

Curl Curl North Public School P&C Association supports the proposed project.

I would like to thank both the Department of Education (**DoE**) for the opportunity to be involved in this project through its Project Reference Group (**PRG**) and the time and effort already put into the planning; and the NSW government for including the much needed upgrade of our school in its budget. We are excited about and grateful for the opportunity for the students and teachers of Curl Curl North Public School (**CCNPS**) to work and learn in state of the art permanent accommodation after many years of scraping together as a community to provide much needed facilities and equipment. Through my involvement with the PRG including discussion as to the DoE's Educational Facilities and Standards Guidelines (**EFSG**) I am aware that certain things will not be provided for in this project as a matter of DoE policy.

While I understand that the DoE has carefully considered many of the issues raised below and will no doubt be on top of those issues throughout the build, in order that the school and school community (who will not be parties to any contracts with those carrying out the works and accordingly not have rights or the capacity to ensure that works are carried out in a suitable way) can have some comfort that appropriate measures will be taken by those undertaking the works, I raise the following issues for consideration of the Department of Planning and Environment (**DPE**).

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.

Request: Could the DPE 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 DPE 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 DPE 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 DPE 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 moved, 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 DPE 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. Further specific provision should be made to ensure that students are not disturbed during NAPLAN and other relevant important assessment times.

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 (8:30am to 9:15am) and pick up times (2:45pm to 3:20pm). 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. Many students are brought to school by their parents with younger siblings in tow, significantly adding to the traffic and pedestrian volumes significantly.

Request: Could the DPE 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: 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.

It is assumed that the construction works will involve the use of fuels, chemicals, concrete etc, and 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 DPE please condition the management and reporting of incidents during construction.

Issue: Existing OOSH facility and its continuing operation

Detail: While the EIS discusses provision of a "new OOSH" facility at the school, it does not provide sufficient detail 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 paid service run by the Curl Curl North Public School Parents and Citizens Association (P&C) and paid for by parents, certainty around quality of care is required.

Request: Could the DPE please request further information from DoE regarding how the existing OOSH facility will continue to safely operate for 160 existing students. Given its importance to the school community, could the DPE 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: 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. I understand that the EFSG does not provide for air-conditioning being provided by the DoE, accordingly I am putting my faith in the architects designing a fit for purpose facility in respect of cooling to maintain acceptable classroom temperatures. At a meeting of the PRG, we discussed parent funding of air-conditioning as part of the design but the total cost estimate was well beyond any amount which could be contemplated as a fundraising goal.

Request: Could the DPE 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.

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, all 18 demountable classrooms (which will be removed) have air conditioning, although I understand that this has issues with the inadequate power supply which is to be addressed in the project. If suitable classroom temperatures are not able to be maintained (whether by air conditioning or fans and other ventilation) this is likely to be a significant issue for students in the future and a barrier for learning.