

23 February 2022

Sunnah Life Academy
463 Chapel Road,
BANKSTOWN NSW 2200

Re: 463 Chapel Road, BANKSTOWN NSW 2200 (Response to Council Traffic and Parking Related Matters – DA (DA-970/2020))

Dear Sir/ Madam

The letter addresses Bankstown-Canterbury Council's traffic and parking related matters raised at their letter dated 21 January 2021. Council's specific traffic and parking related matters and responses are summarised in the following table.

Table 0.1: Council's traffic & parking related matters and responses

Matter no.	Council Matter	Response
1	The Applicant is to supply a Traffic Study based on the existing operating facility. Traffic report need to show where students are currently being dropped off, given that the Chapel Road frontage is No Stopping and the French Avenue frontage is No Stopping and timed 2P. The SEE states that there is substantial street parking. If the traffic assessment relies on nearby street parking, then an Occupancy Survey is needed to demonstrate that this can be achieved. The Traffic Report should also address the mode of travel based on the existing operation.	Refer to Sections 1 to 5.
2	Vehicular access is provided via the existing driveway (approximately 6 metres wide) from French Avenue. As this will operate as a commercial establishment, all vehicles shall enter and exit the site in a forward direction.	Refer to Section 6.
3	The Existing Ground Floor Plan (Dwg No. 3 - Issue B - dated 11/12/2020) does not show the sight triangle for pedestrian safety at the proposed driveway. This needs to be shown as per AS2890.1:2004 Figure 3.3 – Minimum sight lines for pedestrian safety on the ground floor plan and is to be kept clear of any obstructions. Note that the sight line on the eastern end of the driveway cannot be accommodated with the current arrangement. This needs to be demonstrated due to the nature of the business that is proposed. It is in Council interest that any pedestrians, especially children, visiting the site are accommodated for in the correct manner.	Refer to Section 6 and Appendix A.
4	The proposed development fails to meet Objective (C) of Part A1 of the BDCP 2015, which provide as follows: (c) To have development that provides the adequate amenity to people who line in, work in and visit the local area. It is considered, due to the above, the development does not provide adequate amenity for people who work in or visit the local area due to the parking and traffic issues that are yet to be resolved.	Refer to Section 7.
5	The proposed development fails to demonstrate compliance with Clause 2.1 of the BDCP 2015 – Part B1, in relation to Off Street Parking requirements. Please be advised that while it has been noted that the applicant has requested for this clause be varied, further assessment will be considered once point 1 – 3	Refer to Section 7.

	are submitted. This is by no way an indication that a variation on this clause will be considered by Council.	
--	---	--

1. Existing operation

The facility is located at the north-eastern corner of Chapel Road/ French Avenue, Bankstown (Figure 1). The site contains an existing two storey building which has previously been used for counselling services.

The total site area is 771m² with a building floor area of 270.3m². The car parking to the site is provided via French Avenue, which is approximately 35m west of Chapel Road intersection (Photograph 1.1).



Figure 1: Site location (Source: Six Maps)



Photograph 1.1: Existing off-street parking to the site

The facility provides home schooling to year 1 to year 6 children. It operates on weekdays (Monday to Friday) . between 10am - 4pm under an interim approval. At any given time there are maximum four classes operate at the facility. There is maximum 15 students at any one class. There is total seven teachers who work on shift basis and at any given time, there are maximum four teachers which equates to one teacher per class.

Most of the students are from the local areas. During the site visit, it is noted that most of the parents attend the facility by walking which multiple children (Photograph 1.2). the majority of the students have their siblings in the same or different classes. Despite there is no existing travel mode data, it is understood that the parents who are required to drive to the centre, park in the nearby restricted on-street or off-street parking facilities and walk to the centre to drop-off or collect their children at the beginning or end of the classes. A number of parents were observed to drop-off their children at the site driveway. The driveway is attended by a site personnel during the drop-off and pick-up periods to ensure safety (Photograph 1.3).

No parent wait outside while their children attend the centre. All seven teachers drive to the centre and park within the existing off-street car parking facility which can accommodate maximum four cars.



