Submissions Report Sydney Olympic Park new high school SSD-11802230

On behalf of NSW Department of Education August 2022



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1 Introduction

This Submissions 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) was exhibited from 14 October 2021 to 10 November 2021. Following exhibition, DoE prepared a Submissions Report, which addressed the issues raised during exhibition and proposed a number of design refinements.

An Amendment Report was subsequently submitted in June 2022 in response to the issues raised by Department of Planning and Environment (DPE). The changes proposed included:

- 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.
- Maintain the roundabout at the intersection of Burroway Road and Wentworth Place (to align with the approved Ridge Road design).

The Amendment Report was publicly exhibited from 20 June 2022 to 6 July 2022. A total of 18 submissions were received including 12 submissions from individual members of the public, 3 submissions from organisations and 3 submissions from agencies/authorities.

DPE addressed a letter to DoE dated 11 July 2022 requesting a response to the submissions received during exhibition of the Amendment Report.

This report addresses the comments in DPE's letter and the submissions received during exhibition of the Amendment Report.

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

2 Analysis of submissions

A total of 18 submissions were received including:

- 12 submissions from individual members of the public, including 9 objections and 3 comments.
- 3 submissions from organisations, including 2 objections and 1 comment.
- 3 agency and authority submissions, being Transport for NSW (TfNSW), Sydney Olympic Park Authority (SOPA) and City of Parramatta Council (Council),

Six of the 12 individual public submissions were made by residents of Newington, 5 from Wentworth Point and 1 from Sydney Olympic Park.

No petition letters or form letters were received.



3 Further actions taken

3.1 Community consultation

The table below provides a summary of consultation activity carried out since lodgement of the previous Submissions Report.

Table 1. Response to DPE

Date	Audience and Purpose	Activity
25 May 2022	School community and Wentworth Point residents	A project update explaining the revised planning pathway and upcoming amendment, how new high schools generally open with staggered enrolment and advertise community information session for June 1. Distributed via project mailing list (approx. 200), mail drop to local residents (approx. 400), distributed to local primary school communities via feeder schools and P&C, and provided to building managers for the peninsula to distribute to residents (approx. 4000).
1 June 2022	School community and local residents	Community information session to explain how the project will be delivered in phases due to the wider peninsula planning context, the amendment to the SSD, facilities, how the school will be opened with staggered cohorts, and next steps. Project team representatives available for one-on-one conversations to answer questions. Held between 3-7pm at Wentworth Point Public School. 100 registrations, 57 attendees. All information from the session including information boards and FAQs published to the project webpage . Representatives from Landcom in attendance for attendees to speak to regarding matters outside the remit of School Infrastructure NSW (SINSW) such as the peninsula planning and park.
14 June 2022	Email to all attendees or registrations for information session.	Follow up email to all who registered and/or attended the information session to remind of materials presented providing links to Project update, Information boards and FAQ materials (as above), thank them for attendance and confirming they are signed up to the project mailing list.
22 June 2022	School community and Wentworth Point residents	Project update to advise of public exhibition period for the SSD Amendment, respond to key themes raised at the information session and update project name to 'A new high school in Wentworth Point' to align with NSW Budget papers. Distributed via project mailing list (approx. 200), mail drop to local residents (approx. 400), distributed to local primary school communities via feeder schools and P&C, and provided to building managers for the peninsula to distribute to residents (approx. 4000).

Direct enquiries to School Infrastructure NSW via community contact lines included 2 phone calls to 1300 482 65 and 7 emails to schoolinfrastructure@det.nsw.edu.au.

Common themes from the direct enquiries included:



- Enrolment dates and intake area.
- Ongoing construction impacts.
- Traffic and public transport including studies, congestion, bus access.
- The proposed removal of the roundabout on Burroway Road.
- Private parking, staff parking and bus parking.
- Phased construction of the school.
- Access to play space and NESA requirements.
- The adjoining playing field.
- Site selection in Sydney Olympic Park and access to facilities.
- Privacy of students in completed school.
- Shading.

Themes mentioned only once or twice:

- Support classes.
- Whether the school is a specialist sport high school.

The majority of these enquiries also raised matters outside this project and the remit of the DoE, such as the timeline for the peninsula park, proposed nearby apartment developments and future Parramatta light rail.

3.2 Meeting with DPE

DoE met with DPE officers on 21 July 2022 and again on 28 July 2022, with Council, Landcom and the Planning Delivery Unit in attendance at the second meeting. It was discussed that a 3m-wide easement will be required along the eastern boundary to support fire safety until such time as a road is approved/constructed in that location.

Landcom submitted a modification application to Council on 29 July 2022 seeking to realign the approved Ridge Road from its current location to the eastern boundary of the site. Once approved/constructed, this road will negate the need for the 3m-wide easement. Key relevant documents from Landcom's application are provided at Appendix 4 of this report.

An in-principle support letter is being pursued from the adjoining landowner, TfNSW/Landcom, to confirm the 3m-wide easement can be established should the modification for the revised road not be approved in time for the school to commence operations.

3.3 Additional investigation

At the request of DPE, a Flood Emergency Management Plan has been prepared by TTW (Appendix 3). This plan, which was prepared following consultation with SES (on 2 August 2022), summarises the flood risks within the site, identifies preparation measures that should be undertaken, and provides an action plan with steps to be completed during a flood event. The project's mitigation measures have been updated to reflect this plan (see Section 5 below).



4 Response to submissions

4.1 Response to DPE RtS request

Following its initial assessment of the amended proposal and review of submissions, DPE issued a letter to DoE dated 11 July 2022 requesting that a Submissions Report be prepared and submitted to DPE to respond to the submission lodged during the exhibition of the amended proposal.

In its letter DPE requested that some additional information be provided. This additional information is outlined and addressed in the table below.

Table 2. Response to DPE

Matters Raised in Submission	Response
The RtS must include an updated plan detailing the available open play space on site for student use.	An updated open play space plan is attached at Appendix 1 of this report.
The RtS must also be accompanied by a detailed Flood Emergency Management Plan developed by a suitably qualified flood risk and emergency management consultant in consultation with NSW SES and be in accordance with current best practice flood emergency management. The Flood Emergency Management Plan must provide clear, quantifiable triggers for each emergency management action.	A Flood Emergency Management Plan has been prepared by TTW and is provided at Appendix 3. The plan has been prepared following consultation with SES (on 2 August 2022), is in accordance with current best practice flood emergency management, and provides clear, quantifiable triggers for emergency management actions and details flood response actions.

4.2 Response to Council

Table 3 provides a response to the comments by Parramatta Council in the submission letter dated 20 July 2022.

Table 3. Response to Council

Matters Raised in Submission	Response
 <u>1. Integration with Wentworth Point Precinct</u> <u>Development Control Plan 2014</u> It is acknowledged that the modified SSD adheres to the current DCP local road network as it accommodates the approved Ridge Road to the west of the school (albeit it will not rely on this road as access will be gained from Burroway Road to the south) and does not impact open space. Notwithstanding, any future expansion of the school under a separate SSD will rely on a Planning Proposal to amend the LEP and the DCP masterplan, such as changes to the indicative land uses and road network. The supporting documentation states that the Department of Education (DoE) intends to increase the school's capacity under a separate future SSD to 1,530 students. This is intended to occur following delivery of the eastern road and the northern playing field. The 	As previously noted, the Wentworth Point Precinct DCP clearly provides some level of flexibility and allows for reasonable alternative solutions: 1.6 Application of this DCP [] Consistency with Objectives and Controls in this DCP Clauses in this DCP contain objectives and controls relating to various aspects of development. The objectives enable Council and applicants to consider whether a particular proposal will achieve the development outcomes established for the precinct. The controls establish standards, which if met, mean that development would be consistent with the objectives. However ,



Matters Raised in Submission

DoE June 2022 FAQ page notes the construction of the 1,530 capacity high school would "run in parallel with finalisation of the plans for the remainder of the Peninsula". It is therefore apparent that the envisaged completed school (with up to 1,530 students) will rely on future unplanned infrastructure that will not be compliant with the existing DCP masterplan.

The modified SSD report anticipates "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." However, there is no certainty that such a Planning Proposal would be successful, and therefore it should not be assumed that any future stage to the school will align with a future DCP. Consequently, proceeding with a first stage of development that could prejudice the proper development of the final school proposal should not occur until the full school development has been properly considered through the process of the amendment of the existing DCP.

Although a high school is supported in principle to serve the needs of residents, it is the preference of Council officers that a holistic approach be taken with regards to planning for and delivery of a school that integrates with the master planning of the peninsula to ensure all matters can be properly considered, with particular regard to integration of any future development stage of the school with the approved Peninsula Park. The SSD's location in the DCP Masterplan is shown in **Figure 2**.

2. Inadequacy of School Facilities and Local Infrastructure

The modified SSD results in a 2,000m² reduction in play space and reduced access to recreational facilities due to the removal of one indoor and one outdoor court replaced by one new outdoor court. The modified SSD only provides 6m² of outdoor play space per student, which is below the 10m² benchmark (2020 SINSW School Site Selection and Development Guidelines). Since the timing for delivery of the future playing field is uncertain, it is therefore critical that as much play space is provided as soon as possible. Council officers recommend the previous layout (Phase 2) be delivered as part of a coordinated and holistic approach to developing Wentworth Point peninsula with adequate and innovative play space that meets the Educational Facilities Standards and Guidelines requirements.

Noting the significant lack of community open space in Wentworth Point, Council officers will always advocate for the provision of as much open space as possible at every opportunity.

esponse

in some circumstances, strict compliance with the controls may not be necessary, or may be difficult to achieve because of the particular characteristics of a development site. In these situations, Council may grant consent to a proposal that does not comply with the controls in this plan, providing the relevant objectives are achieved. Where a variation is sought it must be justified demonstrating how the development will meet the vision and development principles as well as the objectives of the relevant control [emphasis added].

