10 July 2020

Jason Maslen
Team Leader
School Infrastructure Assessments
NSW Department of Planning, Industry and Environment
320 Pitt Street, Sydney 2000

Dear Jason

RE: RESPONSE TO SUBMISSIONS
FORT STREET PUBLIC SCHOOL (SSD-10340)

The Environmental Impact Statement (EIS) for Fort Street Public School (FSPS) was publicly exhibited for a period of 28 days, concluding on 29 April 2020. During the exhibition, eight submissions were received from government agencies, six submissions were received for non-government organisations and ten submissions were received from members of the public. An additional five submissions were received after the exhibition period ended.

All government agency submissions commented on the proposal. Three submissions from the non-government organisations objected to the proposal, whilst the remaining submissions provided comments on the proposal. Six submissions from members of the public objected to the proposal whilst the remaining submissions provided comments on the proposal.

The Department of Planning, Industry and Environment (DPIE) has also prepared a letter setting out additional information and clarifications required prior to final assessment of the project. The proponent, School Infrastructure NSW (School Infrastructure) and its specialist consultant team have reviewed and considered all issues raised in the submissions and DPIE's letter.

This letter sets out the responses to the issues raised in accordance with Clause 85A of the *Environmental Planning and Assessment Regulation 2000* (EP&A Reg). The response relates to clarification of certain elements of the proposal and the provision of additional technical assessment to address issues raised. The description of the proposed development remains the same as originally sought.

A detailed response to each submission is provided in the response table provided at **Appendix A**. This covering letter and the response table should be read in conjunction with the following attached documentation:

- Detailed Response to Submissions Table prepared by Ethos Urban (**Appendix A**)
- Traffic and Transport Response to Submissions Report prepared by ARUP (**Appendix B**);
- Updated Construction Management Plan prepared by Lendlease (**Appendix C**);
- Amended Landscape Plans prepared by FJMT (**Appendix D**);
- Amended Elevations and Sections prepared by FJMT (**Appendix E**);
- Amended External Finishes Schedule and External Finishes Samples prepared by FJMT (**Appendix F**);
- Acoustic Letter Response to Submissions prepared by ARUP (**Appendix G**);
- Amended Arborist Report prepared by BirdsTrees (**Appendix H**);
- Heritage Response to Submissions Report prepared by Curio Projects (**Appendix I**);
- Updated Detailed Site Investigation prepared by JBS&G (**Appendix J**);
- Updated Remedial Action Plan prepared by JBS&G (**Appendix K**);
- Hazardous Building Materials Survey prepared by JBS&G (**Appendix L**);

- Interim Audit Advice No. 1 & No. 2 prepared by Senversa (**Appendix M**);
- Schematic Design Report Rev 01 – Modularity prepared by FJMT (**Appendix N**);
- Tree Protection Zone Sketch Drawing SK200623 prepared by FJMT (**Appendix O**); and
- BCA and DDA Compliance Statement prepared by BM+G (**Appendix P**).

This covering letter provides a response to the following key issues raised in the submissions:

- Safety at the entrance to the school, including waste collection and drop-off / pick-up within the school site;
- How and when the Sydney Harbour Bridge Cycleway redevelopment will occur in relation the redevelopment of the school; and
- Safety of pedestrians and regular users of Kent Street as a result of the cycleway diversion.

This covering letter also provides further information on the intended design and staging approach for delivery of the cold shell spaces. This is reflected in FJMT's Schematic Design Report Rev 01 – Modularity provided at **Appendix N**.

1.0 Key Issues and Proponent's Response

1.1 Design and Management of the School Entrance

1.1.1 Issue

The City of Sydney and the FSPS P&C raised concerns over the design of the school's entrance at Upper Fort Street and safety of young children and cyclists. Specific concerns included:

- The highly constrained nature of the school entrance will give rise to potential conflict created between vehicles, students and cyclists during drop-off and pick-up (DO/PU) times;
- Potential congestion and safety incidents resulting from the proposed cul-de-sac U-turn arrangement;
- Proposed school entrance does not allow for waste collection in a forward direction only; and
- Waste collection and DO/PU should be done on Upper Fort Street and not within the school playground.

1.1.2 Response

Responses to each of these concerns are provided below.

Alternatives

It is acknowledged that the FSPS site is constrained, and it is not possible to accommodate a linear DO/PU zone. As outlined in section 10.11 of the exhibited Traffic and Transport Assessment (TTA), a number of alternatives were considered as part of the design process, however all were considered inappropriate, as outlined below

Firstly, the use of Kent Street and Argyle Street was considered as a DO/PU zone. However, use of these streets was considered inappropriate for the following reasons:

- Only a limited number of spaces could be provided which limits the ability for proper operation. Cars would queue and wait in the traffic lane blocking traffic movements; and
- Council are reluctant to lose permit holder spaces due to high resident demand for car parking.

Secondly, the use of the Observatory Hill roundabout was also considered. To enable this to work, a number of changes to Observatory Hill Park would be required. This option was considered inappropriate for the following reasons:

- Shorter queue length - 6 car queue external versus up to 13 cars queue within school;
- Loss of 5.3m landscape width (2.3m car line + 3.0m footpath) x 40m long (210sqm); and
- No shelter available and limited waiting area remote from school grounds.

Therefore, the continued use of the internal DO/PU was considered to be the most appropriate response for the proposed development. It is noted that the proposed cul-de-sac arrangement has been successful at other similarly constrained schools such as the Lindfield Learning Village opened in 2019.

Through the implementation of an Operational Management Plan and the proper management of pick-up and drop-off arrangements, the proposed design of the school entrance will operate safely and efficiently at FSPS. It is noted that the proposed arrangement represents a vast improvement on the school's current operation and will require a lower degree of operational management.

