

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

EXECUTIVE SUMMARY

City of Parramatta Council thanks the Department of Planning, Industry and Environment (DPIE) for the opportunity to provide comment on the Sydney Olympic Park High School proposal. Council recognises the importance of providing a high school in this location and broadly supports the use in this location. However Council does not support this 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 existing development approvals. For this and other reasons detailed in this submission the current proposal would provide for a poor outcome for future students and residents of Wentworth Point.

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 in this location however, the subject SSD cannot be appropriately assessed in this instance. The SSD relies upon the provision of facilities and infrastructure (including playing fields, new road and car parking) which have not been approved or formally lodged as part of any planning process.

The application lacks clarity and raises uncertainty as the proposal relies on facilities to be "provided by others" which do not form part of the application. The proposed school cannot be considered in isolation to the remainder of the Maritime Precinct particularly in regard to the detailed design of the approved Peninsula Park, marina and rowing club facilities, as well as the impacts upon the future residual high density residential lot.

As a result it is considered that the proposal in its current form does not promote the orderly and economic use and development of land or promote good design and amenity of the built environment and a range of key issues need to be addressed in the application as listed below and detailed in this submission:

- 1. Impact on Existing Subdivision Pattern
- 2. Compliance with Wentworth Point Precinct DCP
- 3. Consideration of Existing Approvals
- 4. Contravention of LEP and Development Standards
- 5. Future Planning Proposal
- 6. Inadequacy of school facilities/infrastructure
- 7. Shared Open Space and Recreation Facilities
- 8. Public Domain
- 9. Sustainability
- 10. Traffic Impacts



Key Issues

1. Impact on Existing Subdivision Pattern

The application provides plans for the proposed school effectively in isolation from how the surrounding area will be redeveloped and will function in the future given the contextual change resulting from this application. The application will override previous plans for the precinct without providing alternative solutions and does not adequately address the impacts upon current plans for the road network, Maritime Precinct and the proposed Peninsula Park.

The Environmental Impact Statement (EIS) states that the subject school site will form its own separate lot. The subdivision is currently being progressed through a separate approvals process, with the separate lot to be established prior to determination of the SSD. This is not considered an appropriate process pathway. There are significant impacts of this SSD application on the existing subdivision of the precinct that has been specifically established for the overall development of the area. Subdivision should form part of this SSD application and not be dealt with as a separate process.

As part of an amended SSD application it is recommended a fully coordinated block master plan of the whole area is provided with particular attention paid to:

- A new street layout that will support the school, the resultant lots in the surrounding developable area and public space (river foreshore and new proposed playing field, including car park and services).
- Building setbacks to the existing streets and to the proposed streets to be respectful of the approved DCP to provide adequate street front deep soil areas and landscaping consistent with neighbouring developments (5m to Burroway Road, 3m to new local roads).
- The operation of Stage 1 of the school will require vehicle access and staff car parking in addition to that provided along Burroway Road. The new road and car parking associated with the proposed playing field is meant to function as staff car parking, however the new road and car parking is being considered separately from the school site. Should the road design alter, this could impact the design and function of the school. Therefore, the school site should not be approved ahead of the agreed plan for the road, car parking and playing field. Confirmation of the design and construction of the new access road should be obtained to ensure the school can meet loading and parking requirements prior to finalising the design of the school.
- The subdivision that is required to accommodate the school site similarly impacts multiple land uses including the layout of the road, playing field, Peninsula Park, and development to the east. The school site assumes the new subdivision will be as shown in the SSD drawings, however this has not been tested by Council. The subdivision should also be agreed prior to determination of the SSD.

2. Compliance with Wentworth Point Precinct DCP

The proposal is inconsistent with the Wentworth Point Precinct DCP (including the over-arching indicative structure plan) which impacts the entire eastern precinct layout and development controls.

The proposal does not comply with key elements of the DCP including street layout, pedestrian/cycle networks, distribution of land uses and vehicular access/parking.

3. Consideration of Existing Approvals

The EIS has failed to appropriately consider the impacts of this proposal upon the existing development consents already issued within the precinct.

Currently there are development consents for key components of the precinct including the Peninsula Park, dry dock, rowing club and marina. Approval of this SSD would nullify those consents and raises questions about the delivery and timing of these components.

