

Amendment Report  
Sydney Olympic Park new high school  
SSD-11802230

On behalf of  
NSW Department of Education  
June 2022



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\*This document is for discussion purposes only unless signed and dated by the persons identified.

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## Executive Summary

This Amendment Report has been prepared by Mecone NSW Pty Limited on behalf of the NSW Department of Education (DoE) to support the proposed Sydney Olympic Park new high school (SSD-11802230).

The Environmental Impact Statement (EIS) for the project was exhibited from 12 November 2021 to 9 December 2021. Following exhibition, DoE prepared a Submissions Report, which addressed the issues raised during exhibition and proposed a number of design refinements.

DoE now seeks further changes to the project to address the issues raised by DPE. The proposed changes are as follows:

- Cap student population at 850 students for this application to ensure the development does not rely upon road and open space infrastructure outside the site (any future increase in student population will be subject to a separate approval);
- Remove all school development from the approved Ridge Road reserve (in order to allow for construction of the road in case it goes ahead);
- Reduce the size of 2-storey hall building and reorganise outdoor activity areas to accommodate removal of development from the Ridge Road reserve; and
- Maintain the roundabout at the intersection Burroway Road and Wentworth Place (to align with the approved Ridge Road design).

While the student population is now proposed to be capped at 850 students, the incremental introduction of students previously proposed remains. This incremental approach would see the school commence with a cohort of Year 7 (255 students) or Year 7 and Year 8 students (510 students), and a new cohort of Year 7 students would then commence each following year.

Regarding strategic context, the proposed changes will bring the proposal into closer alignment with the Wentworth Point Development Control Plan 2014 (DCP) by allowing for construction of Ridge Road as identified in the DCP's structure plan, if required.

Regarding statutory context, the proposed changes result in no inconsistencies with relevant environmental planning instruments. As detailed within Section 2.2, an existing concept development application applies to the site and broader precinct (DA-40/2015). Pursuant to Clause 4.24 of the Environmental Planning and Assessment Act 1979, the determination of a development application cannot be inconsistent with a concept development application that is in force on a site. As such, the proposal has been amended to ensure it is consistent with DA-40/2015 in that it removes all school development from the approved Ridge Road reserve, which will allow for construction of the road in the future if necessary. The Ridge Road design approved under DA/875/2017/A has been overlaid on the proposed architectural plans to ensure all school development is outside the approved road reserve.

The proposed changes will result in no additional environmental impacts. Furthermore, the mitigation measures identified in the EIS and Submissions Report remain generally relevant, with changes only required to the measures regarding social impacts (to reflect the change in student numbers) and waste (to reflect noise assessment of waste collection on Burroway Road).

Overall, the amended proposal will result in a high-quality development that achieves the original aims of the proposal while resulting in no unacceptable environmental impacts subject to the implementation of mitigation measures.

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# 1 Introduction

This Amendment Report has been prepared by Mecone NSW Pty Limited on behalf of the NSW Department of Education (DoE) to support the proposed Sydney Olympic Park new high school (SSD-11802230).

The Environmental Impact Statement (EIS) for the project was exhibited from 14 October 2021 until 10 November 2021. DoE subsequently prepared and lodged a Submissions Report to address the issues raised during exhibition.

Following consideration of the Submissions Report, the Department of Planning and Environment (DPE) requested further information.

DoE now seeks further changes to the project to address the issues raised by DPE. This Amendment Report has been prepared to describe and assess these changes.

This report has been prepared with regard to the State Significant Development Guidelines (DPE, 2021).

## 2 Description of amendments

### 2.1 Summary

The following amendments are proposed:

- Cap student population at 850 students for this application;  
[The incremental introduction of students previously proposed remains, which would see the school commence with a cohort of Year 7 (255 students) or Year 7 and Year 8 students (510 students), and a new cohort of Year 7 students would then commence each following year.]
- Remove all school development from the approved Ridge Road reserve;
- Reduce the size of 2-storey hall building and reorganise outdoor activity areas to accommodate removal of development from the Ridge Road reserve; and
- Maintain the roundabout at the intersection Burroway Road and Wentworth Place.

These changes are illustrated and discussed in the updated architectural drawings and architectural package by Woods Bagot at **Appendix 1**, and in the updated landscape package by Urbis at **Appendix 2**.

A comparison between the original and amended proposal is provided in the table below.

**Table 1** Summary proposal description – original vs. amended

Element	Original proposal	Amended proposal
Earthworks	Approx. 5,600m <sup>3</sup> cut Approx. 6,346m <sup>3</sup> fill	Approx. 957m <sup>3</sup> cut Approx. 6,258m <sup>3</sup> fill
Built form	Two x 6-storey wings, one along Burroway Rd boundary and one along eastern boundary 2-storey hall building for performance and sports	Two x 6-storey wings remain the same 2-storey building reduced in size

Element	Original proposal	Amended proposal
Student numbers and staging	Staged occupation: Stage 1: 850 students Stage 2: 1,530 students	No staged occupation proposed 850 students max under this application (Future increases subject to a separate approval)
Open play space	On-site open play space provided for Stage 1 student population  Future playing field to the north to provide for the needs of the Stage 2 student population	On-site open play space sufficient for proposed cap of 850 students  Additional open space will be considered as part of any future proposed increase in student numbers
GFA and FSR	14,418m <sup>2</sup>  1.53:1 FSR based on site area of 9,441m <sup>3</sup> (RE1 land excluded)	13,349m <sup>2</sup>  1.41:1 FSR based on site area of 9,441m <sup>3</sup> (RE1 land excluded)
Height	6 storeys  Roof: RL 29.200  Lift shaft: RL 33.200	6 storeys  Roof: RL 26.920  Lift shaft: RL 31.450  Note: This height change was previously detailed in the Submissions Report.
Land use	School	No change
Vehicular access and servicing	2 road frontages including main frontage to Burroway Rd and secondary frontage to future road along eastern boundary	No change  Note: The proposal no longer relies upon the future eastern road for vehicular access or servicing.
Pedestrian access	Main access point off Burroway Road and a secondary access point off the future eastern road.	No change  Note: The proposal no longer relies upon the future eastern road for pedestrian access
Car parking	30 car parking spaces along the future eastern road  258 bicycle/rideable parking spaces	Staff to utilise Sydney Olympic Park P5 car park (fully subsidised) and travel via bus to school  146 bicycle/rideable parking spaces
Jobs	Construction: 735  Operation: 80*	CIV report has been amended based on the amended proposal
Construction hours	Mon-Fri: 7am to 5pm  Sat: 8am to 1pm  No work Sunday and public holidays	No change
Hours of operation	8am to 4pm Mon-Fri	No change