Phased Access to the School

As part of the EIS, a phased approach to the operation of the school entrance and interface with the construction and completion of the Sydney Habour Bridge (SHB) cycleway passage was proposed, as it is likely that the new school will open before the upgrade to the SHB cycleway. The two phases comprise:

- Phase 1 – After construction of FSPS but prior to construction of the new cycleway, cyclists will continue to use Upper Fort Street to access the Harbour Bridge. As shown in **Figures 1, 3, 5** and **7** below, under this scenario the school entry gate is located within the school site to allow cyclist passage along Upper Fort Street.
- Phase 2 – Once the dedicated cycleway is complete and cyclists no longer need to use Upper Fort Street, the school entry gate will be relocated to the northern FSPS boundary on Upper Fort Street, as the road passes over the Cahill Cut, as shown in **Figures 2, 4, 6** and **8** below.

The following sections provide further clarification on the phased operation of the school entrance in the following scenarios:

- DO/PU operation in Phase 1 and Phase 2;
- Outside of School Hours (OOSH) operation in Phase 1 and Phase 2; and
- School operation, closed mode and waste collection in Phase 1 and Phase 2.

Indicative management and safety measures during DO/PU are also included below. These will be formalised in a Operational Management Plan, which will be prepared prior to the commencement of operation.

For additional details on the operation of the school entrance, please refer to the Arup's Traffic and Transport Response to Submissions Report provided at **Appendix B**. The sections below should also be read in conjunction with the exhibited TTA and Green Travel Plan.

Phase 1 DO/PU

DO/PU operations will occur via a single U-turn manoeuvre turnaround provided in the main forecourt of the school. The school gates located at the boundary of the main forecourt will be opened strictly between 8:30am-9:00am for drop-off, and between 3:00pm-3:30pm for pick-up. **Figure 1** below shows the proposed Phase 1 DO/PU arrangements and interface with pedestrians and cyclists.

During DO/PU, there is sufficient space in the main forecourt for three large cars to safely complete their DO/PU manoeuvres. The areas for cars will be delineated through pavement types that are continuous from Upper Fort Street. Up to 30 cars will be able to queue along Upper Fort Street, with an additional overflow queue on Watson Road capable of accommodating 18 cars.

A pedestrian path that provides access into the school will be provided on the western side of Upper Fort Street for students, parents and public pedestrians. The alignment of the path on the western side of Upper Fort Street ensures that students and parents will not be crossing the street in front of queueing cars. Public pedestrians will need to cross Upper Fort Street.

Cyclists travelling south will use the eastern lane of Upper Fort Street alongside the queueing cars. Cyclists travelling north will need to cross Upper Fort Street and use the western lane. It is anticipated that the majority of cyclists mixing with traffic flow will occur during the morning drop-off period when the cycleway is busiest with morning commuter cyclists. This is less likely to occur in the afternoon pick-up period as bicycle traffic is significantly lower than in the commuter peaks. Whilst the cyclists will mix with traffic flow, the queueing vehicles will either be

stationary or moving slowly. As such, this does not present a major safety risk and can be readily managed through signage and education of parents and cyclists.

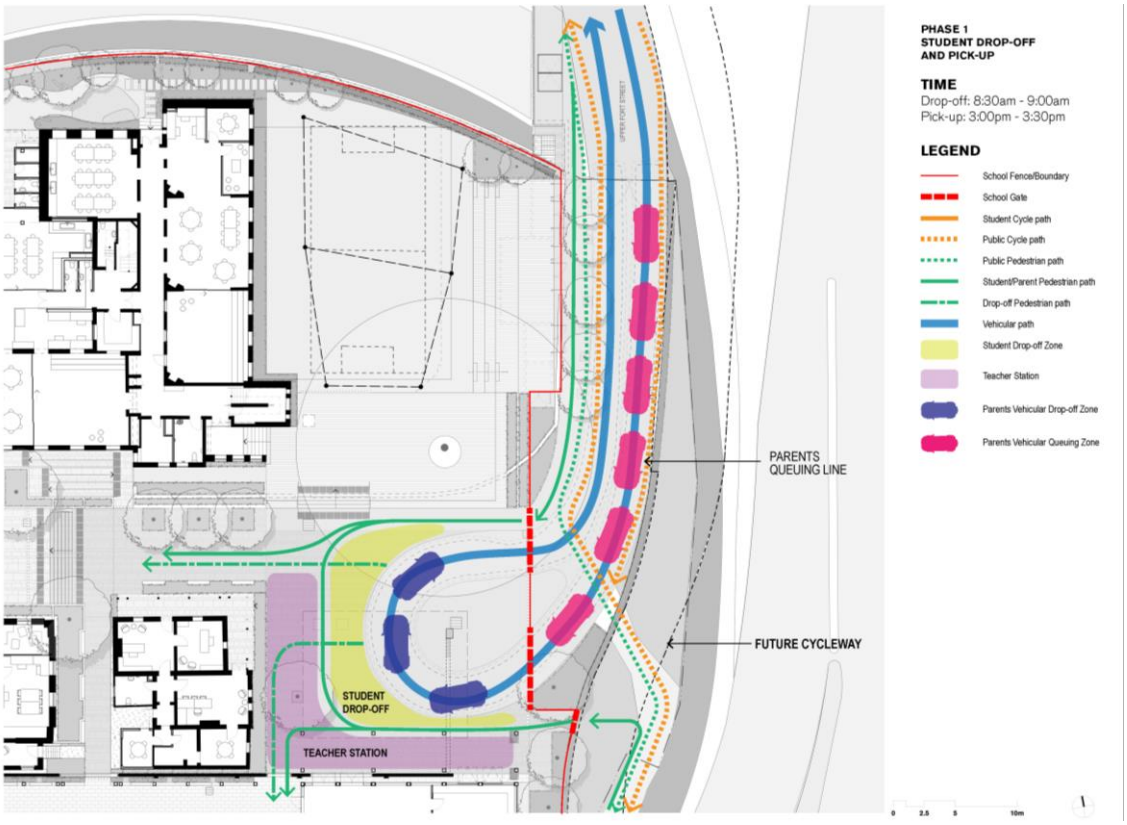

Figure 1 Phase 1 Student Drop-off and Pick-up

Source: FJMT

Phase 2 DO/PU

DO/PU operations will continue to occur via a single U-turn manoeuvre turnaround provided in the main forecourt of the school. At Phase 2, the school gates are now located at the north eastern boundary of the site on Upper Fort Street. The gates will be opened strictly between 8:30am-9:00am for drop-off, and between 3:00pm-3:30pm for pick-up. **Figure 2** below shows the proposed Phase 2 DO/PU arrangements and interface with pedestrians and cyclists.