A review of the proposed development against the principles of the DCP in the Amendment Report submission (Appendix 14) shows that the development generally implements the elements sought for the peninsula or addresses these in a different way while still meeting the vision and development principles.

Furthermore, as previously noted, the DCP is outdated and will be superseded by a new DCP, which will be prepared by TfNSW and its development partner Landcom in consultation with Council as part of the planning proposal process and which will accommodate the proposed school.

Importantly, the revised school layout and capacity set out in the Amendment Report have been designed to be consistent with both the current and proposed DCP.

The amended proposal provides 5,108sqm of play space, which equates to 6qm per student (refer to diagrams at Appendix 1 of this report). 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



Matters Raised in Submission	Response
Matters Raised in Submission	 Response 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. DoE also intends that students will have access to the future playing field to the north (to be delivered by others). DoE expects that the field will be subject to a Joint Use Agreement between DoE and TfNSW whereby the field will be available for school use during school hours. We emphasise that the proposed reduction in capacity and facilities is an interim measure proposed in order to comply with current restrictions on development in the area of the approved Ridge Road (as described in the Amendment Report). Landcom has prepared and submitted a modification application to Council which seeks to realign Ridge Road in order to allow for construction of the school as set out in the previous Submissions Report. Once this modification is approved, which will allow delivery of the future eastern road and northern playing field, DoE intends to expand the
	removed under the Amendment Report (through a separate approval process).
 <u>3. Urban Design</u> Street Setbacks The proposed setbacks do not reflect 	The proposed setback from Burroway Road has been carefully considered and has been designed to be a strong street wall suitable to the high density context.
 the proposed serbacks at nonrolectron the required serbacks in according to the Wentworth Point DCP in either Burroway Road (6m) or the future local roads (3m). The street setbacks in the DCP must be reinstated to be consistent with neighbouring recent development and to support public amenity (including tree canopy). 	Regarding the setback from the future eastern road, we note that a significant portion of the built form is set back more than 4m, which is greater than the DCP's 3m minimum requirement. This large setback allows for generous planting while defining the school's interface with the eastern road. The result is an edge condition that is scaled for and sympathetic to pedestrians. We further emphasise that, whilst the DCP has
	been considered, Clause 2.10 of State Environmental Planning Policy (Planning Systems) 2021 states that DCPs do not apply to SSDAs. As such, the proposal's inconsistencies



Matters Raised in Submission	Response
	with the DCP do not raise any critical issues from an assessment or approval perspective.
Street Activation	As evident in the architectural plans submitted with the Amendment Report, the school's large

below.

The proposed service area (pump room, comms room, etc.) at the corner of Burroway Road is not supported. This is the site's most prominent corner and should be given to more "active uses". The relocation of the main entry to this corner would facilitate its activation.

Public domain plans can be provided following determination. Comprehensive DA standard Public Domain Alianment Drawings, as described in the DoE accepts DPE's standard condition Parramatta Public Domain Guidelines should be reaarding public domain works to the direct prepared prior to granting consent. perimeter of the boundary to Burroway Road, which requires consultation with and approval from Council prior to the commencement of any public domain works.

main entry is immediately adjacent to the

activation in this area. A ground floor plan

extract and photomontage are provided

corner of the building, providing strong street

We understand that Landcom lodged a modification application via NSW Planning Portal on 29 July 2022 to modify the approved Ridge Road location, which will impact any public domain alignment drawings. As such, submission of the public domain plans following determination will allow design to consider the most up-to-date circumstances.

As discussed in the transport letter at Appendix 5 of the Amendment Report, the school designs have been modified to be consistent with the approved Ridge Road including roundabout. Concerns are raised with regards to the With the new design, the footpath pinch point along Burroway Road is eradicated because (particularly at the roundabout and the the site is now integrated with the Ridge Road main entry). Consideration should be



4. Transport

Pedestrian Access

footpaths along Burroway Road

Public Domain Plans

Matters	Raised in Submission	Response
•	given to widening the footpaths to support pedestrian volumes. A pedestrian crossing along Burroway Road is required. The SCT Consulting traffic report (September 2021) recommended pedestrian crossings to support a school of 850 students. A review of the proposed pedestrian facilities should be undertaken and any proposed pedestrian facilities on local roads should be provided to Council for review.	 design. To clarify, the previously developed give-way intersection at this location is no longer proposed. A pedestrian crossing is proposed along Burroway Road, east of Wentworth Place. This crossing has been part of the proposed development since the original EIS, and there has been no proposal to remove it. This proposed crossing was confirmed as part of the proposal's off-site works in Section 3.6 of the Amendment Report. Pedestrian facilities have been reviewed throughout preparation and assessment of the subject application. Designs for the proposed facilities will be provided to Council for review as per DPE's standard conditions of consent.
•	Car Parking Concerns are raised with regards to the nil provision of on-site car parking. Compliant on-site car parking should be provided to serve the development as it is proposed, rather than relying on a potential future SSD for which there is no guarantee of support. A Pedestrian and Traffic Management Plan and a Car Park Management Plan are required at a minimum to address any transport issues as well as the shuttle bus access arrangements. They should be provided to Council prior to the construction certificate (CC). This should form part of the conditions of consent. The 30 staff car parking spaces in Sydney Olympic Park Authority's (SOPA) P5 car park should remain subsidised until the future proposed road / parking is delivered. This should form part of the conditions of consent.	Sydney Olympic Park P5 parking will be available for staff prior to delivery of the future eastern road. DoE intends to fully subsidise 30 parking spaces at P5 so that cost is not an issue. The P5 parking area is located on a frequent bus route and the corridor of the future Parramatta Light Rail Stage 2. Buses depart every 20-30 minutes and are within a short walk of the parking area. This is sufficient frequency to cater for the trip to be attractive. The vision for the school and the planning are all focused on increasing the attractiveness of the non-car network rather than making car access easier and supporting car dependency. Providing parking on-site would increase traffic generation and the congestion impacts of the development. DoE does not intend to prepare a separate Pedestrian and Traffic Management Plan and Car Park Management Plan for submission to Council. A School Transport Plan will be prepared as required by DPE's standard conditions. The plan will address relevant transport issues, including bus access for staff.
An ade be prov accom be inve and pro	Bus Access equate bus parking facility is required to vided for the school and it is to modate peak bus demand. This should stigated before the SSD is determined ovided as part of the proposed oment given it is critical to the operation chool.	 The school does not intend to purchase its own buses and therefore does not require a dedicated onsite bus parking facility. Buses will be arranged for excursions as necessary. Regarding public buses, DoE has consulted with TfNSW bus planners on 30 November 2021 (post-lodgement) and confirmed the following: TfNSW regularly reviews bus services and will provide additional bus services through its network as required by the growth. As students tend to travel in the opposite direction to the peak travel,



Matters Raised in Submission	Response
	TfNSW believes there is spare capacity in the bus system.
	 TfNSW will be provided with projected enrolment figures to be included in the annual bus service planning processes.
	Hence TfNSW bus planners are satisfied that additional bus services can be provided if required before the school opening.
	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), it would still generate less traffic than has been assessed in the application.
 <u>Kiss and Ride</u> It is unclear whether the queuing analysis took into consideration the reduced number of standard kiss and ride spaces. If not, the queuing analysis is required to be updated. The proposed kiss and ride facilities will require approval to be obtained under the traffic committee process. This should form part of the conditions of consent. 	As clearly explained in the previous Submissions Report, the reduction in standard kiss 'n drop spaces from 5 to 4 raises no issues for kiss n' drop operations. The original queuing analysis assumed 190 students would use the kiss 'n drop, based on a student population of 1,530. Now that the student capacity has been reduced to 850, it is estimated that just under 90 students will use the kiss 'n drop. The reduction in demand is 54%, which is much larger than the 20% reduction in kiss 'n drop spaces. As such, the kiss 'n drop facility is expected to operate satisfactorily with 4 standard spaces. DoE accepts DPE's standard conditions regarding roadworks, which requires the applicant to obtain approval for the works under section 138 of the <i>Roads Act 1993</i> .
 <u>5. Delivery and Waste Services</u> No waste and loading area have been specified. This must be adequately 	As outlined in the letter at Appendix 4 of the Amendment Report, the project waste consultant has reviewed the amended proposal
 The use of Burroway Road as kerbside waste collection and loading raises concerns with noise, smell, and impact to pedestrian access. It will also impact kiss and ride facilities. 	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. These arrangements are
 A waste and loading management plan are to be provided to Council prior to CC and should form part of the conditions of consent. The Plan is to ensure that such activities will not impact school pick-up and drop-off, pedestrian access and cause adverse noise and smell. Proposed signage changes on Burroway Road will require Council approval under 	 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. Bins will be removed from the waste
the Parramatta Traffic Committee process.	• bins will be removed from the waste storage area (WSA) by the Site



Matters Raised in Submission	Response
 This should form part of the conditions of consent. It is unclear how waste will be transported from the storage bins at the rear of the site to the street kerb. The appropriate route a mobile towing device would traverse should be considered. 	Manager/Caretaker using a mobile bin towing device of an approved type. Upon completion of servicing all bins will be returned to the WSA. The future waste contractor (SUEZ) has confirmed that they can facilitate kerbside collection off Burroway Road via a rear- lift truck (refer to correspondence at Appendix 17 of the previous Submissions Report).
	DoE accepts that any signage changes along Burroway Road will require Council approval.
	DoE considers that submission of a waste and loading management plan to Council is unnecessary. DoE accepts DPE's standard condition prior to occupation regarding operational waste management, which requires preparation of a Waste Management Plan (WMP) and submission to the certifying authority. This WMP will contain measures that ensure waste activities do not negatively affect school pick-up and drop-off or pedestrian access.
<u>6. Energy Efficiency</u>	A Sustainable Development Plan prepared by Stantec was prepared to support the EIS
 Green Star Rating The nominated Green Star target (4 star) is low. The development should adopt a 5-star Green Star rating which aligns with the NSW 	(Appendix 7). The report explains how the project has addressed the SEARs requirements and summarises the ESD initiatives adopted for the project.
Government Resource Efficiency Policy.	As noted within the Architectural Design Report Amendment Report Addendum, the project's baseline goal set by Schools Infrastructure NSW is to achieve 4-star Green Star accreditation; however, it is anticipated that a higher level of performance will be achieved as the project progresses through design phases. Despite the green star rating, the scheme incorporates passive measures as described in the design report.
7. Relationship to Adjoining Development	DoE considers that the Amendment Report and
 Insufficient information has been provided to understand how the proposal integrates with Ridge Road and adjoining land. Sections and elevations are required indicating the approved levels of the adjoining land. Concerns are raised that the land levels have not been considered, which may result in poor amenity for students. It appears that the school will be at a similar level to the approved Ridge Road level, then will fall to approx. Im below Ridge Road as it goes northbound. This could result in safety impacts on students from vehicular traffic, and visual amenity impacts. 	supporting documentation have sufficiently described the amendments to the design that will allow the Ridge Road corridor to remain available for future construction if required. A retaining wall would be provided at the boundary between the school and Ridge Road, as evident in the amended plans. However, as Council is aware, there is no intention to construct Ridge Road in the previously approved location. TfNSW and Landcom have been undertaking pre- lodgement discussions with CoP for over 12 months and informally lodged a planning proposal, which will revise the whole peninsula layout and move Ridge Road to the eastern side of the school site.



