

OBJECTION SUBMISSION TO UPGRADES TO CARLINGFORD WEST PUBLIC SCHOOL (CWPS) AND CUMBERLAND HIGH SCHOOL AS PER DPE EXHIBITION NOVEMBER 2022 SSD APPLICATION NUMBER: SSD-43065987

Introduction / Background

I live within close proximity to both Cumberland High School and CWPS schools.

I have a good knowledge of the local area of Carlingford, Telopea and Dundas and frequently walk in those areas and engage in discussions with a large number of my neighbours and fellow residents as well as staff and students at all three of the close proximity schools viz. CWPS, Cumberland High School and James Ruse Agricultural High.

My concerns about the proposed development plans and EIS are :

1. The most important and inherent traffic and road structure features / constraints in the area surrounding the schools creating serious safety risks now and into the future is not properly recognised nor addressed in the EIS and TAIA report

The EIS does not adequately / properly recognise nor address the key inherent features of the roads and traffic network surrounding CHS and CWPS which creates the current and future serious risk of injury or death of students, teachers, parents and local community alike.

The key features that create this serious health and safety risk are:

- that main ingress and egress entrance points (car and bus traffic and pedestrian) for CHS and CWPS schools is on on their respective eastern (both schools) and north eastern (CWPS) sides of their respective boundaries and these are all part of a tightly constrained enclosed labyrinth of small twisting streets and cul-de-sacs with no traffic flow through access to either respective school's western side.
- This eastern side enclosed labyrinth situation creating serious traffic congestion is exacerbated by the fact that James Ruse High is the central vicinity and being a selective high school with a high proportion of students driven to school by parents creates additional large volumes of traffic

Despite recent staggered school start and finish times and proposed future changes such as the traffic lights at Baker St / Pennant Hills Road the overlaps of high traffic volumes still creates extended time periods where an emergency vehicle during morning and afternoon peak hour periods would see normal 7 minute response times to these affected areas taking up to approx 54 minutes (as cited in the Carlingford Community meeting with State MP for Parramatta Geoff Lee in June, 2022).

In last year's 2021 Parramatta Council submission response to the EIS for CWPS Upgrade proposal, it stated that Council did not support the SINSW State Significant Development application (SSD) in its current form as it raises a series of concerns, particularly that it only

includes the school itself and does not adequately address the immediate context of the site and the impacts on the local area. "For this and other reasons the current proposal would provide for a poor outcome for future students and residents".

It went on to cite the following worrying recent observation from police trying to attend an emergency call out to the 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)."

There is nothing in the current EIS which addresses similar emergency vehicle scenarios and the proponent has not given assurances to the local and school communities that similar appalling emergency vehicles response times will not be encountered with their current proposed traffic "solutions".

SINSW has not provided one concrete example of success for achieving significant alternative active transport modes such as walking, cycling and other non-motorised means of transport in any similarly located outer suburban school in Sydney !

The traffic modelling which relies heavily on assumptions of unrealistic, purely "aspirational" levels of alternative active transport modes that should be viewed as totally fanciful and unreliable.

2. The EIS contains misleading and / or inaccurate road network context maps and pedestrian access details which are critical for understanding why proposed plans should not be approved.

In further support of point 1 above, the TAIA report fails to provide an accurate representation of both schools main traffic and pedestrian access points on their eastern sides ie the tightly constrained enclosed labyrinth of small twisting streets and cul-de-sacs with no traffic flow through access to either respective school's western side.

Under Section 2 of the TAIA Report titled "Existing Transport Network" the Figure 2.1 - Aerial view of Site; Figure 2.2 - Road Hierarchy; and Figure 2.3 - Control Intersection Points and their accompanying narrative under each of those headings all fail to inform the reader of the most relevant and material context and salient feature viz. that the eastern side is an enclosed labyrinth with no way for traffic to enter and exit other than at 2 extreme (north / south) ends viz Jenkins Road and Pennant Hills Road and most importantly there is no road connections allowing traffic east / west connection.

Fig 2.2 in particular creates a totally distorted and misleading interpretation to the reader who, because of the representation shown, could easily believe that there is an east / west road connection. This figure mixes walkways, future linkroads (yet to be built) and roads and displays them all as existing roads. It should be withdrawn and replaced with a context map similar to the following:



This enclosed labyrinth creates a natural traffic trap on the eastern side which simply cannot cope with the traffic from an already overpopulated CWPS during peak drop off and pick up times. Plans to increase CHS from a school of some 750 students to 2040 with all the additional traffic plans clearly impacting the eastern side will only lead to more serious health and safety risks for local and school communities alike.

