

Department of Planning and Environment
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Your Ref	SSD-11802230
Our Ref	NCA/14/2020
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20 July 2022

Attn: Navdeep Shergill

COUNCIL SUBMISSION TO MODIFIED STATE SIGNIFICANT DEVELOPMENT APPLICATION - SYDNEY OLYMPIC PARK HIGH SCHOOL (7 Burroway Road, Wentworth Point)

Thank you for the opportunity to comment on the modification to the State Significant Development Application for a public high school at 7 Burroway Road, Wentworth Point and for granting an extension for the time within which the submission is to be made.

Council officers continue to raise fundamental concerns in relation to the exhibited State Significant Development (SSD) as detailed in the attached submission and Council's earlier submission.

The modified SSD cannot be supported in its current form given the lack of open space, insufficient car parking, poor pedestrian connectivity, inadequate setbacks and street activation, unidentified loading area, unsatisfactory green star rating and uncertain relationship to adjoining land. As raised in Council's earlier submission, a holistic approach is required to the planning of the Wentworth Point peninsula to ensure that the high school can be delivered with the required supporting infrastructure that does not rely on a future second stage of development that has the potential to impact upon delivery of essential open space associated with Peninsula Park.

The application is unclear regarding the staging of the school's development and relies on addressing issues concerning the orderly development of land by referring to a future Planning Proposal that is yet to be formally lodged and assessed. The fully envisaged development of the proposed school cannot be considered in isolation to the remainder of the Maritime Precinct, particularly with regards to the detailed design of the approved Peninsula Park, marina, and other remaining land.

Given the above, it is considered that the proposal in its current form does not promote the orderly development of land, nor promote good design and amenity of the built environment and the issues identified need to be resolved before the proposal can progress.

The key issues Council officers raise in detail in this submission relate to the following:

1. Integration with Wentworth Point Precinct Development Control Plan 2014
2. Inadequacy of School Facilities and Local Infrastructure
3. Urban Design
4. Transport
5. Delivery and Waste Services
6. Energy Efficiency
7. Relationship to Adjoining Development.

We look forward to continuing to work with the applicant and the Department of Planning and Environment to seek to resolve Council's concerns regarding this State Significant Development application.

Regards



David Birds – Group Manager, Major Projects & Precincts

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CITY OF PARRAMATTA COUNCIL SUBMISSION – PROPOSED SYDNEY OLYMPIC PARK HIGH SCHOOL - 7 BURROWAY ROAD, WENTWORTH POINT

An interim submission outlining Council officer's key concerns with the modified SSD was provided to DPE on 8 July 2022. This submission expands on the key issues raised in that submission.

Changes to SSD

Council officers note the changes made to the modified SSD compared to the originally lodged SSD are as follows:

- Construction and operation of the development in a single stage (previously 2 stages).
- Reduced student capacity from 1,530 to 850 students so that the development does not rely on the use of future playing fields to the north, and future road (for car parking, drop off/pick up and service vehicles) to the east of the site, and to integrate with existing DCP masterplan and approved DA for Peninsula Park.
- Reduced size of the hall building.
- Deletion of 1 x indoor and 1 x outdoor sports court replaced by 1 new outdoor sports court.
- Retention of the existing roundabout on Burroway Rd.

The changes made in this most recent modified SSD compared to the last modified SSD provided in March are shown in **Figure 1** below.

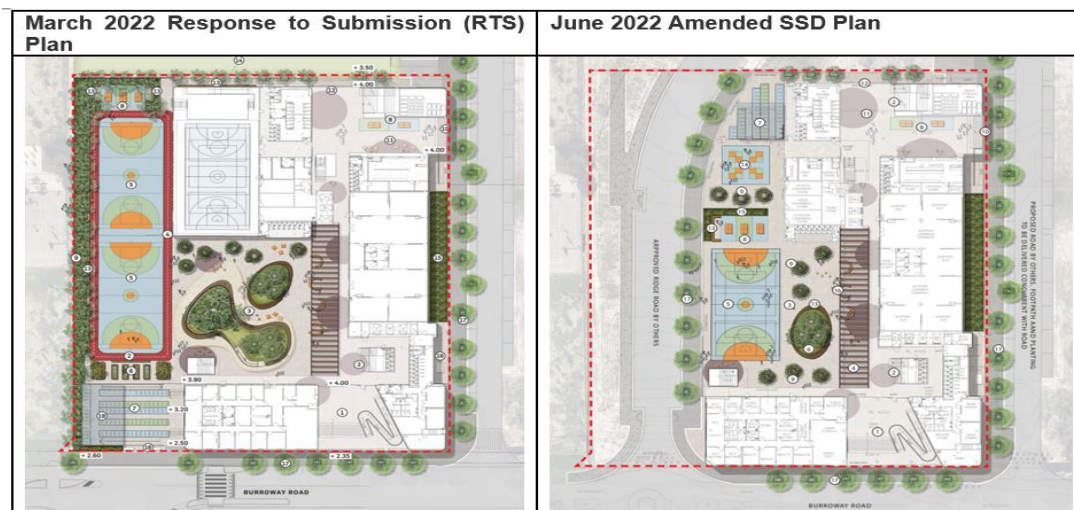


Figure 1: Amended SSD changes

It is also noted that minor amendments were made in April 2022 to the SSD that responded to Council's original submission that did not warrant re-exhibition. Those changes included:

- Existing Burroway Road roundabout changed to a T-intersection.
- Changes to form and increased setback of hall building.
- Reduced building height.
- Internal amendments to buildings.
- Amendments to pedestrian entry.