Element	Original proposal	Amended proposal
	<p>*The proposal for 850 students results in 80 operational jobs as per the submitted EIS in September 2021 and the approved business case. Following lodgement of the EIS, an addendum business case was lodged in October 2021 to provide for the maximum 1,530 students, which would increase the total operational jobs to 120. As this proposal now provides for a maximum of 850 students, the operational jobs are correctly stated as 80, which includes administrative, teaching and support staff.</p>	

## 2.2 Reasons for amendments

The changes are proposed in order to make the proposed development consistent with consent DA-40/2015 (former Auburn City Council reference) and to ensure the school does not rely upon road and play space infrastructure that might not be delivered in a timely manner. This is discussed in further detail below.

### 2.2.1 Consistency with concept DA

On 17 February 2016, the Sydney West Joint Regional Planning Panel granted consent to DA-40/2015 for a staged development proposal for demolition of existing buildings, tree removal, earthworks, site remediation, construction of roads, sea wall and public domain works, and further subdivisions to create roads.

The consent was subsequently modified by DA/875/2017 (City of Parramatta reference), which was in turn modified by DA/875/2017/A. This consent is operational and remains in force. See attached consent at **Appendix 6a** and key relevant stamped plans at **Appendix 6b**.

Importantly, consent DA-40/2015 is a "concept development application". Pursuant to Clause 4.24 of the Environmental Planning and Assessment Act 1979 (EP&A Act), the determination of a development application cannot be inconsistent with a concept development application that is in force on a site. As such, the proposed high school development cannot be inconsistent with consent DA-40/2015.

The key components of consent DA-40/2015 affecting the proposal are construction of Ridge Road and GFA allocation. These are discussed below.

#### Consistency with approved Ridge Road

The development as proposed in the EIS and Submissions Report did not align fully with consent DA-40/2015 because the development impinged upon the approved Ridge Road reserve within the site, with landscaping and a portion of the 2-storey hall building located in the road reserve.

The amended proposal is consistent with DA-40/2015 in that it removes all school development from the approved Ridge Road reserve, which will allow for construction of the road in the future if necessary.

The Ridge Road design approved under DA/875/2017/A has been overlaid on the proposed architectural plans to ensure all school development is outside the approved road reserve, and the design has considered an appropriate interface between the school and the Ridge Road reserve. Along the western and north-western boundaries, Ridge Road levels will be maintained. A retaining wall is proposed to address the levels difference between Ridge Road and the proposed works. To the north-east and eastern boundaries, the proposed levels will be coordinated with the future eastern road finish surface levels during the design and development phase. To the southern boundary, all works including ramps and entries are to match smoothly with the existing public domain levels.



### Consistency with GFA allocation

The amended proposal is also consistent with the GFA allocation specified in the concept consent. Condition 2 of DA/875/2017/A says that Lot 203 shall not exceed a maximum GFA of 46,283sqm and Lot 204 shall not exceed a maximum GFA of 5,000sqm. The proposed development is located almost entirely in the land nominated as Lot 203 and has a GFA of 13,349sqm, which is well below the maximum of 46,283sqm.

(Note: Lot boundaries have changed since approval of DA/875/2017/A, but it remains clear that the proposed school does not contravene the maximum GFA established for the land under DA/875/2017/A.)

#### 2.2.2 Relationship to future surrounding infrastructure

Under the EIS it was proposed to stage occupation of the development, with Stage 1 allowing for 850 students and Stage 2 increasing the total to 1,530 students. It was proposed to make Stage 2 occupation dependent upon delivery of the future eastern road and implementation of a joint use arrangement regarding the future playing field to the north. The eastern road would provide for access and parking for Stage 2 operation, and the playing field would provide for the outdoor play space needs of the Stage 2 student population.

However, concerns have been raised about the timing and delivery of the future eastern road and playing field. As such, the application is being amended to remove the staged occupation and to allow for 850 students only, with any future increase in student population subject to a separate approval.

Capping the student number at 850 for this application will ensure that adequate play space is provided within the site (play space is discussed in further detail at section 3.2 of this report). That is, the development will not rely upon delivery of the playing field to meet outdoor play space needs.

Capping the student number at 850 also means the development does not rely upon parking or access associated with the future eastern road. Parking and access will occur as per the "Stage 1" arrangements described in the Submissions Report, with access and loading to occur along Burroway Road and staff parking to occur at the Sydney Olympic Park P5 car park.