Matters Raised in Submission	Response
• The school will be 2m higher than the eastern adjoining land and 1.5m to 2m higher than Burroway Road. The retaining walls and their impacts have not been adequately detailed.	We also note that Landcom lodged a modification application on 29 July 2022 which seeks to realign Ridge Road to account for the proposed school and allow for construction of the road along the eastern boundary of the school site as intended by DoE. A copy of the modification application documentation is provided at Appendix 4 of this report.

4.3 Response to agency submissions

4.3.1 Transport for NSW

Table 4 provides responses to the comments by Transport for NSW in its submission letter dated 13 July 2022.

Table 4. Response to TfNSW

Matters Raised in Advice	Response
The submitted amendment report calculates traffic generation potential based on mode share calculations from the traffic report submitted as part of the EIS, and based on the stretch mode share case for the previously proposed student numbers. DPE should ensure valid justifications provided for the assumptions used and any revised calculations that reflect the currently proposed student numbers and staggered enrollments.	As discussed in SCT's letter at Appendix 2 of this report, mode share benchmarking was conducted on similar sites in the original Transport Access Impact Assessment (Turramurra High School and Inner Sydney High School). The forecast car mode share for the Sydney Olympic Park new high school is similar to that of Turramurra High School despite having a much higher density. Higher density would mean that it is expected car mode share would be lower, owing to lower car ownership and shorter travel distances from residences to the school.
	The assessment in the original Transport Access Impact Assessment was conducted based on a student population of 1,530, rather than the 850 students now proposed. The traffic modelling was conducted with the full 1,530 students as well. As a result, the impact assessed was with more traffic than the school is now expected to generate as part of the Amendment Report.
	DPE can be confident that the assessment has followed the normal process for mode share forecasting in the development application process and that the impact will be at the level explained in reporting.
The applicant is requested to provide an updated STP addressing comments provided in the TfNSW letter for SSD-118002230 dated 23 November 2021, to provide additional comments prior to the preparation of the finalised STP that is to be submitted to TfNSW prior to commencement of construction work.	As noted in SCT's letter at Appendix 2 of this report, TfNSW was previously engaged and confirmed that they would accept a draft/interim School Travel Plan pre- construction and a final plan updated and submitted before occupancy.
Due to the proposed eastern road no longer being delivered, waste collection and deliveries	As noted in SCT's letter at Appendix 2 of this report, the proposal is for a loading zone that



Matters Raised in Advice	Response
are proposed to occur on the frontage of the school at a Burroway Road loading zone, which should be provided outside of kiss 'n drop times (e.g. before 8 am, 9.30 am-2.30 pm and after 4 pm). There is the potential for delays or unforeseeable circumstances when waste collection and deliveries cannot occur within the designated times proposed, 5am-7am. This could cause a congestion along Burroway Road and possible risks for school children if the waste collection or deliveries coincide with the school drop off or pick up times due to malfunctions or time delays. TfNSW recommends alternative, off- road options for all loading and servicing are proposed as contingency.	 would occur outside of kiss 'n drop periods (e.g. before 8am, from 9.30am to 2.30pm, and after 4pm). Off-road options for loading and servicing would impact on pedestrian connectivity by creating a crossing in an important pedestrian thoroughfare. It would also be challenging to achieve sight distances to the adjacent roundabout. The management plan for the site will likely specify that if drivers miss the window, they need to return another time or day to access the site. A management approach is an appropriate response to this risk. We emphasise that this is an interim strategy. The final waste solution (for the full 1,530-student school) will be provided along the future eastern road (through a separate approval process), following approval of the Landcom modification to relocate Ridge Road to the eastern boundary and provide for the future playing field to the north of the school site.
DPE to ensure the footpath width complies with relevant standards and identify potential safe crossing points in the precinct and along Burroway Road adjacent to the roundabout and Wentworth place.	As noted in SCT's letter at Appendix 2 of this report, the road layout is consistent with the City of Parramatta's Development Consent DA 40-2015 as modified, in particular, the approved Ridge Road. At the western boundary of the site, the footpath dimensions and crossing points are dictated by this approval. Within the area not affected by Development Consent DA 40-2015, the narrowest point of footpath width is about 2.8m. This is more than the spatial requirement of two wheelchairs passing comfortably (1.8m). The footpath widths in the design, therefore, comply with the relevant standards. It is consistent with other footpath widths in the area. Pedestrian crossing points have also been designed to standards. The midblock island refuge to the west of the site is defined by Development Consent DA 40-2015 as modified, in particular the approved Ridge Road. The school is proposing a new raised threshold zebra crossing along Burroway Road has been designed based on Austroads Guide to Road Design and TfNSW Technical Direction TDT2011/01a. DPE should be satisfied that the designs comply with the relevant requirements.
It is noted that the bicycle parking has been reduced from 258 to 146 spaces. TfNSW considers that the reduction in parking will discourage bicycle riding as an alternate mode of transport. If the site doesn't have adequate space for the initially proposed 258 bicycle parking spaces,	As discussed in SCT's letter at Appendix 2 of this report, the bicycle parking has been reduced because the number of students has been reduced compared to the original submission (850 students instead of 1,530



Matters Raised in Advice	Response
adequate evidence should be provided that on- site bicycle parking is sufficient to cater for the expected demand and meets the Green Travel Plan initiatives.	students). The ratio of bicycle parking spaces has not changed.
	As such, there is no need for changes to the mode share assumptions. The number of bicycle spaces is consistent with the forecast cycling mode share adopted for the site.
	The evidence for the mode share assessment was articulated in the originally submitted transport access impact assessment. The mode share and infrastructure provision per student are the same.
	We emphasise that this is an interim strategy. Additional spaces will be provided when DoE increases the student population to 1,530 in the future (through a separate approval process), following approval of the Landcom modification to relocate Ridge Road to the eastern boundary and provide the future playing field to the north of the school site.
Although TfNSW supports no parking for the site, this application is still proposing parking but in an alternate location a substantial distance from the site. TfNSW recommends that any required car parking is provided on-site. TfNSW advises that if P5 parking is to be utilised the school should provide a dedicated school shuttle for staff from the parking structure. This will ensure staff do not utilise kerbside space adjacent to the school.	The P5 parking area is located on a frequent bus route and the corridor of the future Parramatta Light Rail Stage 2. Buses depart every 20-30 minutes and are within a short walk of the parking area. This is sufficient frequency to cater for the trip to be attractive.
	The vision for the school and the planning are all focused on increasing the attractiveness of the non-car network rather than making car access easier and supporting car dependency. Providing parking on-site would increase traffic generation and the congestion impacts of the development.
	We also emphasise that this is an interim strategy. DoE intends that 30 staff spaces will be provided along the future eastern road (through a separate approval process).
	Landcom lodged a modification to Council on 29 July 2022 that seeks to realign the approved Ridge Road to account for the proposed high school and enable the eastern road to be constructed (with parking for staff).

4.3.2 Sydney Olympic Park Authority

Table 5 provides responses to the comments by SOPA in its submission letter dated 5 July 2022.

Table 5. Response to SOPA

Matters Raised in Submission	Response
 School name SOPA reiterates that it is not supportive of the proposed naming for this new school as "Sydney 	As previously responded to, the name "Sydney Olympic Park new high school" has been used in the SSDA documentation for general identification purposes. It identifies



Matters Raised in Submission	Response
Olympic Park High School" given it is not located within the actual boundary of Sydney Olympic Park.	the name of the project and is consistent with government announcements. It does not identify the final name of the school.
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 Park, and also may require a separate approval process under the Olympic Insignia	The name of the new high school will be determined following consultation and in line with NSW Government legislation (Section 27(2) of the Education Act, 1990) and DoE policies on school naming. It is anticipated the name will be finalised in the year before opening of the school. The SSDA does not seek approval for the school name "Sydney Olympic Park High
Protection Act 1987. In addition to the above, SOPA would like to further note that as previously discussed with School Infrastructure New South Wales (SINSW), a	School". The proposed school has more recently adopted the interim name "Wentworth Point new high school", which is also temporary and not the final name proposed for the school.
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.	It is acknowledged that SOPA notes that a high school will be required within Sydney Olympic Park in the future, however this falls outside the remit of this application.
2. Transport and Access	Noted.
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.	
Remaining transport and access issues include:	
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;	As noted in the transport letter at Appendix 5 of the Amendment Report, there is an existing crossing provided on the southern side of the roundabout, and there is no proposal to remove this crossing facility, which provides a safe crossing at that point of the road.
	The safety of students would be compromised with the delivery of a raised crossing at this location because it does not meet sight distance requirements for drivers.
	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.
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;	As previously noted in the Amendment Report, 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. 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



Matters Raised in Submission	Response
	options. This will also benefit the peninsula by reducing the car demand for Wentworth Point and therefore reduce the traffic impacts of the proposal. Teachers not wanting to park in P5 can also utilise public transport to work as an alternative.
	We also emphasise that this is an interim strategy. DoE intends that 30 staff spaces will be provided along the future eastern road (through a separate approval process).
	Landcom lodged a modification to Council on 29 July 2022 that seeks to realign the approved Ridge Road to account for the proposed high school and enable the eastern road to be constructed (with parking for staff).
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;	Noted. This will be considered in the planning for any school excursion.
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.	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.
	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.
3. Public Domain Interface 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.	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.
4. Open/Recreational Space SOPA raise concern about the lack of open space and recreational area available for students within the school ground and the effects that this may have on their physical and mental well-being.	The amended proposal provides 5,108sqm of play space, which equates to 6qm per student (refer to diagrams at Appendix 1 of Amendment Report package). 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



Matters Raised in Submission	Response
	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.