Photograph 1.2: Single parent accompanying multiple children to the centre



Photograph 1.3: Parents and children are greeted by site personnel

2. Parking occupancy in nearby streets

At the vicinity of the centre, parking is generally restricted to '2P; 8.30am – 6pm, Mon – Fri; 8.30am – 12.30pm, Sat' on the northern side of French Avenue (between Chapel Road and Conway Road). On the southern side, parking is restricted to '2P; 8.30am – 6pm, Mon & Thurs; 11am – 6pm, Tues, Wed, Fri, 8.30am – 12.30pm, Sat; No Parking, 1am – 11am, Tues, Wed, Fri', possibility due to waste collection arrangements for the high density residential dwellings. In Conway Road and French Avenue (east of Conway Road), parking is currently unrestricted. During the site inspection, the on-street parking was found to be approximately 80 to 85% occupied in the restricted zone and fully occupied in the unrestricted zone (Photograph 2.1 & Photograph 2.2).



Photograph 2.1: Parking occupancy in French Avenue (at 9am on Thursday, 11 February 2021)



Photograph 2.2: Parking occupancy on Conway Road (at 9am on Thursday, 11 February 2021)

In Chapel Road, some sections of the parking, near French Avenue, is restricted to '1P; 8.30am – 3.30pm, No Parking, 3.30pm – 6pm, Mon – Fri' and other sections of the road, parking is generally unrestricted. There were approximately 70% spaces found to be occupied in the restricted zones and fully occupied in the unrestricted zones.



Photograph 2.3: Parking occupancy in the unrestricted section of Chapel Road (at 9am on Thursday, 11 February 2021)

Street parking on west of Chapel Road (eg French Avenue, Kitchener Parade etc) is also a combination of restricted ('2P; 8.30am – 6pm, Mon – Fri; 8.30am – 12.30pm, Sat') and unrestricted parking. There were some vacant spaces in the restricted zones and fully occupied in the unrestricted zones.

In summary, unrestricted on-street parking in the locality is in high demand and are generally fully occupied before the start of the operation of the facility (10am), however, restricted parking, which are likely to be used by the parents to drop-off and pick-up their children, have reasonable spare capacity.

3. Nearby off-street parking

There is nearby retail parking at the Aldi store which are allocated for their customers. Parking up to one hour is free, however, a valid ticket must be displayed in the vehicle. This parking facility could be used by the parents if they visit the Aldi store during the pick-up/ drop-off activities of their children. During the site inspection, there were about 60% vacant spaces at the Aldi off-street parking (Photograph 3.1).

Existing TAFE parking is allocated to their students and staff members.



Photograph 3.1: Aldi parking (at 9.30am on Thursday, 11 February 2021)

4. Nearby public transport facilities

It is understood that some parents use the public transport to/ from the facility. Bus stops are located on both sides of Chapel Road, within 100m of French Avenue (Photograph 4.1). Numerous bus services operate at various directions throughout the day. Therefore, parents or teachers who are required to rely on alternate mode of transport, other than driving, can use the high frequency bus services available in this established area.



Eastern side



Western side

Photograph 4.1: Bus stops at Chapel Road

5. Existing pedestrian infrastructure

There is excellent pedestrian connectivity at the vicinity of the site. Footpaths are provided on both sides of French Avenue and Chapel Road (Photograph 5.1). In addition, pedestrian crossing facilities are provided in all four approaches of Chapel Road/ French Avenue & Chapel Road/ Rickard Road signalised intersections. Further to the north, there is another signalised pedestrian crossing facility in Chapel Road, approximately 20m north of Raw Avenue.



Photograph 5.1: Footpath on the eastern side of Chapel Road (looking south)

6. Existing off-street car parking

As stated above, the existing vehicular access is provided in French Avenue (Photograph 1.1). The driveway is approximately 7.5m wide and the off-street facility can accommodate up to four vehicles within the property at a stack arrangement. Stack arrangement is considered acceptable given that all parkings are allocated to the same property.