There is no change to the DO/PU operations for vehicles. The pedestrian path that provides access into the school will continue to be provided on the western side of Upper Fort Street for students and parents.

As the upgrades SHB cycleway is complete, there will be no more mixing of traffic between vehicles, public pedestrians and cyclists. A fence will be installed separating the school from the new cycleway. Cyclists and public pedestrians will be separated in dedicated lanes on the new cycleway.

A gate between the new cycleway and school will be installed to provide access to school for cyclists and pedestrians. It will provide direct access to the southern side of the main forecourt and will not mix with the travel route for vehicles. This gate will be opened during DO/PU periods.

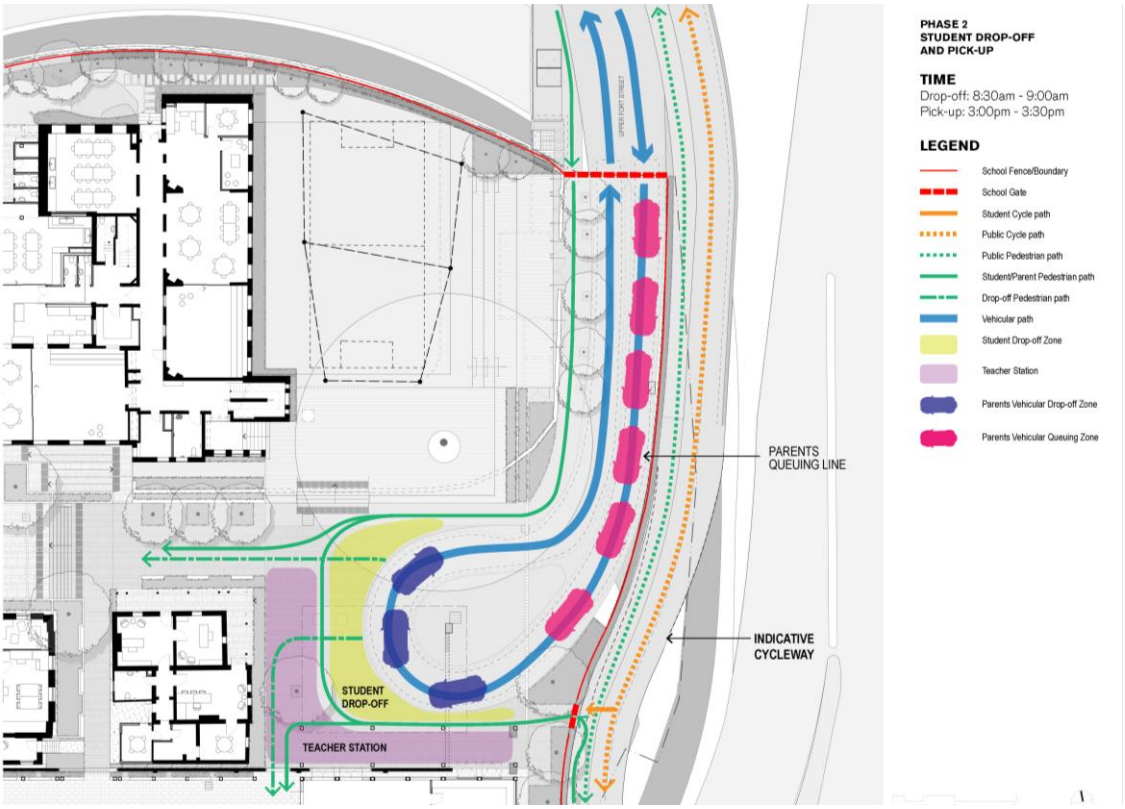

Figure 2 Phase 2 Student Drop-off and Pick-up

Source: FJMT

Indicative Management Measures and Procedure for DO/PU

A number of management measures and safety procedures will be implemented to ensure the safety of the DO/PU area during DO/PU periods.

To ensure that there are no students in the DO/PU area, the main forecourt area will be actively supervised and controlled by staff at the changeover times from a school play area to a DO/PU area. A potential sequence of events for the process is presented below to ensure that sufficient time is allocated for a smooth and safe transition to DO/PU operation:

- 30 minutes before DO/PU – staff will begin to clear the area of children and close access to the playground area;
- 0 minutes before DO/PU period – staff will open the outer gates;
- 0 minutes after DO/PU period – staff will close the outer gates; and
- 2 minutes after DOPU time – playground gates will be opened, and children will be permitted into the area.

As previously stated, the area for vehicles will be delineated through pavement types that are continuous from Upper Fort Street. Dedicated staff will stand in this area to manage the DO/PU operation.

During the drop-off period, staff will assist students out of the vehicles to ensure a smooth and efficient drop-off operation. Then staff will usher students away from the vehicle and into the school or COLAs and usher the vehicles to exit. Parents must stay in the vehicle at all times. Staff will be present to supervise this operation.

During the pick-up period, students will be marshalled in the nearby COLAs whilst waiting to be collected. Staff will observe the unique student ID that is displayed on the vehicle dashboard and will call-up the corresponding student to the vehicle. Staff will assist students into the vehicles to ensure a smooth and efficient pick-up operation. Then staff will usher vehicles to exit. Parents must stay in the vehicle at all times. Staff will be present to supervise this operation.

Phase 1 Outside of School Hours (OOSH) Care

During OOSH hours, 7:00am-8:30am and 3:30pm-6:00pm, the main forecourt area will be used solely for OOSH play (see **Figure 3** below). The school gates will remain closed and no DO/PU operations involving vehicles will occur within the main forecourt.

