

2 July 2022

Department of Planning and Environment

**RE: Wentworth Point Residents Action Group (WPRAG) submission on Wentworth Point High School - Application Number SSD-11802230**

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The Wentworth Point Residents Action Group (WPRAG) is committed to representing the residents of Wentworth Point to improve our local neighbourhood. Our group comprises a broad cross-section of occupations, backgrounds and age groups. Our suburb is unique in many ways including that we have the highest density of any suburb in NSW, with all residents living in apartments. Approximately 42 per cent of all Wentworth Point residents have children.

According to the 2022 Census, 10% of all families have adolescent children. It is not surprising then that education, schools and parks are key concerns for WPRAG, we are a key stakeholder in the School Infrastructure NSW (SINSW) proposal.

The formation of WPRAG was closely linked to the demands of residents for the State Government to deliver on its promise to build a public school at Wentworth Point. Many current residents were drawn to Wentworth Point by the promise of a new school. The Wentworth Point Precinct Development Control Plan 2014 stated that the new school would include; “Playing fields located at the northern end of the school site” that were in addition to the 3.9 hectare Peninsula Park.”

We are disappointed with the recent amendment to SSD-11802230 and the Department of Planning and Environment’s current exhibition, that 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 General’s Report 2021 “Delivering School Infrastructure”. The proposal has no oval in the proposed Stage 1 and an oval shared between

2,200 students (primary & secondary) and 15,000 residents in Stage 2. The proposed Stage 2 (at some future unspecified date) has the High School land area increased to 1.9 hectares if you count the Joint Use Oval owned by Transport for NSW or Parramatta City Council. This is still well below the recommended minimum.

A vast majority of responses to the original exhibition Submissions Report Sydney Olympic Park new high school SSD-11802230 in April 2022 were made by WPRAG members including Convenors; Clement Lun (also President of the Wentworth Point Public P&C & High School PRG member), Mark Green (Wentworth Point Public P&C member, Former High School teacher & Senior Executive) and Paul Noack (subsequently elected as a Rosehill Ward Councillor, City of Parramatta Council).

In terms of the two Schools, we have sought to be included in the consultation and development of sustainable plans. The Department of Education's consultation (as noted in the NSW Audit Office reports in 2017 & 2021 & the P&C Federation submission to a NSW parliamentary inquiry in February 2022) is characterised as extremely poor and tokenistic. This is consistent with the experience of our community and WPRAG. Clement Lun (WPRAG Convenor) as P&C President is on the Project Reference Group (PRG) for the new High School and has commented numerous times that he is there to tick a box and sign what School Infrastructure NSW has already agreed to. This is consistent with the criticism stated by the NSW P&C Federation to a parliamentary inquiry "It is concerning that the Auditor-General found that some Business cases for school developments are reverse engineered to fit pre-announced funding" The Department of Education consultation is completely tokenistic in Wentworth Point. There is a two-page dot point consultation plan for Sydney Olympic Park High on the School Infrastructure NSW webpage. This contrasts with similar size school developments in Alexandria Park, Darlington, Fort Street, Smalls Rd, North Ryde and Armidale Secondary College which have 20 to 26-page Community Communication Strategies. Wentworth Point needs and deserves a comprehensive consultation plan that includes surveying the local community for their views, a town hall meeting to gauge community opinion and WPRAG representatives being included in the Project Reference Group (PRG).

Our group is generally supportive of investment in community infrastructure at Wentworth Point. However, the community is extremely concerned that the current proposal has been

developed to meet the commercial interests of Transport for NSW rather than the needs of the students or the community. We have listed our main concerns below with proposed solutions and supporting examples/data.

<b>Issue:</b>	<b>Supporting examples/data</b>	<b>WPRAG Response/alternative solution</b>
<p><b>Disability Access</b></p> <p>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.</p> <p>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.</p> <p>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.”</p>	<p>Wentworth Point Public School disability drop-off zone</p> <p>Greystanes High School disability drop-off zone.</p> <p>Disability Standards for Education 2005</p> <p>Disability Discrimination Act 1992</p>	<p>Complete the proposed Eastern Road and modified Ridge Road in Stage 1 and provide a safe and secure disability dropoff zone</p>
<p><b>Mandatory PDHPE Requirements</b></p> <p>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).</p> <p>The student numbers and lack of suitable spaces will threaten the accreditation of the school and its ability to provide a diverse curriculum</p>	<p>NESA mandates that all 1,500 secondary students must complete at least 2.5 hours per week of planned physical activities. As it stands the proposed High School would find it almost impossible to pass a NESA random inspection</p>	<p>Two mesh-enclosed rooftops for mixed sports activities</p> <p>There is strong community support for the development of Joint Use playing fields and other community sporting facilities on the land to the east of the High</p>

