

To: Deborah Yong - PMDL
From: Dean Brodie
CC: Peter Ibrahim
Date: 15 February 2021
Re: St Ignatius College Riverview - SSDA RTS Responsibility Matrix Responses for Traffic

Deborah

Further to your email dated Wednesday 10 February 2021, please find below preliminary responses to the matters raised by authorities following submission of the Stage 2 development application for a loading dock, kitchen and new classroom areas. For ease of reference I have included each item followed by a response.

3. Construction and Traffic Management Plan

The Department requires more information on the turning circle and size of the largest construction vehicles to be used during the proposed works to ensure that the vehicles can appropriately manoeuvre on the site.

Response

The Construction Traffic Management Plan was not undertaken by Positive Traffic but by Novati Constructions Pty Limited. We suggest this item is allocated to them unless they do not have the capability to both respond and prepare appropriate turning path assessments of the largest vehicle.

4. Administrative errors in EIS

Incorrect reference to bus routes and ferry services in Appendix 15.

Response

The 'error' with the description of bus route 253 that:

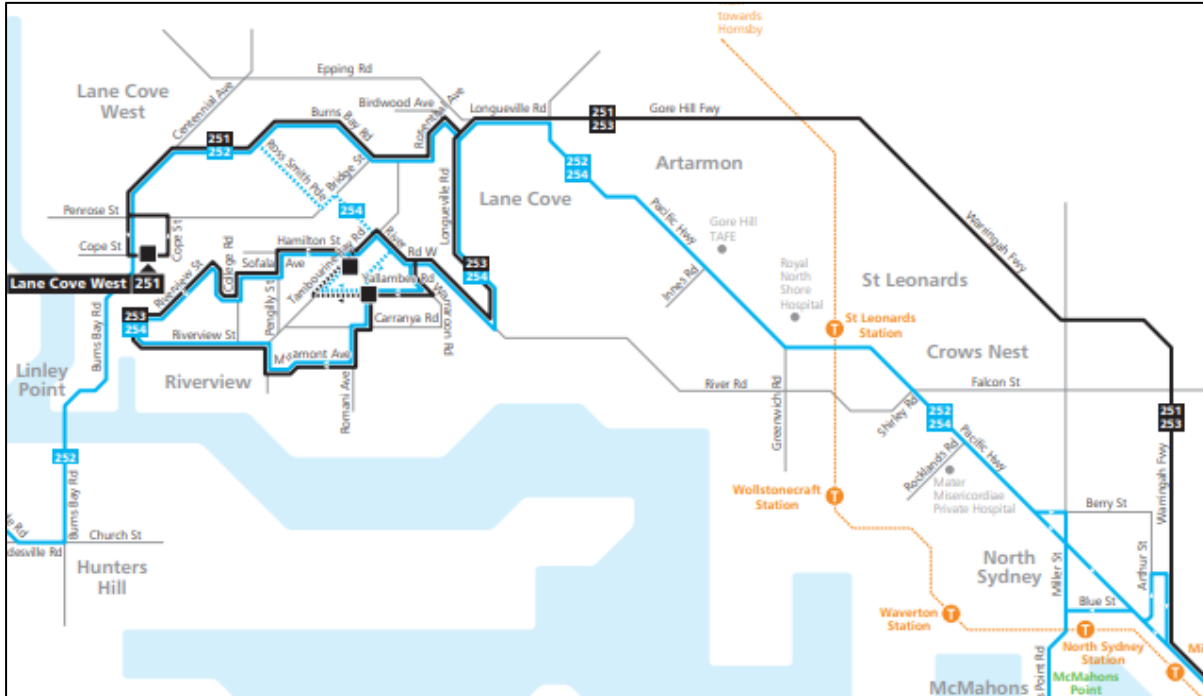
'Route 253 does not operate via North Sydney. It operates via the Warringah Freeway.'

Our report at Section 2.4.2 states:

'Rt 253 runs between Riverview and the CBD (City Wynyard) via the Gore Hill Freeway.'

