



13 October 2023

Brent Devine  
Major Projects  
Department of Planning and Environment  
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Dear Mr Devine

**Central Coast Council submission - St Philip's Christian College, Charmhaven (SSD-14082938)**

Thank you for the opportunity to comment on the proposed non-government school, St Phillip's Christian College at Charmhaven. Further to Council's objection dated 2 October 2023, Council provides the following additional concerns in relation to the proposal.

1. It is noted the proposed development includes a one into two lot subdivision. It is unclear how a subdivision can form part of a State Significant development, is necessary for the development of an educational establishment, or consistent with the provisions of Schedule 1(15) of *State Environmental Planning Policy (Planning Systems) 2021*.
2. There appears to be no proper plan of subdivision for the site identifying appropriate easements, particularly access and servicing, and how that will work between both proposed lots. Are rights of access proposed, Asset Protection Zones etc.? If the Department formed the view that subdivision could form part of the application, then an appropriate draft plan of subdivision and associated draft 88B instrument should be submitted for c.
3. If subdivision of the land was accepted by the Department as an appropriate form of development to be accepted as part of an SSD, then the proponent is required to demonstrate satisfactory servicing of both proposed future lots. In this regard, the servicing of the proposed lot that will cater for industrial development has not been demonstrated. Whilst Council considers the existing water and sewer system capacity can cater for the proposed educational establishment, Council has not undertaken an assessment of the capacity of the system to cater for an industrial development and no servicing strategy, as requested, has been provided to Central Coast Water Authority to date.
4. Concern is raised regarding the subdivision of the land being nominated as stage 1A. It is unclear why this would be nominated as being the first stage and notwithstanding, there is no guarantee that once subdivided, the rest of the development would proceed.