An application which provides a broader scope of the precinct is imperative to ensure the intended plan for the area can be achieved. Alternatively, if this plan is proposed to change, commensurate detail should be provided as to what will replace the approved development consents so that any revised layout and uses can



be properly understood holistically within the broader context.

4. Contravention of LEP and Development Standards

The site is currently zoned part R4 High Density Residential, B1 Neighbourhood Centre and RE1 Public Recreation. Both the R4 High Density Residential and B1 Neighbourhood Centre zones include "educational establishments" as permitted uses, however, the RE1 Public Recreation zone does not permit this proposed use.

The site has various height of building development standards, being partially zero -19m - 25m - 88m. The proposal has a maximum height of 29.5m which exceeds the 25m height maximum applicable to part of the site, albeit by a minimal amount.

The site has various FSR allocations being partially zero and partially 1:25:1. The proposed FSR is 1.53:1 (based on a floor area of 14,418m²) which exceeds the maximum FSR permitted on the site under the existing planning controls.

It is noted the proponent may seek to utilise the controls of the *EP&A Act* and the *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* to override the *Auburn LEP 2010* provisions. However, the impacts of the proposed school would be better addressed through a broader scheme that takes a holistic approach to the development of the precinct.

5. Future Planning Proposal

The proponent states that a Planning Proposal is currently being prepared for the subject school site, the Transport for NSW (TfNSW) land to the east and the future Peninsula Park to the north. The Planning Proposal will address the zones and planning controls and will seek to apply an SP2 Infrastructure zoning for the school site with no height or floor space controls.

Whilst the Planning Proposal may resolve some of the issues raised above, there is no certainty of when this will be lodged with Council, the timing of any assessment and whether the proposal will ultimately be approved. It is considered imperative that the master planning of the entire Maritime Precinct (including the Peninsula Park) be resolved before any determination for the school be granted. This will provide future certainty regarding the orderly development of land, delivery of assets (including the new road and Peninsula Park) and provide for appropriate controls for future development within the precinct.

The current SSD only considers the school site, however a Planning Proposal should be considered for the precinct, not just for the school site. The Planning Proposal should consider and include those areas impacted by the school site including the Peninsula Park, the road network, and the development site. The Planning Proposal should be agreed by Council ahead of the SSD and include but not be limited to:

- A revised street layout for Ridge Road (now part of the proposed school site) and development site to the east of Ridge Road
- A built form layout, including building envelopes and densities contained in a master plan for the developable area east of Ridge Road
- A revised design of the Peninsula Park and playing field as a result of the inclusion of the school development
- A set of public domain drawings (60% resolved public domain design and fully resolved alignment drawings) describing the scope of public domain works required on Burroway Road and Ridge Road.

A master plan of the Precinct (including the Peninsula Park) should be resolved before any determination for the school is made. This will provide greater certainty regarding the orderly development of land, delivery of assets (including the new road and Peninsula Park) and provide for appropriate controls for future development within the precinct.

6. Inadequacy of School Facilities/Infrastructure

The EIS states that the proposed playing field and the new road with associated car parking do not form part



of the SSD application. Notwithstanding the proposed school will have insufficient open space for students and fails to meet the minimum standards set out by the Department of Education's Educational Facilities Standards and Guidelines (EFSG) for both stages 1 and 2. The application however depends upon these facilities being provided for the construction and operation of the high school. In this regard:

