

17 May 2021

File No: 2021/203545
Our Ref: R/2019/6/C
Your Ref: SSD-10340-Mod-1

Jenny Chu
Planning Officer – Social and Infrastructure Assessment
Department of Planning, Industry and Environment

via Planning Portal

Dear Jenny,

Fort Street Public School Redevelopment - SSD 10340 Mod 1 - Design and layout changes

Thank you for your correspondence dated 22 April 2021 inviting the City of Sydney Council ('the City') to comment on proposed design modifications to the redevelopment of Fort Street Public School, Millers Point.

SSD 10340 was approved 7 October 2020 for the redevelopment of Fort Street Public School comprising demolition of selected buildings and structures, construction of four new buildings, refurbishment of existing retained buildings, alterations to drop-off and pick-up arrangements and associated works (including tree removal), landscaping and consolidation of lots.

The subject modification application broadly proposes the addition of an extra storey to Building J (to be part-3 storeys) and introduction of a rooftop link connection between the Met Building and Building J; removal of the basement below Building G; relocation of the lift from the Met Building to Building J; relocation of the central stair between Building J and H to the south of Building J; design changes to the facade, internal layouts, the size of the OSD tank, removal of the extension to the Messenger's Cottage, roof pitch changes; changes to landscape design; changes to the loop road pick-up and drop-off arrangements and changes to the widening of Upper Fort Street and the design of the Bradfield Shed.

The City has reviewed the proposed modifications to the development and do not object to the proposal, however, we do note issues with the proposed reduction in tree planting, landscaping changes, lack of clarity concerning transport and access arrangements, and waste management. We raise the following for your consideration.

1 Heritage, materials and design

The revisions proposed to the approved application as outlined in the Heritage Impact Statement presents a careful balance between minimising heritage impacts, whilst achieving the practical and functional needs of the school redevelopment. Overall, it is

considered that the changes proposed will have an acceptable heritage impact subject to the following conditions:

- A suitability qualified heritage consultant, experienced in the conservation and adaptive re-use of heritage buildings, is actively involved throughout the design development and construction stages of the project until its completion, to ensure positive heritage outcomes.
- The heritage interpretation plan that is being prepared for the site incorporates meaningful heritage interpretation initiatives to communicate the heritage significant and history of the site as a way of mitigating the impact to heritage values as posed by the development works.

Regarding the extensive use of glazing proposed, the materials and finishes schedule should specify clear glass with a shading coefficient of less than 30% to ensure the glass is clear and colour-neutral. Based on the products presently specified, it is likely the glass will need to be Solarban 60(2) Solarblue + Clear.

2 Trees

The amended landscape plans have deleted 35 new trees from the proposal due to changes to the drop-off zone, Met Building, and the addition of an entry ramp. No effort has been made to offset the loss of these trees.

Research by Dr Sebastian Pfautsch and Western Sydney University has found unshaded asphalt and artificial grass within schools have had recorded surface temperatures of 60-100 degrees Celsius. As City Greening and Canopy Cover is a Premier's Priority the deletion of these trees is not supported, and it is strongly recommended the plans are amended to include the previously proposed trees.

The modification application has deleted the proposed trellises that contained vines for greening and shading throughout the site, and eight trees have been removed for their installation. These elements have been replaced with metal awnings. While these covered outdoor learning areas (COLAs) do provide some shade, their metal roofs emit heat into the surrounding environment, unlike trees and vines that actively cool the air. This will result in a poor school cooling outcome. The removal of these elements is not supported.

As the OSD tank has been reduced in size there is opportunity to off-set losses of greening with planting within the Eastern Courtyard and Terrace Zone, which would cool these hardstand areas. It is recommended that four additional medium sized trees are included in this area, either through amended plans or via condition.

Similarly, there are additional impacts to the Significant Fig Tree onsite due to the installation of accessibility ramp. The construction of this ramp must be supervised by an AQF5 Arborist to ensure that the tree remains viable throughout the development.

3 Landscape design

The City's landscape officer echoes tree management's concerns about the substantial reduction in new trees. The applicant states they still meet the 15% canopy coverage requirements of the Sydney DCP 2012, however this development, at the outset, removes 86% of existing trees.

The previously proposed replacement planting went some way in compensating this loss of existing trees. Subsequently, by reducing the replacement planting, the compensation upon which the approved scheme was based is reduced, as is the overall environmental quality of the scheme.

As per previous comments on earlier iterations of this scheme, the City does not support the use of synthetic turf because the plastic material has no biophilic value, can become extremely hot under the summer sun, and often ends up in landfill. The City does not support the replacement of timber decking with synthetic turf and suggests that all synthetic turf areas be replaced with timber decking.

The three roof terraces are stated as having been 'rationalised' in design terms. The outcome of this is that all three roof terraces no longer incorporate any landscape elements, with the exception of a slight variance in surface treatment to one and some future proofing (drainage holes) should planting be included at a later date. This represents a serious reduction in quality for the campus, and results in three spaces that are exposed, empty, and entirely relying on the addition of other loose furniture or items.

