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Transport Planning, Traffic Impact Assessments, Road Safety Audits, Expert Witness

8 July 2013

Ref: 2012/228.F01B.CM/hc

Government Architects Office
Department of Services Technology & Administration
McKell Building, Level 18
2-24 Rawson Place
SYDNEY NSW 2000

Attention: Julia Carras

**TRAFFIC IMPACT ASSESSMENT THE PONDS SCHOOL MASTERPLAN
RESPONSE TO COUNCIL LETTER**

Dear Julia,

Reference is made to Blacktown Council's letter dated 5th June 2013 which, amongst other matters, contains correspondence from the Sydney Regional Development Advisory Committee (SRDAC). In summary, the SRDAC has identified the following matters which required to be addressed:

- i. To enable students to be dropped in the school grounds and not on the local street, the drop off point on Wentworth Street should be configured similar to the bus bay on Riverbank Drive.*
- ii. Due to the number of high pedestrian movements at the main entrance, it should be relocated away from the Everglades/Wentworth Street T-intersection*
- iii. The proposed wombat crossing should be relocated closer to the Public School and away from the intersection of Wentworth Street and Everglades*
- iv. All vehicular and pedestrian access to Hambledon Road shall be denied and appropriate fencing being erected along the entire Hambledon Road frontage*

The relevant extract of Council's 5th June 2013 letter is shown in **Annexure A** for reference.

Response to i

The use of kerbside parking is a well accepted practice around public schools and the provision of on-site parent drop-off/pick-up is contrary to the department's policy based upon security reasons, unreasonable costs for the limited duration of the generated set-down / pick-up parent parking activity (typically 15 to 30 minutes), internal vehicle/pedestrian conflicts and limited on-site space for such provision.

Further, the roads fronting the school campus where pedestrian access is to be provided, excluding Hambledon Road, will require 40km/hr school speed zones given that school related pedestrian / cyclist activity will need to cross these road frontages at planned pedestrian crossing locations. Kerbside parking activity around schools assists in reducing traffic speed, whilst the alternative of prohibiting kerbside parking acts to increase traffic speed.

The statement that the "drop off point on Wentworth Street should be configured similar to the bus bay on Riverbank Drive" is unclear as the Riverbank Drive bus bay is a combined High School and Primary School bus bay as detailed in section 3.1 & 4.5 of the lodged February 2013 traffic report. The recommendation that parents use kerbside parking along the school frontages (excluding Hambledon Road is detailed in section 4.2, 7 and Annexure E of the lodged traffic report.

Further, the carriageway width for both Riverbank Drive and Wentworth Street is 11m, as stated in section 2.1 (page 2) of the lodged traffic report, which adequately accommodates two lanes for traffic flow and two kerbside parking lanes. It is understood that previously the planned carriageway width for Wentworth Street was narrower at 9m, which may be the reason for the request to indent parking, due to the erroneous assumption that the 9m wide carriageway will prevail.

Response to ii

The main pedestrian access to the combined school sites is from Riverbank Drive adjacent to the combined large bus bay and kerbside parking along the Riverbank Drive frontage. This is due to the large number of students that will use bus services with concentrated delivery and collection during the school weekday AM & PM arrival and departure periods respectively.

The pedestrian access on the Wentworth Street frontage will generate secondary and moderate pedestrian access activity with a significant proportion of bicycle activity. It is not mandatory that this secondary entry be relocated away from the Everglades / Wentworth Street T junction as pedestrian fencing along the kerb line can adequately control / manage pedestrian / cyclist activity such that it remains along the footpath to the desired pedestrian / cyclist road crossing location. We note that the plans actually state Tomah Crescent continuing along the alignment of Everglades Street on the approach to the school site such that Everglades Street does not intersect with Wentworth Street, however Tomah Crescent does as detailed throughout the lodged traffic report.

Response to iii

This can be modified if absolutely necessary.

Response to iv

No vehicular or pedestrian access points have been proposed or provided to Hambledon Road. Appropriate fencing and / or landscaping can achieve / enforce this outcome.