4.4 Response to organisations

This section provides responses to the issues raised in the organisation and public submissions. The issues and responses are addressed in each individual submission.

4.4.1 Wentworth Point Residents Action Group (WPRAG)

Table 6 provides responses to the comments by the WPRAG in its submission letter dated 2 July 2022.

Table 6. Response to WPRAG

Matters Raised in Submission	Response
Disability Access The proposal does not provide direct vehicle access for students with a disability. Students with a disability require direct safe vehicle access to the new High School. There is only one disability drop-off space provided on Burroway Road. Given the demand during school drop-off there is a high likelihood that this space will be illegally taken. The school transport scheme should be provided with direct safe access to a dropoff zone secured within the site. SINSW has a legal requirement to properly plan for students with a disability. As the 2020 federal report reviewing the Disability Standards for Education 2005 stated; "adjustments (should be) proactively offered by education providers."	The Amendment Report was supported by a BCA Compliance Report as Appendix 10a. The report confirmed that the amended access arrangements can address the relevant fire protection, access and egress requirements of Sections C, D and E of the Building Code of Australia 2019 Volume One, Amendment 1.
Mandatory PDHPE Requirements The school will find it almost impossible to meet the mandatory practical hours for PDHPE as set out by the NSW Education Standards Authority (NESA). The student numbers and lack of suitable spaces will threaten the accreditation of the school and	The PDHPE requirements for Year 7-10 specify a total of 300 hours. This includes 50% spent in classroom activities and 50% in physical activities. The physical component of PDHPE at the proposed school is not solely dependent on the playing field, with the hall,



Matters Raised in Submission	Response
its ability to provide a diverse curriculum. Stage 1 has only one temporary basketball court or 420sqm of sports facilities for 850 students. This is less than half a square metre per student. The proposal has no oval, hall or permanent basketball courts in the proposed Stage 1 and an oval shared between 2,200 students (primary & secondary) and 15,000 residents in Stage 2.	fitness studio and outdoor courts also being available, as well as separate arrangements with the school to use nearby sporting facilities where relevant.
	The number of Year 11-12 students undertaking the senior subjects with a physical component will depend on the interests of the students, which varies from school to school. The senior courses also have both a classroom and physical component, which varies depending on the subject selection. It is not expected the full cohort will elect these subjects, with typical enrolments less than half.
	The school will timetable the curriculum around the needs of the students and use of the field and all school facilities and will ensure all NESA requirements are met.
	Furthermore, as noted in the Amendment Report, 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.
Safety and Criminal Damage	No oval is proposed as part of this
A major concern for parents and WPRAG is the safety of students and damage to the oval and other property if the shared oval isn't fully fenced. The location of the shared oval gives direct access	application. Any proposal for a playing field will be subject to a separate planning approval process and subject to assessment at that time.
to the Sydney Olympic Park Ferry Wharf and the oval will have limited visibility due to Wentworth Point Public School. The greatest concern is that the area will need to be checked daily after	The EIS was supported by a Crime Prevention Through Environmental Design (CPTED) report that considered the safety of crime opportunities provide by the development.
community use to avoid the risk of needle stick injuries. Other concerns relate to criminal damage in other parts of the school, general rubbish and how dogs would be kept off the shared oval.	The CPTED Report assessed the proposal through the utilisation of the principles of CPTED, which are based on a situational approach to crime prevention that seeks to minimise the risks for possible crime offences to occur.
	A number of design recommendations were made to increase the security of the site and to reduce concealed areas within the school.
Playground and Recreational Facilities The school does not come close to meeting the required open space ratio of 10sqm per student. The total land area in Stage 1 for the High School is 1 hectare which falls well below the minimum area of 2.5 hectares recommended for High Schools as detailed in the Auditor Generals Report 2021	The amended proposal provides 5,108sqm of play space, which equates to 6qm per student (refer to diagrams at Appendix 1 of Amendment Report package). This is 4sqm short of the 10sqm benchmark set by the NSW Education Facilities Standards and Guidelines (EFSG).



Matters Raised in Submission	Response
"Delivering School Infrastructure". A similar combined shared school space for primary and secondary students was developed in Parramatta. Arthur Phillip High School and Parramatta Public School have similar density (though most students at APHS & PPS come from medium or low density suburbs). A total of 27,043 m2 (or 2.7ha) of open space has been provided for both school sites with 8,000m2 on the PPS site, 14,442m2 on the APHS site and 4,600m2 share space – this includes five external sports courts, an ampitheatre, outdoor space for markets, and a roof garden on the PPS site. Wentworth Point Public has no playground space with a utilisation rate in 2021 of 117%. The current proposals will not address this and they will not get access to the proposed Joint Use Oval.	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. 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. DoE also intends that high school students will have access to the future playing field to the north (to be delivered by others). DoE expects that the field will be subject to a Joint Use Agreement between DoE and TfNSW whereby the field will be available for school use during school hours.
School Bus Parking: The proposals for bus parking are completely impractical. The suggestion that buses could park on SOPA land to the east of the Sanctuary development would require teachers to supervise students well away from the school. It is a small space insufficient for the number of buses required by the school. It is also located on land reserved for the preferred route for the approved Parramatta Light Rail Stage 2. The second proposed location is a bus bay on Community Association Land. It is a small space and would require their approval and may well be required for other bus services given the planned population growth.	As per the Amendment Report of July 2022, TfNSW provided a submission on 23 May 2022 in which they noted that the applicant has consulted with TfNSW and Council regarding the coach/bus parking spaces and that such parking would be subject to final approval from SOPA. TfNSW has requested 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. DoE accepts that further consultation with Transport for NSW, Council and SOPA will be required to address bus servicing.



Matters Raised in Submission	Response
	DoE will prepare a School Travel Plan prior to occupancy that includes information about the school excursion bus parking requirements.
Staff parking: The High School will require approximately 150 teaching and administrative staff. The proposal for 29 school parking spaces is completely unsatisfactory for school staff requirements. Given the nature of teaching, schools require spaces for all teachers. Teachers cannot afford to be late because of timetable issues and are often required to carry heavy resources to the school. Bicycles are not a practical solution for teachers carrying books, computers and teaching resources. The existing buses have very limited connectivity and the cycleways have a number of missing links and have major safety issues. The SOP short-term parking proposal isn't dealing with the problem. There are already High School staff shortages in NSW and this is likely to make the school unattractive to staff.	As discussed above, P5 parking will be available for staff prior to delivery of the future eastern road. The P5 parking area is located on a frequent bus route and the corridor of the future Parramatta Light Rail Stage 2.
	Buses depart every 20-30 minutes and are within a short walk of the parking area. This is sufficient frequency to cater for the trip to be attractive.
	Kerbside space in Wentworth Point is generally time-restricted. As the school and adjacent development are completed, it is expected that there will not be any unrestricted parking in the vicinity of the school. With time restrictions being generally 2-3P or shorter, on-street parking would not be viable for teachers.
	The vision for the school and the planning are all focused on increasing the attractiveness of the non-car network rather than making car access easier and supporting car dependency. Providing parking on-site would increase traffic generation and the congestion impacts of the development.

4.4.2 Billbergia

Table 7 provides responses to the comments by Billbergia in its submission letter dated 5 July 2022.

Table 7. Response to Billbergia

Matters Raised in Submission	Response
 Staff parking: We note the proposal for 30 staff parking spaces at P5 in Sydney Olympic Park (SOP) to be subsidised by SINSW. This is a distance of more than 2.2 km from the school, which makes this option impractical: 1. Sydney Olympic Park Authority's (SOPA) comment in the Transport Letter (Appendix 5. Amendment Report June 2022) that 'car parking must be provided on site as staff may not want to park in P5 and catch a bus or walk" 	An investigation of nearby commercial carparks has been undertaken, and it has been found that the car parking provided in these carparks is allocated to GFA/uses contained within the approved developments. Use of this car parking would require modification to these consents and is therefore impractical.
2. DPE's requirement noted in the Transport Letter (Appendix 5. Amendment Report June 2022 ref A 2.2) that 'evidence of consultation with operators of nearby commercial carparks that are proposed to be relied upon to manage parking impacts'.	