There is maximum four staff members to the facility at any given time and all park in the current off-street parking facility. No staff member needs to rely on street parking. However, the current arrangement of parking with no turn around facility within the site, vehicles are either need to forward-in/ reverse out or vice versa to/ from the site. However, due to the safety reasons, it is recommended to reverse in and forward out while ingressing and egressing the driveway.

The driveway does not meet the pedestrian site triangle in accordance with Figure 3.3 of the AS2890.1: 2004. The plans now have been amended to meet the pedestrian site triangle on both sides (Appendix A).

7. Car parking provision in accordance with council's car parking DCP

The Canterbury-Bankstown Council's Bankstown Development Control Plan 2015 (Part B5) stipulates the following car parking rate for 'Educational Establishment':

*1 car space per employee or classroom, whichever is the greater; and
1 car space per 8 students in year 12.*

The subject facility with four classrooms and seven employees and no year 12 student, the total car parking requirement is seven. However, as stated above, employees work on shift basis and any given time there are maximum four employees on site. Based on this consideration, minimum four off-street car parking is considered adequate.

As all the employees currently park onsite, there is no parking impact to the adjoining public roads. In addition, the facility was previously operated as a counselling service which used to generate some level of traffic generation parking demand by its employees and visitors. Therefore, the current proposal of home schooling facility is unlikely to cause any amenity issues or generate any significant additional parking demand or traffic impact in the locality.

8. Proposed 10 Min parking zone on French Avenue along the site boundary.

Despite there is no on-street parking demand by the employees or parents due to the proposed development, it would be beneficial to have a 10min parking on French Avenue along the site boundary. There is existing 21.5m

section between the existing 'No Stopping' zone and the driveway which is restricted to '2P; 8.30am – 6pm, Mon – Fri; 8.30am – 12.30pm, Sat' (Photograph 2.1). This parking restriction could be amended to '10 Min; 8.30am – 10am, 3pm-4pm, Mon-Fri; 2P, 10am – 3pm, Mon – Fri; 8.30am – 12.30pm, Sat' (Figure 2). This would significantly assist the pick-up and drop-off by the parents right outside the centre.



Figure 2: Proposed parking restriction

As the proposal is along the site boundary of the subject facility, there is no parking impact to the adjoining businesses or residents. The dropping off and picking up the children outside the centre would improve the safety to the children and their parents as they are not required to park away and walk to the centre which is assumed to be currently occurring.

The matter is to be considered by Canterbury-Bankstown Local Traffic Committee and subsequently be endorsed by Council. Therefore, this matter is recommended to be referred to the Traffic Committee and all costs associated to this proposal are to be borne by the applicant.

9. Shuttle Bus Operation

The development proposes to operate a shuttle bus between the facility and Bankstown Rail Station on weekdays at 10am and 4pm to transport parents, students and staff to/ from the station. This would encourage public transport intake for the occupants of this facility. The shuttle bus will return to the base after dropping off passengers which means it will not park in the street when not in operation.

10. Closing

In summary, the proposed home schooling facility is unlikely to generate any significant traffic or parking issues in the locality. The pedestrian site triangle is provided as part of the development, however, due to the site constraint, forward in/ forward out movement is not possible. Thus, it is recommended for reverse in and forward out while ingressing and egressing this driveway. As there is no noticeable adverse impact due to this development, it is recommended for approval.

If you have any question, please don't hesitate to contact me on 0425 478 650.