- The proposed playing fields are identified as being required for the Stage 2 construction, with such works clearly being included within the SSD. Irrespective of any future joint use agreement with Council, there are no details on the design and delivery of these playing fields, including how the playing fields will relate to the Peninsula Park. The playing fields are being included within the SSD by default which provides a high level of uncertainty for the Council and the overall design of the Peninsula Park. It is therefore considered essential for any playing fields/playing spaces to form part of the SSD application as they cannot be considered separately to the assessment within the boundaries of the school lot.
- Page 10 of the Architectural Design Statement identifies that the onsite open space of 6,738sqm is insufficient for Stage One (containing 850 student places), for Department of Education (DOE) to meet its minimum requirement of 10sqm of open space per student. The Social Impact Assessment (p. 6) states the play space required in Stage One can be accommodated on site, however it utilises the measurement of 9,511sqm which is the site area, not the open space area. In order to meet the Department of Education's minimum open space requirement of 10sqm per student of Stage Two student place numbers (1,530), the adjacent Joint Use Agreement Playing Field (8,834sqm) is required. The Joint Use Agreement does not form part of this application and has not been finalised. It is noted that the SINSW definition of open space includes court and hard surfaced areas, not just green open space as is usually the definition.
- The new road and car park is being proposed as part of a separate process which has not been confirmed. The EIS states that this will be "provided by others", and therefore there is no certainty that this will be provided at all, let alone in a manner that will satisfactorily meet the functional requirements of Council, the school and precinct. Subsequently, it is possible that the high school may be constructed and operated with no off street parking. This could therefore place a significant demand on on-street public parking in an already dense urban environment and must be addressed at this stage of the development process. The design and delivery of the road and car parking also plays an important role in the entire Maritime Precinct and for access to the Peninsula Park and cannot be considered in isolation. Furthermore, an assessment of the road and drainage infrastructure cannot be assessed to determine if it can cope with the drainage requirements, or if easements to drain water will be required, and their possible location.

The EIS states that if this road has not been delivered by the time the school becomes operational, then staff and visitors can park at the nearby shopping centres (as can the construction workers during construction). This is a completely unacceptable approach to address car parking provision as it relies on the parking of other development and burdens those landowners.

The school also depends on the new road (which does not formally form part of the SSD) for pedestrian access, servicing, and waste collection. It also proposes a building that is 0.7m from the proposed school boundary which is unlikely to comply with BCA setback requirements.

In addition, it is considered unacceptable that the former Ridge Road which was to be delivered to Council as a fully operational public road has now been removed and replaced with a road and car parking that is only accessible to the public on a part time basis. This is a significant reduction of public benefit to the existing approved scenario, and is not supported by Council.

7. Shared Open Space and Recreation Facilities

Council has identified a significant under-provision of open space and recreation facilities (particularly playing fields) in Wentworth Point, with future population growth facilitated by nearby high-density residential development to exacerbate this shortfall. The proposed Peninsula Park will be the largest public open space with the greatest capacity to accommodate the facilities required to meet the diverse social and recreational



needs of the surrounding local community, and is therefore critical to achieving an adequate provision of high quality public open space in Wentworth Point. As noted, the playing field is not part of the SSD application, but an understanding of how it will be provided and how it interrelates with surrounding uses including the school is essential for the proper planning of the Wentworth Point Peninsula. Therefore, comments in relation to elements outside the area of the SSD application must be taken into consideration when assessing the proposal for the school.

The proposed school and playing field will significantly encroach into the proposed Peninsula Park and will reduce the area of recreational space available to the surrounding residential community during school hours. City of Parramatta Council has previously resolved that any playing field associated with the new school should not be provided at the expense of land already proposed for the Peninsula Park. It is noted that the existing plans for the proposed Peninsula Park equate to approximately 3.6ha, and the addition of the playing field increases the overall size of the open space to 4.1ha. However, the playing field encroaches into the Peninsula Park area by approximately 0.5ha, thereby reducing the area that is unencumbered by the school to 3.1ha. Any such playing field should be wholly located on land outside of the existing plans for the proposed Peninsula Park and not compromise the unrestricted access to the Peninsula Park.

Although SINSW has committed to integrating shared facilities into their schools to provide useful spaces outside school hours, community access to the high-quality facilities within this development remains uncertain. Council seeks SINSW's intention to pursue shared use arrangements within this site (not exclusive to the playing field) and requests further details on the access points and processes to facilitate this outcome.

Playing Field Amenities

A key requirement for a playing field to operate is to provide adequate access to amenities. The amenities within the proposed multi-purpose hall are currently disconnected from the playing field and should be relocated closer on the northern side of the school site. This will enable the amenities to be directly accessed from the playing field without users needing to traverse further into the wider school site.

Playing Field

Despite the playing field not being included in the SSD application, more detail needs to be provided to demonstrate that it can meet required standards and has the capacity to accommodate a high level of both school and community use e.g. dimensions, lighting, surface, irrigation, etc. Given the anticipated level of usage the playing field will need to have a synthetic surface (capable of accommodating 60 to 80 hours of use per week) as a natural turf surface (capable of accommodating 20 to 30 hours of use per week) would not likely have the capacity to accommodate additional community use outside school hours, whilst maintaining an adequate condition consistent with community and sporting group expectations.