Matters Raised in Submission	Response
Billbergia supports the principle of parking being included within the school site for staff parking. The Billbergia Group is also the owner operator of Marina Square Shopping Centre, (less than 100m from the proposed high school site). Our shopping centre includes a 3- level below-street public car park with 570 spaces. We confirm that our Centre has capacity to accommodate 30+ staff secure undercover parking spaces, subject to negotiation of a long-term lease arrangement with SINSW.	
School Bus parking:	The recommendation is noted. As detailed above, TfNSW requested submission of a
We note the Transport Letter (Appendix 5. Amendment Report June 2022) identifies options for dedicated school bus parking on Wharf Road, or on Wentworth Place, both of which are located away from the school and are suboptimal outcomes. Specifically:	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. Consultation will also be undertaken with Billbergia if necessary.
1. SOPA's comment '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'.	
2. Wentworth Point Marinas Community Association's ownership of Wentworth Place under Community Titles, which would require a negotiated agreement for dedicated school bus parking at this location. This bus bay has been designed and built for future bus routes, as part of future development.	
The most logical place for dedicated school bus parking is directly at the school entrance on Burroway Road in a purpose-designed lay-by (similar to Wentworth Place and Footbridge Boulevard lay-by's, designed to TfNSW and Sydney Buses specs). The provision of a school bus stop on Burroway Road is consistent with the SSDA in that it encourages travel by means other than private vehicle, and provides benefit to the greatest number of attendees of the school.	

4.4.3 Wentworth Point Public School P&C Group

Table 8 provides responses to the comments by the WPPS P&C Group in its submission letter dated July 2022.

Table 8. Response to WPPS P&C Group

Matters Raised in Submission	Response
Reduction in student capacity	As described in the Amendment Report, it is
A reduction in student capacity from 1,530 to 850	anticipated that a road along the eastern
students will be detrimental to the future of the	boundary of the site will be delivered in the
high school. An 850 student high school will reach	future, in place of the approved Ridge Road.
capacity within 3 years, just like the primary school	Once the Landcom modification is approved,
did next door. Furthermore, a high school with 850	which will provide for the eastern road and



Matters Raised in Submission	Response
students still deserve a playing field. This shouldn't be used as an excuse to reduce student capacity so that the Dept can deliberately cut corners. Reduction in size of school hall A reduction in the size of the school hall is troubling. This amended proposal is already aiming to reduce open space, now it proposes to reduce student spaces. The primary school next door does not even have a proper hall to house the entire school for assemblies. History should not repeat itself for the high school.	the future playing field to the north, 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 (through a separate approval process). There is funding approved for the full 1,530-student school. 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.
School bus parking The proposal for school bus parking on Ferry Wharf Circuit is not possible because the subject location will be eliminated by the Parramatta Light Rail Stage 2 alignment.	Whilst there is no set timeframe for the delivery of Parramatta Light Rail Stage 2, it is noted that in June 2022 the NSW Government announced a \$602 million commitment to planning and delivery of the project. Whilst the exact alignment has not yet been confirmed, it may impact traffic and parking opportunities within the school catchment. As detailed above, TfNSW requested 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. Consultation will be undertaken with Billbergia following their submission if necessary.
Staff parking The high school will require approximately 200 teaching and administrative staff. The proposal for 29 parking spaces will be insufficient. It is also not feasible to assume school staff will live close enough to commute by active transport. The lack of parking space has affected talent recruitment at the primary school next door which also lacks staff carpark spaces.	As discussed above, P5 parking will be available for staff prior to delivery of the eastern road. The P5 parking area is located on a frequent bus route and the corridor of the future Parramatta Light Rail Stage 2. Buses depart every 20-30 minutes and are within a short walk of the parking area. This is sufficient frequency to cater for the trip to be attractive. Kerbside space in Wentworth Point is generally time-restricted. As the school and adjacent development are completed, it is expected that there will not be any unrestricted parking in the vicinity of the school. With time restrictions being generally 2-3P or shorter, on-street parking would not be viable for teachers.



Matters Raised in Submission	Response
	If teachers can find a park on-street that suits their travel needs, this would be their choice and could not be prevented.
	The vision for the school and the planning are all focused on increasing the attractiveness of the non-car network rather than making car access easier and supporting car dependency. Providing parking on-site would increase traffic generation and the congestion impacts of the development.
Traffic congestion Contrary to the proposal's expectation that the majority of students will be walking to school, according to the latest 2021 Census, only 219 secondary high school students live within Wentworth Point. This means the majority of the anticipated enrolments will be from out of the rarea. Due to limited public transport services into Wentworth Point, these students will most likely arrive by car.	Currently, public high school students residing within the peninsula must travel to Strathfield South High School (as an out of area enrolment) or Concord High School (in-area). Travel to these locations is highly dependent on private vehicle given the long travel distances, barriers to walking and cycling, and limited public transport offerings. The proposal is expected to reduce private vehicle trips and replace them with more sustainable and efficient modes so that future students of the proposed school, will be able to walk or utilise the area's multiple public transport options to access the school. While vehicle movements directly related to the kiss- and-ride movements will increase frequency on Burroway Road, the modelling for the school indicates a decrease in traffic movements in the local road network given that land zoned for residential/mixed use development is being used for a school, another permissible use, which has lower transport impacts overall. Traffic modelling conducted as part of preparation of the EIS estimates that the school will generate 112 vehicles in the peak periods and that all intersections will operate at Level of Service A. Regarding bus capacity, SINSW has consulted with TfNSW bus planners and confirmed the following: • TfNSW regularly reviews bus services and will provide additional bus services as required by the growth. • As students tend to travel in the opposite direction to the peak travel, TfNSW believes there is spare capacity in the bus system.
	 TfNSW will be provided with projected enrollment figures to be included in annual bus service planning processes.
	Regarding light rail, the second stage of the Parramatta Light Rail, if implemented, will benefit students and staff travelling from



Matters	Raised	in Su	bmission

Respons

Parramatta and other suburbs to Wentworth Point via public transport.

4.5 Response to individual submissions

The tables below provide responses to the comments made by individual submissions to the project.

4.5.1 Name withheld #1

Table 9. Response to name withheld #1 submission

Matters Raised in Submission	Response
The Sydney Olympic Park high school should remain near the Sydney Olympic Park station. Putting the high school at the end of the WWP makes no sense, it's not even in the Sydney Olympic Park suburb anymore.	The site is well-positioned to meet the demand for a new high school in the local area. The site is located directly adjacent the high-rise developments of Wentworth Point and thereby maximises the opportunity for students to walk or cycle to school, demonstrated by the 866 students predicted to live within a 20-minute walking radius of the school in 2026.
	The proximity to the public school provides an education precinct that is walkable and can maximise use of available open space and facilities between the schools making the best use of public investment.
	Traffic modelling conducted as part of preparation of the EIS estimates that the school will generate 112 vehicles in the peak periods and that all intersections will operate at Level of Service A. The site's dependence upon Hill Road as the single main access road into the precinct acts as a contraflow to the movement of traffic and is expected to reduce current vehicle movements which are used to support high school students outside of the peninsula. The site will also be serviced by the local bus
	network and future PLR Stage 2.
There's going to be 1000+ students attending, how on earth are they going to physically arrive at the school at the end of WWP? There's hardly any frequent public transport to the end of WWP and Hill Road + Burroway Road will not be able to support the increased traffic for pick up and drop off. Keep the high school near the SOP train station so students can actually access it.	Currently, public high school students residing within the peninsula must travel to Strathfield South High School (as an out of area enrolment) or Concord High School (in-area). Travel to these locations is highly dependent on private vehicle given the long travel distances, barriers to walking and cycling, and limited public transport offerings.
	The proposal is expected to reduce private vehicle trips and replace them with more sustainable and efficient modes so that future students of the proposed school, will be able to walk or utilise the area's multiple public transport options to access the school. While vehicle movements directly related to the kiss-



Matters Raised in Submission	Response
	and-ride movements will increase frequency on Burroway Road, the modelling for the school indicates a decrease in traffic movements in the local road network given that land zoned for residential/mixed use development is being used for a school, another permissible use, which has lower transport impacts overall.
	Traffic modelling conducted as part of preparation of the EIS estimates that the school will generate 112 vehicles in the peak periods and that all intersections will operate at Level of Service A.
	Regarding bus capacity, SINSW has consulted with TfNSW bus planners and confirmed the following:
	 TfNSW regularly reviews bus services and will provide additional bus services as required by the growth.
	 As students tend to travel in the opposite direction to the peak travel, TfNSW believes there is spare capacity in the bus system.
	 TfNSW will be provided with projected enrollment figures to be included in annual bus service planning processes.

4.5.2 Name withheld #2

Table 10. Response to name withheld #2 submission

Matters Raised in Submission	Response
Fix the surrounding infrastructure first. The school is a good fit across the river in Rhodes.	The concern is noted. However, additional infrastructure in Rhodes is out of the scope of this application.

4.5.3 Name withheld #3

Table 11. Response to name withheld #3 submission

Matters Raised in Submission	Response
As a resident of 2127, parent and educator, I am concerned that the amendments to the project will mean that teachers and students will lose valuable playground space, learning area in the hall, and numbers will quickly outgrow the supply of available classroom space.	The amended proposal provides 5,108sqm of play space, which equates to 6qm per student (refer to diagrams at Appendix 1 of Amendment Report package). 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



Matters Raised in Submission	Response
	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.
	DoE also intends that students will have access to the future playing field to the north (to be delivered by others). DoE expects that the field will be subject to a Joint Use Agreement between DoE and TfNSW whereby the field will be available for school use during school hours.
To reduce the number of students to 850 is short- sighted and does not include students who will travel from Newington, Olympic Park or Rhodes.	As described in the Amendment 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 approved through the Landcom modification application, currently being considered by Council, 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 (through a separate approval process).
	The 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 Landcom modification being approved in relation to the eastern



Matters Raised in Submission	Response
	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.
Not to mention the lack of parking for staff. As a parent and educator, the plan to park at P5 and have a shuttle bus is a terrible idea. Teachers need access to their vehicles in case of emergency and there is virtually no street parking in the area.	As previously noted in the Amendment Report, 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. 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. This will also benefit the peninsula by reducing the car demand for Wentworth Point and therefore reduce the traffic impacts of the proposal. Teachers not wanting to park in P5 can also utilise public transport to work as an alternative.
The land next to the school being sold to build more high-rise apartment blocks is abominable, considering the needs of the community are being overlooked in these measures.	This matter is outside the scope of the application.

