

Ms Ingrid Ilias Department of Planning and Infrastructure 23-33 Bridge Street SYDNEY NSW 2000 DOC13/452008

Dear Ms Ilias,

## Submission on CBD and South East Light Rail Project

Thank you for inviting submissions on the Environmental Impact Statement (EIS) for the CBD and South East Light Rail Project. We have reviewed the EIS and the table below provides a summary of the schools near the light rail corridor and issues of concern that we request the applicant address.

Table 1: Project concerns requested to be addressed

Precinct	Public Schools	Comment on the EIS
Surry Hills	Cleveland Street Intensive English High School	Changes to local parking and pedestrian thoroughfare will affect existing travel routes to Cleveland Street Intensive English High. Where necessary, new local infrastructure such as alternative on-street parking, pedestrian pathways and crossings need to be included in the project to ensure safe and efficient school access is maintained.
	Bourke Street Public School	Changes to local parking or pedestrian thoroughfare will affect existing accessibility routes to Bourke Street Public School. Congestion around Bourke Street Public School continues to grow and the project may exacerbate existing congestion problems around Bourke Street Public School.
		Where necessary, new local infrastructure such as alternative on-street parking, pedestrian pathways and crossings need to be included in the project to ensure safe and efficient school access is maintained.
		The local impact study identifies that Bourke Street Public School will be slightly impacted but does not say how, why or what measures will be in place to mitigate impacts.
		The Department of Education and Communities request that the school is identified as a sensitive receptor and that the EIS clarify the extent of amenity impacts. Amenity impacts of concern include noise and dust associated with light rail itself and works to Olivia Gardens.



Precinct	Public Schools	Comment on the EIS
		The close proximity of the project to Bourke Street Public School will result in the need for reconsideration of the School's evacuation procedures in the event of an emergency. The Department request that the applicant consider the evacuation emergency needs of the school and consult with the school about any new traffic changes so that a safe evacuation route can be applied.  Bourke Street Public School is growing in enrolments and it is imperative that access to spaces such as Moore Park will need to be appropriately maintained.
	Sydney Distant Education Primary School	Changes to local parking or pedestrian thoroughfare changes will affect existing travel routes to Sydney Distant Education Primary School. Where necessary, new local infrastructure such as alternative on-street parking, pedestrian pathways and crossings need to be included in the project to ensure safe and efficient school access is maintained.
Moore Park	Sydney Boys High School Sydney Girls High School	These schools will be significantly affected by the project.  Traffic and the safety of students crossing ANZAC parade to the proposed new light rail stop are significant concerns and should be addressed in the EIS. It is anticipated the project will draw up to 1,800 student crossings on ANZAC Parade each day to access the proposed light rail stop.  An overhead pedestrian safety bridge is an appropriate mitigation measure in this circumstance and the Department of Education and Communities request such a bridge is constructed as part of the project.
		Operational impacts, including access to Moore Park West playing fields, noise, vibration and traffic circulation are not assessed in detail in the EIS. The EIS has not clarified whether or not these potential impacts will occur and if so to what extent. Access to alternative playing fields will be a considerable challenge with the loss of the Moore Park West fields. The EIS does not recognise this or indicate how much of Moore Park West fields will be lost to house the construction compound.



Precinct	Public Schools	Comment on the EIS
		The proposed construction compound near the Sydney Boys High School will result in loss of amenity, such as noise and dust emissions. How significant these will be depends on where the construction compound is sited. Amenity impacts will need to be managed during school times as well as important school periods such as exam periods.
		The Moore Park stop in the afternoon will be located after the stop at UNSW where it is expected many students will board the tram. There is concern that the present dedicated bus transfer to and from the schools will be replaced with a light rail network that provides no guarantee that carriages will accommodate all students to enable timely and efficient trips.
Randwick Precinct	Sydney Childrens Hospital School	The local study should be updated to reflect the Children's Hospital School as a sensitive receptor.
	Randwick Girls High School Randwick Boys High School Rainbow Street Public School	Changes to local parking and pedestrian thoroughfare will affect existing travel routes to the schools. Where necessary, new local infrastructure such as alternative onstreet parking, pedestrian pathways and crossings need to be included in the project to ensure safe and efficient school access is maintained.
Kensington / Kingsford Precinct	Kensington Public School	Changes to local parking or pedestrian thoroughfare will affect existing travel routes to Kensington Public School. Where necessary, new local infrastructure such as alternative on-street parking, pedestrian pathways and crossings need to be included in the project to ensure safe and efficient school access is maintained.
		The Department requests that the school is identified as a sensitive receptor for the purpose of amenity based environmental impact assessments and that the EIS clarify the extent of amenity impacts on Kensington Public School.



# 2. Proposed conditions of consent

## Traffic Safety Monitoring and Reporting

The Department of Education and Communities requests that the condition of consent include monitoring and review of school traffic impacts by a competent traffic engineer, and that any required safety measures are identified. It is requested that monitoring and reporting is carried out during construction and six months after the light rail commences operation. It is also requested that the school safety monitoring and reporting is carried out in consultation with relevant schools, Department of Education and Communities, Roads and Marine Services and the relevant local council.

#### **Amenity Impacts**

The Department of Education and Communities request that mitigation measures be implemented by the proponent and not the schools. Mitigation measures could include:

- Installation of noise barrier walls
- Glazing of school classroom windows
- Real time noise and dust monitoring and warning system to management personnel
- Continued monitoring and specific management plans during construction with a communication protocol established with the schools
- Restrictions on construction activities and truck movements near key areas of the school during the school traffic zone periods and during certain periods of school activities (e.g. exam periods).

#### <u>Construction Management Plan – Consultation with schools</u>

The Department of Education and Communities requests that all construction management plans are prepared and monitored in consultation with the nearest affected school(s) so that issues are identified early and practicable measures are in place to mitigate construction impacts on school environments.

Please contact Martin Karm, Statutory Planner, by telephone on 9561 8147, or by emailing <a href="Martin.Karm@det.nsw.edu.au">Martin.Karm@det.nsw.edu.au</a> should you require any further assistance or clarifications in relation to this matter.

Yours sincerely

Tony McCabe

**Director, Planning and Delivery** 

6 December 2013