



20 August 2025

Andrew Newman
Regional Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street, Parramatta,
NSW 2150
Locked Bag 5022, Parramatta, NSW, 2124

Via email: Andrew Newman andrew.newman@dpie.nsw.gov.au

Dear Sir,

Proposal: **Construction and operation of a new special education school catering for 200 students in Years K-12 including 2 lot subdivision and ancillary civil works.**
Property: **84 Gavenlock Road, Mardi**
Application: **SSD-67173718**

I refer to your letter for Council to review and provide an online submission regarding the proposed Construction and operation of a new special education school catering for 200 students in Years K-12 including 2 lot subdivision and ancillary civil works. Council provides the following in relation to the provided development on the subject development site:

Planning

- The proposed development is to comply with the relevant provisions of the *SEPP (Transport and Infrastructure) 2021*, *SEPP (Resilience and Hazards) 2021* and *SEPP (Biodiversity and Conservation) 2021* that are relevant to this proposal.
- The proposed development is to comply with the provisions of the *Central Coast Local Environmental Plan 2022* and the *Central Coast Development Control Plan 2022*.
- The proposed development requires vehicular access through Keefers Glen from Woodbury Park Drive. Due to the flooding impacts on Woodbury Park Drive, Council raises significant concern that the proposal will not satisfy the provisions of Clause 5.22 of the Central Coast Local Environmental Plan 2022. Please refer to the comments provided by Council's Flooding Engineering below.
- The proposed vehicular access to the development from Keefers Glen is **not supported by Council**, as the intended traffic will have a detrimental impact on the traffic movements and car parking through the existing residential area and impact on the amenity of the existing residents. The proposed vehicular access to the intended development should utilise the



existing vehicular access to the site from Gavenlock Road. Please refer to the comments provided by Council's Traffic Officer below.

Traffic

The applicant seeks vehicular access for passenger vehicles and Buses to the new school via Keefers Glen on the western boundary of the site which is essentially a narrow lane which services 16 residential dwellings. Council does not support this proposal for the following reasons:

- The proposed special needs school will generate considerably higher passenger vehicular movements than other schools of similar size.
- Resident amenity will be severely affected by traffic and parking generated by the proposal.
- Keefers Glen was not constructed to facilitate traffic loading associated with a traffic generating development.
- The western boundary of the site is fully fenced, partly to prevent parents and students accessing the existing school via Keefers Glen.
- The existing intersections in the vicinity of Keefers Glen will not support the swept path of buses.
- All access to the new school is to be provided via the existing driveway on Gavenlock Road.

Flooding

The determining authority being the Department of Planning, Housing and Infrastructure should determine whether the proposed development and the emergency management plan satisfies the provisions of Clauses 5.21 and 5.22 of the *Central Coast Local Environmental Plan 2022*

Water and Sewer

- Water and sewer are available to the land.
- As a two lot subdivision is proposed, separate water services and sewer connection points are required for each new lots.
- Council existing water main is located along Keefers Glen and can be connected for the proposed new school. It is recommended to obtain a Flow and Pressure statement from Council to assist internal hydraulic design.

- An existing Council sewer main is located at the intersection of Keefers Glen and Brickendon Ave. A sewer main extension from Council sewer main will be required for the proposed development. Council sewer manhole G03 would be the point of connection.
- The proponent is required to submit a S305 application under the Water Management Act and obtain a S307 Certificate prior to issue of the Subdivision/Occupation Certificate.
- Water and Sewer Developer Charges will be applicable for the proposed development.

Urban Design

The site with proposed access via Keefers Glen

- The choice of the site is not the issue as there is an existing school on the larger lot that appears to have been there for a significant period of time.
- The issue is that the new school proposes to have access via Keefers Glen. This issue was raised as problematic by Council staff in the pre-DA meetings held with the applicant.
- Keefers Glen is not an appropriate front access street for a school of 200 students with special needs.
- In the existing residential subdivision, there are many cul-de-sacs, laneways and small streets of narrow widths. These have not been designed to take traffic, buses, services and emergency vehicles associated with a school.
- The design report fails to mention the many constraints of the site, particularly the issues associated with having the proposed vehicle access and address to Keefers Glen.