Further to the SRDAC matters in Council's 5th June 2013 letter, Council has also provided its response to the proposed Ponds Primary & High School in their letter dated 28th May 2013. The relevant extracts of this letter are shown in **Annexure B**.

Response to Item 2 : Traffic

In relation to community use of the proposed school hall and gymnasium after school hours, this is a well accepted practice and section 4.8 of the lodged traffic report identifies how the peak parking demand of a large event (which may only occur once a year) can be effectively and sustainably managed by a combination of use of proposed on-site parking areas, frontage kerbside parking areas, bus bay (as it is not used by buses after school hours) and by identified on-site overflow areas such as the turfed areas adjoining on-site car parking areas under a Traffic Management Plan.

The school's frontage on-street parking is some 120 parking spaces including potential parking in the bus bay. As outlined in the traffic report, the parking associated with the hall and gymnasium use (worse case they're used simultaneously) is some 360 vehicles. Accounting for the on-site provision of 152 spaces and on-street frontage parking of 120 spaces, an overflow of 88 spaces can be expected as a worst case scenario. Potential on-site overflow parking area includes 'free play' area in the south east corner as shown in **Annexure C**.

Response to Item 4 : Parking

In relation to staff numbers for both the Primary & High schools, whilst the proposed on-site car parking may not strictly meet the Council's parking rates, they do meet the Department's School Facilities Standard.

The Department of Education & Communities Primary School Facilities Standard specifies parking provision for 21 on-site car parking spaces for 400 primary school and 110 spaces for a 1,200 place high school. These rates are lower than the Council DCP however the Department's Primary School Facilities Standard prevails over the Council's in accordance with Clause 32 of the State Environmental Planning Policy (Infrastructure) 2007, as repeated below:

32 Determination of development applications

(2) Before determining a development application for development for the purposes of a school, the consent authority must take into consideration all relevant standards in the following State government publications (as in force on the commencement of this Policy):

- (a) School Facilities Standards-Landscape Standard-Version 22 (March 2002),*
- (b) Schools Facilities Standards-Design Standard (Version 1/09/2006),*
- (c) Schools Facilities Standards-Specification Standard (Version 01/11/2008).*

(3) If there is an inconsistency between a standard referred to in subclause (2) and a provision of a development control plan, the standard prevails to the extent of the inconsistency.

(4) Copies of the standards referred to in subclause (2) are available for inspection by the public at the head office of the Department of Planning and such other offices of the Department (if any) as the Director-General may determine.

(5) If a development application has been made before the commencement of the amendment to this clause by State Environmental Planning Policy (Infrastructure) Amendment (Group Homes) 2009, and the application has not been finally determined before that commencement, the application must be determined as if that amendment had not been made.

The Council's parking rates are excessive in relation to encouraging reduced dependence on private car travel demand consistent with achieving sustainable outcomes. There is a trend towards reduced car parking rates to encourage increased public transport usage, car pooling and bicycle / walk modes. Workplace Travel Plans are one of the more recent management techniques that are employed to achieve less private car dependent outcomes. These workplace travel plans are endorsed by RMS consistent with sound transport planning practice in modern urban environments.

In addition to the above, the school will implement a complaints procedure for local residents in the first instance to directly report improper behaviour to the school. The complaints procedure will generally consist of the following:

- 1) On-street parking of students and/or staff in local streets including, but not limited to, kerbside parking beyond:
 - a. Riverbank Drive frontage (northern side),
 - b. Riverbank Drive (south side adjacent to open space / drainage land) between Hambledon Road and Beauchamp Road.
 - c. Wentworth Street frontage (western side).
- 2) Complaint to be formally recorded in a 'complaints register' which is to be readily available to Council officer's for review. The complaints register shall include the time and date of the complaint, the complainant's name / phone number, car registration number, the staff member/ students name and the location of the parked vehicle.
- 3) Compliant to be acted on by the school. If the complaint is not content with the action taken by the school, then the complainant can contact the Council who can enter into correspondence with the school regarding the matter and is resolution of the complaint is not achieved to Council's satisfaction, within a reasonable grace period, can issue a breach notice of a condition of consent.