The proposed bus link road from Dunmore Avenue to Pennant Hills Road and the stated egress times claimed in the EIS are totally unbelievable as they fail to properly account for traffic volumes and flows now and in the future for Pennant Hills Road at peak hour times in that egress location and needs to model the circular compounding impact of the lights at Pennant Hills Road and Baker Street. Proper independent analysis of the proposal on the basis we recommend would (we believe) show the “paradox” effect of the lights and Bus link actually increasing congestion to gridlock point in Baker and Dunmore Avenue for extended periods of time.

On page 59 of the EIS (6.1. Detailed Assessment 6.1.1. Traffic, Transport and Accessibility) it states that “The primary access point for CHS is Dunmore Avenue Additional pedestrian access to the school is available from Blenheim Avenue.”

This is totally and utterly wrong on several grounds. Firstly there is no pedestrian access now or planned for the future. The REF Dunmore Ave / Blenheim Rd link road has had this pedestrian access closed for several months. Secondly it was a very important and valuable pedestrian access used almost exclusively by many CWPS primary school children, rarely by CHS students. It also facilitated a very large number of CWPS parent car movements drop offs which was significantly relieving the CWPS car movements on the main Felton Road (east).

The Blenheim Road access closure has now created an even more significant detrimental congestion impact on Felton Road east than when EIS traffic surveys were undertaken. There appears to be no correction of this error in the EIS and we believe this creates distorted and unreliable traffic survey data and analysis,

An accurate traffic analysis and proper recognition of the east side enclosed labyrinth situation would clearly support the local community solution for CWPS upgrade to incorporate a through link road from Felton Road east to Felton Road west.

3. Omission of the Telopea Precinct Redevelopment and its shared and cumulative social and environmental impacts with the proposed CHS upgrade plans

In terms of fairness and transparency to the local community and compliance with ethical planning standards and SEARs requirements, I believe it is absolutely critical that details of the proposed massive Telopea Precinct Redevelopment which is only some 2 kilometres away and sits within the current massive outdated CHS enrolment catchment area be recognised as having overlapping cumulative significant environmental and social impacts with the proposed CHS / CWPS Upgrade proposal.

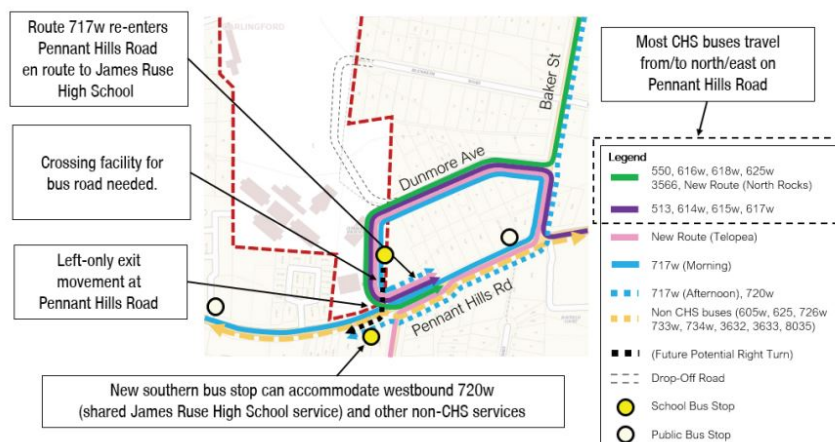
The omission of the massive Telopea Precinct Redevelopment impacts from Section 2.4 “Consideration of Cumulative Impacts” is a major oversight for EIS evaluation purposes.

The Telopea Precinct Redevelopment (TPR) plan is predominantly high rise in nature with some 4,700 new dwellings with “the broader suburb projected population of 17,600 people is likely to generate demand from approximately 950 primary and 625 secondary school students by 2036.”

The TPR EIS shows that SINSW representatives were well aware of these details and it seems incredible that CHS / CWPS area should even be considered for absorbing such an impact of virtually a whole new adjoining suburb. Especially when only last year (2021) they stated in the CWPS EIS that “The local road network cannot accommodate additional traffic volumes”.

Yet despite this knowledge, the following bus plan (via SINSW Project update) shows a planned new route from Telopea :

Map of proposed new one-way bus only road



**Transport infrastructure is proposed and subject to further consultation with stakeholders including Council and Transpo*

As at early December, 2041, the projected population growth rate from year 2022 to year 2041 for Carlingford (as per Parramatta Council official website details) is only 17.8% .

This compares with the extraordinary population forecast growth of 186% in Telopea as result of the proposed Precinct Redevelopment.