This statement is an accurate description of the route used by this bus service.

Memo



At the time of preparation of the GTP in August 2020 ferry services were in place serving the site. It would appear that the state has withdrawn these in January or February 2021. However, we have now confirmed that due to public backlash following the cancellation of the Ferry services they will now return to operation as confirmed below:

Sydney Harbour Cruises / Ferries / Lane Cove Ferry

Lane Cove Ferry



Commuter and school ferry services operating Monday to Friday between Darling Harbour, Balmain East, Jeffrey St Wharf North Sydney, Circular Quay, Long Nose Point Wharf Birchgrove, Greenwich Point, Bay St Wharf Birchgrove, Northwood Wharf, Longueville Wharf, Alexandra St Wharf Hunters Hill and Riverview College Wharf Lane Cove.

UPDATE 16 Dec 2020: Transport for NSW has reviewed community and stakeholder feedback and has confirmed the Captain Cook Lane Cove Ferry Service will continue in 2021 and will not end service on 18 December 2020 as previously announced.

RMS – Transport for NSW

General comments

Active Transport Considerations

Section 5.7.1 in the Traffic and Access Assessment Report (TAAR), contains incorrect route information in Table 20. Route 253 does not operate via North Sydney. It operates via the Warringah Freeway from Lane Cove.

Response

See above comment on bus route description being correct.

Section 5.7.2 in the TAAR states there is a ferry. The ferry route has just been cancelled and replaced by school buses. Take out mention of Ferry on page 253, 264, 265 & 267.

Response

See above comment on Ferry service being reinstated.

The Traffic and Assessment Report provided as part of the EIS does not address TfNSW policies for integrating transport with land use, or the requirements of the Lane Cove DCP 2010 regarding off street bicycle parking, motorcycle parking and end of trip facilities. It is requested that the Applicant amend their proposal and associated EIS supporting documentation to satisfy the minimum requirements of the Lane Cove DCP 2010.

Response

The above comment completely ignores all the work undertaken on such matters in the preparation of the original masterplan traffic impact assessment report which is the approval basis of this SSDA. Further, it lacks context to what this proposal entails.

Under the 'recommendation' in regard to trip end facilities can I suggest¹:

- The College provides information about the current availability of trip end facilities in terms of:
 - Current number and access times to change rooms with shower facilities to support cyclists changing from their cycling gear into their school-day clothes for students and staff
 - Some photos of existing formal/informal bicycle parking.

We suggest the inclusion of a measure in the GTP where the College prepares and provides information to students and staff about the scheduled location and times of access for these change and shower facilities if not already undertaken by the College.

It is requested that prior to the issue of the first Occupation Certificate, the applicant be conditioned to provide off-street bicycle parking spaces, motorcycle parking spaces and end of trip facilities in line with the Lane Cove DCP 2010 and in accordance with AS2890.3.

Response

The proposal with no increase in student population and provision of a kitchen / loading dock facilities along with renewal of existing classrooms does not trigger any requirement for end of trip facilities or bicycle parking.

It appears there is a retrospective view in the above comment that overall masterplan requirements for such facilities are necessary for this particular application which we do not agree.

¹ I am sure the College would have more than sufficient availability of this type of facility to support other activities, such as before school sport (rowing, rugby, athletics, basketball, etc)

Sustainable Travel and Access Plan/Travel Access Guide

General comment

Remove any reference to Ferrys.

Response

At the time of preparation of the GTP in August 2020 ferry services were in place serving the site. It would appear that the state has withdrawn these in January or February 2021.

As of 16 December 2020, it appears that the ferry is back in service. This should be left in the GTP for now.

TfNSW does not consider the documentation submitted by the Applicant to have adequately addressed the SEARs requirement for travel demand management measures including a Green Travel Plan and the provision of facilities to increase the non-car mode share for travel to and from the site.

