



Camden Council

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19 June 2017

Department of Planning and Environment
Attention – Peter McManus
GPO Box 39
SYDNEY NSW 2001

Dear Sir,

RE: Oran Park High School and Expansion of Oran Park Public School

**PROPERTY: 390 South Circuit ORAN PARK
LOT: 1000 DP: 1164435**

Reference is made to the above State Significant development application (DA) which is currently being assessed by your department.

Council officers have undertaken a review of the Environmental Impact Statement (EIS) and have concerns regarding the suitability of the proposed development on this site.

Council objects to the proposed development for the reasons outlined in this submission.

This submission has been endorsed by Council at its meeting on 13 June 2017.

Traffic and Vehicle Movement

Council has major concerns with the proposed layout of the new 2,000 student high school and the extension of the primary school to increase the capacity from 704 to 1,000 students. The development as proposed will have a long term traffic impact on the surrounding precinct.

Insufficient Onsite Car Parking – Primary School

There are existing traffic issues in this area related to the Oran Park Primary School, with traffic queueing along South Circuit at pick up and drop off times as there is insufficient car parking provided on site for the existing school. Council officers have concerns that no additional onsite car spaces are proposed for the primary school.





Council officers reviewed a masterplan submitted with the Secretary's Environmental Assessment Requirements (SEARs) on 22 September 2016 which showed an additional car park to be located in the far north western corner of the site. This car park is not proposed as part of this application. Council staff are of the opinion that a car park can be accommodated in this area and the application should be amended to include the carpark as previously outlined.

Insufficient Onsite Car Parking – High School

The provision of 10 car parking spaces on site to support a 2,000 place high school is grossly inadequate for the proposed staff and senior student population of the high school. The figures referenced in the traffic report indicate that 90% of teachers and 20% of senior students would drive to school.

Using these figures the traffic report indicates that 204 spaces are required. This is a shortfall of 194 spaces. The surrounding road network cannot accommodate these additional vehicles.

Council's Traffic Engineers are of the opinion that a greater number of staff and students will drive to the school than referenced in the traffic report.

Council requests the high school provide both student and all staff parking on-site in accordance with the requirements of the Oran Development Control Plan (DCP). The Oran Park DCP requires education establishments to provide:

- 1 car parking space per full time equivalent staff member, plus
- 1 car parking space per 100 students, plus
- 1 car parking space per 5 students in Year 12 where appropriate.

Relocation of Bus Bays

Consideration should be given to relocating the bus bays and the provision of accessways to the Dick Johnson Drive frontage for the following reasons:

1. The 3 bus spaces proposed on Holden Drive will not accommodate the 15 buses required without adversely impacting the road network.
2. An indented bus bay could be provided along Dick Johnson Drive which could accommodate a greater number of buses. Camden High School which is currently just over half the size of this proposal has a bus bay length that can accommodate 8 buses. Even at this length buses, particularly in the afternoon, have to queue on the road in order to wait to access the bus bay.

Other Traffic and Parking Related Issues

1. The land to the south of Holden Drive opposite the high school is zoned R3 Medium Density. Higher density development on this land will limit on street parking available for the school overflow. The 'no parking areas' proposed on the





southern side of Holden Drive are not appropriate. Residents in the area should not be inconvenienced by 'no parking' restrictions from the proposed school.

2. The drop off zones proposed are considered inadequate and will not accommodate the proposed 400 vehicle drop off in the AM peak.
3. The requirements for visitor parking generated by the site has not been assessed in the traffic report.
4. The impact of parking demand during events has not been addressed in the traffic report.
5. Accessible car spaces should be provided on site and not within the roadway.
6. The intersection of South Circuit and Holden Drive will be signalised in the future. The pedestrian refuge as shown on the plans will be redundant as signalised pedestrian crossings will be installed.
7. The pedestrian crossing as proposed cannot be provided until such time as the warrants for the crossing have been met and approved by the RMS. It may take several years to reach the number of pedestrians and vehicles required for installation of the crossing.
8. The Green Travel Plan by the applicant has numerous theoretical plans which cannot be conditioned to be implemented as part of the ongoing operation of the high school. The carpooling as an example would be very difficult to achieve in such a situation. The participants need to live in the same geographical area, have the same timetables with no extracurricular activities before or after school for this to be effective. While theoretically this would result in a lower demand for parking it is unlikely to operate successfully.

The applicant has not provided any other examples of percentage rates of participation at other high school locations where this has worked effectively.

9. The Green Travel Plan advises that the school would encourage active transport to and from the school and encourage students to walk and cycle. The provision of 100 bicycle spaces is considered to be low considering a student population of 2,000 to achieve this outcome.
10. The schools referred to in the traffic report including Hunter Sports High School, Parramatta Public School, Arthur Phillip High School, Homebush West and Summer Hill are not considered to be good examples to use as comparisons for the proposed Oran Park High School. For example, Parramatta Public School and Arthur Philip High School are located 150m from a train station. The private school in Summer Hill is partly a boarding school which reduces the number of students arriving and leaving the site.





11. The Camden LGA has one of the highest dependency rates on private vehicles due to the lack of sufficient public transport in the area. Analysis of car ownership in 2011, indicates 68% of households in Camden Council area had access to two or more motor vehicles, compared to 44% in Greater Sydney.
12. Also, the sites used as a comparison are not of the size proposed by this school. Examples should be of a similar size and similar areas of high car dependency.
13. It is not feasible to co-locate bus zones and no parking restrictions. Past experience has shown that parents spill over into the bus zone areas affecting buses from effectively using the bus zones.
14. Due to the high number of students, consideration should be given to staggering the start and finish times for the primary school and both the junior and senior high school.
15. Holden Drive is currently a dead end. The traffic counts and volumes presented do not reflect how the road will be used in the future when Holden Drive is extended through to Oran Park Drive.

Comments from Transport NSW and RMS

The Environmental Impact Statement (EIS) details that a copy of the preliminary construction management plan was submitted to Transport NSW and the Roads and Maritime Service (RMS) for review as part of the SEARs. Confirmation is required that the RMS has reviewed the detailed traffic report submitted and raise no issues with the development as proposed.

Previous Advice

Council officers provided detailed comments on the draft Secretary's Environmental Assessment Requirements (SEARs) on 4 October 2016 for this development and raised the issue of car parking as a major concern. It does not appear that any consideration has been given to the advice already provided by Council.

Other Issues

The application has not considered the Julia Creek riparian corridor that extends along the eastern boundary of the site. This land will potentially become bushfire prone land once the revegetation of the creek occurs. Council officers recommend the Environmental Impact Statement (EIS) is amended to include an asset protection zone to reflect the potential future bushfire risk.

Public Interest

The proposal is considered not to be in the public interest in light of the issues discussed in this report.





Should you have any enquiries in relation to this matter, please do not hesitate to contact Aisling McGrath, Executive Planner, on (02) 4654 7773.

Yours sincerely,

Tina Chappell
A/DIRECTOR PLANNING & ENVIRONMENT

