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Department of Planning and Environment  
Major Projects

Attention Ms Jenny Chu

**Re; Upgrades to Carlingford West Public School and Cumberland High School  
Application No SSD-43065987**

We refer to the proposed redevelopment of Carlingford West Public School and Cumberland High School Application No SSD-43065987 and we wish to object to the proposed development on the following basis.

Whilst, we understand the need for upgrading the existing School facilities we consider that the proposed redevelopment of both CWPS & CHS is excessive and will severely impact on our property, our neighbours and the community in general.

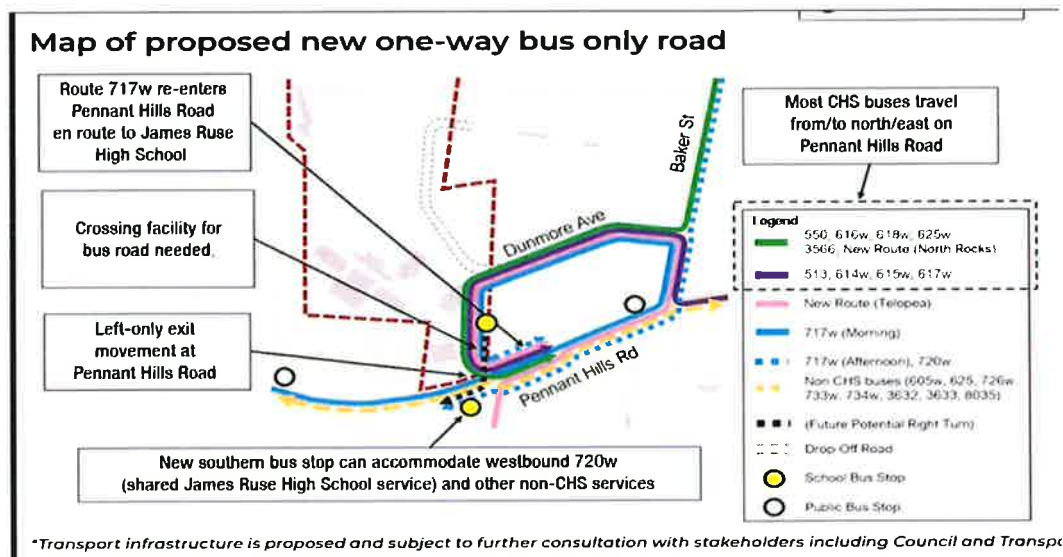
Our reasons for objecting the proposed development are;

**1. Increased Traffic Congestion**

The proposed development of both CWPS & CHS will greatly increase the local area traffic congestion and the proposed mitigation measures will do little to reduce congestion and we note the following;

**a. Bus Link Road**

- i. EIS and related Transport and Accessibility Impact Assessment (TAIA) and all associated modelling fails to recognise the highly constrained labyrinth of small roads on the eastern side of both schools. An projected increase of additional cars and buses into the same closed area will only add to congestion. The EIS quoted 25 - 30 buses via a link road back onto an already officially recognised dangerous crash hotspot and highly congested (and projected worsening) Pennant Hills Road will result in heavy congestion in Dunmore Avenue and Baker Street and in turn Blenheim Road.  
The planned traffic lights at Baker st / Pennant Hills Road will actually exacerbate congestion at peak times - not alleviate it.
- ii. As noted in the School Infrastructure March 2022 Information pack with the "Map of proposed new one-way bus only road" - see attached map is a proposed new bus route for Telopea and note the route shown in pink which is explained in the Map Legend as "New Route (Telopea)"



The introduction of this additional route and additional Bus capacity is not included or reference in the TAIA

- iii. Further, it would appear that the local community will be impacted by increased population demands from the Telopea Precinct Redevelopment. These are critical cumulative impacts as recognised / referred to by the DPE Guidelines. These cumulative impacts have not been addressed or assessed in the current EIS and TWIA..