Response

As previously advise when the SEARS were issued the items in the SEARS lack context to this actual proposal and were 'general' in nature and applicable to say the masterplan proposal or such a proposal where travel behaviour would be affected. This particular proposal as no bearing on travel behaviour and overall planning for the site has accounted for travel demand management and the promotion of non private vehicle modes.

TfNSW acknowledges that COVID-19 has impacted the way people travel on the transport network. However, reliance on 2015 travel survey data (for students) and 2016 JTW data (for staff) as a proxy for either the current or pre-COVID-19 mode split for students and staff travelling to and from the site is not considered to be sufficient to inform more share targets and actions of the subject GTP.

Surveys during the pandemic to inform long term planning obligations to be placed on the proponent would be inappropriate. The use of existing survey data from surveys conducted prior to the pandemic do provide a reasonable baseline for mode shares. Conducting a survey of travel behaviour in the previous year, as suggested further on in the RTS, is likely to have material difficulties (these are discussed further below).

Further, the GTP states that 'a list of postcodes where enrolled students live showed that students have origins across Sydney'. There is no analysis nor any discussion of how this information was used to shape the development of the GTP.

Response

In section 2.7.5 of the GTP, it states, in regard to the postcode data, that:

'This is a substantially larger catchment than would be expected for a non-selective state high school, which generally have defined local catchments, preventing enrolments from outside the catchment except in specific circumstances.'

This analysis indicates that a detailed catchment analysis is inappropriate (see below for further comments on catchment analysis).

TfNSW does not support postponing the implementation of the GTP. A GTP is a living document; there will be actions which can be implemented at or prior to the issue of the first Occupation Certificate for the proposed development.

Response

We support the idea that the GTP is a living document.

However, as made clear in the GTP at Section 1, the COVID-19 pandemic has altered travel patterns and has led to significant burdens on institutions such as schools, in terms of compliance with public health requirements, in a dynamic environment, etc;

Using College resources to implement the GTP during the pandemic, when the transport situation could change rapidly, would place a burden on the College which would be of limited use, due to the changing transport situation.

As such the statement in the GTP at the end of Section 1 that the implementation requirements for the GTP, which are not specified in the SEARS, should be determined in consultations between the Department of Planning and the College, remains valid.

TfNSW notes that the subject development does not propose any increase either in staff or student population at the College.

Response

This statement confirms that the incremental transport demand of the proposal is zero. The proposed traffic and transport impacts are therefore also zero; so, the GTP is not a measure to mitigate the impact of the development.

Prior to the issue of the first Occupation Certificate, the Applicant should develop a Green Travel Plan in consultation with TfNSW. The GTP is to be updated based on student catchment data including the number and/or proportion of students living in each postcode and a 2021 travel survey of school staff and students which captures at a minimum how they travelled to school prior to COVID-19 (if applicable) and their current mode of travel to and from the site.

Response

We do not agree that the 2015 data is too old to be useful. Mode shares do change over time, for various reasons, but they are very unlikely to change substantially at an established school over the course of 3 or 4 years. As such, the extent of target setting and measures to address the targets, also, are unlikely to change substantially.

Collecting travel information from a previous year presents some real issues:

- Respondents may provide their general or typical mode of transport for the year in question, as opposed to the snapshot mode of transport used on a specific nominated day – snapshot surveys provide a better estimate of typical mode shares for the College, rather than trying to re-weight an unknown mix of single day and typical modes, doing a snapshot survey retrospectively from months ago is not practical
- A proportion of students would not have travelled to the College in the nominated survey year (likely 2019) – nonetheless some of these out of scope respondents may feel compelled to provide an answer, even if it's not applicable
- Asking about their current mode of transport in the same survey increases the potential for respondent confusion, with potentially 2021 mode recorded as 2019 mode and vice versa.

In order to provide control over the sample and provide adequate error checking for such a post-survey, it is likely that we would require identifying information from respondents and additional control questions. This would increase respondent burden, affecting results. Also, we would generally seek to avoid collecting any identifying information due to privacy issues, especially from minors.