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Executive Summary

The modified SSD attempts to address the concerns raised in Council's submission dated 29 November 2021 and most recent letter dated 20 May 2022, by reducing student numbers to 850 students (from 1,530 students) and reconfiguring parts of the development, so that it better integrates with the existing masterplan contained within the Wentworth Point Precinct Development Control Plan 2014 (DCP), and other Development Application (DA) approvals. To accommodate the approved Ridge Road, the proposed outdoor sports court and an indoor sports court are removed, and the 2-storey hall and central courtyard are reduced in size. The two 6-storey teaching wings remain largely the same.

Although the modified SSD has been proposed to enable a school to be provided without the delivery of significant supporting infrastructure it is the opinion of Council officers that such infrastructure is in fact still required (for example, the playing field based on play space requirements, and car parking with no on-site parking currently proposed). It is considered that the extent of school infrastructure proposed is insufficient for the proposed number of students and does not promote the orderly and economic use and development of land in accordance with Section 1.3 of the *Environmental Planning and Assessment Act*.

The lack of supporting infrastructure is contrary to the Council resolution made on 7 December 2020 to write to the Minister for Education seeking assurances that any masterplan for the proposed Sydney Olympic Park High School includes the following spatial and community requirements:

- a. *That school buildings and grounds be designed and built to accommodate students from the entire Olympic Peninsula, including Newington, Wentworth Point, Carter St and Olympic Park.*
- b. *Any covered outdoor learning areas be designed and built to accommodate the maximum number of anticipated enrolments.*
- c. *Library and ancillary study spaces be designed and built to serve the entire school community and be included within the school precinct.*
- d. *That Peninsula Park will not be considered as a de-facto school active and or passive green space for use by any NSW Department of Education facilities and/or students during school hours.*

Council officers do not support the modified SSD. The high school at Wentworth Point can only be supported if it is delivered concurrently with adequate supporting infrastructure (including open space and parking). The school should be delivered in a staged approach in concert with the delivery of supporting infrastructure and the revision of the Wentworth Point masterplan as a holistic planning approach led by a Planning Proposal.

In addition to the concerns raised with the reconfigured school, the supporting documentation notes that the fully envisaged development of the school will be subject to a second, separate SSD application. The envisaged development (subject to a future separate SSD) would be inconsistent with the current DCP masterplan in terms of the street layout and open space provision. It cannot be assumed that a second stage of development would be supported given that this would rely on a Planning Proposal to amend the DCP masterplan, which is yet to be lodged and assessed. Fundamentally, Council officers continue to raise concerns regarding the lack of a holistic approach to the development of this part of Wentworth Point.

Subsequently, a range of key issues need to be addressed in the application as listed below and detailed in this submission:

1. Integration with Wentworth Point Precinct Development Control Plan 2014
2. Inadequacy of School Facilities and Local Infrastructure
3. Urban Design
4. Transport
5. Delivery and Waste Services
6. Energy Efficiency
7. Relationship to Adjoining Development.

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1. Integration with Wentworth Point Precinct Development Control Plan 2014

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 [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**.



Figure 2: DCP Masterplan

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.

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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. The removal of an outdoor basketball court and removal of an indoor multipurpose court in the modified SDD will have an adverse impact to both the students and the wider community. As previously proposed, these courts were to be designed to accommodate community uses outside of school hours. The remaining courts should be designed to ensure they can accommodate community access. This issue reinforces the need to undertake a holistic approach to planning Wentworth Point.

3. Urban Design

Street Setbacks

- The proposed setbacks do not reflect the required setbacks 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).

Street Activation

- 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

- Comprehensive DA standard Public Domain Alignment Drawings, as described in the Parramatta Public Domain Guidelines should be prepared prior to granting consent.

4. Transport

Pedestrian Access

- Concerns are raised with regards to the footpaths along Burroway Road (particularly at the roundabout and the main entry). Consideration should be 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.

Lack of 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.

School Bus Access

- An adequate bus parking facility is required to be provided for the school and it is to accommodate peak bus demand. This should be investigated before the SSD is determined and provided as part of the proposed development given it is critical to the operation of the school.

Kiss and Ride

- 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.

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5. Delivery and Waste Services

- No waste and loading area have been specified. This must be adequately addressed and form part of the 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.
- 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 the Parramatta Traffic Committee process. 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.

6. Energy Efficiency

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 Government Resource Efficiency Policy.

7. Relationship to Adjoining Development

- 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. 1m below Ridge Road as it goes northbound. This could result in safety impacts on students from vehicular traffic, and visual amenity impacts.
- 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.

Conclusion

A high school is an important and much needed asset for this growing part of the city. It will provide an essential service and is a positive and active use for the suburb of Wentworth Point.

Council officers acknowledge the importance of providing a school for this community. However, the modified SSD cannot be supported in its current form given the lack of open space, insufficient car parking, poor pedestrian connectivity, inadequate setbacks and street activation, unidentified loading area, unsatisfactory green star rating, and uncertain relationship to adjoining land.

The application is unclear regarding the staging of the school's development and relies on addressing issues concerning the orderly development of land by referring to a future Planning Proposal that is yet to be formally lodged and assessed. The fully envisaged development of the proposed school cannot be considered in isolation to the remainder of the Maritime Precinct, particularly with regards to the detailed design of the approved Peninsula Park, marina, and other remaining land.

Given the above, it is considered that the proposal in its current form does not promote the orderly development of land, nor promote good design and amenity of the built environment and the issues identified need to be resolved before the proposal can progress. Most importantly the delivery of the school must be in accordance with Council's 7 December 2020, as the school should be constructed concurrently with adequate supporting infrastructure.

Thank you for the opportunity to provide a finalised submission.

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