

SUBMISSION TO DPIE RE CARLINGFORD WEST PUBLIC SCHOOL(CWPS) UPGRADES AS PER EIS EXHIBITION JULY 2021

Introduction / Background

I live within 500 metres of CWPS and have done so for the last 41 years.

I have a good knowledge of the local area of Carlingford and frequently walk in the area 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. Omission of Cumberland High School Upgrade and its shared and cumulative environmental impacts with those of the CWPS upgrade

SINSW website refers to a [Cumberland High School Upgrade](#) with one works notification already issued and an initial budget allocation of \$ 7.9M The project is “an upgrade of Cumberland High School and will include additional permanent teaching spaces and core facilities to support the growing population in Western Sydney”

Cumberland HS physically adjoins CWPS and only 700 metres nearby is James Ruse Agricultural HS all sharing much of the same local and arterial roadways. It also creates one of the highest school population density per sq kilometre in Sydney.

CWPS EIS (p29) states in relation to Cumberland HS that “The school sites are separated by a steep drop in the land and operate independently” but later on p32 contradicts this by stating “pedestrian access can be gained through the Cumberland High School site from Pennant Hills Road, Dunmore Avenue and Blenheim Road”. Later on p45 again that the proposed plan will maintain “existing pedestrian connectivity to Cumberland High School.”

Other shared activities not mentioned or included in the EIS include :

- CWPS teachers / staff parking in Cumberland HS via Dunmore Avenue and then walking up the existing pathway to CWPS;
- CWPS parents picking their CWPS students up from the Cumberland HS car park via Dunmore Avenue
- grounds staff using shared resources with regular workcart access between sites

The first dot point above would of course result in a distorted favourable view of traffic and street parking congestion around the CWPS traffic surveyed areas as well.

In terms of both fairness and transparency to the community and ethical planning standards, I believe it is absolutely critical that details of the proposed Cumberland HS upgrade be obtained and their overlapping environmental impacts be taken into account for CWPS EIS evaluation purposes.

Under SEARS General Requirements it states that the EIS must include “likely interactions between the development and existing, approved and proposed operations in the vicinity of the site”.

2. Misleading School Catchment Access Analysis as per Section 2.10 of Appendix 24 “Transport and Accessibility IA”

Section 2.10 of Appendix 24 “Transport and Accessibility IA” contains Figures 2.30 and Table 2.7. These all reference walking times and cycling times that are all based on average adult walking speeds of 5 km/ hr on flat topography and in good weather conditions.

It should be noted walking and cycling capabilities should be based on the intended modal participants i.e. primary school students (children <=12 years of age) not adults. However I do concede that most 11 or 12 year olds would walk at average adult speeds.

The table should also show walking times at an average speeds of 3 km per hour to reflect speeds of children at ages 5,6 7,8 and reflective of the “steep drop in the land” referred to on page 29 of the EIS and references to the sloped topography cited throughout the EIS and its Appendices.

Thus for younger ages :

400 metres walk time should be shown as 8 minutes not 5 minutes

800 metres walk time should be shown as 16 minutes not 10 minutes

1,200 metres walk time should be shown as 24 minutes not 15 minutes

2,400 metres walk time should be shown as 32 minutes not 20 minutes

3. Misleading / distorted Parent onward journey analysis as per Section 3.2.7 of Appendix 24 “Transport and Accessibility IA”

The survey question as asked was :

If your child is dropped off by car (or picked up), where does the driver typically go next (or come from)?

This therefore covers two distinct trips that should never have been combined in the first place and also should have been tailored to specifically address covid safe work from home realities prevailing at the time of the survey.

There should have been two separate questions asked and reported upon separately as follows:

1. For drop offs only : Where does the driver typically go next : 1 Covid safe paid work from home OR 2 on-site work OR 3. Home OR 4. Other
2. For Pick ups only : Where does the driver typically come from : 1 Covid safe paid work from home OR 2 on-site work OR 3. Home OR Other

The distorted effect along with the distortions in the Walk times (explained in 2. above) is to give a distorted view / impression of a lot of school community members who are just stay at home parent(s) who could easily just walk to school instead of drive.

4. Misleading / distorted data presentation for Figure 3.5: Survey results – student travel modes (morning)

The survey question should have asked “How does your child(ren) travel to school in the morning? Select **only one** of the following options : 1 by car from home to school or within walking distance to school OR 2 Walks from home to school unaccompanied OR 3. Walks from home to school accompanied by parent or carer OR 4. Bicycle / scooter from home to school (whether accompanied by parent / carer or not) OR 5. Catches bus and/or train

Given the original data capture with Multiple selections then the analysis presentation for multiple selection combinations should be shown as a separate category on their own eg “car / walk”: “bus /walk” etc - this would give the reader a much fairer view of the data.