Parents will be required to park their vehicles on Upper Fort Street and then use the pedestrian path on the western side of Upper Fort Street to access the school to drop-off or pick-up their children. 15 minutes free parking is proposed to be available on Upper Fort Street to facilitate this arrangement.

During these OOSH hours in Phase 1, cyclists will use the eastern and western lanes of Upper Fort Street. There will be minimal mixing with vehicles and no interference with pedestrians accessing the school.

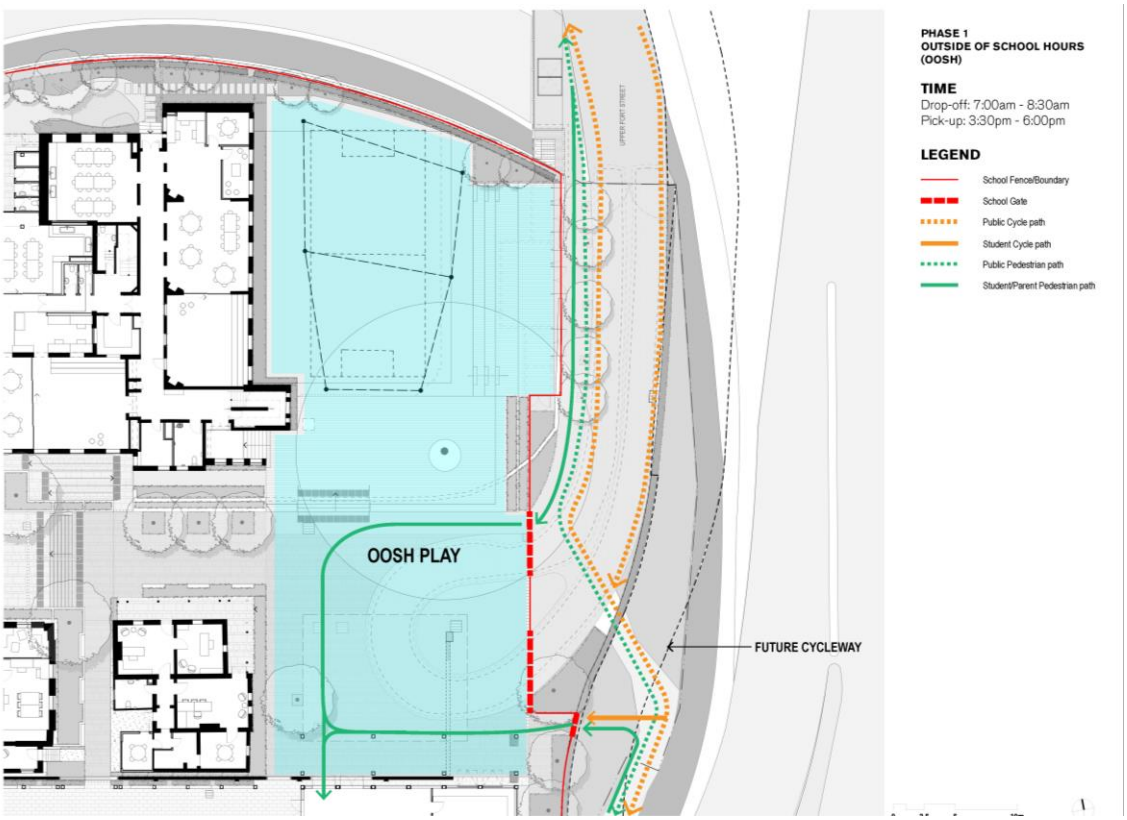

Figure 3 Phase 1 Outside of School Hours

Source: FJMT

Phase 2 Outside of School Hours (OOSH) Care

The area for OOSH play in Phase 2 will be extended to the north eastern boundary of the site, as the school gate will be moved to the north eastern corner of the site (see **Figure 4** below). The DO/PU arrangements requiring parents to park on Upper Fort Street will remain.

A fence will be installed alongside the new cycleway, separating the OOSH play area from cyclists and public pedestrians.

