a bin bay etc.
 8. **Student numbers.** The plan to increase the school's buildings is married to the idea of filling them with students; therefore, discussing student capacity is relevant to a discussion of this DA. No consent for 225 students was ever granted by Council, yet this figure has consistently been cited by the applicant as the approved student capacity.
 In 2010 a trial was granted for an increase in student numbers from 150 to 225. The trial was to assess the impact of additional students – at the time the school was operating beyond their 150-student consent, causing considerable disruption to the neighbourhood and daily traffic chaos. An extension to the trial period was granted but no final assessment was ever conducted by Council to grant a permanent increase to student numbers. Instead, the applicant submitted a new DA in 2015, quoting the 225 number as "approved" and requesting increases to 285 up to 350 students. The success of the trial period was never established and an "approved" number of 225 is not a valid base line from which to argue for student increases. The My Schools website shows current student numbers at 230, causing daily disruption and traffic chaos every day.

My family has been dealing with relentless DAs from this applicant for over 20 years. We continue to be adversely affected by the stress of receiving almost annual applications and amendments, often right before Christmas, and the daily disruption to our lives from traffic, vehicles parking over our driveway and the school's daily and after hours use of Wyatt Reserve. The ongoing loss and degradation of the site's unique bushland causes us great distress. This next part of the staged consent has multiple non-compliances. The applicant has not provided compelling reasons for these to be overlooked. The applicant has not demonstrated that this ongoing development of the site and the cumulative impacts, are low impact, low intensity and consistent with the desired future character of the area. I urge the panel to reject this non-compliant application.

Yours Sincerely, Clare McElroy