<p>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.</p> <p>The proposal has no oval, hall or permanent basketball courts in the proposed Stage 1 and an oval shared between 2,200 students (primary &amp; secondary) and 15,000 residents in Stage 2.</p>	<p>to monitor curriculum compliance.</p>	<p>School owned by Transport for NSW. This should be negotiated with TfNSW and Parramatta Council</p>
<p><b>Safety and Criminal Damage</b></p> <p>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 to the Sydney Olympic Park Ferry Wharf and the oval will have limited visibility due to Wentworth Point Public School.</p> <p>The greatest concern is that the area will need to be checked daily after community use to avoid the risk of needle stick injuries.</p> <p>Other concerns relate to criminal damage in other parts of the school, general rubbish and how dogs would be kept off the shared oval.</p>	<p>There are already significant issues with anti-social behaviour at the Ferry Wharf, the eastern end of Burroway Rd, The Connection at Rhodes and at the shelters on the Bennelong Bridge. <b>(See Figure 1)</b></p> <p>Drug use is already an issue in that area. The police have placed two permanent monitoring cameras on the High School land.</p> <p>The proposed Peninsula Park will be the only 'greenspace' in Wentworth Point and the area is 'dog friendly'. At the moment dog waste is a major issue in the surrounding Marina Square shops, in front of the Public School and Sydney Olympic Park</p>	<p>Additional playing field/s need to be negotiated on the Crown land owned by TfNSW to the east of the High School.</p> <p>The proposed Joint Use Oval should only be shared between the two schools with school security fencing that complies with the education department's specifications and is designed to secure the schools and educational facilities from unauthorised access.</p>

	surrounding the Louise Sauvage pathway.	
<p><b>Playground &amp; recreational facilities:</b></p> <p>The school does not come close to meeting the required open space ratio of 10sqm per student.</p> <p>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 “Delivering School Infrastructure”.</p> <p>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 &amp; PPS come from medium or low density suburbs). A total of 27,043 m<sup>2</sup> (or 2.7ha) of open space has been provided for both school sites with 8,000m<sup>2</sup> on the PPS site, 14,442m<sup>2</sup> on the APHS site and 4,600m<sup>2</sup> share space – this includes five external sports courts, an amphitheatre, outdoor space for markets, and a roof garden on the PPS site.</p> <p>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.</p>	<p>The Department of Planning Design Guide for Schools says that they must “Ensure outdoor playground space is sufficient to accommodate the student population including future growth”.</p> <p>Arthur Phillip High School, Parramatta. Rooftop courtyard and recreational facilities</p> <p>St Andrew’s Cathedral School. Rooftop playground which can double as a social space.</p> <p>Parramatta Public School, Parramatta. Rooftop terrace (<b>See Figure 2</b>)</p> <p>Manly United Football Club Sydney installed a sports curtains system. The 90m soccer curtain divides the ground into two.</p>	<p>A mesh-enclosed rooftop playground that can double as a wonderful social space. Students can eat lunch or play games overlooking the Parramatta River &amp; Haslams Creek.</p> <p>Opportunities for school &amp; community gatherings including outdoor learning and markets.</p> <p>Utilise the gate on the eastern side of the public school. Use a retractable fence so that the oval can be shared as a playground. The retractable screen would allow the High School to modify for use during PDHPE lessons or</p>

		competitive sports competitions.
<p><b>School Bus Parking:</b></p> <p>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.</p> <p>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.</p>	<p>The 2022 Census shows that the great majority of students will travel from Newington and Concord West. There are only 219 High School age students in Wentworth Point. This demonstrates increased demand for buses.</p> <p>Similar schools in Parramatta &amp; Cumberland LGA's require 6 dedicated school buses per 1,000 students for morning and afternoon travel. The school can therefore expect to need 9 buses for both morning and afternoon travel.</p> <p>The High School will be part of the Northern Sydney School Sports Zone and will play competitive school sports on a Tuesday afternoon. According to local schools, the competitive sport requires 2 buses per 1,000 students. If the school offers recreational sports this also requires 2 buses depending on the sports offered.</p>	<p>The most logical place for a dedicated school bus bay is on the southern side of Burroway Road opposite the new High School. The owner of Block H land has indicated their support for this proposal. (See <b>Figure 3</b>)</p>
<p><b>Staff parking:</b></p> <p>The High School will require approximately 150 teaching and administrative staff. The proposal for</p>	<p>Every school Senior Executive that we spoke to said that almost all</p>	<p>If SINSW is unable to find suitable spaces on site they need to</p>

<p>29 school parking spaces is completely unsatisfactory for school staff requirements.</p> <p>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.</p> <p>The existing buses have very limited connectivity and the cycleways have a number of missing links and have major safety issues.</p> <p>The SOP short-term parking proposal isn't dealing with the problem.</p> <p>There are already High School staff shortages in NSW and this is likely to make the school unattractive to staff.</p>	<p>their staff drove to school. Many live long distances from their schools and public transport isn't a feasible alternative.</p> <p>All the School Senior executives that we spoke to thought that travelling by public transport or bicycle was an unrealistic alternative for their staff.</p>	<p>negotiate with other nearby landowners.</p>
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The original High School proposal and this amended proposal appear to the community to have been drafted so Transport for NSW can move ahead with its intention to build more towers on the peninsula. The High Rise will overshadow and create wind tunnel effects for the new High School. The proposed Joint use oval plan does not meet the needs of the school or the students, it fails to meet the criteria for successful sharing agreements and will be more costly to build, operate and maintain. The WPRAG proposals outlined above address these concerns and would result in a better school and stronger community partnerships.



# Appendices

**Figure 1** - Anti-social behaviour at the Ferry Wharf, the eastern end of Burroway Rd and The Connection at Rhodes





**Figure 2** - Rooftop terrace at Parramatta Public School



**Figure 3 - WPRAG proposed bus bay on Burroway Road, Wentworth Point**