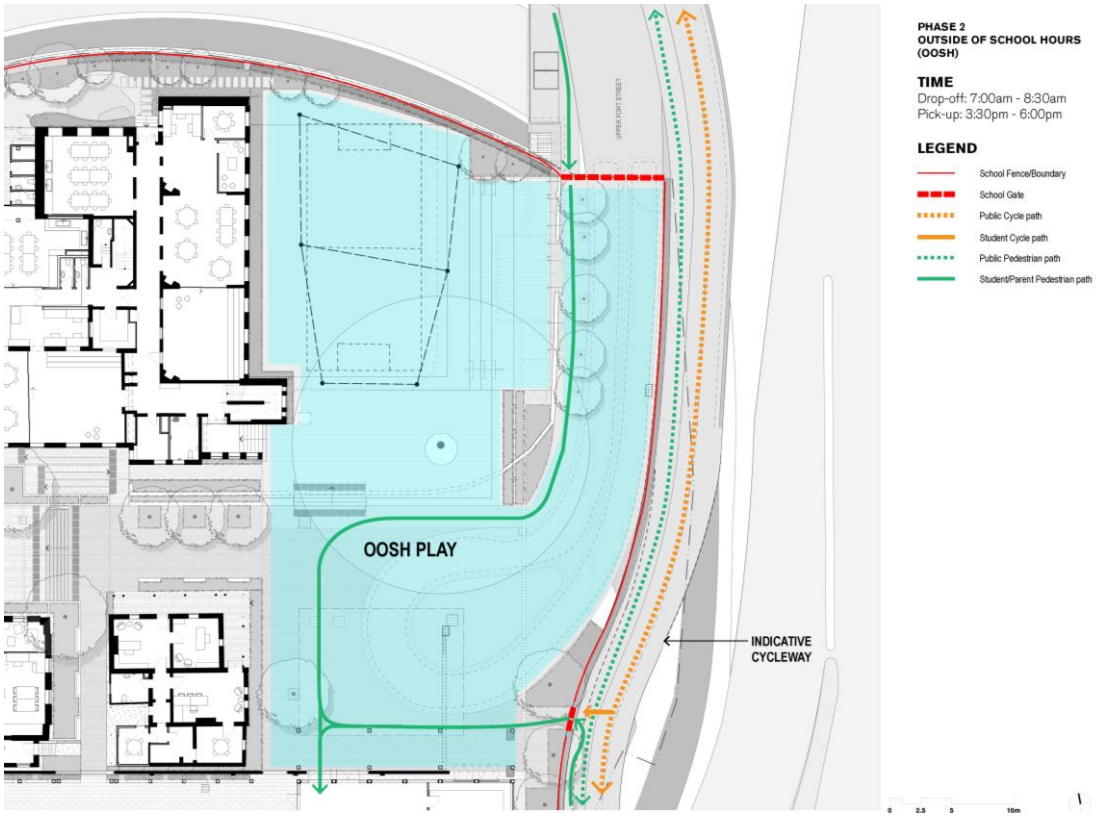

Figure 4 Phase 2 Outside of School Hours

Source: FJMT

Phase 1 School Operation, Closed Mode and Waste Collection

The school gates will remain closed when the school is closed between 6:00pm-7:00am weekdays and on weekends. Cyclists will use the eastern and western lanes of Upper Fort Street whilst public pedestrians will use the footpath on the western side of the street.

Waste collection will be managed to occur at a time when the school is closed to students. This will be scheduled to be outside of school times and DOPU times by the school administrators. This will ensure that students are not at risk during any waste collection operations.

Several routes for waste collection vehicles were explored in the original TTA. The two waste collection swept path options that have been proposed below allow for entry and exit from Upper Fort Street to Watson Road in a forward direction:

1. The first route is to drive into Upper Fort Street, and through the first Phase 1 school gate where the vehicle will complete a three-point turn at the cul-de-sac. Then the vehicle will exit the second Phase 1 gate and drive forward to stop at the collection point on Upper Fort Street, before exiting Upper Fort Street. This is shown below in **Figure 5**.
2. For the second route, the collection vehicle will complete a turning manoeuvre before the school gate outside of the site boundary and reverse into the collection point. Then the vehicle will exit driving forward. This is shown below in **Figure 6**.

Whilst both routes involve an element of reversing, there is no risk posed to the safety of students as waste collection will occur outside of school operating hours, between 6:00pm-7:00am. The school gates are able to be opened by a waste contractor outside of school operating times to facilitate this access.