Additional Information

Further to recent discussions with Council, a Traffic Management Plan will be developed to control bus, staff and senior high school drivers behaviour as detailed in **Annexure D**.

In relation to bus activity bus companies and their drivers will be advised to undertake drop-off/pick-up activity in Riverbank Drive only and not to occur along Wentworth Street. Bus providers

will be consulted in regard to drop-off/pick-up locations and timing for the High School and Primary School.

Bus drivers will be notified that drop-off/pick-up is to occur in the provided bus bay on Riverbank Drive and under no circumstance is it to occur in Wentworth Street or any other nearby streets during the hours of 8:00-9:30am and 2:30-4:00pm which coincides with the peak drop-off/pick-up period.

Other details, including complaints handling is shown in **Annexure D**.

Please contact the undersigned should you have any queries or require further information.

Yours faithfully

M^cLAREN TRAFFIC ENGINEERING



Craig M^cLaren
Director

BE Civil. Graduate Diploma (Transport Eng) MAITPM MITE

RMS Accredited Level 3 Road Safety Auditor

RMS Accredited Traffic Control Planner, Auditor & Certifier (Orange Card)

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ANNEXURE A: SRDAC MATTERS

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2. Sydney Regional Development Advisory Committee

Council has received correspondence from the SRDAC regarding the JRPP application dated 29 May 2013 in accordance with the State Environmental Planning Policy (Infrastructure) 2009. Roads and Maritime Services have identified the following matter to be addressed:

- i. To enable students to be dropped in the school grounds and not on the local street, the drop off point on Wentworth Street should be configured similar to the bus bay on Riverbank Drive.
- ii. Due to the number of high pedestrian movements at the main entrance, it should be relocated away from the Everglades/Wentworth Street T-intersection.
- iii. The proposed wombat crossing should be located closer to the Public School and away from the intersection of Wentworth Street and Everglades.
- iv. All vehicular and pedestrian access to Hambledon Road shall be denied and appropriate fencing being erected along the entire Hambledon Road frontage.

ANNEXURE B: EXTRACTS OF COUNCIL'S 28th MAY 2013 LETTER (Sheet 1 of 2)



28 May 2013

DA-13-369

DEPARTMENT OF EDUCATION & TRAINING
LEVEL 4
35 BRIDGE STREET
SYDNEY NSW 2000

COPY

Attention: Terry Brooke

Dear Sir

Proposal: Educational Establishment – The Ponds Primary and High School
Property: Part Lot 47 DP 28833, Part Lot 43 DP 28833, Lot 41 and 42 DP 28833, Part Lot 101 DP 1161271
No. 90-102 Hambledon Road, Schofields

Reference is made to your Development Application (JRPP-13-369) lodged with Council for the development of an Educational Establishment – The Ponds Primary and High School at the abovementioned property and Council's letters dated 4 April 2013 and 9 May 2013 and additional information submitted to Council dated 16 May 2013.

Please be advised that the following additional information remains outstanding:

1. School Facilities Standards

A detailed compliance table demonstrating compliance of the proposal with the following standards in accordance with Clause 32 of the State Environmental Planning Policy (Infrastructure) 2007.

- (a) *School Facilities Standards—Landscape Standard—Version 22 (March 2002),*
- (b) *Schools Facilities Standards—Design Standard (Version 1/09/2006),*
- (c) *Schools Facilities Standards—Specification Standard (Version 01/11/2008).*

2. Traffic

i. The submitted documentation identifies that school halls and gymnasiums will be made available for hire to the community outside school hours that would generate parking demand for 360 vehicles. School parking areas can accommodate 150 vehicles only, the remaining 210 vehicles will be parking on the surrounding road network as indicated in the submitted traffic report. Council's Traffic Section does not support school facilities being hired out for private functions unless all parking demand can be met within the site. As such, provision of 150 car parking spaces which includes 12 disabled parking spaces are considered insufficient for the proposed development as there will be additional parking demand for functions that can be organised in the school halls/gymnasiums.