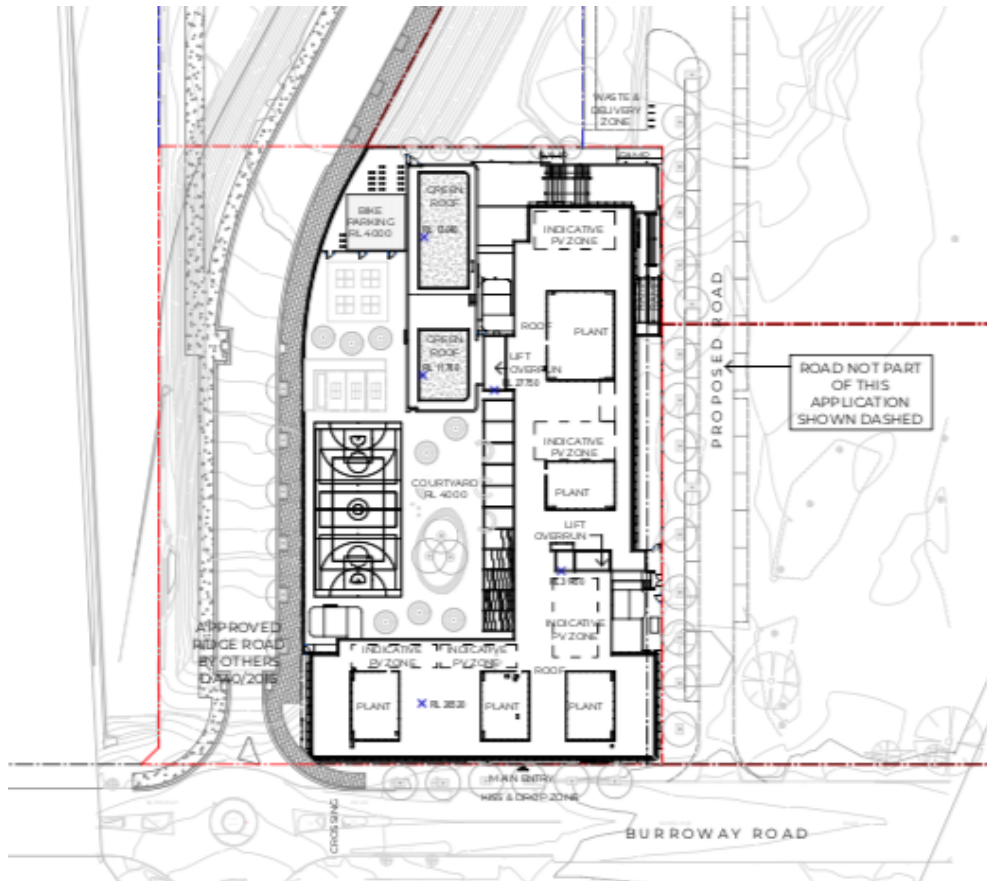
### 2.3 Removal of development from Ridge Road reserve

It is proposed to remove all school development from the approved Ridge Road reserve, which cuts diagonally across the site. This will ensure Ridge Road can be constructed as approved under consent DA 40-2015 (as amended), if necessary.

Removal of development from the approved road reserve requires several changes to the school design, namely:

- Reduction in size of the 2-storey hall building including removal of indoor sports court;
- Reconfiguration of central courtyard;
- Removal of an outdoor sports court; and
- Bicycle parking moved to rear of site and quantity reduced from 258 to 146 to reflect the proposed cap of 850 students.

An updated site plan is provided below. For further detail, refer to the updated architectural, landscape and civil drawings at **Appendix 1**, **Appendix 2** and **Appendix 3a**, respectively.



**Figure 1** Updated site plan (based on roof plan)  
Source: Woods Bagot

## 2.4 Intersection change

Under the EIS, the roundabout at the intersection of Burroway Road and Wentworth Place was maintained. The Submissions Report then proposed to change this roundabout to a T-intersection in order to provide a better crossing experience for students. It is now proposed to revert to the originally proposed roundabout.

The reason for this change is to ensure the intersection aligns with the design of Ridge Road under consent DA-40/2015 (as amended).

## 3 Clarifications

This section provides further clarification regarding the amended development and also addresses matters raised by DPE and other authorities following exhibition of the Submissions Report.

### 3.1 Future increases in capacity

As described in the EIS and Submissions Report, it is anticipated that a road along the eastern boundary of the site will be delivered in the future, in place of the approved Ridge Road. Once this eastern road and the future playing field to the north are delivered (by others), DoE intends to increase the school's capacity to 1,530 students, expand the size of the hall building and provide for landscaping generally in the area of the approved Ridge Road within the site.

These plans for increased capacity are provided for information purposes only and do not form part of the development for which approval is sought under this application. Any increase in capacity will occur as a separate approval process and, as noted, is subject to delivery of the eastern road and future playing field, which are being progressed by others.

DoE is committed to working with Council and Transport for NSW (TfNSW) to finalise the plans for the remainder of the precinct.

### 3.2 Play space

The amended proposal provides 5,108sqm of play space, which equates to 6qm per student (refer to diagrams at **Appendix 1**). This is 4sqm short of the 10sqm benchmark set by the NSW Education Facilities Standards and Guidelines (EFSG).

The EFSG suggests management measures for school proposals where the open space benchmark cannot be met. For secondary schools, this includes supplementing open space provision with Council-owned open space and/or demonstrating that the site can provide desirable play outcomes.

The GANSW Design Guide for Schools (2018) provides some insight into play outcomes, stating that schools should “allow for passive and dynamic play of different age groups” (2018: 18). The proposal has sought to achieve this by providing a range of high quality open space areas and recreational facilities that can support a diversity of activities. This includes an outdoor multipurpose sports court, a main landscaped courtyard area for free play and socialising, and dual outdoor learning and breakout spaces, including landscaped seating areas. It is considered that this design approach and the inclusion of a range of open space areas will help meet most of the recreation needs of students.

Also, as discussed above, the school does not propose to commence operation with 850 students. The school will incrementally increase in student population, which will see the school commence operation in year 1 with a cohort of Year 7 (255 students) or Year 7 and Year 8 students (510 students), and a Year 7 cohort will commence each subsequent year. This incremental approach will further mitigate impacts regarding student access to open space.

### 3.3 Consistency with existing consents

DPE requested commentary on consistency with existing consents on the site, namely DA-273/2014 and DA-40/2015.

Consent DA-40/2015 is the only concept development application in force on the site and is therefore the only application with which the proposed development must be consistent under Section 4.24 of the EP&A Act. Consistency with DA-40/2015 is a key driver for the amendments to the development and is discussed in detail at section 2.2.1 above.

Consent DA-273/2014 is for Torrens title subdivision of the “Burroway Road site” to create 4 lots for residential development, a school, maritime uses and a peninsula park. This subdivision was carried out but has since been superseded through creation of the high school lot (Lot 1 DP1276305). Consistency with this consent is neither mandatory nor possible.