4.5.4 Jillian McKee

 Table 12. Response to Jillian McKee submission

Matters Raised in Submission	Response
The proposal of this school does not take in the basic requirements of a school or of the people of the area. No ovals, less green space than actually required (6sqm rather than 10sqm) no parking for teachers.	The amended proposal provides 5,108sqm of play space, which equates to 6qm per student (refer to diagrams at Appendix 1 of Amendment Report package). This is 4sqm short of the 10sqm benchmark set by the NSW 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,



Matters Raised in Submission	Response
	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.
	DoE also intends that students will have access to the future playing field to the north (to be delivered by others). DoE expects that the field will be subject to a Joint Use Agreement between DoE and TfNSW whereby the field will be available for school use during school hours.
Students will outgrow this school before it is even built just like they have at Wentworth point primary. This school needs to be rethought with more space and more capacity.	As described in the Amendment Report, the reduction in school capacity (from 1,530 to 850) is proposed to ensure consistency with an existing development consent on the site and to ensure adequate facilities are provided for the student population in the short term.
	In the future, DoE intends to increase the school's capacity to 1,530 students, expand the size of the hall building and provide for additional landscaping. This future expansion would be carried out under a separate approval process once the Landcom modification is approved.

4.5.5 Withheld Name #4

 Table 13. Response to name withheld #4 submission

Matters Raised in Submission	Response
I believe the building of the new High School at Wentworth Point is a mistake, as it should have been built at Sydney Olympic Park, which was the original plan.	The site is well-positioned to meet the demand for a new high school in the local area. The site is located directly adjacent the high-rise developments of Wentworth Point
The current plan takes valuable and scarce open space away from our community, and from the current Primary School.	and thereby maximises the opportunity for students to walk or cycle to school, demonstrated by the 866 students predicted to live within a 20-minute walking radius of the school in 2026.
	The proximity to the public school provides an education precinct that is walkable and can maximise use of available open space and



Matters Raised in Submission	Response
	facilities between the schools making the best use of public investment.
	Traffic modelling conducted as part of preparation of the EIS estimates that the school will generate 112 vehicles in the peak periods and that all intersections will operate at Level of Service A. The site's dependence upon Hill Road as the single main access road into the precinct acts as a contraflow to the movement of traffic and is expected to reduce current vehicle movements which are used to support high school students outside of the peninsula.
We were promised a 3.9-hectare Peninsula Park, but as a result of this planned development, this will be reduced to a miserable 2 hectares, which is nothing short of disgraceful.	This matter is out of the scope of the application. The master plan for the precinct is being revisited as part of a future Planning Proposal and accompanying DCP process being progressed by TfNSW. A review of the planning framework is appropriate given the current development controls were adopted more than 16 years ago. The updated master plan will take a holistic approach to development of the precinct and will accommodate the new high school.
The school will have a shared oval with the Primary School and we are now told with the community. This would deny the necessary space our students require. This is a failure of planned as it does not take in	DoE expects that the future playing field to the north will be subject to a Joint Use Agreement between DoE and TfNSW whereby the field will be available for high school use during school hours and for
account the needs of students at 2 schools crammed together and a large community of around 15,000 and getting bigger.	community use outside of school hours. The design of the field, including lighting and fencing, is outside the scope of this project
Our community desperately needs more space and more community facilities. This proposal development is another nail in the coffin for our growing community, which could double in the next 10 years	but is expected to accommodate the Joint Use requirements and also address the connection to the school and the future Peninsula Park.

4.5.6 Name Withheld #5

Table 14. Response to name withheld #5 submission

Matters Raised in Submission	Response
Wentworth Point has the highest population among its neighbouring suburbs, measured at > 12,000 people census 2021. This compares to 11,000 in Rhodes, 6,000 Newington and just over 4,000 in Syd Olympic Park. WWP already suffers from a lack of amenities specifically parks and playgrounds for children and pets, mixed use community spaces, chronic shortage of public parking and only one main road in, Hill Road which suffers from chronic potholes, is dangerous	The site is well-positioned to meet the demand for a new high school in the local area. The site is located directly adjacent the high-rise developments of Wentworth Point and thereby maximises the opportunity for students to walk or cycle to school, demonstrated by the 866 students predicted to live within a 20-minute walking radius of the school in 2026. The proximity to the public school provides an education precinct that is walkable and can



Matters Raised in Submission	Response
for pedestrians to cross, and frequent near misses at Bennelong Parkway intersection.	maximise use of available open space and facilities between the schools making the best use of public investment.
	Traffic modelling conducted as part of preparation of the EIS estimates that the school will generate 112 vehicles in the peak periods and that all intersections will operate at Level of Service A. The site's dependence upon Hill Road as the single main access road into the precinct acts as a contraflow to the movement of traffic and is expected to reduce current vehicle movements which are used to support high school students outside of the peninsula.
Internet coverage is also notoriously bad for a large number of residents.	The proposal will provide adequate telecommunications infrastructure for the purposes of the education use.
	Schools have dedicated broadband services and infrastructure, separate to domestic NBN and/or telecommunications carrier mobile networks. This means the school's telecommunications do not compete for resources with services such as mobile phone coverage. Network connection issues are a matter for individual telecommunications providers.
Wentworth Point is not a suitable location for a high school for abovementioned reasons and more. Building a high school here would only worsen the traffic on Hill Road between Holker and the proposed high school site. Instead, there should be no more new residential developments to be built anywhere in WWP. What is needed at the proposed high school site instead, is a mixed- use community zone similar to the Rhodes Connection development and play areas for children and pets. There should be a bike path and running/footpath that connects all the way from Blaxland Park/Armory wharf, along the shore, connects up to the existing Bennelong bridge but also continues under it along the shore, all the way to Wentworth Common. Like Rhodes Connection, the community facilities should have a cafe/restaurant, public toilets, public parking, quiet working spaces, function rooms/hall, spaces where people can dance, learn yoga and boxing, etc. The area between 'north' and 'south' WWP currently housing warehouses should be demolished and also returned to the public in the form of parks, children's play areas, and public BBQ facilities and public parking.	The site is well-positioned to meet the demand for a new high school in the local area. The site is located directly adjacent the high-rise developments of Wentworth Point and thereby maximises the opportunity for students to walk or cycle to school, demonstrated by the 866 students predicted to live within a 20-minute walking radius of the school in 2026.
Sydney Olympic Park is better placed in which to build a new high school, specifically the pocket of land where the AM transmission tower sits. This area sits facing Hill Road and is to the left of where the new Urban Wave Park is being built. I suggest	As noted above, the site is well-positioned to meet the demand for a new high school in the local area. The site is located directly adjacent the high-rise developments of Wentworth Point and thereby maximises the



Matters Raised in Submission	Response
the AM tower is easily moved to another location and wildlife that currently live in that parcel can be moved to neighbouring wetland in SOP. The high school will be a catchment for the current WWP public school and other primary schools such as in Newington. Thus it is easily accessible to local children and bus routes can be created from WWP and other suburbs - Rhodes, Homebush etc. As well as good connection from the ferry and train stations nearby. Being located on the southern side of Holker St also means traffic created by the new school is directed away from WWP which is already highly populated and congested.	opportunity for students to walk or cycle to school, demonstrated by the 866 students predicted to live within a 20-minute walking radius of the school in 2026. The proximity to the public school provides an education precinct that is walkable and can maximise use of available open space and facilities between the schools making the best use of public investment.
I suggest the high school will have many students with academic strength. In addition to this, the Olympic Park High School will capitalise on its location on the doorstep of world-class sporting facilities, sporting expertise and training grounds to cultivate students with outstanding athletic potential. Western Sydney and Sutherland shire have sports high schools where students who excel in athletic pursuits are nurtured, why not Olympic Park which is the geographic heart of Sydney? It has the potential of making itself known as a prestigious school for both academic and sporting prowess. It will be easily accessible to and from the M4 via Hill Road, and to Holker St (West) and Bennelong Parkway (north and east); without further burdening the WWP population.	The new high school in Wentworth Point will be a Year 7 to 12 comprehensive high school. There are no plans for it to be a specialist high school focusing on sports. The new high school will provide a range of general and specialist learning spaces to deliver the curriculum.
As it is a school, any added traffic would occur between 7-9am and 3-5pm Monday to Friday. I assume the school will organise suitable traffic safety measures during pick up and drop off times. And being a school, it would not conflict with the busy period for the Wave Park next door.	Traffic analysis prepared to date as part of this application indicates that the additional traffic resulting from the development will cause no significant impacts on the road networks or have any notable adverse safety impacts. The school will be provided with adequate pedestrian and vehicular access to ensure safe pick-up and drop-off operations. The School Transport Plan to be prepared prior to commencement of operation will also help increase the safety of the journey to school.
Lastly, being located in the SOP and near WWP nature reserves, the students will benefit from being located so close to nature reserves and I hope this helps them to develop a healthy respect for nature and looking after their environment. I ask you to carefully consider my proposal carefully as it would be a gross error of judgement to build a high school next to the WWP public school.	Noted.