Walk should reflect a walk only answer.

My contention is that walk only would accurately reflect a much smaller % total.

5. Critical school population growth and safety risk factors not properly addressed by the EIS

The EIS does not properly recognise nor adequately address the dangers and risks posed to students, teachers, parents and local community by the existing dangerous congested traffic conditions near the CWPS. This type of situation has been described by the NSW Minister for Transport The Hon. Andrew Constance as “a recipe for a kid to get hit” (SMH May 27, 2020) This is exactly right and what our community have been saying and writing to the local Parramatta state member Geoff Lee about for years.

These safety risks are of course created by the dangerous traffic congestion, poor driver behaviours (arising in large part from vehicle congestion frustrations and gridlock impatience) poor school access and ultimately the mix with the very nature of young kindergarten and primary school children with innate poor road / vehicle awareness.

The EIS states that they are working on a **new reduced CWPS catchment area**. However a decision on this is years away and even afterwards would take further years to phase in on an implementation basis.

When this is coupled with a policy and practice that does not mandate child transfers out when parents subsequently move out of the catchment area there will continue to be 13 -15 new kindergarten classes of average 20 per class in coming years as has been the case in the previous couple of years.

There is ample evidence to suggest that the above-mentioned policy is a loop-hole that is and will continue to be exploited / “gamed” by aspirational parents who temporarily rent in the catchment area and intentionally move out after 6 months, but with children continuing in CWPS

Evidence of this unbridled high rate growth was reported in the SMH article earlier this year (March 28 2021) titled “[Sydney’s most sought-after schools growing rapidly despite enrolment caps](#)”.

As each year's cohort of 13 - 15 classes progress year on year the school numbers (based on DoE allowable class sizes per year of yr1 - 22 per class; yr 2 - 24 per class; yrs 3 to 6 - 30 per class) will result in a school size of approx 2,200 - 2418 by 2024 just as a proposed school for 1,610 students is completed !

Not only will this mean that some 600 - 800 students and their teachers will be condemned to suboptimal demountable classrooms but the growth in private vehicle traffic will increase as well.

When using the "out of catchment" School population % of 14.39% as per Table 2.7 of Appendix 24 TAIA then applying that same % to an additional (2418-1535) 883 population could see a rise of potentially 127 vehicles to morning and afternoon traffic from the out of catchment segment.

Furthermore, as explained above the EIS claims of changing behaviours to encourage walking and bicycling are considered highly aspirational at best and are totally unsupported by references to experience in similar north west and western suburbs primary schools. But even if a highly optimistic 20% of the additional "in catchment" increased population of 756 did walk or bicycle then this would also lead to potentially another 605 vehicles to morning and afternoon traffic from the "in catchment segment" - this is in addition to the 127 above-mentioned cars from the out of catchment segment.

The TAIA (Appendix 24) states on pp2-3 that as at 2021 "The local road network cannot accommodate additional traffic volumes" and this community knows this to be completely true. The assertion on page 3 that "The active and public transport travel provisions will assist in reducing private vehicle volumes" should be changed to the more accurate and realistic statement as supported by later details in the TAIA itself viz *The active and public transport travel provisions may marginally assist in reducing private vehicle volumes.*

I request that DPIE pursue resolution of these important safety issues and suggest an investigation of a design plan that incorporates Felton Road east to Felton Rd west drive through and drop-off zones using slope of east west topography of site and roofed covering to facilitate / maximise use of open play space. I further request that the concept of incorporating this with an underground car park as per details in 6 below be pursued with the proponent and independent architects.

It should be noted that this design is successfully in place in several schools in Sydney with design to segregate all pedestrians from vehicles from entry through to exit and better/ safer drop off points with the added benefit of safety during wet weather.

It should also be noted that the proponent has already incorporated in the EIS Appendix 26 Construction Management Plan page 30 "to " Create a temporary Through Road, connecting Felton Road east and west created to provide access for crane and module delivery for building X and Y." This should be capitalised upon as a segway to a long term traffic management and safety solution.

6. Inadequate CWPS Teacher / staff parking and need for better car park solution / design and safety issues

The carpark only accommodates approximately 53 of the 106 staff. Appendix 24 TAIA states that :

- “96% of teachers drive to work and that Council and TfNSW have not been able to identify any action to reduce that percentage”
- “Need to balance carparking with the internal play space requirements. The more space that is converted from play space to carparking. The space premium that is providing carparking in lieu of play space on one of the most restricted play space schools in the portfolio. Council, that is a more legitimate reason to support more play space and limiting parking. Currently 8 per sqm instead of 10 and we are having staggered play times to get to 8.”