Consent DA/644/2017 is for construction of a new marina. The proposed school will impinge upon the western portion of the dry boat facility approved under this consent. However, it is not necessary, from a statutory perspective, that the development be consistent with this consent. It is not uncommon for there to be multiple conflicting consents for the same site. It is expected that if the marina development progresses, it will be modified to take into account the high school.

### 3.4 Relevant acquisition authority

#### 3.4.1 Northwestern corner of site

DPE raised concern regarding potential conflict between the school use and the land identified for acquisition (local open space) in the northwestern corner of the site.

The proposed amended development features no school development in this portion of the site, and therefore concerns regarding conflict between school use and Council acquisition are no longer relevant.

#### 3.4.2 Playing field

DPE also raised concern regarding potential conflict between the school's use of the future playing field to the north and Council acquisition because a portion of the playing field is identified for acquisition (local open space).

The proposed amended development no longer includes the "Stage 2" student population of 1530 students and therefore no longer relies upon the future playing field to the north to meet open space needs. Therefore, concerns regarding conflict between school use of the field and Council acquisition are no longer relevant.

### 3.5 Removal of surcharge on Ridge Road

DPE requested clarification regarding removal of surcharge on Ridge Road.

Section 4.1 of the Submissions Report details the Heads of Agreement terms entered into between TfNSW and DoE. Item 1a) and 1b) note TfNSW as the responsible party for the delivery of the Ridge Road and removal of surcharge (where "surcharge" relates to surplus material used for structural pre-loading of the proposed road on the eastern boundary of the school site). Removal of the surcharge and placement of that material from the new road will be undertaken as detailed within the civil drawings and report prepared by TTW and provided at **Appendix 3a** and **Appendix 3b**, respectively.

### 3.6 Off-site works

DPE requested confirmation as to which off-site works are required to support the development.

The off-site works required to support the amended development are:

- Upgrade of incoming services (as discussed in Section 7.11 of the EIS) (no changes to services required as part of the amended development);
- 2 raised pedestrian crossings:
  - Burroway Road east of Wentworth Place; and
  - Footbridge Boulevard east of Wentworth Place.

An additional pedestrian crossing would be built across the future eastern road once that road is constructed.

### 3.7 Sydney Olympic Park name

DPE has requested that DoE provide evidence that Sydney Olympic Park Authority (SOPA) has authorised DoE to continue to use the name Sydney Olympic Park new high school throughout the SSD assessment process.

In its comments on the Response to Submissions (addressed below), SOPA notes that it understands that “Sydney Olympic Park new high school” is only the project name and kindly requests that it be involved in any discussions regarding the final name.

DoE acknowledges SOPA’s comments and will continue to consult with SOPA regarding the final name.

## 4 Response to further submissions

### 4.1 Submission by MP

A late submission was received from Lynda Voltz MP, member for Auburn. Responses to member Voltz’ issues are provided below. We note that the issues raised in the submission generally reflect the issues already raised during exhibition of the EIS, which were addressed in the previously submitted Response to Submissions Report.

#### **Two-stage process**

The submission expresses concern about impacts on the community due to a 2-stage construction process.

DoE clarifies that no staging is proposed as part of the amended development, neither staged construction nor staged occupation. The high school is intended to be constructed in a single stage (with potential minor upgrades in the future under a separate approval process). Student numbers will be capped at 850 under this application, and any future increase in numbers will be carried out under a separate approval. The construction program will be reviewed upon approval of this Amendment Report. Requirement for any construction or occupation staging will be considered to enable occupation of the development at the earliest.

#### **Lack of required playing space**

The submission expresses concern that the play space required for Stage 2 falls outside the scope of the application.

DoE clarifies that no staging is proposed as part of the amended development. Student numbers will be capped at 850 under this application, with adequate play space provided on-site for 850 students. The development will not meet the EFSG’s 10sqm benchmark, but the EFSG allows for variation in certain circumstances. Overall, it is considered that the proposed play space adequately meets the needs of the proposed 850 students. Refer to section 3.2 above for further discussion on play space.

It is also noted that there will be an incremental increase in student population, which will see the school commence operation in year 1 with a cohort of Year 7 or Year 7 and Year 8 students, and a Year 7 cohort will commence each subsequent year.

#### **Transport**

The submission expresses a number of concerns regarding transport including:

- There is no information regarding a turning circle for cars to leave Burroway Road after utilising the kiss n’ drop;
- The expected walking/biking mode share is unrealistic;
- Congestion may be caused by traffic leaving the school, as there is only one road in and out of the peninsula; and
- The 533 and 526 bus services are the only services that travel near the school, and these are already at capacity.

Regarding the Burroway Road turning circle, the turning head at the end of the road allows for a turning radius of 17m, while the minimum turning circle diameter for a B99

vehicle is 12.5m. This means that the 99<sup>th</sup> percentile largest car can use the facility with a single turning movement.

Regarding mode share and traffic impacts, the proposal is expected to reduce private vehicle trips and replace them with more sustainable and efficient modes so that students will be able to walk or utilise the area's multiple public transport options. While vehicle movements directly related to the kiss-and-ride movements will increase frequency on Burroway Road, the traffic modelling for the school indicates a decrease in traffic movements in the local road network. The modelling estimates that the school will generate 112 vehicles in the peak periods and that all intersections will operate at Level of Service A—and this assumes a final student population of 1,530. Assuming the 850 student cap proposed under this Amendment Report, the impacts to intersections would be even less.

Regarding bus services, DoE has consulted with TfNSW bus planners and confirmed that TfNSW regularly reviews bus services and will provide additional bus services as required by growth; as students tend to travel in the opposite direction to the peak travel, TfNSW believes there is spare capacity in the bus system; and TfNSW will be provided with projected enrolment figures to be included in annual bus service planning processes.

## 4.2 TfNSW submission

TfNSW provided comments on the Submissions Report in a letter dated 23 May 2022. The table below provides responses to TfNSW's comments.