4.5.7 Amy De Paula

 Table 15. Response to Amy De Paula submission



Matters Raised in Submission	Response
Open space: Documents on the portal correctly identify that there is not enough open space provided for students. Students who live in densely populated areas have greater need for open space than in other areas. Additionally there are no full size parks or playing fields in walking distance from the proposed plan. Many of the future students will reside in Wentworth Point or Rhodes and will not have a backyard or local park. There is land on the peninsula remaining that could be used to provide for the 10sqm per student, rather than only 60% of the recommended allowance. Young people need space to feel that they belong. There is inadequate space for them to all be outside at once, let alone space to play sport, move around and feel that it is their space. Ideal design would utilise co-design to create usable spaces for young people to gather outside of school hours in proximity to the school, to increase sense of belonging and ownership. With no public parks in Wentworth Point, and only 2 small toddler play areas, the community lacks any public facilities for youth. Poor high school design will contribute to alienating not including young people.	The amended proposal provides 5,108sqm of play space, which equates to 6qm per student (refer to diagrams at Appendix 1 of Amendment Report package). This is 4sqm short of the 10sqm benchmark set by the NSW 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.
Child Protection: The plans clearly articulate that they were designed to facilitate protection from being overlooked or impeded by the buildings across Burroway road. At the consultation session I was told by a representative that the plans did not need to consider child protection concerns from the Landcom proposal to sell the adjacent land for the development of two potential 24 storey towers. This creates a situation where the towers will overlook every part of the school, and many levels will be able to look straight into windows. It may also negatively impact the eastern sunlight, despite the report detailing the desirability of natural light. Good planning considers the total land use, the integration with the local environment and the ability to meet needs. This	The proposal seeks to provide a healthy, safe learning environment for all students, promoting active lifestyles, social cohesion, privacy and security at all times. The arrangement of the two teaching wings creates a protected courtyard, ensuring privacy from the tall residential towers overlooking the site, and separating the play space and walkways from the public roads.



Matters Raised in Submission	Response
'bitsy' approach could lead to an unsafe and unhealthy environment.	
Reduced capacity from 1500 to 850: This is an injustice to a neighbourhood that has been promised a delivered high school for over a decade, with planning for years before that. This is despite the fact the SEARS report has identified that the catchment area (2127 +Rhodes) will house another 4000 students in the next 15 years - that is in addition to the number of students that already commute out of area to high schools. Removal of the hall and gym: In new suburbs we already have few places to meet, with just the community centre in Newington and library in Wentworth point, a decent school hall and/or gym allows for religious and community groups, school events etc. When originally the community was told a sports high was planned for the area, this proposal feels like an insult, and not the opportunity for a new community hub that the school could be. COVID has also shown us that larger, well ventilated indoor and outdoor spaces are important, and the ability to gather together safely in groups is vital for our wellbeing. The changes to the school design ignore this important community and student need.	As described in the Amendment Report, the reduction in school capacity is proposed to ensure consistency with an existing development consent on the site and to ensure adequate facilities are provided for the student population in the short term. In the future, DoE intends to increase the school's capacity to 1,530 students, expand the size of the hall building and provide for additional landscaping. This future expansion would be carried out under a separate approval process once the Landcom modification is approved to relocate Ridge Road to the east and provide the future playing field to the north of the school site.
Physical Education/Sports: Where are the students' physical education classes intended to occur with no indoor facilities and only 1 basketball court? The local playing fields at Wilson 2 of 4 Park were sold 3 years ago with a promise to 2127 that they would be replaced elsewhere in the area, but this has not been fulfilled. Without local facilities within walking distance, students will not be able to participate in a full curriculum. This will have a negative impact on student health and wellbeing. It will create ongoing logistical difficulties for teaching staff, and increased cost of participating in sport for students, with parents faced with constant bus costs. An alternative would be to build a school with full sized sports facilities as is available in most schools across NSW, even if they have local playing fields, which 2127 does not.	The PDHPE requirements for Year 7-10 specify a total of 300 hours. This includes 50% spent in classroom activities and 50% in physical activities. The physical component of PDHPE at the proposed school is not solely dependent on the playing field, with the hall, fitness studio and outdoor courts also being available, as well as separate arrangements with the school to use nearby sporting facilities where relevant. The number of Year 11-12 students undertaking the senior subjects with a physical component will depend on the interests of the students, which varies from school to school. The senior courses also have both a classroom and physical component, which varies depending on the subject selection. It is not expected the full cohort will elect these subjects, with typical enrolments less than half. The school will timetable the curriculum around the needs of the students and use of the field and all school facilities and will ensure all NESA requirements are met.



Parking: Providing a school on the edge of the Students not within walking distance will be region it is designed to cover means that although able to travel to school by public transport or private vehicle. The submitted traffic you may have students in walking distance, you assessment documentation confirms that the are neglecting to address how students from the other densely populated zones of Newington and proposed kiss 'n drop facilities are sufficient for Sydney Olympic Park will get to and from school. meeting the demands of students travelling The parking for teaching staff is untenable, and will by private vehicle, and consultation with result in difficulties staffing the school. The school TfNSW has confirmed that bus services will be site is not in a CBD. Neither does it have suburban reaularly reviewed and additional services will streets around it where staff can find parking and be provided as required by growth. then walk a few hundred meters to school. It is also Regarding staff parking, the P5 parking area difficult to understand how the 'bussina' staff (and for staff is located on a frequent bus route only 30 out of 80) from the carpark will work, when and the corridor of the future Parramatta staff arrive and leave at different times. The Light Rail Stage 2. Buses depart every 20-30 proposed car park is not within walking distance of minutes and are within a short walk of the the school. parking area. This is sufficient frequency to Drop Off: A school of any size should have cater for the trip to be attractive. appropriate drop off facilities. In particular, it The vision for the school and the planning are needs to accommodate the needs of students all focused on increasing the attractiveness of and staff with a disability. There should also be the non-car network rather than making car onsite parking for students and staff with a access easier and supporting car disability. Level access from this parking should be dependency. Providing parking on-site would provided into the main school area. The routine increase traffic generation and the morning and afternoon buses need bus stop congestion impacts of the development. locations that do not block important commuter routes in such a densely populated suburb. Buses cannot sit on narrow laneways in public bus stops at the ferry wharf and block the movement and flow of traffic. This area is already busy with the primary school drop off and commuters. Buses are also going to be required to take students to sport and excursions, and there is not sufficient street access to allow for them to safely load and unload students, or to wait as needed. It is noted that if and when further high rise towers are also included as part of the peninsula design, the street pressure will greatly increase. It is unrealistic to consider it a car free school when it is not properly in a CBD or connected to mainstream public transport. Students attending extracurricular activities also are frequently dropped off and picked up earlier and later than school bus timetables, particularly if they have additional items to carry like heavy musical instruments, art projects or sporting gear. Perhaps there will not be space for art, drama, music or sport in this school in any case.

Proposed entry: There appears to be an awkward	The Amendment Report was supported by a
ramp with hairpin turns through a tunnel to access	BCA Compliance Report at Appendix 10a.
the school from the street. This would also appear	The report confirmed that the amended
to be the fire exit. There is a concern that this	access arrangements can address the
bottleneck with no other entry/exit points could	relevant fire protection, access and egress
create a hazard. I was unable to identify alternate	requirements of Sections C, D and E of the
strategies for students/staff with a disability to exit	Building Code of Australia 2019 Volume One,
the building in the case of an emergency.	Amendment 1.
As a long term resident, previously of Newington and now of Wentworth Point, there was a strong	While the transport assessment carried out as part of the application anticipates that the



Matters Raised in Submission	Response
focus on the 20 minute walk radius in the reports. This does not include any of Newington, despite the fact the largest feeder primary school for the high school will be in Newington. Neither has there been any public exhibitions at the Newington school as there was in Wentworth Point. Not planning for drop off, public transport and parking because some students in the catchment can walk seems discriminatory.	majority of students will walk or use active transport, the assessment also takes into account students who will travel by bus or car. The proposed kiss 'n drop facilities have been assessed as being sufficient for catering for students travelling by car.
School capacity: What is the articulated plan for the students who will not be able to attend their local school due to its physical capacity limitations? Will students who have an interest in things such as physical education and who excel at sports be allowed to apply for out of area placement to enable them to have access to appropriate facilities? There is no space for demountables or expansion if the surrounding land is sold. The Wentworth Point community also should not be expected to share or lose its one and only public park to accommodate for future growth. This plan for the remaining land on the peninsula needs to be done correctly now, because once it is sold for tower height development there is no alternative.	DoE undertakes regular review of student enrolment numbers and school catchments, which inform decisions to upgrade existing schools or provide additional facilities within the catchment. The new high school in Wentworth Point will be a Year 7 to 12 comprehensive high school. There are no plans for it to be a specialist high school focusing on sports. The new high school will provide a range of general and specialist learning spaces to deliver the curriculum.
Overshadowing and inadequate space at Wentworth Point Primary School. When the peninsula was first proposed as the site, it was also discussed that Wentworth Point Primary School also had lost much of its play space to demountable buildings. With recent changes to planning and development and a much higher volume of dwellings, any plans for a high school next door should allow for an increase in capacity for the Primary School Again, no walking distance facilities, and potential for loss of natural light.	Overshadowing diagrams were submitted with the EIS package, which confirm that no overshadowing of the adjoining primary school will occur between 9am and 3pm at mid-winter (worst-case scenario) as a result of the proposed high school. Whilst the concern about capacity of the WPPS is noted, it is outside of the scope of this application to consider expansion to the adjoining school.