Regards,

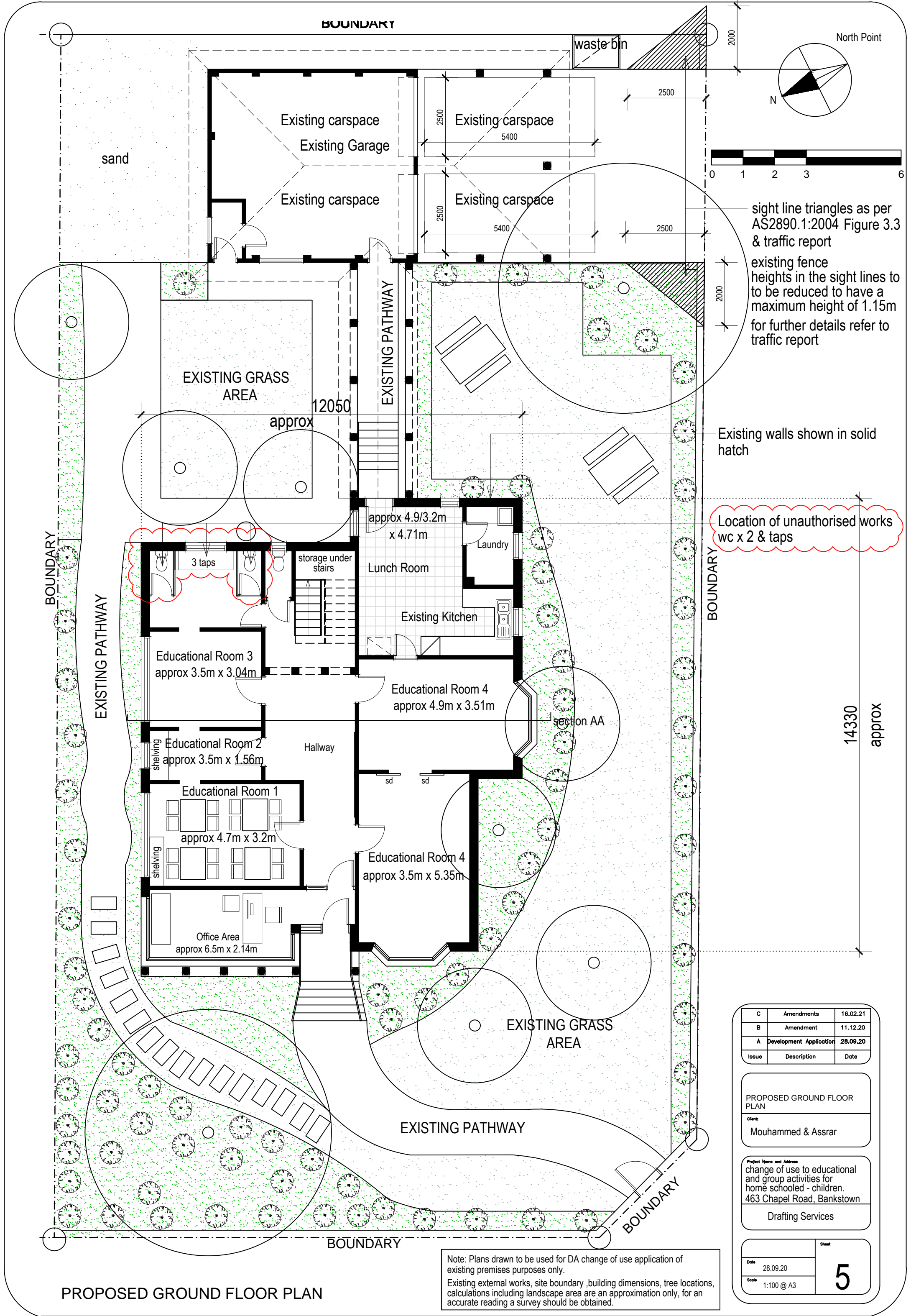
A handwritten signature in black ink, appearing to read 'A Uddin'.

A Uddin

Traffic Engineer

AITPM, IEAust CPEng

Appendix A – Site Plan



PROPOSED GROUND FLOOR PLAN

Note: Plans drawn to be used for DA change of use application of existing premises purposes only.
Existing external works, site boundary ,building dimensions, tree locations, calculations including landscape area are an approximation only, for an accurate reading a survey should be obtained.

C	Amendments	16.02.21
B	Amendment	11.12.20
A	Development Application	28.09.20
Issue	Description	Date

PROPOSED GROUND FLOOR PLAN

Client:
Mouhammed & Assrar

Project Name and Address
change of use to educational and group activities for home schooled - children.
463 Chapel Road, Bankstown

Drafting Services

Date	28.09.20	5
Scale	1:100 @ A3	