

School Re-Development - EIS submission

Thursday, 14 September 2017

6:26 PM

Issue: Construction Management

Detail: The EIS lacks sufficient detail regarding the proposed mitigation measures that will be implemented during construction to ensure minimal impact to the school students, teachers and surrounding natural environment. The lack of detail makes it very difficult to have any certainty that key construction impacts - such as noise, dust, air quality, soil and water management, construction traffic etc - will be effectively managed during the proposed 18 month - 2 year construction timeframe.

The EIS notes that further detailed management plans will be developed by the construction contractor, however there is no assurance regarding the adequacy of these documents, their implementation, or revision when required in response to incidents and non compliances. Further, the EIS notes that these management plans will be sent to Northern Beaches Council. It is assumed that management plans may be issued to a Principal Certifying Authority, as is the case on other similar projects.

Request: Could the Department please consider conditioning the project so that key environmental management matters and their associated management plans that fall outside the expertise of the Principal Certifying Authority be issued to the Department for review and approval prior to the commencement of the relevant phase of works. Given the extensive nature and scale of the proposal within an operating school of over 900 students, and on a highly constrained site, these could include as a minimum Noise and Vibration, Air Quality, and Construction Traffic Management.

In addition, given the size and scale of the project, the length of the construction period, the highly constrained site, where students and teachers will continue to work and learn adjacent to a major construction site, could the Department please consider conditioning the project with an Independent Environmental Representative as is the case on other large construction projects. The EIS provides no certainty nor commitment regarding the management of key environmental matters. Conditioning the appropriate and detailed management of these matters to a high standard will be the only way that the school community can be assured of appropriate environmental management controls and student wellbeing and safety during the extensive and lengthy construction period.

Issue: Fig Tree

Detail: A significant Moreton Bay Fig is contained within the central area of the school grounds. This tree is integral to the character of the school and DoE have advised that it is to be retained. The EIS does not however specifically detail how this tree will be protected during construction.

Request: Given the size and significance of this tree to the school community, could the Department please consider specifically conditioning its retention and ongoing protection during construction in accordance with the relevant AS for Tree Protection. As the tree is located in close proximity to multiple construction activities, including where demountable classrooms will be craned during decanting, there is a reasonable risk that the tree could be damaged by the construction works if not specifically protected by a condition of consent.

Issue: Hours of work

Detail: The EIS states that the hours of work for the proposed development will be 7am - 5pm Monday to Friday and 8am - 1pm on Saturdays. Given that the development works will be undertaken within the grounds of the school where in excess of 900 students and 65 teaching staff will continue to work, learn, and play, it seems prudent to work as much as possible outside the standard school hours. This may assist in reducing the construction timeframe, which is shown as being up to 2 years.

Request: Could the Department please seek clarification from DoE regarding why extended working hours are not being sought as a means to minimise impact upon the students and teaching staff. Extended working hours on Saturdays and scheduling significant works during school holidays should be prioritised to minimise the impact on students.

Issue: Construction Traffic

Detail: The Construction Traffic Management information provided in the EIS is very brief and fails to identify the significant peak in pedestrian and traffic movements in and around the school during the school drop off and pick up times. The EIS focusses on public safety, rather than student safety. With over 900 students arriving and departing school during these times there is a significant volume of vehicle and pedestrian traffic. As this is a primary school, many students are brought to school by their parents with younger siblings, which adds to the traffic and pedestrian volumes significantly.

Request: Could the Department please consider requesting detailed pedestrian and traffic

management plans and traffic control plans that clearly identify accurate pedestrian and traffic volumes during peak times and genuine measures to ensure public and student safety, particularly where construction traffic interfaces with the school. All construction entrances to the school should be permanently manned during working hours with an RMS accredited traffic controller, as is standard practice on other large construction sites.

Issue: General Construction Management - runoff to lagoon and beach

Detail: the EIS does not provide adequate information regarding how soil and water will be managed on site to ensure no runoff to the nearby Curl Curl Lagoon and North Curl Curl Beach. These are sensitive ecosystems that provide habitat to many protected flora and fauna species.

Request: Could the Department please consider requiring the preparation of a detailed Soil and Water Management plan, to be prepared in accordance with relevant standards to the satisfaction of the Department. This management plan should require no discharge off site.

