



3 March 2026

The Director, School Infrastructure Assessments
Department of Planning, Housing and Infrastructure
GPO Box 39
Sydney NSW 2001

Subject - Submission Regarding SSD-73688210: Queenwood School Sporting Facilities

Dear Director

Oxford Falls Grammar (OFG) hereby submits this formal response to the New South Wales Department of Planning, Housing and Infrastructure (DPHI) regarding State Significant Development (SSD) Application 73688210. OFG welcomes Queenwood School for Girls to the Oxford Falls community and supports the capital investment into local sports infrastructure. Research demonstrates that engagement in sporting programs improves student well-being, working memory, and attention, translating to higher academic outcomes.

We welcome Queenwood as a foundational "Precinct Partner". This project represents a vital opportunity to complete a regional educational vision by establishing a collaborative "Oxford Falls Education Precinct" alongside OFG and, potentially, St Pius X.

We have also raised concerns regarding **traffic** and **water** management.

OFG's support is conditional upon the implementation of Conditions of Consent under the Environmental Planning and Assessment Act 1979 (EP&A Act).

1. Precinct Partner and Shared Use

To successfully transition the site into a high-intensity institutional precinct, it must offer genuine community utility. We request that the DPHI encourage Queenwood enter a Memorandum of Understanding (MOU) with OFG for shared facility access as a Condition of Consent. This will guarantee the facilities are available to the public when not in use by Queenwood, authenticating the project's public benefit and firmly establishing Queenwood's identity as a collaborative partner in the Oxford Falls Education Precinct.

The Environmental Impact Statement (EIS) heavily relies on community access to justify the project's overarching public benefit, stating that "the proposal will have positive social impact as



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the school facilities will be able to be used by the community at certain times" (EIS, p. 19). Crucially, the project's own Social Impact Assessment (SIA) explicitly mandates that the proponent "develop a Plan of Management, including information about the use of the facilities between the school community and the local community as a condition of consent prior to occupation" (SIA, p. 68; EIS, p. 115).

To transition these broad statements into an enforceable reality, and to align with the SIA's formal recommendation to "Consider development agreements between the school and the broader community" and "explore potential agreements and partnerships with local sports clubs and schools" (SIA, pp. 68-69), we request a formal MOU between Queenwood and OFG.

To support OFG's successful 'Falls Academies', our interschool commitments, and the collaborative "Oxford Falls Education Precinct" vision formally acknowledged by stakeholders in the SIA (SIA, p. 38), foundational terms of the MOU should include:

- **Off-Peak Access:** Pre-scheduled access to the synthetic pitch and indoor courts in hours to be agreed upon when Queenwood has not timetabled use, effectively authenticating the "external community use" proposed in the project's Plan of Management (POM, p. 9).
- **Examination Access:** Priority booking rights for the multipurpose hall during Higher School Certificate (HSC) and other examination blocks to the extent Queenwood has not timetabled their use.
- **Emergency Management:** Official designation of the Queenwood multipurpose building as a secondary emergency assembly point for OFG students and staff, enhancing precinct-wide resilience.
- **Governance:** A reciprocal, at-cost usage fee structure governed by a joint steering committee, providing operational certainty over the "yet to be determined hire fee" currently stated in the Plan of Management (POM, p. 9).

2. Traffic Management

The Wakehurst Parkway and Oxford Falls Road currently operate at capacity. The School experiences highly concentrated traffic peaks, demonstrating significant inbound and outbound movements between 8:00am and 9:00am and again between 2:30pm and 4:00pm.

The local road network is concurrently undergoing planning for two multi-million dollar infrastructure upgrades, comprising the Transport for NSW (TfNSW) Wakehurst Parkway Improvement Project and the Northern Beaches Council project to upgrade to Oxford Falls Road and Dreadnaught Road. Adding commercial-scale heavy construction vehicles to this zone presents substantial safety risks.

TfNSW Wakehurst Parkway Improvement Project

Section 2.2 of the EIS states that the approved TfNSW road and intersection upgrades in the area will significantly enhance accessibility and safety to the 'subject site' – providing additional traffic capacity to accommodate future site users. Section 6.5.3 further states that it is expected that the approved roadworks will be completed prior to commencement of the Queenwood sporting complex. Traffic Impact Assessments have been made with the assumption that the approved TfNSW Roadworks will be completed first.

- **TfNSW Roadworks:** Can an approval condition be included that links to the completion of the TfNSW roadworks prior to the sports complex?
- **Traffic Assessments:** If this cannot be included, then the Traffic Assessments need to be re-run to provide an opinion on the 'as-is' status of the road network should works commence with current roads status.

NBC upgrade to Oxford Falls Road and Dreadnaught Road

Environmental Impact Statement (EIS) does not provide specific details or a completion timeline for the proposed Northern Beaches Council roadworks on Oxford Falls Road and Dreadnaught Road. The EIS acknowledges that "other construction projects may occur in the vicinity during the works" and states that Queenwood's appointed contractor will regularly review cumulative heavy vehicle traffic and coordinate routes with the Council and TfNSW to minimise impacts.