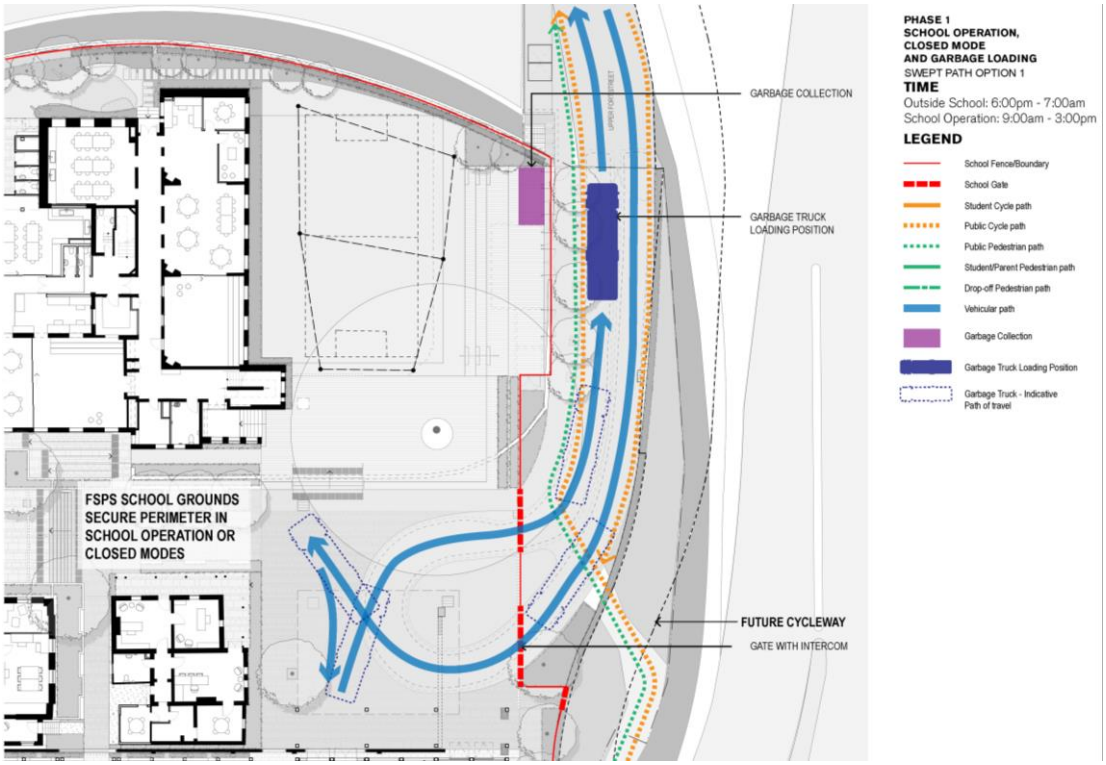

Figure 5 Phase 1 Waste Collection Swept Path Option 1

Source: FJMT

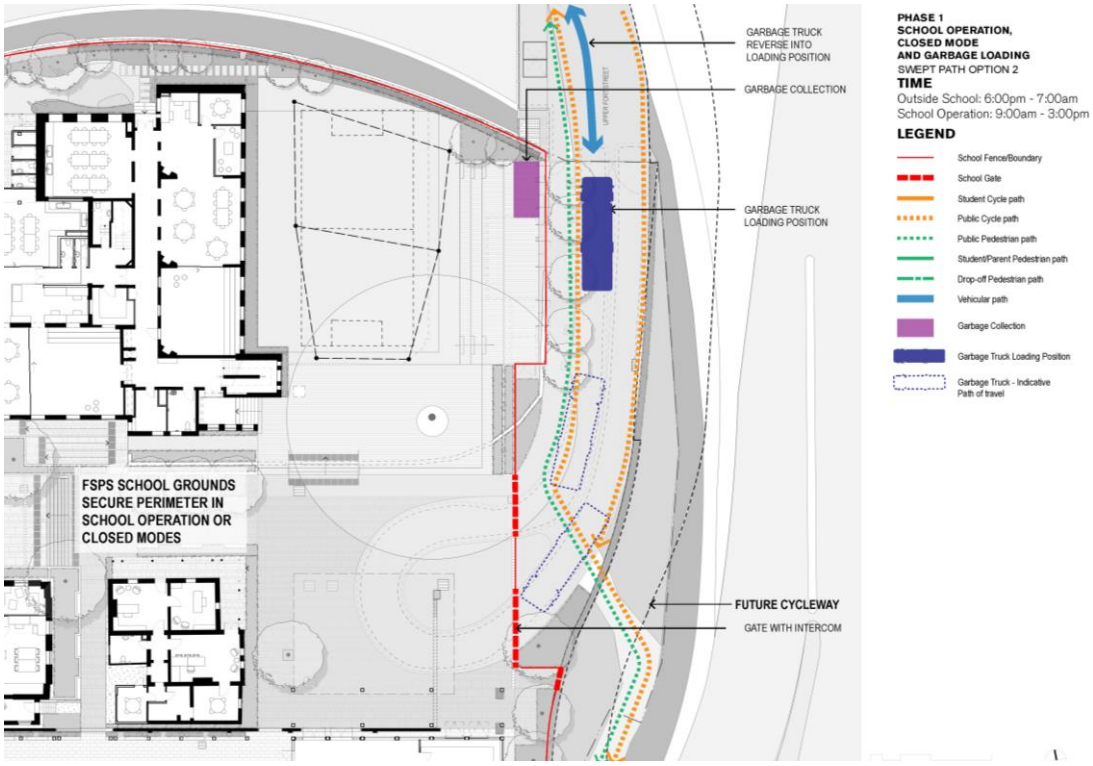

Figure 6 Phase 1 Waste Collection Swept Path Option 2

Source: FJMT

Phase 2 School Operation, Closed Mode and Waste Collection

During Phase 2, the school gates will remain closed when the school is closed between 6:00pm-7:00am weekdays and on weekends. The key change is that cyclists and public pedestrians will use the new SHB cycleway which will be separated from the school boundary by a fence.

There is no change to the operation of the two waste collection options outlined for Phase 1 apart from the changed location of the school gate. Option 1 is shown in **Figure 7** and option 2 is shown in **Figure 8**. Waste collection will continue to occur outside of school operating times and the school gate will be able to be opened by a waste contractor outside of school operating times to facilitate this access.