Outdoor Multi-use Courts (Indoor and Outdoor)

The proposed school incorporates outdoor courts and table tennis tables that are located along the interface with the proposed publicly accessible playing field. These much needed recreational facilities should be made available for community use concurrently with the playing field (outside school hours) to better offset the loss of recreational opportunities within Peninsula Park. This could be readily facilitated though removal of screening vegetation and replacement of the proposed 2.4m high fencing with retractable (sliding) gates consistent with those to be used to provide access between the school and playing field. This solution could also be adapted for the interface between the courts and remainder of the school grounds to address the balance between site security and permeability requirements i.e. open or closed based on school hours.

Indoor Court

Council has identified a shortage of indoor court facilities and the proposed indoor hall provides an opportunity to address this in part through community access outside of school hours. Community access to the indoor court and associated facilities could be efficiently managed by Council via an online booking system or similar subject to a suitable agreement being reached between the proponent and Council.

Circuit Track

It is recommended that the proposed running track be relocated to extend around the proposed playing field instead of the indoor court to maximise existing space for the school and access by the wider community.



This will then allow for an appropriate fencing solution as referenced above to separate community access to the courts, table tennis tables and indoor facility without compromising access to the remainder of the school.

Peninsula Park

There is a significant level change between the proposed school / playing field and the Peninsula Park, which will potentially physically and visually disconnect the playing field from the Peninsula Park. The playing field will also require infrastructure, such as ball screens to ensure the safety of park users, which will likely exacerbate this disconnection. Appropriate treatment of the interface between the playing field and Peninsula Park is critical to maximising permeability between the two adjoining 'public' spaces.

Further details are required on the interface with the Peninsula Park to demonstrate adequate amenity and access to facilities (including maintenance) is retained consistent with the intent of the proposed design.

8. Public Domain

The indicative new road design illustrates a roundabout terminating the north end of Ridge Road. In previous plans, Council's preference is for a 'T' or hammer-head terminus that converts to a loop road, which forms an edge separating the development site and the eastern waterfront.

The current Ridge Road design is elevated above the school, future playing field and Peninsula Park levels. The elevated road contains the building basements that would otherwise be buried – this is not possible due to contaminated soil and shallow depth to water table. This transition of levels needs clarification; cross-section and a civil design for Ridge Road should be provided.

The school proposal should contribute to the development of the site's street frontage public domain. The landscape drawings provided show indicative street tree locations and vague public domain design outcomes. However, clearer public domain drawings meeting the requirements set out in the Parramatta Public Domain Guidelines (PPDG) should be provided.

9. Sustainability

The nominated Green Star target (4 star) is low and a higher standard should be sought for a development of this nature. The Department of Education's Educational Facilities Standards and Guidelines specifies the use of the NSW Government Resource Efficiency Policy (GREP) that sets a 5 star Green Star rating for newly constructed facilities in Sydney. The school development in Wentworth Point should adopt the higher 5 star Green Star target specified in the GREP. The NSW Government has adopted a Net Zero emissions target by 2050, and all NSW Government development should contribute to achieving this target as a minimum.

Water management strategies proposed as part of the SSD application include the installation of rainwater tanks for irrigation and potentially toilet flushing. The site is in close proximity to an existing recycled water network (WRAMS). It is recommended that recycled water piping be included in the development to service irrigation and toilet flushing, for the future connection to the recycled water network. This will provide greater water security for non-potable water uses.

Resilience strategies for urban heat primarily focus on a green star plan view approach for 75% cool services for the site. The development should ensure adequate façade shading is installed to limit heat reflected from the façade into areas were students and staff occupy. Façade shading not only provides improved internal thermal comfort outcomes, but also can reduce urban heat, as facades can reflect additional heat to the pedestrian areas surrounding the buildings. See the City of Parramatta Urban Cooling façade controls contained in the Draft Parramatta CBD DCP for shading requirements to reduce external urban heat reflected from facades (Attachment 1).

To further limit urban heat effects, all heating ventilation and air conditioning (HVAC) heat rejection units should be located on the roof tops of buildings.