However, OFG has been in discussion with the Northern Beaches Council over the past two years around their plans regarding widening Oxford Falls Road, traffic calming devices, and a new roundabout at the intersection of Dreadnaught and Oxford Falls Roads. The Council anticipates commencing these works at the south end of Oxford Falls Road specifically to avoid interfering with the TfNSW Wakehurst Parkway improvements.

OFG understands that this proposed work is subject to the Council procuring funding. Because the Council works do not share the same guaranteed pre-construction completion timeline as the TfNSW upgrades, there is a significant risk that Queenwood's construction phase will coincide and overlap with the Council's intersection and roadworks. Internal analyses have flagged this possible overlap of heavy construction vehicles with active local road upgrades as potential gridlock.

- **NBC Roadworks:** Can an approval condition be included that links to the completion of the NBC roadworks prior to the sports complex?
- **Traffic Assessments:** If this cannot be included, then the Traffic Assessments need to be re-run to provide an opinion on the both the 'as-is' status of the road network should construction commence with current roads status and the impact on the traffic should the Queenwood construction overlap with that of the NBC upgrade to Oxford Falls Road



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and Dreadnaught Road.

Traffic Management through construction period

To address community reliance on perceived safety over technical capacity, we advocate for a Construction Traffic Management Plan (CTMP) that includes:

- **Synchronized "Blackouts":** Construction traffic must be strictly synchronized to "blackout" peak school drop-off and pick-up times (8:00am to 9:00am and 2:30pm to 4:00pm). This is non-negotiable to ensure student safety on Dreadnought Road and to reduce local driver frustration.
- **Zero-Tolerance Queuing:** An absolute prohibition on heavy vehicle staging or idling on local roads, utilising a "just-in-time" delivery model.
- **Worker Transport:** Mandatory off-site staging areas and shuttle buses for construction personnel.
- **Precinct Liaison Group:** The establishment of a Construction Liaison Group to dynamically coordinate overlapping civil works with OFG, NBC, and TfNSW.

Traffic during operating hours

Queenwood's proposed operating hours, including before and after-school training, present a significant operational conflict if left unmanaged. To maintain network fluidity, we request a comprehensive Joint Traffic Management Plan (JTMP) featuring:

- **Term-by-Term Coordination:** Mandated coordination between Queenwood and OFG to ensure major external events do not clash.
- **Internal Queuing:** All vehicular staging must occur wholly within the Queenwood site boundaries, with no queuing permitted on public thoroughfares.

We propose the formal establishment of an "Oxford Falls Educational Precinct" Event Coordination Committee. This collaborative body would manage a shared master calendar and coordinate joint emergency protocols, transitioning our relationship from neighbours to active partners.

3. The "Riparian First" Approach and Hydrological Innovation

We advocate that the DPHI evaluate the environmental impacts of the site through a "Riparian First" approach, framing the project not as a degradation of rural character, but as a much-needed catalyst for ecological restoration. Conditions of Consent must mandate the cleaning of the Oxford Falls catchment, the removal of exotic weeds, and the establishment of a native biodiversity corridor that does not currently exist.

Environmental Operations and Hydrological Accountability

Community anxiety regarding the environmental and thermal impacts of the synthetic surface must be addressed through strict engineering requirements. OFG is situated geographically downstream from the development. The replacement of permeable land with a massive synthetic pitch and high-clearance roofing introduces significant hydrological and ecological variables.

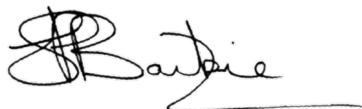
We request conditions enforcing strict Water Sensitive Urban Design (WSUD) principles:

- **Runoff Control:** Section 3.5 of the EIS states that upstream stormwater, as well as site generated stormwater will be stored onsite initially in detention tanks, and then discharged to a constructed swale. Concern is raised regarding the capacity of this constructed swale, and the ultimate discharge rate to ensure that surge capacity is alleviated to the downstream creek system. Post-development runoff profiles (volume and peak velocity) must not exceed pre-development metrics to prevent the exacerbation of downstream flooding.
- **Microplastic Filtration:** Advanced microplastic filtration biomembranes must be installed at every stormwater egress point to capture synthetic shedding before it enters the local catchment.
- **Infill Standards:** The use of traditional crumb rubber (SBR) infill must be prohibited due to documented chemical leaching risks. We request the use of alternative infills that comply with rigorous European Union (REACH) toxicity standards.
- **Thermal Management:** Implementation of a scientifically validated surface heat mitigation strategy to manage the Urban Heat Island effect.

Conclusion

By embedding these balanced and necessary parameters into the Conditions of Consent, the DPHI can ensure the Queenwood project is a resounding success that protects the safety and amenity of the existing community. OFG looks forward to collaborating constructively with Queenwood and the Department to realise this shared vision.

Yours Sincerely



Graham Baikie

Head of Operations and Company Secretary
Oxford Falls Grammar School Limited



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