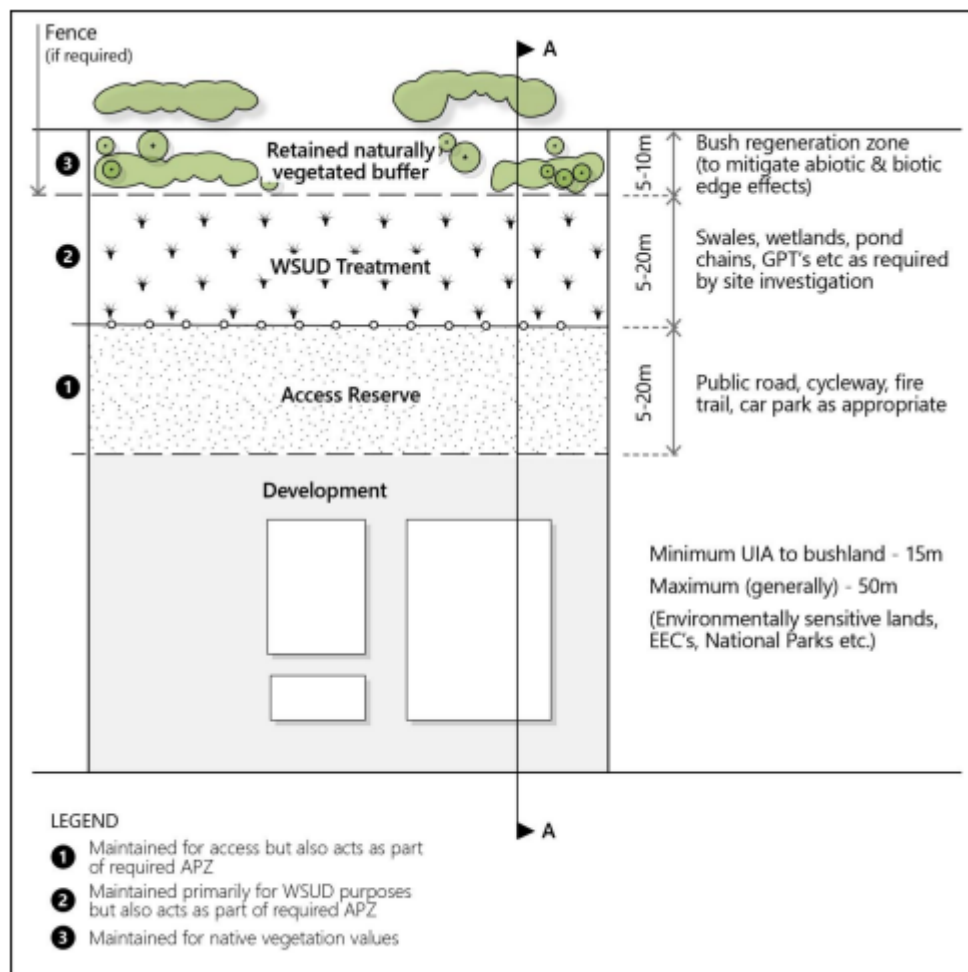
5. The development should be designed having regard for best practice with a focus on avoidable road trauma. It should be noted that school zones are the worst areas for road trauma, especially for younger children (approximately 13 years & under) as they have no spatial awareness, speed distance relationship or understanding of what "danger" really is.
6. The Traffic Impact Report does not include a road safety assessment section as per the requirements of the "Guide to Traffic Generating Development", Austroads Guide to Traffic Engineering Part 12 "Integrated Transport Assessments for Developments".
7. The Traffic Impact Report appears to only report on capacity and Level of Service, nothing about safe intersection performance for "all road users", specifically vulnerable road users (pedestrians and cyclists) and the connectivity for these.
  - a. The provision of a shared path connection for school kids with a bus drop off on the Pacific Highway has the potential to generate uncontrolled pedestrian and cyclist crossing of the Pacific Highway as well as uncontrolled kiss & ride & drop offs by parents/carers, creating significant road safety issues, unless the signalised intersection is constructed.
  - b. If the intersection is constructed it will require full pavement construction due to changes and increases in loads on the current pavement (braking, acceleration, different turning, etc) as well as to accommodate detector loops for signals.
8. It should be noted that there is an absence of any studies that support a rezoning of this site and the broader area, and this development, given its scale, should be subject to additional contributions, which has due regard for the widening of Arizona Road, and other infrastructure required as a result of this development.
9. The location of the eastern road to provide access to an industrial development and by default, to the school site, is questionable in terms of broader strategic plans for the area.
10. The proposed future use of the proposed lot for industrial purposes, next to a school, is not desirable having regard for expected uncontrolled pedestrian and cycling. Crossing of numerous accesses into industrial developments by school children significantly increases road trauma risk, and highlights that these adjoining land use types are not compatible.
11. Without precinct wide studies and investigations, desired outcomes can be compromised due to sometimes incorrect and/or inappropriate assumptions being made. It is also not orderly development.
12. Have any Voluntary Planning Agreements (VPAs) and/or Works in Kind Agreements (WIKAs) been proposed for required works?
13. It is understood that the Arizona Road/Chelmsford Road intersection is proposed to be a "compact" type roundabout made worse by the fenced and protected vegetation on the south-east corner that extends into the existing road reserve. Whilst this intersection is in the

Contributions plan the concept was developed based on a specific priority and predominate traffic movements. This development may considerably alter the proposal.

14. There is no infrastructure to provide for pedestrian and cycle access to the school on any of the adjoining road networks.
15. Depot Road, although not identified for frequent use, will be used as a more direct route by school patrons.
16. Depot Road has the direct access that generates significant movement of heavy vehicles into and out of Council's Charmhaven depot.
17. The creation of a through-road rather than the current no-through road can create increased traffic and road safety issues.
18. Arizona Road, north of the bus depot entry, is not wide enough to safely accommodate the proposed traffic. Additionally, no drainage exists, no shoulders exist, no delineation exist, no street lighting exists and as previously stated, no pedestrian or shared path systems exist.
19. The Arizona Road road pavement will not cater for the increased loads from this development through the construction stage/s and ongoing operation of the school. The pavement will fail creating numerous issues and will need to be reconstructed at Council's expense (as the Roads Authority) which is not considered reasonable.
20. During school operation there will be delays along Arizona Road if the appropriate infrastructure is not in place, and the safety of workers and visitors as well as Vulnerable Road Users is of great concern. Concerns are also raised in relation to the impacts of the construction of the site would have on the road network. It should be noted that Council has received complaints from the local bus companies about delays currently experienced having regard for existing development in the area.
21. The school plans, throughout the 'Concept' design report, appear to be inconsistent, having different intersections at the same locations.
22. The development will impact the operation of the RFS headquarters, and any helicopter movements will significantly disrupt school operations.
23. The Stormwater quality and quantity report/s will need interrogating to confirm correct parameters have been used as even minor differences in some parameters can impact outcomes for both quantity and quality.
  - a. Watercourse crossing (culvert capacity/flooding), water quality - MUSIC, MUSIC-LINK, wetting and drying cycles of receiving areas/vegetation/under bank erosive flows, etc.
  - b. Reuse opportunities for this large site would be significant (irrigation/sports field/s, toilets, landscaping, etc).