Council Chambers • 62 Flushcombe Road • Blacktown NSW 2148
Telephone: (02) 9839 6000 • **Facsimile:** (02) 9831-1961 • DX 8117 Blacktown
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ANNEXURE B: EXTRACTS OF COUNCIL'S 28th MAY 2013 LETTER (Sheet 2 of 2)

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ii. No disabled car parking spaces are shown on the DA drawings. The plans should be amended to demonstrate compliance with Australian Standard 2890.6-2009.

3. Heritage

i. The submitted Due Diligence Report carried out by GML has identified a PAD within the subject site and concluded that there is sufficient evidence of potential aboriginal archaeology to require a AHIP process to be applied to the site. To date, however, no consultation with Aboriginal communities has been carried out. In accordance with Clause 5.10 (8) under Appendix 4 of the State Environmental Planning Policy (Sydney Region Growth Centres) 2006, where there is a reasonable possibility of Aboriginal Archaeology being present on the site, consultation with the local Aboriginal Communities is required. As such, a suitable qualified Archaeologist is required to be engaged and undertake consultation in accordance with the Office of Environment and Heritage's guidelines *Aboriginal cultural heritage consultation requirements for proponents 2010*.

In addition, the need for the following matters to be addressed has been identified:

4. Car Parking

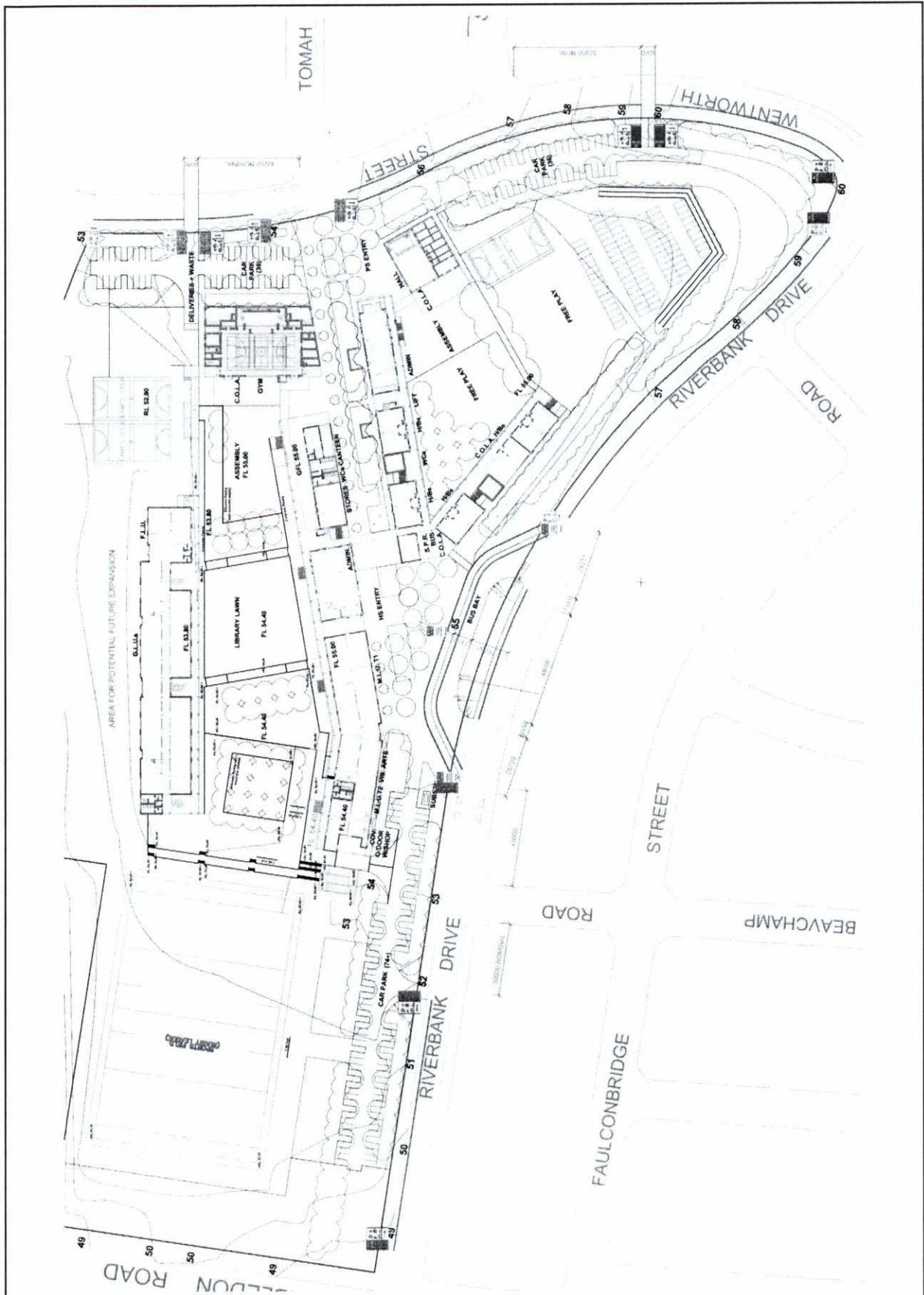
Your letter dated 16 May 2013 identifies that the proposed staffing of the schools is for 32 staff members for the primary school and 105 staff members for the High School. As such, the car parking provided on site does not satisfy the car parking requirements for an Educational Establishment under the Blacktown City Council Growth Centre Precincts Development Control Plan 2010. In this regard, the Table 4-13 of the Growth Centre's DCP requires:

- Primary and Secondary Schools - 1 space per staff member (teaching and administrative) plus 1 space per 100 students
- Senior High School - 1 space per staff member (teaching and administrative) and 1 space per 5 students in year 12

Based on the 32 staff and 600 students, the primary school generates the need for 38 car parking spaces. In addition, based on 1200 students plus 200 year 12 students and 105 staff members, the high school generates the need for 157 car parking spaces. The total number of car parking spaces required on site are 195 spaces.

As such, the car parking should be revised to satisfy the minimum number of car parking spaces required on the site to satisfy the development controls. In addition, the submitted Traffic Report prepared by McLaren Traffic Engineering is inconsistent with the proposed number of staff on the site and should be revised.

ANNEXURE C: OVERFLOW PARKING



ANNEXURE D: TRAFFIC MANAGEMENT PLAN

A Traffic Management Plan shall be prepared and submitted to Council for approval prior to the opening of the school and shall be implemented for the entire life of the school. The plan shall include:

- (a) That high school and primary school related bus services are only to undertake set-down / pick-up of school children activities within the indented bus bay constructed in Riverbank Drive. At no time shall school related buses undertake set-down / pick-up of school children activities within other nearby streets, including Wentworth Street and Hambledon Road.
- (b) That all staff and senior high school students (of driver age) shall be advised in writing, by way of a newsletter or like, at the time of commencement of employment or enrolment that:
 - (i) They should not use nearby public streets for parking, including but not limited to, kerbside parking beyond:
 - Riverbank Drive frontage (northern side),
 - Riverbank Drive (south side adjacent to open space / drainage land) between Hambledon Road and Beauchamp Road.
 - Wentworth Street frontage (western side).
 - (ii) They should at no time double park or obstruct driveways of nearby premises.
- (c) That a sign detailing (b) above shall be displayed within the foyer of the school at all times and in the staff room.
- (d) A formal complaints handling register shall also be developed in consultation with the Department of Education & Communities and with Blacktown City Council that identifies who local residents are to contact in case of parking related complaints generated by bus, staff and senior high school students. The record of complaints and how these are resolved are to be kept within the school's administration area and be available for inspection by authorised council staff upon request within 7 days of that request.
- (e) Establish, as far as practicable, a staggered end time for the primary and high schools by at least 15 minutes.

The Traffic Management Plan (TMP) shall be reviewed each year within the first 5 years of operation of the school by management of the school with a report of findings of its operational outcomes submitted to Blacktown Council. Following the first 5 years, the TMP shall be reviewed at 5 yearly intervals or as the need arises.