**Table 2** Response to TfNSW comments

TfNSW comment	Response
<p>1. It is noted the traffic generation potential of the school has not been provided for each stage of the operation.</p> <p>As per the submitted Traffic Response Letter, the stretch mode share case, containing unconfirmed bus service improvements to be delivered by TfNSW prior to April/May 2023, more accurately estimates actual modal share. However, it is noted that confirmation of bus service improvements will succeed SSDA approval and may not be operational for the planned operational commencement of the high school in January 2024. TfNSW requests traffic generation calculations for Stage 1 and 2 using currently available data and considering approved infrastructure upgrades operational at each stage.</p>	<p>As noted in the transport letter at <b>Appendix 5</b>, traffic generation for the amended proposal (850 students) is expected to be 104 vehicles per hour, and the number of kiss n' drop movements has been calculated at 52 vehicles per hour.</p> <p>DoE has consulted with TfNSW bus planners on 30 November 2021 (post-lodgement) and confirmed the following:</p> <ul style="list-style-type: none"> <li>– TfNSW regularly reviews bus services and will provide additional bus services as required by the growth.</li> <li>– As students tend to travel in the opposite direction to the peak travel, TfNSW believes there is spare capacity in the bus system.</li> <li>– TfNSW will be provided with projected enrolment figures to be included in the annual bus service planning processes.</li> </ul> <p>Hence TfNSW bus planners are satisfied that additional bus services can be provided if required before the school opening.</p> <p>If bus services are not in place at the beginning of school operations, the traffic generation would still be much lower than these projections. On day of opening, it is estimated that there would be only 255 students (if only Year 7 commences) or 510 students (if both Year 7 and Year 8 commence). Even if the car mode share was 50% (which is very unlikely for a high school),</p>



TfNSW comment	Response
	it would still generate less traffic than has been assessed in the application.
2. It is noted that the applicant has consulted with TfNSW and Council regarding the Coach/Bus Parking spaces, which would be subject to final approval from SOPA. However, TfNSW requests submission of a School Coach/Bus Parking Management Plan prior to issue of an Occupation Certificate, to ensure the wider road network is not impacted by services within the precinct.	<p>It is acknowledged that further consultation with Transport for NSW, Council and SOPA will be required to address bus servicing.</p> <p>DoE will prepare a School Travel Plan prior to occupancy that includes information about the school excursion bus parking requirements.</p>
3. DPE should be satisfied with the temporary waste collection arrangements from the Burroway Road loading zone during off-peak times pending construction of Ridge Road. Permanent waste collection arrangements should also be investigated.	<p>DoE has demonstrated that the road can accommodate the design waste vehicle (<b>Appendix A</b>).</p> <p>A permanent waste collection on-site relies on the delivery of road and open space infrastructure by others.</p>

### 4.3 Council submission

Council provided comments on the Submissions Report in a letter dated 20 May 2022. The table below provides responses to Council's comments.

**Table 3** Response to Council comments

Summary of Council comment	Response
<p><b>1. Impacts to Peninsula Park</b></p> <p>Council seeks certainty regarding the future ownership of the future playing field, carpark and eastern road.</p>	<p>The proposal has been amended to remove reliance upon the future playing field, carpark and future eastern road, and therefore these elements are not critical matters for consideration as part of this SSDA.</p> <p>DoE encourages Council to continue to liaise with the current landowner, TfNSW, regarding these future elements.</p>
<p><b>2. Remediation</b></p> <p>Council expresses concern that a new contamination consultation has been engaged to prepare the RAP Addendum.</p> <p>Furthermore, the RAP Addendum does not consider the impacts the RAP will have on the maintenance of the adjoining site or future remediation requirements, e.g., due to potential gas migration from the school site.</p>	<p>DoE does not consider the change in contamination consultant to be an issue. The RAP Addendum builds on a previously endorsed RAP (Parsons Brinckerhoff, 2015) for the site and will ensure the site is suitable for the proposed use. This approach has been endorsed by the appointed Contaminated Land Auditor.</p> <p>Given the amended proposal no longer relies upon the playing field to the north, it is considered unnecessary to investigate this area directly. Nonetheless, DoE has been in discussions with Council, TfNSW and Landcom to confirm health investigation level, design and long term environmental monitoring plan for the playing field.</p> <p>Regarding potential gas migration, the letter by BGL at <b>Appendix 8</b> confirms there is no expectation for lateral gas migration as a</p>

Summary of Council comment	Response
	consequence of development of the site given it is underlain by a venting layer designed to capture and exhaust these gases.
<p><b>3. Wentworth Point Precinct DCP 2014</b></p> <p>Council emphasises that the proposal does not comply with the existing DCP and that approval for the school should not be granted ahead of resolution of broader development principles and layout to ensure suitable integration between the school and the remainder of the precinct.</p>	The amended proposal has brought the project into closer alignment with the DCP structure plan by removing all school development from the approved Ridge Road corridor. This will ensure Ridge Road as approved can be constructed in the future if required.
<p><b>4. Inadequacy of school facilities/infrastructure</b></p> <p>Council expresses concern that the application depends upon a playing field, road and car park that do not form part of the application. Council also states that the application should not be approved without the playing field being secured as its inclusion will allow the EFSG open space requirement to be met.</p>	<p>The amended proposal seeks consent for 850 students only, which means the application no longer relies upon the playing field, carpark or eastern road being delivered by others.</p> <p>The amended proposal does not achieve the EFSG outdoor open space benchmark of 10sqm per student. However, the EFSG allows for variations in certain circumstances, as discussed at section 3.2.</p> <p>The incremental increase in students is a further mitigating factor. The school will see the school commence with a cohort of Year 7 (255 students) or Year 7 and Year 8 students (510 students), and a new cohort of Year 7 students will then commence each following year. As such, the proposed 6sqm of play space per student is a worst-case scenario.</p>

## 4.4 SOPA submission

SOPA provided comments on the Submissions Report in a letter dated 2 May 2022. The table below provides responses to SOPA's comments.