Issue: Incident management

Detail: The EIS provides no detail regarding how incidents will be managed on site. This is of concern, as the construction of the new school will be undertaken within the grounds of the existing school whilst it is in operation. As such, any environmental or safety incident, if not appropriately managed, has the potential to adversely impact upon the health, wellbeing and safety of students, teachers and the natural environment.

The EIS notes that asbestos will be removed from site, however no assurance regarding asbestos management procedures is given. It is assumed that the construction works will involve the use of fuels, chemicals, concrete etc, and again, no information nor assurance is provided as to how works will be undertaken to ensure the appropriate management of any incidents on site, should they occur.

Request: Could the Department please condition the management and reporting of incidents during construction.

Issue: Scale of boundary fence

Detail: The EIS states that a 2.1 m high palisade fence will be constructed at the school boundary. The construction of such a fence is inconsistent with the surrounding

boundary. The construction of such a fence is inconsistent with the surrounding streetscape and is inappropriate for the area. Its construction will require the unnecessary removal of further native vegetation from site.

Request: Could the Department please consider requiring the construction of a smaller scale boundary fence in keeping with the existing streetscape.

Issue: Existing OOSH facility and its continuing operation

Detail: The EIS discusses provision of a "new OOSH" facility at the school, utilising the existing Library which is proposed to be reconfigured. The EIS does not provide sufficient detail however regarding how the existing OOSH facility that already operates at the school for up to 160 children will continue to operate safely during the 18 month - 2 year construction period. The existing OOSH facility at Curl Curl North is an essential service for working parents that must continue to operate during construction. As noted above, the EIS lacks sufficient detail regarding construction environmental management issues, including construction vehicular traffic to be assured that students attending OOSH before and after school will be safe and able to enjoy the use of the school facilities without being affected by noise, dust etc. As OOSH is a service paid by the parents, certainty around quality of care is required.

Request: Could the Department please request further information from DoE regarding how the existing OOSH facility will continue to safely operate for 140 existing students. Given its importance to the school community, could the Department also please consider conditioning the project to ensure that the existing OOSH facility continues to operate during construction with no reduction to service provided.

Issue: Proposed Futsal Courts

Detail: The EIS (Landscape Master plan) states that two synthetic turf Futsal courts will be built on the northern part of the site. The DoE have advised that it is intended that the school can hire these facilities out to raise funds. However, the current proposed courts are to be constructed on an existing slope making it unlikely to be user friendly, safe, or likely to be hired out.

Request: Could the Department please consider requiring through a condition of consent that the futsal courts, and other proposed sporting facilities within the school (eg handballs courts etc), be constructed so that they are on a flat grade making them effective and usable facilities. These are unlikely to be facilities that the school can use effectively if they are constructed on a slope. Given the size and scale of the proposed works, there is no valid reason why the facilities cannot be constructed at grade so that

they are appropriate for use.

Issue: Air Conditioning

Detail: The proposal does not provide for any mechanical ventilation (heating or cooling) of the new buildings. This is likely to result in the buildings/ classrooms being unusable during the hot summer and cold winter times. The newly constructed buildings (2016) at Harbord Public School were also built without mechanical ventilation, and as a result, on hot days they are unable to be used. Children and teachers share use of the older style buildings with existing air conditioning.

Request: Could the Department please request further justification from DoE as to how the new class rooms will be able to achieve and maintain a constant and suitable temperature conducive to learning, particularly during the hotter and colder times of the year. Could the Department please consider requiring that the design include mechanical ventilation.

With more extreme weather events forecast over the next 50 -100 years, its seems short sighted to build a state of the art education facility that does not facilitate a sound learning environment. Currently at Curl Curl North Public School, on hot days, children and teachers in classrooms without air conditioning move to classrooms with air conditioning and share the working space. As this is already an issue for the school, it is disappointing that the new school class rooms will not provide any heating or cooling, and this is likely to be a significant issue for students in the future and a barrier for learning.

Issue: Complaints Management and resolution

Detail: The EIS does not outline any complaints management or resolution process in the event of complaints being made during the construction process.

Request: Could the Department please consider including a requirement in the consent for the management and resolution of complaints.

