

6 October 2023

Karen Harragon
Director - Social and infrastructure Assessments
Department of Planning and Environment (DPE)
Locked Bag 5022 or 4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2124

Subject: Objection to proposed school: St Philip's Christian College, Charmhaven (SSID-14082938)

Dear Karen,

On behalf of Busways, I am writing to strongly oppose the proposed school near our Charmhaven bus depot located at 40 Arizona Rd, Charmhaven. We believe that this school project will have a significant and detrimental impact on the operations of our bus routes that serve the Central Coast area. To provide a clear understanding of our stance, the proposed school raises several concerns related to the roads that are essential for our bus services to operate efficiently.

Our objections are based on the information provided in the Traffic Impact Assessment (TIA) dated 8 December 2022. The TIA identifies several roads that will be affected by the proposed school, which include Pacific Highway, Arizona Road, Jetty Avenue, Chelmsford Road, Lake Haven Drive, and Hakone Road. According to the TIA, both Pacific Highway and Lake Haven Drive are already experiencing congestion due to the current volume of vehicles. This observation is further corroborated by feedback from our bus drivers who traverse these roads daily. Currently, the Peak Vehicle Requirement operating from our depot is:

1. Weekdays: AM 49 and PM 49.
2. Weekends (excluding Sunday): 13

One prime example of an adversely affected service due to the proposed development is Route 79. This particular bus route currently operates on a tight schedule, and any additional bottlenecks or delays arising from the proposed project will only exacerbate the existing challenges. Such disruptions may necessitate that we submit an application to Transport for New South Wales for an extension of time to maintain adherence to the timetable. However, this is far from an ideal solution and could potentially disrupt the quality of service provided to our passengers.

Moreover, it's crucial to note that our drivers rely on efficient routes to ensure they have adequate time for their meal breaks and to reach our depot at the end of their shifts. Delays in departing from the depot can have a detrimental impact on the initial performance of a shift, potentially leading to non-compliance with our contractual obligations and, subsequently, the imposition of fines. This underscores the importance of addressing the concerns surrounding the proposed development and its potential consequences on our operations and service commitments.

Another significant area of concern pertains to the proposed bus bay arrangement along Arizona Road, as depicted in section 3.6 "Bus Zones" of the submitted TIA. We wish to emphasize our apprehensions regarding both safety and operational efficiency associated with this proposed bus bay, and they are further



elaborated in the below points. Our concerns are primarily rooted in our firsthand experience with other schools that have implemented a similar bus bay system, based on the diagram provided in the TIA.

1. For students to board buses on the outer row (closest to Arizona Road), they would be crossing in front of the bus parked in the inner bay. This causes unnecessary risk for the students and an unnecessary supervisory duty for the teacher on bus duty. To eliminate the risk, we suggest that there should be only 1 row of buses and fencing along the road curb, except where the students board the bus
2. In the proposed arrangement it forces the scenario where buses in either row would be required to wait for the first bus, in front, to move. If this bus is waiting for late arriving students all buses are stalled. We suggest eliminating the middle concrete divide to allow the buses to use the right-hand lane to depart from the school. Effectively, the removal of the divide will optimise the flow of traffic in the proposed bus bays.
3. If the above points (1 and 2) are considered, the nominal capacity of 9 buses stated in the TIA is reduced to 4 or 5 buses.

Given the significant concerns outlined above, we earnestly request a comprehensive examination of the potential impact of the proposed development on our operations. We also seek an open and constructive dialogue to proactively address these issues. We are genuinely concerned that without such discussions, our ability to deliver dependable public transportation services to the Central Coast community may be severely compromised by the proposed school.

To help us address our current concerns effectively, we would greatly appreciate additional details regarding the following matters:

1. Proposed School bell times (start time and end time)
2. Anticipated number of students using bus services
3. Private transport usage (i.e. anticipated number of students carried to or picked up from school via Arizona Road and Pacific Highway)
4. Timing of the Pacific Highway secondary entrance opening and anticipated operating year
5. Any proposed upgrade works on Arizona Road

Lastly, as previously discussed with the designated DPE contact, Mr. Brent Devine, we wish to bring to your attention that there are additional technical concerns pertaining to the TIA. Regrettably, due to the constraints of the current exhibition period, we will be submitting a supplementary letter with more detailed information and clarifications at a later date, which we anticipate to be approximately two weeks from now. This will allow us the necessary time to thoroughly review and address these concerns to ensure a comprehensive and informed response.

Busways is committed to providing safe, reliable, and timely public transportation services to the Central Coast community and believes working collaboratively can help mitigate the adverse effects mentioned above. We look forward to discussing this matter further and finding a solution that ensures the uninterrupted operations of our existing and future services and the satisfaction of the community we serve.

For any future correspondence, please kindly reach out to Dave Davies, Manager of Stakeholder Engagement Scheduling, at Busways. You can reach him via email ddavies@busways.com.au or work phone, 02 9497 1927.

Yours sincerely,

Ben Hur

Assistant Development Manager