**Table 4** Response to SOPA comments

SOPA comment	Response
<p><b>1. School name</b></p> <p>SOPA reiterates that it is not supportive of the proposed naming for this new school as "Sydney Olympic Park High School" given it is not located within the actual boundary of Sydney Olympic Park.</p> <p>While SOPA understands that the current name for the school may only refer to the project name during development stages and not the final name, SOPA kindly requests to be involved in any discussions/determinations regarding the final name. SOPA would also like to reiterate that any reference to "Olympic" within the school name is inappropriate given its location out of Sydney Olympic</p>	<p>DoE notes SOPA's comments regarding the school name and will include SOPA in future discussions regarding the final name.</p> <p>DoE notes SOPA's comments regarding the need for another high school; however, it is outside the scope of this SSDA to provide further commentary on this issue.</p>



SOPA comment	Response
<p>Park, and also may require a separate approval process under the Olympic Insignia Protection Act 1987.</p> <p>In addition to the above, SOPA would like to further note that as previously discussed with School Infrastructure New South Wales (SINSW), a high school will be required within Sydney Olympic Park in the coming years to cater for the growing residential population, and surrounding localities such as the Carter Street Precinct.</p>	
<p><b>2. Transport and Access</b></p> <p>SOPA supports SINSW's commitment to sustainable transport. SOPA agrees this site provides potential for students to access the school through sustainable transport modes such as walking, cycling and public transport.</p> <p>Remaining transport and access issues include:</p> <ul style="list-style-type: none"> <li>- The removal of the proposed crossing point appears to be problematic as the desire line for students heading south west needs to be realistically accommodated to avoid unsafe crossing behaviour;</li> </ul>	<p>As noted in the transport letter at <b>Appendix 5</b>, there is an existing crossing provided on the southern side of the roundabout, which was proposed to be upgraded. There is no proposal to remove this crossing facility.</p> <p>The safety of students would be compromised with the delivery of a formal crossing at this location because it does not meet sight distance requirements for drivers.</p> <p>A further challenge with the delivery of a crossing on this road is Wentworth Place is held in community title. As a result, additional approval from the community title holder would be required to deliver any crossing on this road.</p>
<ul style="list-style-type: none"> <li>- The car parking must be provided on site as staff may not want to park in P5 and catch a bus or walk for Stage 1. We note that construction stages are now planned to occur concurrently, however, the RtS notes that occupation will occur in two stages. This does not seem to be ideal unless the stages of occupation are in quick succession;</li> </ul>	<p><u>Staff car parking:</u></p> <p>Due to site constraints, it is not possible to fit off-street parking within the boundary. Also, the subsurface conditions make underground car parking facilities challenging.</p> <p>SINSW is proposing to fully subsidise 30 parking spaces in the P5 car park so that cost is not an issue for future staff members. This also mitigates the risk that teachers prefer to use other available parking options.</p> <p>This will also benefit the peninsula by reducing the car demand for Wentworth Point and therefore reduce the traffic impacts of the proposal.</p> <p>Teachers not wanting to park in P5 can also utilise public transport to work as an alternative.</p> <p><u>Staging:</u></p> <p>No staging is proposed (neither construction nor occupation) as part of the amended proposal. However, similar to other new schools, the full 850 capacity will not commence immediately but rather will be achieved incrementally, with a cohort of Year 7 or Year 7 and Year 8 students beginning the first year of operation and a new cohort of Year 7 students commencing each following year.</p>

SOPA comment	Response
<p>- SOPA notes that the RTS states "TfNSW bus planners are satisfied that additional bus services can be provided if required prior to the school opening". SOPA would like to comment further that any bus loading/unloading area for the high school cannot be on Wharf Road. SOPA already receives complaints from the primary school about traffic conditions on Wharf Road and in particular, the buses;</p>	<p>Noted. This will be considered in the planning for any school excursion.</p>
<p>- SOPA recommends a new road be created providing circulating flow from Wharf Road to Burraway Road around the riverside of the primary school and then between primary school and high school. This will provide drop off circulating flow for both primary school and high school. SOPA understands that City of Parramatta also requested that the planning for the precinct around the school be completed first to facilitate the orderly development of the land.</p>	<p>The amended proposal provides suitable traffic circulation arrangements for operation of the high school, whereby kiss 'n drop users will utilise the dedicated bays off Burroway Road and turn around in the turning circle at the end of the street.</p> <p>It is beyond the scope of this project to provide additional roads in the remainder of the precinct. TfNSW is progressing plans for development of the remainder of the precinct via the planning proposal and DCP process, as previously discussed in the EIS and Submissions Report.</p>
<p><b>3. Public Domain Interface</b></p> <p>SOPA recommends that a condition of consent is included in any approval which ensures that links to the foreshore park are provided from the high school and are planned in consultation with SOPA.</p>	<p>DoE does not agree to this recommended condition. The subject SSDA relates to the school site only and does not extend to the foreshore. It is beyond the scope of the project to provide links to the foreshore.</p> <p>However, we note that the amended design allows for construction of Ridge Road within the site if required, and public access to the foreshore park could be provided along this road.</p> <p>TfNSW is progressing plans for development of the remainder of the precinct via the planning proposal and DCP process, as previously discussed in the EIS and Submissions Report.</p>
<p><b>4. Ecological impacts</b></p> <p>The RTS specifically states that plantings of Tuckeroos are proposed to meet City of Parramatta guidelines. Tuckeroos are an invasive native species not local to the area. SOPA strongly reject the planting of this species so close to Sydney Olympic Park. Currently, the SOPA bush regeneration team are removing Tuckeroo seedlings from the critically-endangered Sydney Turpentine Ironbark Forest within nearby Newington Nature Reserve, as well as from native landscapes within Sydney Olympic Park. SOPA will not endorse more seed sources so close to the Park.</p> <p>SOPA recommends that conditions of consent are included in any approval which require:</p>	<p>The Tuckeroos have been changed to <i>Elaeocarpus reticulatus</i> Blueberry Ash, which is from the Sydney Turpentine Ironbark Forest community. Refer to the updated landscape drawings at <b>Appendix 2</b>. Given this change, no condition regarding further consultation with SOPA on the landscape scheme is required.</p> <p>Stantec have reviewed the proposal and confirm that the lighting design meets the requirements for external lighting design, in compliance with the National Light Pollution Guidelines for Wildlife.</p> <p>DoE accepts the recommended condition regarding compliance with National Light Pollution Guidelines for Wildlife.</p>

SOPA comment	Response
<ul style="list-style-type: none"> <li>- the proposed species list for the project (which excludes Tuckeroos) is included in the landscape plan and is to be agreed with SOPA;</li> <li>- external lighting complies with the National Light Pollution Guidelines for Wildlife.</li> </ul>	

## 5 Strategic context

### 5.1 Wentworth Point Precinct DCP 2014

The development as described in the EIS was not fully aligned with the structure plan in the DCP in that, inter-alia, it did not provide for Ridge Road, which is intended to provide public vehicle access to the precinct park.