No storage for play equipment is provided, nor is there any indication of how these spaces can be best utilised. Furthermore, the choice of rubber softfall on the two southernmost roofs creates the same issues as the use of synthetic turf, with no shade covering, this will be unusable in summer due to high temperatures. With continued exposure the softfall will deteriorate and require replacement sooner than other paving types.

It is recommended that all roof terraces be provided with, as a minimum, perimeter planting, shade structures of some sort (pergola, canopy etc), and fixed seating. In addition, it is recommended that the softfall to the two southern terraces be replaced with timber decking.

4 Environmental health

The development is located adjacent to the Western Distributor. The submitted Acoustic Statement does not demonstrate compliance with the requirements of Clause 102 of the *State Environmental Planning Policy (Infrastructure) 2007* with respect to educational establishments. It should be confirmed the modifications are capable of compliance with the SEPP.

The Remediation Action Plan denotes that a longer-term Environmental Action Plan may be implemented to deal with any residual contamination issues on this site. This approach is not recommended by Council due to possible impracticalities of future implementation.

5 Public domain

The ground floor plan currently shows a door opening from the new Bradfield shed directly into the main footway. This is not acceptable. The door is to be revised to open inwards or be relocated to a lower impact location.

The proposal to widen Upper Fort Street is generally acceptable, however, further detailed design can be completed under the recommended Public Domain Plan condition, provided as part of the City's referral for the EIS under R/2019/6/A. The remainder of the conditions recommended as part of the EIS referral remain applicable.

Please note there is an existing stormwater kerb inlet pit on the western kerb of Upper Fort Street which is proposed to be realigned. This pit will require relocation. This can be addressed during construction certificate stage under the stormwater and drainage condition.

6 Transport and access

The conflict and safety issue created by co-locating vehicle movement and play areas has previously been raised by the City. These concerns remain.

The submitted documentation is unclear in terms of vehicular, bicycle and pedestrian movements in different phases. Additional information resolving the following issues is required:

- During Phase 1, there are a lot of cross movements at the proposed pedestrian crossing. The applicant should consider bi-directional cycle crossings on the northern and southern side of the pedestrian crossing.
- During Phase 2, the southern perimeter gate opens directly onto the footpath and cycleway. More space should be provided to allow pedestrians and cyclists access between the school, footpath and cycleway.
- The City notes the proposed turning area of the drop-off/pick-up zone is tight and it is unclear whether there is a physical structure proposed. Confirmation is required that the turning area (drop-off zone) is wide enough for large vehicles (SUVs) to turn.

Current operations use this as a turning area, but many larger vehicles (SUVs) / their drivers cannot make the turn in one, struggling before performing a dangerous 3-point turn and blocking traffic. This is a safety issue when vehicles are reversing or queuing.

The radius of the turning circle is approximately 6.6m. A standard car needs approximately 6.3m to turn safely. Any driver error will lead to the driver being unable to complete the turn in one movement.

- There are currently four metered parking spaces near the school that create a pinch point. It is unclear from the documentation whether these are proposed to

remain (they appear to be marked as main queue). The location of these spaces may compromise drop-off and pick-up movements if cars are parked.

7 Waste management

At present, the plans do not accurately reflect the quantity of bins that will be required, and the proposal relies on an increase in collection frequency, which is not recommended. There also appear to be issues with the collection vehicle path. The following issues should be addressed through submission of a revised Waste Management Plan:

- As part of Sustainable Sydney 2030, the City is limiting truck movements to ease road congestion. As such, an increase in collection frequency is not recommended. Truck movements such as waste collections should be ideally weekly but as a maximum 3 x weekly, including collection of food waste – currently proposed to be daily.
- The 'Central Waste Storage Area' (WSA) in should be amended to reflect the number of bins required based on collection frequency. Plans need to show location and space allocated for the bins within the WSA, including the number of bins required. These should be correctly scaled, and the plans should distinguish between sizes and show the layout of bins within the WSA.
- Bulky waste storage of at least 4m² should be provided and clearly marked on the plans as such.
- Waste collection is to occur outside of school hours, with school gates to be opened by a waste contractor. Of the two options provided for waste collection, the use of the drop-off and pick-up turning circle and completing a three-point turn to minimise the reversing of waste collection vehicles is preferred. The option of reversing into the collection point before the school gate is not supported.
- Commercial waste and recycling receptacles and any bulky waste is always to be stored on the property and must not be placed on the kerbside for collection.

Should you wish to speak with a Council officer about the above, please contact Anna Kaskanlian, Specialist Planner, on 9265 9333 or at akaskanlian@cityofsydney.nsw.gov.au.

Yours sincerely,



Graham Jahn AM LFRAIA Hon FPIA
Director
 City Planning | Development | Transport