The TPR would gain significant social, environmental and economic benefits by having its own new high rise school (similar to Arthur Phillip High School in Parramatta). Within the new high rise suburb the new high school infrastructure would be developed from a virtual "blank canvas" plan starting point to achieve realistic high levels of walking and other non motorized transport modes to / from school for cleaner and more environmentally sustainable outcomes.

To ask a suburb of Carlingford with only 17.8% growth rate in population (2022 - 2041) to cop a 300% increase in its local high school capacity is clearly a sign that it is being well and truly overburdened with serious infrastructure deficiencies and lack of proper school infrastructure in new high rise redeveloped adjoining suburbs with exceptionally high population growth where they are needed and should be built.

4. Omission of the Rydalmere Education Campus (formerly Macquarie Boys High) and its shared and cumulative social and environmental impacts with the proposed CHS upgrade plans

In terms of fairness and transparency to the local community and compliance with ethical planning standards and SEARs requirements, I believe it is absolutely critical that details of the proposed Rydalmere Education Campus (on the [Schools Infrastructure NSW website this old Macquarie Boys High site is shown as planned for redevelopment of K to Yr 12 under the new name of Rydalmere Education Campus.](#)) be taken into consideration.

It sits within the current massive outdated oversized CHS enrolment catchment area and as such should be recognised as having overlapping cumulative significant environmental and social impacts with the proposed CHS / CWPS Upgrade proposal.

The omission of the Rydalmere Education Campus impacts from Section 2.4 "Consideration of Cumulative Impacts" is a major oversight for EIS evaluation purposes.

5. Omission of the REF CHS link road and car park operational details and its shared and cumulative social and environmental impacts with the proposed CHS upgrade plans

Construction under REF of the CHS Link road (Dunmore / Blenheim) has a major cumulative shared social and environmental impact on all residents in Dunmore Avenue, Blenheim Road,

Pleasant Court and Baker Street (particularly those between Pennant Hills Road and Felton Road).

Residents have been given repeated assurances by SINSW representatives that the link will operate solely for Cumberland High School parents /students (exception for parents with children who attend both CHS and CWPS) and that this will be enforced by the Education Department

Given those assurances above, the hours of operations for the link road should be **based on CHS student class times** not CWPS late staggered times.

The above- mentioned important representations need to be included as formal conditions in the EIS document itself and the Dunmore / Blenheim link road hours of operations need to be specified as School days only (M-F only excluding public holidays) in the morning 7.30 am - 8.45 am and afternoon 2.45pm - 3.15 pm only.

This is important as it is so integrally linked to the SSD EIS regarding the size of the school and other serious detrimental traffic issues already compounding serious social and environmental impacts in an already traffic stressed and high safety and health risk environment - refer attached newspaper article citing Parramatta Councillors and SINSW representatives attesting to that fact :

LOCAL NEWS

Traffic concerns raised

"You wouldn't build a school there now": Congestion out of control near schools

ELLIE BUSBY

Traffic gridlock at Cumberland High School (CHS) and Carlingford West Public School (CWPS) has sparked safety concerns among locals.

A recent City of Parramatta council meeting has drawn attention to the "extreme levels of congestion" currently occurring near the local schools during peak hours.

With the population continuing to increase and the proposed Telopea Precinct Redevelopment expected to generate an additional 625 high school students, CHS's current number of 801 students is predicted to increase to 2,040.

In CWPS, a permanent cap of 555 students has been increased to a proposed 1,800, driven by catchment area issues and increased development.

With the schools set only to grow, the Parramatta council has voiced its concern about the already "crippling" traffic issues.

A notice of motion, moved by Councillor Georgina Valjak, has pushed to relay concerns over the traffic to the Department of Planning and Environment and to Schools Infrastructure NSW.

As a result of continued parking infringements, the council will also consider the installation of cameras in the streets adjacent to CWPS identified as the most problematic.

Cr Valjak said the roads were not built to handle the current capacity and that it brings the suburb to a "standstill" every school day during drop off and pick up times.

"I was invited to join the residents and walk around these cul-de-sacs next to the primary school and was shocked at the traffic gridlock and primary school children darting between cars," Cr Valjak said.

"After being informed of a recent incident with a student where police and ambulance attended, I bring this to the Chamber's attention as there is nothing more important than the safety, health and wellbeing of our community."

Speaking of a recent meeting with residents that she attended, Cr Valjak shared that the congestion on the road has become so bad that some locals weren't able to make appointments during peak hours.

"A family with a chronically sick child pray that an ambulance not be called on a school day during pick up or drop off times, as it has taken emergency services 54 minutes to reach Felton Road from Parramatta - a trip that would usually take seven minutes," Cr Valjak said.

Cr Kellie Darley seconded the motion.