An extract of the structure plan is shown below.

The proposed changes bring the development into closer alignment with the DCP by allowing for the Ridge Road corridor within the site.

It is anticipated that a new DCP will replace the existing DCP in the near future as part of a planning proposal being led by TfNSW, and the proposed high school will align with this new DCP. Nonetheless, by removing school-related development from the approved Ridge Road corridor, the development will ensure the approved Ridge Road is able to be constructed if the planning proposal and new DCP do not proceed as anticipated.



**Figure 2** Structure plan extract  
Source: Wentworth Point Precinct DCP 2014

### 5.2 Other plans and policies

The development's consistency with other strategic plans and policies was assessed at section 4 of the EIS. That assessment remains relevant. The development will continue to provide for a well-designed and suitably located development that meets an identified social infrastructure need and that is consistent with the objectives, directions and actions of relevant strategic documents.

## 6 Statutory context

The development's consistency with relevant State and local environmental planning instruments (EPIs) was assessed at section 5 of the EIS. That assessment remains relevant. The proposed changes result in no inconsistencies with the provisions of the relevant EPIs.

## 7 Assessment of impacts

### 7.1 Transport

The project transport consultant, SCT, has reviewed the amended proposal and has prepared a supporting letter (**Appendix 5**). The letter takes the form of an update to SCT's previously issued Response to Submissions letter. Key points from SCT's letter include:

- The pedestrian pathway pinch point on Burroway Road adjacent to the roundabout (as identified by Council) has been eradicated because the site is now integrated with the approved Ridge Road design;
- Swept paths have been provided (see attached to SCT's letter) for a rear-facing commercial waste collection vehicle along Burroway Road; and
- The proposed 146 bicycle parking spaces are sufficient for the proposed 850 students and will be accessed by the main entrance from Burroway Road.

### 7.2 Waste

As outlined in the letter at **Appendix 4**, the project waste consultant, Dickens Solutions, has reviewed the amended proposal and has confirmed that waste storage will remain as per the previously proposed design and that waste collection will occur off Burroway Road in accordance with the "interim" arrangements described in the Waste Management Plan (WMP) submitted with the Submissions Report and summarised as follows:

- All services will be provided from the Burroway Road kerbside, adjacent to the site's frontage where the bins will be serviced by the contractor;
- Bins will be presented to the kerbside on the evening prior collection, no earlier than 4pm; and
- Bins will be removed from the waste storage area (WSA) by the Site Manager/ Caretaker using a mobile bin towing device of an approved type. Upon completion of servicing all bins will be returned to the WSA.

Also as identified in the previously submitted WMP, to mitigate adverse impacts relating to noise, traffic flow and pedestrian safety, the WMP recommends that collection will only occur from 5am-7am, when the school is not occupied and pedestrian and vehicular activity is at its lowest.

The waste consultant has recommended no additional waste management measures due to the amended proposal.

### 7.3 Noise

The project acoustic consultant, NDY, has prepared an updated noise assessment that takes into account commercial waste collection on Burroway Road occurring during the night period (between 6am and 7am).

Assuming a sound power level of 89 dBA (typical commercial truck), NDY predicts that noise emissions from waste collection vehicles will be compliant with nighttime noise limits at the neighbouring residential towers when noise management procedures are

implemented. These measures may include switching off the engine during loading activities and using low-noise vehicles.

NDY also predicts that noise emission to the adjacent future mixed-use development area to the east will be compliant with the night-time noise limits when noise management procedures are implemented and an absorptive noise barrier (modular) is installed adjacent to the waste collection area.

Details of this noise barrier cannot be defined at this stage, as its design and even its need are subject to the details of the future mixed-use development to the east. Due to shielding from the school building, the future mixed-use development may not require acoustic screening.

Refer to section 4.1.5 of the updated noise assessment at **Appendix 7** for further detail.

Overall, it is expected that noise impacts from the development, including impacts from waste collection along Burroway Road, are within acceptable limits subject to implementation of the measures recommended in the updated noise assessment.

## 7.4 Social impacts

Urbis has considered the amended proposal and prepared an SIA Addendum, which is attached at **Appendix 9**.

Regarding the proposed 850 student cap, Urbis notes that community concerns regarding the school's ability to meet forecast enrolment numbers are likely to be exacerbated. The cap may cause some disappointment among students and families whose children are hoping to attend the school.

Nonetheless, Urbis concludes that overall the amended proposal will create a low positive impact on the local community, increasing access to and capacity of co-educational secondary education in an area of identified need and reducing the need for some students and parents to commute longer distances to access education.

Given the application now seeks approval for 850 students only, the play space within the site is considered sufficient for accommodating the needs of students as noted above in section 3.2, and the proposal does not rely upon the playing field to the north. As such, the previously recommended condition that Stage 2 not commence until the playing field is delivered is no longer required.

Any future increase in student numbers will occur via a separate approval after the additional play space is delivered and available for student use.

## 7.5 BCA

Under the EIS, the proposal included staged occupation of the development, with Stage 1 allowing for 850 students and Stage 2 increasing the total to 1,530 students. It was proposed to make Stage 2 occupation dependent upon delivery of the future eastern road and implementation of a joint use arrangement for the future playing field to the north. The eastern road would provide access and parking for Stage 2 operation, and the playing field would provide for the outdoor play space needs of the Stage 2 student population.

The amended proposal has removed the staged occupation and will allow for 850 students only, with any future increase in student population subject to a separate approval.