The school is out of character with the existing surrounding residential area

- The existing surrounding residential area is made up of low density housing that is accessed via a network of narrow roads and surrounded by natural vegetation and wetlands.
- The streets and lanes are fairly narrow and have been designed for low traffic volumes for local residential traffic.
- People that have bought into and lived in the area for many years have an expectation that the area will remain the same.
- The proposed school with vehicular access from Keefers Glen is out of character with the existing surrounding residential area.
- If the proposal were to proceed, it will change the character of the local area.

- The road network will need to be widened and strengthened to allow for more and heavier vehicles.
- Private properties will need to be acquired to provide space for bus passing bays, shared paths, on-street parking, and the services required to support such a development.
- The remaining residents may feel that there is just cause for compensation if their homes are devalued because of the change in the local area.

Existing issues with the rear of the school

- The existing school has black open palisade style fencing running along the extent of Keefers Glen.
- During school times there are a significant number of 'P-plate' vehicles parked along the nature strip in front of the fence.
- Clearly there is already an issue with parking within the school for students.
- Keefers Glen is more like a residential laneway for local traffic than a street that is built to supply on-street parking for a large school.
- The existing parking issues with the existing school will only be made worse by the proposed development.

Possible design solutions

- Explore alternative sites for the proposed school, both on private land and on land owned by the Catholic Education system.
- Ensure the selected site can support school vehicular traffic, and that the development will be compatible with the local area.
- Investigate vehicle access to the current site via the existing intersection with Gavenlock Road. Create a defined driveway to the new school past the existing sporting fields.
- Any proposal should provide vegetated buffers and setbacks to surrounding streets and residential development.
- Design entry points to the school that are compatible with the local area and the streetscape, and incorporate familiar materials, colours and finishes.
- Playgrounds should incorporate ramping as well as stairs to provide equitable access for all students. There is adequate space to be clever about integrating the two, instead of ramping being an add-on intervention.

- Vehicular access to service areas and back of house will be required and adequate setbacks with landscaping should be provided to accommodate this.

Issues with the proposed design

- The north-west perspective street view has the appearance of a large Sydney school located on a busy main road.
- Keefers Glen does not have the space required for the shared pathway and substantial street trees and vegetation shown in the perspective.
- The 3-storey building appears imposing to the street and does not relate to the low-scale residential development in the street.
- The vertical stripes in the building visually elongate the development and do nothing to break up the overall bulk and scale of the development.
- The building forms are generally simple rectangular prisms and have little variation to break up the length of buildings. These are particularly visible as the perimeter of the development is generally surrounded by vehicle access driveways without sufficient room for landscaping.
- The internal elevations have first level walkways of 'steel framed screen/ balustrade with mesh infill'. This choice of materials seems quite heavy-handed and could be likened to something used in a correctional facility, or on a bridge to prevent antisocial behaviour.

Could there be consideration of an alternative more friendly solution, for example using colour or more natural looking materials in selected areas.

- The overall design requires more consideration of the visual impacts of the development. Further refinement needs to occur in the building modulation, façade differentiation and resolution, as well as understanding the effects of the choices of colours and materials both on the streetscape and internally within the development.

In view of the above considerations, Council objects to the proposed vehicular access to the development from Keefers Glen. Council does not support this aspect of the proposed development, as the intended traffic will have a detrimental impact on the traffic movements and car parking through the existing residential area and impact on the amenity of the existing residents. The proposed vehicular access to the intended development should utilise the existing vehicular access to the site from Gavenlock Road.



Once the above matter has been addressed by the applicant and before the determining authority grants consent, conditions should be obtained by Council which are to be placed on any consent that is granted.

Please note this preliminary submission has been provided by Councils technical staff and further comments may be provided once the proposal has been reviewed by Councils Development Engineer and Councils Environment & Planning Committee.

Should you have any questions please contact Council's Principal Planner Ross Edwards on 0437 628 027 or via email ross.edwards@centralcoast.nsw.gov.au

Regards

A handwritten signature in black ink, appearing to read "Antonia Stuart".

Antonia Stuart

Section Manager

DEVELOPMENT ASSESSMENT