4.5.8 Withheld #6

 Table 16. Response to name withheld #6 submission

Matters Raised in Submission	Response
Removing the phased approach and approvals means we are unlikely to see the school ever expand beyond the initial 850 students. It has taken so many years to even get to this point as the infrastructure of the area falls woefully short of demand and having to start anew with an expansion plan will only further delay the meeting of locals needs for schooling.	As described in the Amendment Report, the reduction in school capacity is proposed to ensure consistency with an existing development consent on the site and to ensure adequate facilities are provided for the student population in the short term. In the future, DoE intends to increase the school's capacity to 1,530 students, expand the size of the hall building and provide for additional landscaping. This future expansion would be carried out under a separate approval process once the Landcom modification is approved to relocate Ridge Road to the eastern boundary and provide



Matters Raised in Submission	Response
	the future playing field to the north of the school site.
	DoE is committed to working with Council and Transport for NSW (TfNSW) to finalise the plans for the remainder of the precinct.
The initial build for 850 students may meet the first intake cohort but will be patently insufficient to meet the demands of the surrounding suburbs including Newington where I live. Right now the catchment for Newington is Concord High School which requires a 1hr plus trip of two buses each way and this is just completely unacceptable. A school within a reasonable distance should be a right of all children and the build of a school in Wentworth Point should at least cater for the needs of children in the immediate surrounds.	The site is well-positioned and sufficiently sized to meet the demands of children in the immediate suburbs. The reduction in school capacity from 1,530 to 850 is proposed to ensure consistency with an existing development consent on the site and to ensure adequate facilities are provided for the student population. In the future (as part of a separate approval process), DoE intends to increase the school's capacity to 1,530 students, expand the size of the hall building and provide for additional landscaping once the Landcom modification is approved to relocate Ridge Road to the eastern boundary and provide the future playing field to the north of the school site.
Every development application for multi-story dwellings is being pushed to the absolute maximum and even when approved, changes are requested to increase density, increase height and maximise the number of units being built. Why is it that a DA for a school is being made with reduced height and reduced capacity in this area with the population density plans? It beggars belief.	DoE intends that the school will ultimately provide capacity for up to 1,530 students. This future increase in capacity will be subject to a separate approval process once the Landcom modification is approved to relocate Ridge Road to the eastern boundary and provide the playing field to the north of the school site.
There are other concerns I have with the overlooking of future buildings which I know you'll ignore but I'll make the point all the same. I also expect to be ignored when it comes to green space, play space and so on but will make the point.	The proposal seeks to provide a healthy, safe learning environment for all students, promoting active lifestyles, social cohesion, privacy and security at all times. The arrangement of the two teaching wings creates a protected courtyard, ensuring privacy from the tall residential towers overlooking the site, and separating the play space and walkways from the public roads. Any future buildings in the peninsula are out of the scope of this application and subject to their own approval processes.
I fully expect the issue of building the second phase (should it ever come to pass) will impact on all students at the school who are trying to learn. Build it once, build it for 1530 students and service the people who live in this area. In summary, my main concern is really that the current proposal of 850 students will barely meet the current demands of the area and will guaranteed not meet the demands in the very near future. We need to build infrastructure to support the planned and approved population density of this area. Anything short of that is an	The future physical expansion (to cater for up to 1,530 students) would involve a minor expansion of the hall building and some revised landscaping. The two main school buildings will be built as a single stage (under the subject application), and therefore only minimal disruption should be expected as part of future expansion works.



Matters Raised in Submission	Response
abrogation of your responsibilities to the people of the area.	

4.5.9 Amanda Dean

Table 17. Response to Amanda Dean submission

Matters Raised in Submission	Response
We have been residents in the area for 20 years & are constantly appalled at the lack of planning put in to this area where complete overdevelopment has been not only allowed but encouraged! As a former teacher of over 30 years I cannot believe how long & poorly this whole project has been going on. Now when I look at the amendments to the original plan I am in disbelief!	Noted.
You cannot properly educate the future of our nation Without adequate facilities. NO Hall, No grounds, no oval NO Parking for teachers!!! None of the teachers I have worked with will volunteer to work in these conditions.	Regarding the hall, a temporary hall will be provided on Level 1 of the school buildings until the permanent hall is built under a future application. Regarding grounds and oval, whilst the proposal provides for open space below EFSG benchmark, the proposal nonetheless provides 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 the recreation needs of students. Regarding teacher parking, the vision for the school and the planning are all focused on increasing the attractiveness of the non-car network rather than making car access easier and supporting car dependency. Providing parking on-site would increase traffic generation and the congestion impacts of the development. To meet demand for teacher parking, SINSW proposes to fully subsidise 30 parking spaces so that cost is not an issue for the future staff members until such time as the 30 car spaces and the future eastern road becomes available.
I also have two grandsons living in Wentworth point I would not want them to be educated at a school without facilities & that which will be outgrown very quickly. As f or selling off the land on the Peninsula for MORE UNECESSARY Highrise (Overlooking the School Child Protection???) PLEASE Consider keeping the land & giving our	As noted throughout this report, DoE considers that the proposal provides adequate facilities for the needs of a student population of 850. It is important to keep in mind that the subject proposal is the first step in DoE's final intention for the site. In the future, DoE intends to increase the school's capacity to 1,530



Matters Raised in Submission	Response
future generations PROPER Education ! This Is YOUR responsibility! You need to take it seriously!	students, expand the size of the hall building and provide for additional landscaping. This future expansion would be carried out under a separate approval process once the Landcom modification is approved to relocate Ridge Road to the eastern boundary and provide the future playing field to the north of the school site.
	It is also important to remember that 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 mitigate impacts regarding student access to open space. We further note that any future buildings in the peninsula are out of the scope of this application and subject to their own approval processes.
As for the underhanded way this submission was changed after false community consultation is CRIMINAL!	The amended proposal went through the normal planning process as required by the EP&A Act, and the community has had opportunity to comment during public exhibition.
	As discussed in Section 3.1 of this report, community consultation (involving mail outs information sessions and emails) was undertaken to advise of the amended proposal and revised planning pathway before it was submitted and placed on public exhibition.

4.5.10 Carmen Tao

 Table 18. Response to Carmen Tao submission

Matters Raised in Submission	Response
Reducing student capacity of the school from the original proposal will impact on the sustainability. SEARS report has identified that the catchment area (2127 +Rhodes) will house another 4000 students in the next 15 years. Reducing student capacity does not offer viable schooling option for families.	As described in the Amendment Report, the reduction in school capacity is proposed to ensure consistency with an existing development consent on the site and to ensure adequate facilities are provided for the student population in the short term. In the future, DoE intends to increase the school's capacity to 1,530 students, expand the size of the hall building and provide for additional landscaping. This future expansion would be carried out under a separate approval process once the Landcom modification is approved to relocate Ridge
	Road to the eastern boundary and provide the future playing field to the north of the



Matters Raised in Submission	Response
	school site. Funding has been committed for the full 1,530-student school.
There is no planning for green space. There are plans for 1 basketball court and a courtyard, but no grass, no playing field. Is the expectation that all the students share that area at one time (rendering the court and courtyard to standing room), staggered lunch breaks or remain indoors? Please look into increasing the outdoor space and the physical health of the students. From the report: "The amended proposal does not achieve the EFSG outdoor open space benchmark of 10sqm per student", but will only offer 6sqm.	The amended proposal provides 5,108sqm of play space, which equates to 6qm per student (refer to diagrams at Appendix 1 of Amendment Report package). 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.

4.5.11 Withheld #7

Table 19. Response to name withheld #7 submission

Matters Raised in Submission	Response
As Newington residence we have waited more	As described in the Amendment Report, the
than a decade for a local high school to pop up	reduction in school capacity is proposed to
with the proposed plans to reduce the numbers of	ensure consistency with an existing
students to attend Wentworth point high school it	development consent on the site and to
is simply absent minded and no duty of care for	ensure adequate facilities are provided for
our children sake and their future. We cannot be	the student population in the short term.



Matters Raised in Submission	Response
left behind as we have waited so long and I've been in this community for 20 years plus since the Olympics and it breaks my heart that it absolutely is at a cost of our families and also our children's education.	In the future, DoE intends to increase the school's capacity to 1,530 students, expand the size of the hall building and provide for additional landscaping. This future expansion would be carried out under a separate
In order for this there needs to be solutions catered for the local community and the future leaders of this world. I ask you to reconsider and find solutions as we all know we are growing population and our kids are definitely our future without a sufficient education we are definitely nothing and are lacking strategic vision and long-term planning.	approval process once the Landcom modification is approved to relocate Ridge Road to the eastern boundary and provide the future playing field to the north of the school site.

4.5.12 Withheld #8

Table 20. Response to name withheld #8 submission

Matters Raised in Submission	Response
I am petitioning for Wentworth point high school not to be decreasing in numbers and open opportunities for Newington residence we have been waiting more than a decade for opportunity for our children for a local high school it absolutely is appalling that it has come down to the wire and not in the best interest for the community and out people. We are obviously excited and very strong in our belief that a local high school has finally made our way and with little findings and understanding that you need to residents might not be able to enter this high school it absolutely is appalling. I ask New South Wales government to reconsider and cater extra student headcount for the local community and as a preference to Newington residents we have been here from the start, and we would like to continue to contribute to the community.	As described in the Amendment Report, the reduction in school capacity is proposed to ensure consistency with an existing development consent on the site and to ensure adequate facilities are provided for the student population in the short term. In the future, DoE intends to increase the school's capacity to 1,530 students, expand the size of the hall building and provide for additional landscaping. This future expansion would be carried out under a separate approval process once the Landcom modification is approved to relocate Ridge Road to the eastern boundary and provide the future playing field to the north of the school site.

5 Updated mitigation measures

The mitigation measures set out in the EIS, Submissions Report and Amendment Report remain generally relevant, with only one update required—to reflect the Flood Emergency Management Plan. An updated consolidated list of mitigation measures is provided below.

Item	Potential impact	Mitigation measures
Transport and accessibility	Construction: Approximately 20 heavy delivery movements will occur each day during construction.	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.

Table 21. Updated consolidated list of mitigation measures



Item	Potential impact	Mitigation measures
	Workers will utilise on-street parking in the area.	
	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.	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.
	(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).	
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.	Rooftop plant, PA system and school bell should be selected and positioned to achieve the required noise levels outlined in the acoustic report. Treatments should be considered for the outdoor workshop dust extractor as recommended in the acoustic report.
	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	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



Item	Potential impact	Mitigation measures
	heritage into the design.	inform deign 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.
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.
Flood impacts	Risks associated with a serious flood event.	Implement the recommendations contained in the Flood Emergency Management Plan.

6 Conclusion

This Submissions Report has addressed the submissions received in response to the public exhibition of the amendment report to SSD-11802230.

Based on the supporting material provided in this Submissions Report in addition to the material provided in the original EIS, first Submissions Report and Amendment Report, DPE has now been provided with sufficient information and documentation to progress the assessment of SSD-11802230. We request that DPE complete the assessment of the application and proceed to determination.