10. Traffic Impacts

The design and operation of the school (i.e. waste collection, deliveries and staff parking) is dependent on the construction of the new access road, which is unconfirmed at this stage and does not form part of this development. It is recommended that prior to finalising the design of the school, confirmation of the design



and construction of the new access road should be obtained to ensure the school can meet loading and parking requirements. Based on the current design, Stage 1 of the school operation should also not proceed until the new access road is constructed. Stage 2 of the school operation should not proceed until the 30 staff parking spaces provided in new access road is constructed.

Parking requirements

Off-street parking should be provided in accordance with Auburn DCP 2010; Secondary Schools: 1 space per 20 Year 12 Students and 1 space per 2 staff.

There is insufficient information provided to determine the parking requirements of the new proposed High School (i.e. the number of Year 12 students and staff were not provided).

The traffic report states that 74 parking spaces are required to be provided by this development. This consists of 13 spaces for Year 12 students and 61 spaces for staff. The development will provide a total of 30 parking spaces for staff during Stage 2 of school operation and it is noted that this will be delivered by others. The development subject to this proposal will result in a total shortfall of 44 parking spaces.

Most students within the potential catchment area live in high density apartments with limited off-street parking. It is considered unlikely that many of these students will have access to private vehicles and drive to school. There are some students that live in the low density residential areas in Newington that may have access to private vehicles. However, there are bus services and cycle routes in Newington that provides easy access to Wentworth Point. Therefore, no parking spaces provided for Year 12 students is not considered unreasonable in this instance.

Although the staff parking provision does not meet the DCP requirements, the school is located within close proximity to paid parking in the shopping centre. Due to the existing on-street parking restrictions, it is considered likely that the paid parking in the shopping centre will capture any overflow of staff parking. Therefore, the proposed 30 parking spaces for staff parking is considered acceptable. However, it is noted that the 30 staff parking spaces will be located on-street in the new access road which is going to be constructed by others.

The development's parking provision is dependent on the delivery of the new access road which is understood to be unconfirmed at this stage (i.e. no approval has been given regarding the design of the new access road). There are concerns that this will result in no parking spaces provided for the school during both stages of school operation, impacting on parking amenities in the surrounding streets, which is not supported.

The staff parking spaces will be shared with the public outside of school times. As there are no physical barriers provided such as boom gates, it can be difficult to ensure that these spaces remain unoccupied during school times for staff to use. This will also result in the loss of on-street parking spaces during school times, impacting on parking amenities provided in the area, which is not supported.

It is recommended that a Car Park Management Plan be provided to the satisfaction of Council's Traffic and Transport Manager. The plan should address how the school will manage the parking for staff, buses and kiss and ride, during school peak periods and special events (such as school galas and school excursions) such that the parking does not overflow to on-street. The plan should also outline any potential physical measures implemented such as boom gates.

Bicycle Parking Requirements

While the Auburn DCP 2010 does not require secondary schools to provide bicycle parking spaces, the proposal includes 144 bicycle spaces as part of Stage 1, and this will increase to 258 spaces in Stage 2.

The provision of bicycle parking spaces is supported to encourage the use of sustainable transport modes. Bicycle parking spaces should be provided in accordance with AS2890.3-2015, and it is recommended that a portion of the bicycle parking spaces be undercover to provide cyclists with weather protection.

Kiss and Ride Facility

The architectural plans show 5 parking bays on Burroway Road proposed to be allocated for kiss and ride. The traffic report states that 2 additional parking bays in the new access road can be allocated to kiss and ride for students with special needs however this will be delivered by others. Based on this, a total of 7



parking bays for kiss and ride is provided for the school.

However, as noted, the delivery of the new access road is unconfirmed at this stage. This will result in only 5 kiss and ride spaces provided for the new high school. However, the traffic report estimates that 190 students within the proposed school catchment will travel to school by car. The report further states that by providing limited kiss and ride spaces, it will encourage the use of walking and cycling.

It is considered likely that some students will travel to school by car as they live further away from the school and have longer travel times on public transport. The limited kiss and ride facility may result in parents using the nearby kiss and ride facility on Hill Road, impacting on Wentworth Point Public School. It can also lead to illegal parking behaviours (e.g. double parking, parking across driveways, etc.) and parents may pick up/drop off their kids further away from the school, impacting on parking amenities in neighbouring streets. This can also lead to increased traffic congestion due to parents queuing and waiting to use the facility.