Capping the student number at 850 means the development does not rely upon parking or access associated with the future eastern road. Parking and access will occur as per the "Stage 1" arrangements described in the Submissions Report, with access and loading

to occur along Burroway Road and staff parking to occur at the Sydney Olympic Park P5 car park.

As the original proposal previously relied upon the eastern road for egress of the site, the BCA consultant and fire engineer have been requested to consider the amended proposal for 850 students, where the construction of the eastern road is delayed and the school will operate with access provided from Burroway Road.

BCA Logic have provided BCA advice in relation to the amended proposal and note that an easement along the eastern boundary, which allows egress along the eastern boundary when the school is occupied, can be relied upon to address the relevant fire protection, access and requirements of Section C, Section D (which covers access for people with a disability) and Section E of the Building Code of Australia 2019 Volume One, Amendment 1 (BCA 2019). Refer to the BCA letter at **Appendix 10a** for further detail.

Core Engineering Group have provided fire safety advice in relation to the amended proposal and agree with the advice of BCA Logic, noting that the implementation of an easement, in lieu of a public road, is a feasible alternative as long as it is available at the time of occupation of the school. Refer Fire Safety Strategy letter at **Appendix 10b** for further detail.

We note that DoE have undertaken engagement with TfNSW as the owner of the land to the east of the site to discuss the proposed easement and suggest that a condition of consent is provided which will require the establishment of an easement in this location, prior to occupation of the school.

TfNSW have provided in-principle support. If the future eastern road has been constructed when the school is ready for occupation, the public road will satisfy the requirements of the BCA. However, the amended proposal does not rely upon the future eastern road and a condition of consent will ensure an appropriate easement is provided at the time of occupation, if required.

## 7.6 Other impacts

The amended proposal results in no additional impacts in regards to environmental amenity, views, heritage, Aboriginal cultural heritage, biodiversity, stormwater, flooding, soil and water, contamination impacts or economic impacts. These areas of impact were assessed in the EIS and Submissions Report, and the findings of that assessment remain relevant.

## 8 Mitigation measures

The mitigation measures set out at Section 9 of the EIS and Section 5 of the Submissions Report generally remain relevant, with changes only required to the measures regarding social impacts (to reflect the revised student numbers) and noise impacts (to reflect noise assessment of waste collection on Burroway Road). An updated consolidated list of mitigation measures is provided below.

**Table 5** Updated consolidated list of mitigation measures

Item	Potential impact	Mitigation measures
Transport and accessibility	Construction: Approximately 20 heavy delivery movements will occur each day during construction.  Workers will utilise on-street parking in the area.	A detailed construction traffic management plan will be prepared and implemented. Large deliveries should be scheduled generally outside of peak work and school hours. Workers will be encouraged to use public transport/carpool.



Item	Potential impact	Mitigation measures
	<p>Operation: The school will generate approximately 112 vehicle trips in the peak hours. SIDRA modelling shows that the surrounding intersections will continue to operate at LoS A.</p> <p>(This estimate is conservative for the purposes of the amended development given it is based on a total student population of 1,530 rather than 850).</p>	A School Transport Plan will be implemented to encourage sustainable transport modes. Infrastructure will be provided that supports and promotes walking and cycling for students and staff.
Noise and vibration	Construction: Surrounding receivers will experience noise over 75dB(A) during construction.	A construction noise management plan is to be implemented. Noise is to be managed through feasible and reasonable noise mitigation measures as outlined in the NSW Interim Construction Noise Guideline and Australian Standards 2436-2010.
	Operation: Rooftop plant, PA system, school bell and outdoor workshop have minor potential to disrupt amenity.	<p>Rooftop plant, PA system and school bell should be selected and positioned to achieve the required noise levels outlined in the acoustic report.</p> <p>Treatments should be considered for the outdoor workshop dust extractor as recommended in the acoustic report.</p>
	Operation: Waste collection along Burroway could disrupt residential amenity.	Management measures should be implemented and a noise barrier considered in accordance with the recommendations in the acoustic report.
Aboriginal cultural heritage	Construction: The ACHAR has identified that the site has no potential for Aboriginal cultural heritage sites given the land is reclaimed.	No unexpected finds protocol or further investigation is required.
	The proposal seeks to incorporate Aboriginal cultural heritage into the design.	Aboriginal community consultation in accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010 should continue for the remainder of the project. Opportunities to inform design with Country will feature in the final detailed design.
Wind	All areas of the school are expected to be suitable for their intended use. Upper level areas would potentially benefit from local amelioration strategies.	Investigate local amelioration strategies (e.g., vertical blockage, vegetation, section seating areas) for upper levels during detailed design.

Item	Potential impact	Mitigation measures
Contamination	The site is contaminated from previous industrial activities.	Remediation and long term management are to be implemented in accordance with the RAP and RAP Addendum.
Acid sulfate soils	Acid sulfate soils have been identified during site investigations.	Further investigation and management are to be implemented in accordance with the Acid Sulfate Soils Management Plan.
Sediment and erosion	Construction activities have the potential to cause sediment and erosion impacts.	Standard sediment and erosion control measures to be implemented in accordance with the Sediment and Erosion Control Plan.
Social impacts	Noise impacts during construction.	Implement the recommendations in the acoustic report including preparation of a construction noise management plan.

## 9 Justification of amendment project

This Amendment Report has considered the relevant statutory instruments and strategic documents and provided an assessment of the economic, environmental and social impacts of the amended proposal.

In summary, the development is justified for the following reasons:

- The proposal will meet identified demand and deliver on the announcement of a new high school in the local area;
- The proposal will provide for a contemporary, purpose-built facility that will optimise educational outcomes;
- The proposal will generate jobs, both short-term and ongoing;
- The proposal's design is the result of detailed analysis of the site and consultation with the community, Aboriginal stakeholders, DoE, GANSW, Council and TfNSW;
- The proposed school is easily accessible and supports active, sustainable transport;
- The potential environmental impacts of the proposal can be satisfactorily mitigated subject to the recommendations of the supporting technical documentation;
- The site is suitable for the proposal; and
- The proposal is in the public interest.



