

**Application number**

SSD-14082938

**Subject**

St Philip's Christian College, Charmhaven

**Date**

28 September 2023

**From**

Dr. M.D. Kibby

221 Tall Timbers Rd., Kingfisher Shores, 2259

Please accept this submission as my comment on the proposal by St Philip's Christian Education Foundation Ltd to develop a new school in Arizona Road, Charmhaven (Lot 2 DP 809106).

**Context**

As a carer with Wildlife ARC, member of Central Coast Birders, Landcare volunteer, and nature photographer living near Charmhaven, I have an interest in the impact of this development on the ecology of the area.

**The school**

I am unable to comment on the need for a new Christian School in the area although as an educator with fifty years' experience I know that choice is important to parents, however that experience also leads me to question the site's fitness for purpose with the potential for chemical contamination from the adjoining Rural Fire Service Depot, and ongoing noise pollution from helicopter activity.

**The proposal**

The Environmental Impact Study and its appendices is self-serving in that it describes major issues with no elaboration and then either ignores or disregards their significance. Feel-good language is used to promote a specious sense of well-being while hiding the detail of the proposal. The report is a box-ticking exercise prepared by outside consultants on behalf of developers.

## Issues of concern

The road access from the Pacific Highway cuts the C2 section of the lot into two, creating smaller sections and increasing the fragmentation of the site. The negative effects of habitat fragmentation are well documented, contributing to population decline, biodiversity loss, and alteration of community structure and ecosystem functioning. A specific example is the way that Noisy Miners form colonies and dominate eucalypts adjacent to open space such as roadways, driving out other species. The road will also create a traffic hazard, not only for birds and wildlife, but for children using the planned walking/cross country track. Sufficient access from the Pacific Highway can be provided by an eco-friendly footpath/cycleway.

Ten koala-use trees were identified on the site within the area of vegetation to be removed as part of the development, and a koala assessment report found no koalas during the period of the survey. Removing koala-use trees without replacing them is contrary to the Central Coast Council's Koala Project which seeks to preserve and extend koala habitat on the coast. The tree species being removed should, at the very least, be replanted elsewhere on the site.

Significant environmental issues need to be managed in construction and operation. The proposal acknowledges that the site contains significant numbers of the vulnerable Charmhaven Apple (*Angophora inopina*). It also recognises that the habitat is likely to contain other rare and vulnerable plants, but there is no specific detail on how these will be protected during the building phase and beyond. Mr. Boris Branwhite of Wyong Terrestrial Orchid Research has recorded a number of rare orchids on the site including the Wyong midge orchid (*Genoplesium insigne*), of which only fifty plants survive in four small areas between Chain Valley Bay and Wyong. It will require expert identification and management to ensure vulnerable plants are protected.

The site has been identified as a Swift Parrot Important Area, and the squirrel glider has been recorded adjacent to the proposal site. The swift parrot is listed as critically endangered nationally. Squirrel gliders are listed as vulnerable in NSW. The major threat facing both species is habitat loss and fragmentation from clearing, aging and dieback of foraging and nesting sites. Keeping a few favoured trees near to school buildings will do nothing to save these species. An ongoing program to maintain a significantly large area of suitable vegetation is required.

The spring-fed creek system is an important part of the habitat, and following on from the need to avoid fragmentation, the riparian zone should be included in the C2 zone and afforded rehabilitation, protection, and strategic management.

The area has been used for non-destructive recreation by the community. As part of the Central Coast Council's commitment to green zones throughout urban areas, the eastern part of the site should allow for the public to walk, birdwatch, and otherwise enjoy the bushland on the C2 zoned section of the site.

## Conclusion

My blue-sky preference would be for no development to take place, the area to be rehabilitated, fenced, and policed, pedestrian amenities provided, and the ecosystems monitored with respect to the rare and endangered species. However, it is acknowledged that parts of the area are highly degraded and fencing and signage have not eliminated the causal illegal use by off-road vehicles, dumping of household and building rubbish, burning of vehicles, and firewood collection. Significant resources would be required to manage the conservation values of the block.

**It is essential that the area from the Pacific Highway to and including the riparian zone, is rehabilitated, protected, and made available for non-destructive recreational activities.**

This could be achieved through a Biodiversity Stewardship Agreement - a legal agreement between a landholder and the government that aims to conserve and manage biodiversity on private land. A BSA would protect and enhance the biodiversity of the block in perpetuity and generate biodiversity credits to offset the impact of the development and the costs of conservation.