Therefore, the kiss and ride facility proposed to be provided on Burroway Road is unlikely to be adequate for the school. It is recommended that additional parking bays be allocated to kiss and ride along the frontage of the school. This however, will be dependent on the delivery of the new access road.

It is also recommended that a turning facility be provided at the end of Burroway Road so that drivers can safely U-turn after using the kiss and ride facility

Approval from Council and TfNSW is required to be obtained prior to construction under the Parramatta Traffic Committee process.

Loading Facility

A loading facility for waste and deliveries is located on-street in the new access road, near the staff parking spaces as shown in the architectural plans.

As mentioned previously, it is understood that the delivery of the new access road is unconfirmed at this stage and no approval has been provided regarding the design of this new access road. It is therefore unclear whether the new access road will be delivered by Stage 1 of school operation. This will result in no loading facilities provided for the school during the initial stages of school operation which is not supported by Council.

Further clarity is required regarding the delivery of the new access road, specifically the design and construction timeline.

Proposed Facilities

The SSD application states that four raised pedestrian crossings are proposed to be delivered with Stage 1 at the following locations:

- Wentworth Place at Burroway intersection
- Burroway Road east of Wentworth Place
- Footbridge Boulevard east of Wentworth Place
- New access road at Burroway Road intersection.

The raised pedestrian crossings on Council roads in general are supported subject to meeting Council's interim warrants and obtaining approval from Council and TfNSW under the Parramatta Traffic Committee process. It is noted that the raised pedestrian crossing proposed in the new access road does not form part of this development. A modified design of the proposed raised pedestrian crossing on Burroway Road west of Wentworth Place will be required to accommodate a future shared pedestrian and cyclist crossing.

Two of the proposed crossings are located on privately owned roads (Footbridge Boulevard and Wentworth Place) and approval will need to be obtained from their owners.

Footpaths

There is insufficient width along the school frontage north of the roundabout on Burroway Road to provide a compliant footpath and nature strip. The roundabout at the intersection of Burroway Road and Wentworth



Place was originally designed as a 4-way intersection based on the initial proposal for this site. This intersection is now designed to be a T-intersection roundabout and as such, there is a need to dedicate some space to Council so that adequate footpath can be provided.

School Bus Parking

Potential sites for buses to park during school events are:

- Bus interchange on Ferry Wharf Circuit
- Footbridge Boulevard (location is assumed to be at the existing bus stops adjacent to Marina Square).

These locations are in privately owned roads and approval will need to be obtained from the owners of these roads (i.e. SOPA and strata management).

Furthermore, occupying bus bays that are currently used for public transport can impact on bus services. TfNSW will need to be consulted regarding this proposal.

It is also unclear how many buses will occupy these spaces, how often it is required and whether the existing bus zone is sufficient to accommodate the school buses. It is recommended that the traffic report include this information for assessment.

Green Travel Plan (GTP)

In accordance with Wentworth Point Precinct DCP 2014 (Draft Amended 2020):

 A Travel Access Guide approved by Council prior to occupation is to be made available to residents and non-residential tenants of development.

The Travel Access Guide provided in Appendix C of the traffic report however does not show cycle routes. This should be provided particularly given there are assumptions made in relation to cycling options at the expense of vehicle use.

It is noted that the traffic report states that a GTP Committee will be established, comprising of members of the PCA, Council and NSW Department of Education, to promote and build upon sustainable transport initiatives identified in the GTP for both staff and students. Council's standard process is to review the effectiveness of the GTP one year from the issue of the Occupation Certificate and every year for 2 years thereafter. This is considered sufficient in ensuring the effective management of the GTP and this has been successfully implemented in a number of developments. It is recommended that this condition be imposed and therefore, it is not considered necessary for Council to be involved in the GTP committee at this stage.

Construction Pedestrian and Traffic Management Plan (CPTMP) It is recommended that a condition be imposed to provide a CPTMP prior to the commencement of the works to the satisfaction of Council's Traffic and Transport Manager. This is particularly important given the nature of the school operation and the large number of students entering and exiting the site in the morning and afternoon peak periods.

CONCLUSION

As noted earlier a new high school would be an important and much needed asset for Wentworth Point but the current SSD proposal is not considered to promote the orderly and economic use and development of land, or promote good design and amenity of the local built environment. Consequently this submission identifies a range of issues that it is requested the proposal addresses in order for it to proceed.