

Planning Secretary
NSW Department of Planning,
Housing and Infrastructure
Locked Bag 5022,
Parramatta NSW 2124
Via email: information@planning.nsw.gov.au

Tuesday 12 August 2025

Dear Planning Secretary,

RE: State Significant Development Project - New Eileen O'Connor School (SSD-67173718)

I am writing to you as directly impacted local resident and community member of the proposed New Eileen O'Connor School (the Project) to express my concerns and formally object to a number of critical aspects regarding the State Significant Development (SSD).

Importantly, I would like to point out that the proponent has not followed proper and effective stakeholder engagement and consultation as required by the Secretary's Environmental Assessment Requirements (SEARs). I am a direct neighbour of the Project, located at unit 1-10 Keefers Glen, just 20 m from the boundary of the school and I have not been engaged at all nor been made aware of the Project until now.

I note that in the engagement report prepared by Lake Advisory in March 2025 it is stated that local residents were consulted with during preparation of the Environmental Impact Statement (EIS), however, disappointingly, myself and my neighbours were not contacted, consulted-with or notified of the Project until we received the Notice of Exhibition in the mail box on 24 July 2025, at which point the EIS has already been written and our concerns not given proper consideration or assessment of due weight.

I would like to draw the Department and the proponent's attention to the following key areas of concern which I would like to see undergo further assessment as well as additional mitigation and management measures implemented. Moreover, I request to be engaged with by the proponent in their response to submissions phase, opportunities that may arise thereafter before further Project development. I am also aware that a number of my neighbours also wish to be contacted in this regard.

Inappropriate use of Keefers Glen as a sole access point

My Street, Keefers Glen, is a narrow and quiet residential cul-de-sac that was never intended to serve as a thoroughfare for hundreds of vehicles daily. According to the Transport and Accessibility Impact Assessment (TAIA) prepared for the EIS, traffic volumes are expected to increase significantly, by just shy of 400 vehicles per day. Such an increase will far exceed local street capacity, especially during peak school drop-off and pick-up times which coincide with the departure of working residents. This aspect of the Project poses significant safety and privacy risks to residents, particularly children and elderly individuals. Notably, this street is filled with families, many with small young children. I would also like to point out the Central Coast Councils has strongly objected to using Keefers Glen as any form of access road, urging the proponent to utilise Gavenlock Road instead.

On-street parking impacts

The EIS and TAIA shows a shortfall in on-site parking for staff and visitors, leading to inevitable overflow parking onto Keefers Glen. This will obstruct driveways, reduce visibility, impact property values and contribute to congestion. Our street cannot accommodate this safely or fairly.

Noise pollution

The proposed school will introduce an increase in daily noise levels, at both the construction and operational phases, including from equipment, machinery, use of worker vehicles and trucks, playground activities, bells, public address systems, and vehicle movements associated with school staff (teachers and support personnel), parents and students. The Noise and Vibrations Impact Assessment prepared for the EIS identifies predicted increases in noise levels on Keefers Glen specifically. This increase is problematic given the quiet nature of our street, a key drawcard and valued characteristic by residents. Even with mitigation measures, the acoustic character of our street will change dramatically.

Privacy and overlooking

The development includes two-storey buildings and elevated activity areas that will directly overlook and impede upon my property. This is a major concern for the privacy and residential amenity of myself and my neighbours. The EIS offers limited detail on how visual privacy will be preserved and my front yard protected.

Change in neighbourhood character

This development is fundamentally incompatible with the existing R1 General Residential and R2 Low Density Residential zoning and streetscape of Keefers Glen. The scale and intensity of use proposed will permanently alter the quiet, low-density nature of the area. Further, this change is undoubtedly expected to impact property values, an aspect which has been given no consideration in the EIS.

Lack of community compensation or mitigation measures

Given the scale of impact on existing residents, there has been no offer of community compensation, acquisition buffers, or tangible mitigations beyond minimal fencing and landscaping that directly benefits the school and its own amenity. This is inadequate given the long-term nature of the Project.

Insufficient engagement and Social Impact Assessment

I would like to extend my dissatisfaction with the engagement and Social Impact Assessment (SIA) completed for the EIS. It is apparent when reading this document that NSW SIA guidelines have not been adhered to, in particular, the following key elements are missing from the SIA:

- No reference is made or evidence provided showing that any primary data collection with residents or surrounding landowners.
- Severely limited measures for mitigation management or enhancement have been proposed, especially with respects to the broader community beyond the religious, schooling and special needs community groups. Engagement activities also seemed to focus primarily on these specific groups rather than the broader impacted community.
- An authentic assessment, with the SIA appearing to simply be a variation/reproduction of the engagement report.

Requests for the Departments consideration:

I respectfully request that the Proponent is required to undertake further stakeholder engagement and consultation, including with myself and my direct neighbours, as this should have already been completed and was not. Additionally, that the proponent complete and produce an acceptable SIA in line with the recent SIA guidelines published by NSW DPHI (July 2025).

Further, I would like to formally request that the following conditions be imposed:

- That primary vehicle access be redirected via Gavenlock Road rather than Keefers Glen, given the nature of traffic generation, current ambience of Keefers Glen and pre-existing uses of Gavenlock Road which make that alternative compatible.
- That the Proponent provide additional off-street parking and driveways for affected Keefers Glen residents, to address the loss of amenity and on-street congestion.
- That fencing and privacy screening be installed to maintain residential privacy, protect the front yards of direct residents and reduce noise impacts for all properties adjoining the Project site.
- That additional mitigation and enhancement measures be required. Specially, measures that benefit the broader community beyond the religious, schooling and special needs groups that have been the focus of the proponent thus far.

I urge you, Planning Secretary, to give due weight to the serious and irreversible impacts this project will have on our residential community and broader environment. I am not opposed to education infrastructure, but the scale and placement of this proposal, particularly the placement of access roads and parking facilities, on a small suburban cul-de-sac is wholly incompatible. I request that my requests outline above are given the required consideration.

Sincerely,

Gabe Harding-Davis

A directly impacted local resident.