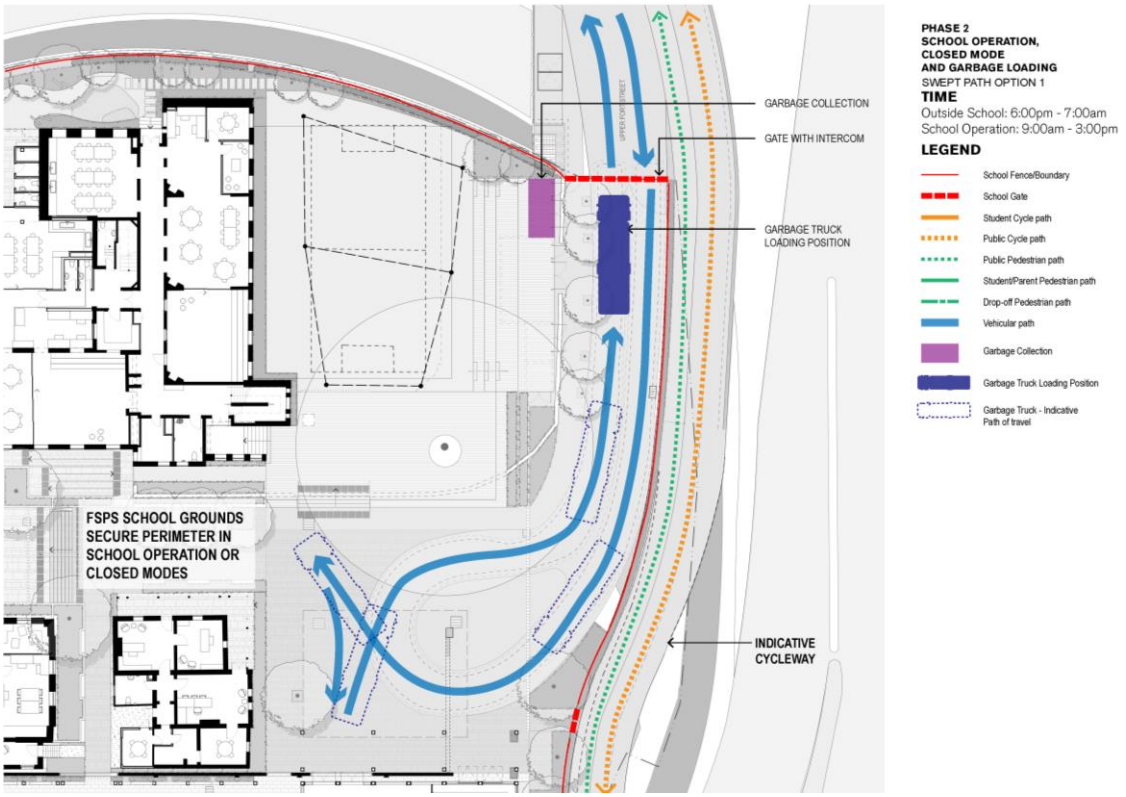

Figure 7 Phase 2 Waste Collection Swept Path Option 1

Source: FJMT

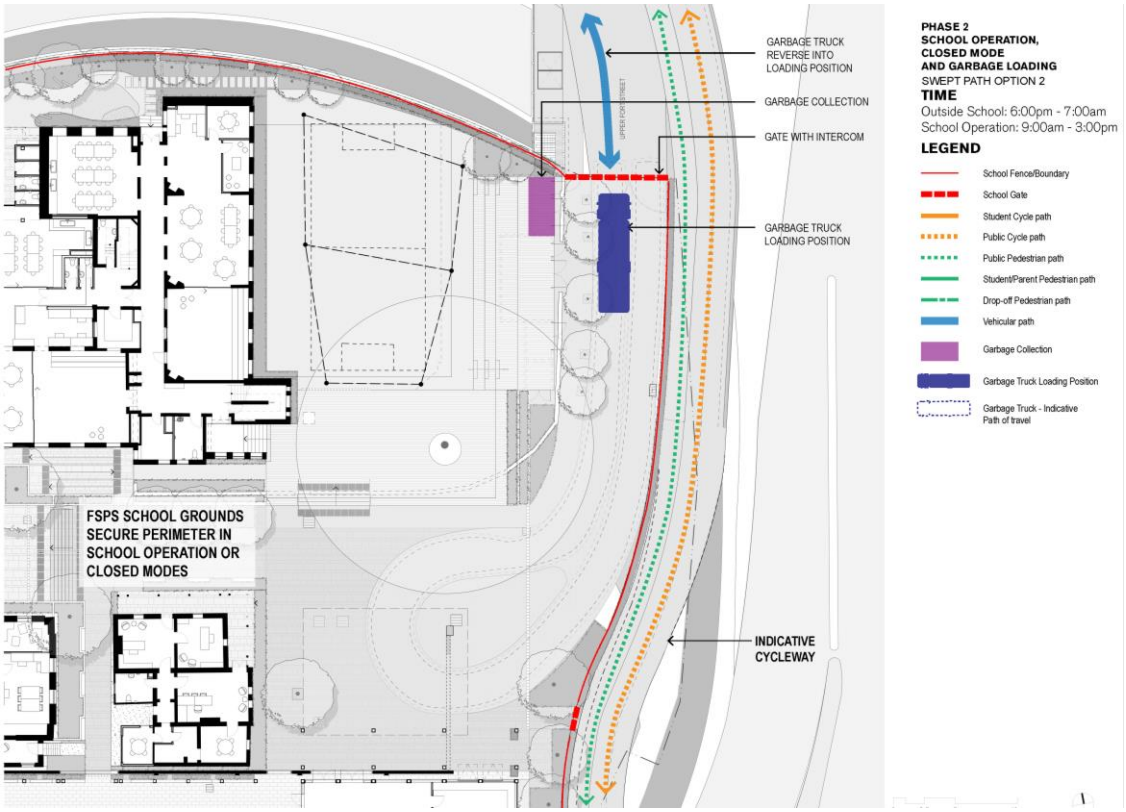

Figure 8 Phase 2 Waste Collection Swept Path Option 2

Source: FJMT

1.2 Timing and relationship of Sydney Harbour Bridge Cycleway redevelopment with the FSPS redevelopment

1.2.1 Issue

Many of the submissions requested clarification on the timing of the Sydney Harbour Bridge Cycleway (SHB cycleway) redevelopment, and the relationship with the FSPS redevelopment.

1.2.2 Response

SINSW appreciates the concerns that have been raised regarding the interface with the SHB cycleway and understands the critical importance of works being undertaken in a coordinated manner to ensure the safety of students and the public. However, funding and timing of the cycleway works is currently unknown, and SINSW is not responsible for the delivery of the cycleway.

SINSW has been actively participating in, and will continue to participate in, whole of government discussions regarding the proposed SHB cycleway upgrade. To this end, SINSW is committed to working with RMS to ensure safe access is provided for students, staff and cycleway users.

Based on recent feedback from RMS, it is likely that the school construction works will occur well in advance of the proposed cycleway project. However, should construction activities occur concurrently, the works will be managed in accordance with the protocols outlined in **Section 1.3** below.

1.3 Cycleway Diversions and the Safety of Kent Street

Should construction works occur concurrently, a cycleway diversion along Watson Road, Argyle Street and Kent Street, or careful management of conflicts between construction activity and cyclists would be required. Many submissions from members of the public and the Millers Point Community Resident Action Group have objected to the cycleway diversion for reasons including, but not limited to, the following:

- Kent Street is already a busy and narrow street, with many parked cars forcing cyclists onto footpaths;
- The expected influx of cyclists along Kent Street will pose a safety risk to workers, tourists, residents, children at pick up and drop off points who use the footpaths;
- The diversion will be hard to police and may result in numerous altercations with pedestrians; and
- Conflict between cyclists and cars exiting large residential developments as a result of high cyclist speeds and obscured sight lines.

1.3.1 Response

SINSW appreciates the concerns that have been raised regarding the implementation of a cycleway diversion, should construction activities associated with the FSPS upgrade and the SHB cycleway occur concurrently. A cycleway diversion would be required as the existing cycleway encroaches on a portion of the FSPS site, which is required to enable construction of the FSPS upgrades. SINSW also understands the critical importance of alternate cycleway alignments being undertaken in a coordinated and considered manner to ensure the safety of students and the public. However, funding and timing of the proposed cycleway has not yet been confirmed by the agency delivering the SHB cycleway (RMS).

Initial review of the cycleway diversion has been undertaken and discussed with City of Sydney bicycle and traffic representatives, Bicycle NSW and RMS. More planning will be required to consider the cycleway diversion which would benefit both projects. SINSW will continue to liaise with the relevant authorities to obtain the most up to date information available on the SHB cycleway diversion works.

Notwithstanding, the cycleway diversion is considered appropriate as Kent Street is already a shared traffic cycle facility with cycle logos marked in the traffic lane and traffic calming devices along the route. Therefore, the presence of parked cars will not inhibit cyclists and cyclists will not be forced to move onto the footpath. As such, conflict between cyclists and pedestrians along Kent Street is unlikely.