"When we met recently with Schools Infrastructure NSW (SINSW), a representative said 'you wouldn't build a school there now' and yet, SINSW are looking to increase it," Cr Darley said.

Cr Georgina Valjak said the traffic issues are having a detrimental effect on local residents.

Photo: Melissa Stevens.

A proposed link road by SINSW for a one-way road between Dunmore Avenue and Blenheim Road will look to increase the flow of vehicles and help reduce congestion, but Cr Darley said it won't fix the issue. "For us, the residents, it's just pushing the issue around and not actually addressing it."

The motion passed successfully.



Also the EIS should address the cumulative social and environmental impacts that will arise from the carpark noise and light spillage affecting adjoining neighbours including for those staff or contractors (eg cleaning; maintenance etc) who require parking before 7.00 am or after 6pm M-F. This is required as neighbouring residences are by virtue of their topographical elevation overlooking the car park and will still be exposed to car noises, lighting etc as they are well above proposed 2.5metre fencing and other "screening" landscaping trees and vegetation provided in the proposed 5 metre perimeter buffer zone.

We request that any car park lighting be strictly time controlled and security lighting be provided on a "smart" motion sensor basis to avoid light spillage and other lighting pollution effects on neighbours as well as adopting energy saving environmental sustainability practices and avoid a nighttime "fortress" impact / effect.

We request that air and noise pollution monitoring be undertaken through an independent 3rd party, organisation eg EPA starting with a baseline reading prior to the use of a proposed link road - it should be measured at the midpoints of both Blenheim Road and Dunmore Avenue. This should be monitored monthly for several months of operation of the link road to ensure pollution levels meet the health, safety and well-being standards for local residents.

6. Serious detrimental visual and physical impacts to site adjoining neighbours requires a separate independent property valuation assessment to ascertain property value losses and compensation claims for residents

The architecture and design of the proposed new CHS breaches virtually every "Implementing of Good Design" design objectives for NSW as promulgated by the Government Architect NSW (GANSW).

The seven objectives they define as the key considerations in the design of the built environment are:

1. Better fit contextual, local and of its place
2. Better performance sustainable, adaptable and durable
3. Better for community inclusive, connected and diverse
4. Better for people safe, comfortable and liveable
5. Better working functional, efficient and fit for purpose
6. Better value creating and adding value
7. Better look and feel engaging, inviting and attractive

In relation to key design objectives 1; 3; 4; 5; 6 and 7 in particular it fails the local community miserably.

Not only does it breach all existing building height codes but its form and fit on site will seriously damage the privacy and level of amenity for all adjoining and immediate site neighbours of both schools.

It is a visual eyesore for and effrontery to everyone who lives in Carlingford.

It is an industrial high rise school design which is totally out of character with and neither sympathetic to nor harmonious with our beautiful, leafy green surrounds and large numbers of existing mature trees which currently beautify the area in our low rise building height residential suburb. The school building will brutalise and degrade the local area's aesthetics and liveability and reduce immediate neighbours property value.

We request the DPE to commission an independent qualified property valuer to assess the value impact on all adjoining site properties and share those details with adjacent neighbours.

7. CHS out of hours hall use should be for Carlingford only local community groups and for restricted days and times

Page 70 of the EIS states under the heading “Out of hours hall use” states

“Out of hours non-school use of the halls will be limited to community dance classes plus community / church singing groups, with the hours of use restricted to between 6pm and 10pm”

We request that this be restated as **only genuine Carlingford local community groups**.

In the past we have seen groups from all over Sydney being afforded access to CHS and they have created difficulties for local residents including EPA noise complaints.

We would also request that use of the hall be limited to one week night per week on M-F basis for 6 - 9 pm and that further to point 5 above that the Dunmore / Blenheim link road is not available.

It should also stipulate that such groups be limited to 20 in number as their cars will presumably be using the CHS carpark adjacent to neighbours, These groups should be encouraged to walk or cycle to the high school as preferred transport modality in line with TfNSW and Department policy.

8. Construction fatigue experienced by residents and damage to surrounding streets by heavy construction vehicles

We have sustained ongoing construction now for over 18 months and raised numerous EPA and SINSW complaints here in Dunmore Avenue.

We have suffered dust, noise and vibration to intolerable levels.

Plans to continue with this till 2025 should include compensation for worst affected neighbours by providing leave relief and mitigation strategies including installation of triple glazed windows.

It should also remedy immediately the damage already caused to these small roads never designed / built to take the high volume of heavy construction vehicles. The state of Dunmore Avenue at present is a real safety concern and should be immediately remedied / repaired by SINSW - see photos (NOTE : photos don't satisfactorily convey extent of serious damage):