Whilst the Telopea Precinct redevelopment is not part of the proposed development of CWPS and CHS, it would be sensible for assessment of this development to also consider other proposed significant developments within the local community and include within these future development the development of a new high school/ educational precinct within any proposed high rise development at Telopea

The EIS for the Telopea development clearly indicated an increased high school children population in Telopea of approx 700 - enough to more than warrant its own high school. Build schools where they are needed !

Further, In relation to CWPS, the local state member for Parramatta (Geoff Lee) stated in June this year, that at least 50% of their enrolments were from outside the catchment area - So if only 50% of the current 1900 CWPS students are local then even allowing for say 20% increase in local population would warrant a school to accommodate 1140 students not 1,610 !

## b. Kiss & Ride Zones

- i. The TAIA notes at section 5.4,

*"Most importantly, under this SSDA proposal, activity at CWPS will be equal to or less than the existing conditions as the student population is not proposed to increase, with a permanent capacity that is lower than existing enrolments".*

Whilst, the proposed student population may be less than existing population the TAIA does not address the already unacceptable traffic congestion during the morning and afternoon 'Kiss and Ride' times.

CWPS was originally built in 1967 and the 'Kiss & Ride' facility was never design for the current student population and the Dept of Education has not undertaken any works to improve the "Kiss & Ride' zones and the safety of the student population.

Our assessment over many years of observation, the majority of the student population are driven to School and the report has underestimated the numbers and the conclusion reached

Current plans will do nothing to ease existing morning and afternoon gridlock traffic conditions and serious safety concerns

The proposed adjustments to 'Kiss & Drop' Zones as noted in the TAIA namely;

*Retention of the existing turning circle at Felton Road East with potential minor 'light touch' upgrades to include the accessible parking space • Provision of a new turning circle for CWPS at Felton Road West*

Do not address the current acceptable current traffic conditions and should not be approved by the Department.

c. On Site Parking

- iv. The planned carpark only accommodates for 50% of staff numbers even through as indicated by the TAIA 90% of the staff drive to work.
- v. The majority of the staff drive and park on the neighbouring streets and thereby impacting on the amenity of the local community.  
Again, the proposed development should not be approved by the Department

d. Access for Emergency Vehicles.

- vi. The most important aspect of all of this is the increased response times that all emergency vehicles will face in trying to access any resident or injured school children in Baker Street, Felton Road (east) Karingal Avenue, Niangla Place; Cressfield Avenue; Pindara Avenue; Billyard Place; Ludmilla Close; Hilar Avenue; Muruba Avenue; Dunmore Avenue, Blenheim Road; Pleasant Court; Sun Valley Place; Lynch Close; Lasburn Crescent and Pennant Hills Road.
- vii. This would put local and school community lives at even greater risk than already exists now - the EIS fails to recognise / state this
- viii. Extract from last year's Parramatta Council submission in relation to Traffic in our local school area :

**"The Hills Police Area Command have previously undertaken a patrol on 26 May 2020 between 3:15pm and 4:30pm and have raised concerns regarding gridlocked traffic in Baker Street impairing access to emergency vehicles. They noted that it took 30 minutes for the Police Patrol vehicle to turn left from Pennant Hills Road (eastbound) into Baker Street and to travel 300m into Felton Road (Ref. PTC 2011 A10)."**

e. Other Consideration

- i. Increase pollution and general loss of amenity.  
Even more insidious, is the increased risk to the health and well being of the local residence arising from an increase of diesel and petrol fumes, increase dust pollution, poor air quality and the general loss of amenity to the local community, for which the EIS does not even propose mitigation measures or address
- ii. Footpath reconstruction  
The proposed development indicates the construction of wider footpaths to accommodate the increase student populations as per the below insert



Whilst the upgrading of some of the existing footpaths that are in a degraded/ damage condition, is welcomed, the construction of the increase width of the footpaths to 3 / 2.4 m will have the following impacts

- Removal or damage to local street trees
- Increase hard surface areas adding to stormwater run off
- Increase to 'heat island' effect.