From my reading of the EIS there is no clear explanation as to why a “cutaway” (using existing slope of the land) underground carpark providing 1:1 car space for all staff whilst achieving a safe / usable playing area on top has not been considered. This would be a clear win / win design and has been implemented at many other schools with safe non co-mingling of play area users with vehicles. This solution not only maximises open spaces for children’s play but enhances use of natural light and level of amenity for the school and its neighbours.

The other benefit of this is reducing the safety risks associated with predominantly female school staff having to walk to their car often late in the day and evening.

I request that DPIE pursue resolution of these matters in conjunction with the drive through drop-off zones referred to in 5. above with the proponent and with independent architects.

7. Lack of effective independent Air Quality and noise monitoring resources and controls during construction - health and safety of community at risk

The EIS Appendix 26 Construction Management Plan page 21 states : (Note yellow highlight inserted by me)

“Taylor are to ensure that excessive dust is not generated by its works to the extent that it may interrupt the normal operations, place at risk or diminish the amenity of the local residents. In doing so, shall as a minimum consider the following:

- implement measures which prevent the generation of dust during demolition and construction works; and
- implement measures to prevent the ingress of dust to the existing surrounding buildings of [site name/location reference] during demolition and construction. Such measures may include the provision of suitable screens, additional filtration on air intakes or other suitable provisions.”

The CWPS Upgrade project is a large construction project in very close proximity to a large number of surrounding residences that will be directly impacted over a long period of construction time.

The community needs access to dedicated independent air quality and noise monitoring resources and personnel who can respond to community concerns on a prompt basis.

In my own recent experience with Taylor Construction with initial works in June and July 2021, as part of the CWPS upgrade I experienced sickening acrid asphalt smells and did complain directly to them.

In short their response was that the work carried out was covered by a Safety Data Sheet. There was no attempt to move equipment away from close proximity to my house. EPA advised that they did not have jurisdiction.

I believe that appropriate air quality monitoring would have revealed dangerous levels of air pollutants.

I urge DPIE to incorporate effective independent air quality and noise complaint handling outside of the control of the proponent or its construction agents into the EIS to protect the safety, health and well being of both local and school communities.

8. Garbage Access Times impacting community

P 94 of the EIS states :

“Information contained in the traffic report indicates a limited number of deliveries or waste removal will occur on any one day. However, to avoid the disturbance of sleeping to the surrounding residential receivers it is recommended all loading dock activities and waste removal are undertaken between 7:00am and 10:00pm”

And details in Appendix 22 Operational Waste Management Plan refer to a Sunday morning pickup in the old / existing bin site

Given where the new proposed waste bin pickups area will be located in such close proximity to residences and the acoustic impact of such large trucks involved especially with young children with early bedtimes etc we ask DPIE to stipulate that school site waste management pickups be limited to 7.30 am to 5.30 pm Monday to Friday only.

9. Pollution and other negative impacts arising from Display signage and Lighting spillage

The display signage should be subject to a curfew to avoid waste of public monies and carbon emissions if kept illuminated and powered 24x7 thus running unnecessarily on weekends; public holidays and school holidays and on school days overnight between 4.30 pm to 8 am.

Lighting for carpark should also be subject to curfew of 5pm to 7 am (aligned with defined hours of carpark operation) and supplemented with motion detection and illumination threshold activated daytime lighting for added security and safety and operating on minimum carbon emission principles..

Details of time of day / night illumination and illumination intensities need to be disclosed and evaluated by the community for their assessment - these details are not revealed in the EIS or Appendix 33 Light Spill Report. This should also contain details of hours of operations for cleaning staff and likely impact of their vehicle movements.

10. Other health and safety impacts

Largely for the reasons outlined in my heading 5 above “Critical school population growth and safety risk factors not properly addressed by the EIS” the school time traffic volumes and resultant congestion will only increase / worsen into the future.

In addition to all the obvious deteriorating student, teacher and parent safety risks explained in 5 above so many of our local community including me personally will experience the increasing anxiety and confrontation caused by vehicles parked across driveways each and every day.

There is also the increased risk that emergency vehicles will simply not be able to enter the area in response to medical, fire or other genuine 000 call outs thus putting lives in danger.

Another less obvious health and safety impact is the pollution from worsening gridlocked traffic.

For these reasons we implore DPIE to insist that the CWPS Upgrade plans as currently proposed be rejected.

Attached for DPIE information / consideration are three (3) photos of traffic in Baker Street during school peak times - 1 from the SMH last year and 2 by me this year

Mark Bernie



Source: Mark Bernie 2021



Source: Mark Bernie 2021



Source: SMH 2020