24. The traffic report indicates that the upgrade will occur in the year 2027, however there are no details as to how the highway access will be managed prior to the upgrade.
25. Access to the site via Depot Road could generate safety issues given the high number of heavy vehicle and machinery movements into and out of Council's works depot. There is also a significant number of bus movements from the adjoining Busways depot.
26. Arizona Road, between Chelmsford Road and the site access, will require upgrading to accommodate the additional traffic when the school is at full capacity (likely sooner depending on the trigger point).
27. The intersection of Arizona Road and Chelmsford Road will require treatment (most likely roundabout) and will need to cater for significant heavy vehicle movements, including articulated vehicles.
28. The proposal will have a significant impact on the intersection of Pacific Highway and Lake Haven Drive. This intersection already suffers capacity issues in the peaks.
29. The proposal needs to consider walking and cycling facilities external to the site. The traffic report only considers internal issues. The report should be amended in this regard.
30. It is important the Traffic Engineer reviewing the proposal on behalf of the Department considers road safety, in addition to design and traffic. Additionally, a road safety assessment (audit) should be carried out for the proposed development -at assessment stage and not as part of a condition of consent.
31. Concern is raised for the suitability of the site having regard for the scale of the development and the associated site constraints, particularly biodiversity, road, safety, and traffic issues.
32. Consideration should be given to the creation of urban interface areas (UIA), or similar, where the proposed development interfaces with significant vegetation. The objectives of a UIA are as follows:
  - To manage edge effects on retained vegetation
  - To suitably locate bushfire protection and water sensitive urban design (WSUD) infrastructure
  - To provide appropriate access to public lands
  - To provide suitable buffers to retained natural watercourses
  - To improve and simplify ongoing management of retained native vegetation and related maintenance costs

The UIA should be applied with reference to the specific characteristics of the site, type of development proposed, type of adjoining vegetation and the ultimate tenure and purpose of tenure. The below figure shows a plan view of UIA model for development abutting significant vegetation.



**Above: Plan view of UIA model**

The proposed development has not satisfactorily avoided biodiversity impacts on the site, and the threatened species and vegetation integrity has not been adequately assessed in accordance with the *Biodiversity Conservation Act 2016* and the *Biodiversity Conservation Regulation 2017*. There has also been insufficient information submitted in relation to access, road safety, proposed road works, traffic, and the proposed subdivision.

It is considered the proposed subdivision does not trigger SSD requirements and SSD provisions should not be used by default, to subdivide the land. The proposed development fails to consider appropriate design transitions between the educational establishment and future industrial development, nor does it provide a UIA between the development and significant vegetation. In this regard, the proposed development needs to respond more appropriately to the constraints of the site and the locality, and provide greater consideration to the retention of vegetation and the provision of appropriate infrastructure.

The above issues have been brought to the attention of the Department for consideration in the detailed assessment of the proposal. In doing so it is acknowledged that these issues, and any other issues raised by state government agencies or via public submissions, will be duly assessed by the Department in their overall consideration of the application under a merit assessment.

If you have any further enquiries contact Emily Goodworth on 0439 603 850 or at [Emily.goodworth@centralcoast.nsw.gov.au](mailto:Emily.goodworth@centralcoast.nsw.gov.au)

Yours faithfully,



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**DEVELOPMENT ASSESSMENT**

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