## 2 Over-development of the Site

We object to the proposed development on the basis that the proposed development is a grossly 'over-development' of the site and will greatly impact on the local residents and the amenity of the area and we note the following.

The latest forecast population growth rates from year 2022 to year 2041 for Carlingford (as per [Parramatta Council official website details](#)) is only **17.8%**

So why the need for a massive Cumberland High & CWPS overdevelopment to cater for nearly 300% increase in enrolments ???

CWPS and CHS and hence our area in Carlingford is being asked to bear the extraordinary population forecast growth (186%) in Telopea as result of the proposed Precinct Redevelopment with no high school infrastructure

It would appear that the Carlingford local community is being asked to carry the bulk of the burden with respect of proposed redevelopment works and the upgrades to CWPS and CHS

## 3 Building Heights

The Statutory Compliance table, Appendix C of the EIS states the following;

*The site is subject to a maximum building height of 9m under the LEP. Pursuant to Clause 3.43 of the T and I SEPP, 'development consent may be granted for development for the purpose of a school that is State significant development even though the development would contravene a development standard imposed by this or any other environmental planning instrument under*

*which the consent is granted'. Notwithstanding, justification for the proposed height variation is provided in Section 6.2.1 of the EIS.*

The EIS notes that the building height is 'compatible' with adjoining developments and streetscape and states the following;

*The proposed buildings will be visible from the surrounding dwellings, but not visually intrusive due to their setbacks and planting along the site boundaries. Specifically, the building setbacks are a minimum 12m from the nearest site boundary for Building W (CWPS) and increase to 25m from Building Y to 11 Dunmore Avenue. The proposed multi-level buildings create the opportunity for more open space at ground level. Retained and planned vegetation along the boundaries will assist in screening the buildings. Civic buildings, including schools and churches, are often at a different scale to the development surrounding them. The scale of the proposed buildings is appropriate given the importance of the CWPS and CHS and their place in the community*

We respectively submit, that the proposed building height of 3 to 5 stories ranging in height from 17.6 to 21.35m (CHS) and 12.25 to 21.2m (CWPS) will be visually obtrusive from adjacent properties and the proposal to provide screening vegetation to mitigate the visual impact of the proposed development of the surrounding residence and local community is not reasonable and the Dept should not approve the application.

#### 4. Construction Management Planning and Activities

We refer to the preliminary Construction Management Plans, Waste Management, Noise & Vibration etc and we note the following

##### i. Construction Traffic & Access

The various construction management plans notes that construction access will be via Felton Road East and Dunmore Ave. We object to the use of these local area road networks for the provision of construction access. The local roadways have not been designed for construction traffic loading and as such the roadways are likely to deteriorate. Please note that Felton Road East is already in a deteriorated state and should this development proceed, then the roadway will require reconstruction.

Alternatively and the preferred option, is that all construction traffic should access both CWPS and CHS construction sites via the proposed new Bus Link road from Pennant Hills Hwy

##### ii Construction Worker Parking

As part of the proposed development should it proceed a restriction should be placed on the development that all construction worker parking should be provided on site and that the surrounding local area roads should not be used for construction worker parking.

##### iii Construction Hours of Work

It is proposed that construction and demolitions works should be undertaken

Monday to Friday 7am to 6pm

Saturdays 8am to 1pm

We object to these proposed hours for Construction & Demolition works and request that the hours of works are limited to 5.00 pm Monday to Friday and no work on Saturdays

iv Proposed Method of Construction

We understand that SINSW proposes to rely upon the use of DfMA construction techniques to construct the new building.

We respectfully submit that the use of DfMA for the construction of the buildings is not appropriate or achievable.

Therefore, as DfMA is unlikely to be the preferred construction technique by the Main Contractor, then more traditional construction techniques will need to be engaged and thereby increasing the overall construction duration and further impacting on the local community

5 Tree Removal

We object to the proposed tree removal within CWPC and CHS as contained in the EIS and Arboricultural impact assessment

Thank you for your consideration of our objections

Yours Sincerely



Greg & Maree Ross