2.0 Further Information and Assessment

2.1 Construction and Operational Jobs

The proposed development will generate 229 construction jobs and 20 additional jobs during operation.

2.2 Social Impacts of the Temporary School

A Part 5 Review of Environmental Factors (REF) has been authorised by SINSW for the ongoing operation of the temporary school at Wentworth Park. The REF considers the social and environmental impacts associated with the operation of the temporary school.

The Fort Street site is significantly constrained, with little space or opportunity to decant students within the site to temporary accommodation. The Wentworth Park temporary school provides an excellent available and proximate alternative. The temporary school also provides ample capacity without the need for any internal works or redistribution of floor space.

Currently, the plan is to relocate the school to Wentworth Park in the later part of Term 3, 2020.

It is acknowledged that the temporary relocation has the potential to result in short-term negative social impacts to way of life for students, families and school staff associated with the temporary closure of the school. This has the potential to result in increased travel times, inconvenience, uncertainty and changes to daily routines for students and their families. Decanting of students off site may also impact student learning and typical school practices.

However, given the inability to provide temporary accommodation at Fort Street, relocating the entire school community to Wentworth Park is considered to be the least disruptive option available to SINSW.

In order to minimise any disruption or inconvenience, the decanting of students will be undertaken in accordance with a Change Management Plan. Measures will be put in place which ensure a smooth transition for students, teachers and families into the temporary school facilities while the proposal is under construction, to minimise disruption to learning outcomes.

2.3 Delivery of Cold Shells

FJMT's Schematic Design Report Rev 01 – Modularity provided at **Appendix N**, provides additional information on the intended design and staging of the proposed cold shell spaces. The project team has been exploring this design initiative since submission of the EIS.

To maintain flexibility in the delivery of the cold shells, the cold shells may be delivered in a staged approached and may incorporate a modular build, as opposed to traditional construction.

This design initiative is still being considered by SINSW and the project team. It will provide flexibility to deliver a modular design, if it is determined to be the most appropriate and effective construction method.

The potential modular build incorporates:

- Modulation of interior construction elements is proposed for Building F, H, G and J;
- Modulation of the facades to be designed as a kit of parts; and
- Modulation of some elements of the COLAs.

Construction of some modular elements would not change the intent of the design or the materiality, finishes, bulk or scale of the proposal. However, where variations to the proposed design are required, SINSW seeks a condition requiring the Secretary to sign off on the final design prior to the construction of these modular elements. The Western Elevation of Building J that identifies the modulated elements, is shown below in **Figure 9**.

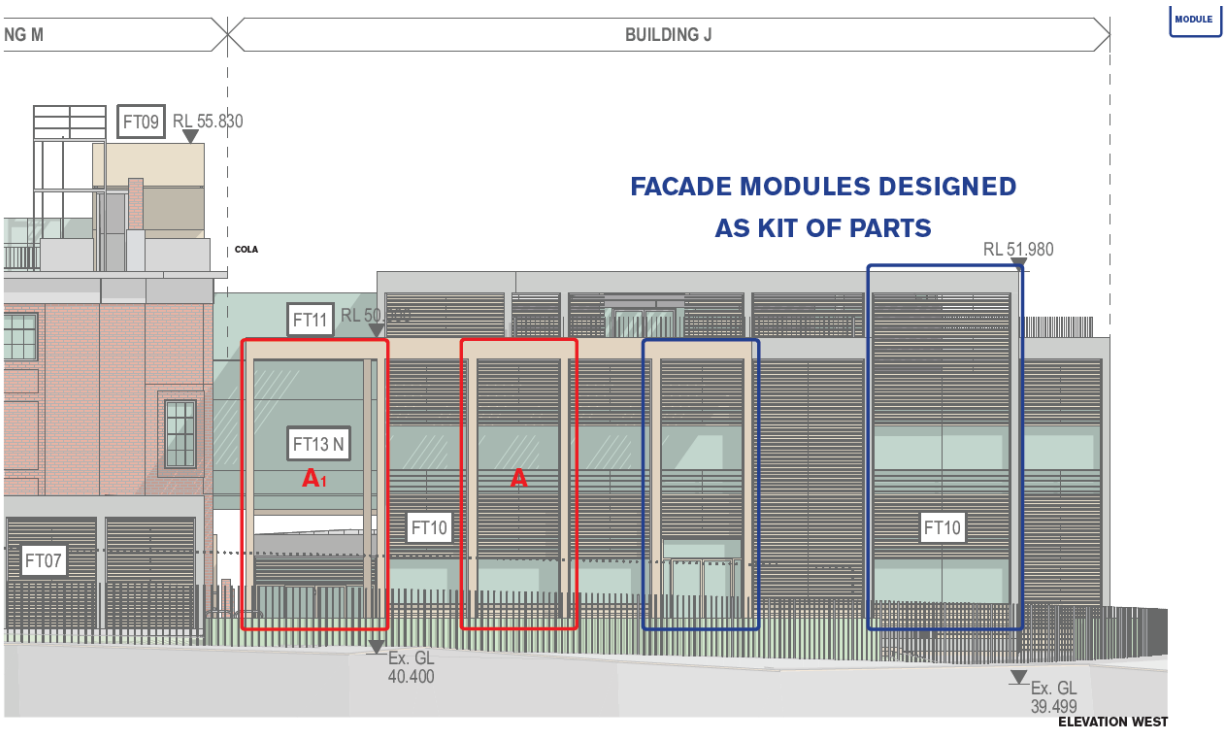

Figure 9 Western Elevation of Building J showing Modulated Elements

Source: FJMT

We trust that this information is sufficient to assist DPIE's assessment of the proposed development. Should you have any queries about this matter, please do not hesitate to contact Karissa Kendall at Karissa.Kendall@det.nsw.edu.au or David Lewis at David.Lewis83@det.nsw.edu.au.

Yours sincerely,

Karissa Kendall
Project Director
School Infrastructure NSW