Comparing the results of this post-survey of 2019 with the 2015 snapshot survey could then result in one of the following situations:

- Broad agreement in mode shares between the surveys – whether the 2021 post-survey is solid or not, or
- Substantial divergences in mode shares from the two surveys – trying to disentangle the source of such differences (e.g., is it due to survey method issues, or due to changes in underlying student/staff travel, etc;) is likely to be problematic and distract from the GTP preparation.

A better approach would be to:

- Work on the basis of the current GTP (including the 2015 survey and 2016 Census).
- This would address particular comments by TfNSW and measures in the GTP – most of which (within reason) would be affected by different starting point mode shares targets in a relatively minor way.
- When the pandemic lifts (in 2022 or 2023??), undertake a fresh base line snapshot survey, which would feed into the potential amendment of targets and associated GTP measures, as per the living document nature of the GTP. This survey would also commence the cycle of the mode share monitoring element of the GTP.

Analysis of the 2021 travel survey data and school catchment data is to be used in conjunction with previous 2015 student travel survey data to inform mode share targets and actions for implementation under the GTP.

Response

See above.

The Green Travel Plan should include but not be limited to:

Analysis of the 2021 travel survey data and school postcode data and discussion of how this data has informed the mode share targets and actions of the GTP

Response

See response above re 2021 post-survey of 2019 mode shares.

Postcode analysis:

- Firstly, providing postcode information – frequency distribution of students by postcode – families did not provide this information for transport planning purposes, therefore it is unlikely to be appropriate to use it.
- Secondly, postcodes in Sydney tend to be coarse, making it unhelpful for close-in analysis of prospective pedestrian and bicycle catchments; and further away, this coarseness makes it difficult to establish whether a group of students could reasonably be expected to use transit. Using data below postcode level is inappropriate from a privacy perspective.

Further, bus operators (and their regulator/funder, TfNSW) are sensitive to changing demands within their area of operations. Where pockets of a catchment gain families sending students to a particular school, generating a demand for travel, in the ordinary course of business there is a hierarchy of actions to address this:

- Can the demand use regular scheduled services? Buses to rail?
- If not, can existing school services be amended to meet demand?
- If not, can new services be provided?

Operators / TfNSW also monitor existing services for adequacy of capacity to meet demand.

Therefore, it is unlikely that a catchment analysis will uncover anything that TfNSW and/or operators are currently unaware of, and working to address.

The GTP indicates this at **Section 3.2.2.**

It's also worth noting that the school is well established in this location and this mode of operation – this suggests that the current day student and staff mode shares are broadly indicative of the accessibility conditions they face as part of their journeys to and from the College. The approach to mode share target setting, as set out in the GTP, is one of continuous improvement:

- Develop mode share targets based on incremental adjustments to existing mode shares
- Implement GTP measures and elements
- Monitor the situation in terms of operational measures and mode shares
- Where targets are not being achieved over time, implement diagnostic process to identify specific causes
- Implement remediation measures
- Monitor
- When targets are achieved, develop fresh targets based on the situation at the time.

In terms of people living close to the College, the GTP provides a description and analysis of pedestrian conditions around the site, identifying a number of favourable features, such as permeability of the site (refer to Section 2.6 of the GTP).

The bicycle network, including proposed improvements, is described in Section 2.5 of the GTP.

Identifying the number of staff and students within reasonable walking/cycling distance [of the College]

Response

As confirmed in both the original masterplan traffic report which included mode of travel surveys of staff and students and the Green Travel Plan report, the nature of the college is that it has a large draw from areas outside the immediate locality as is the case for many of the GPS schools.

It is unclear how the percentage of staff / students within a reasonable walking / cycling distance of the College would provide any further improvement to the work undertaken in all reporting thus far.

Staged mode share targets for staff and students which reflect a commitment to increase non-car mode share for travel to and from the site

Response

The Mode Share Targets are specifically detailed in the Green Travel Plan report in **Section 5.3**.

Include strategies that encourage the use of public and active transport and discourage the use of single occupant car travel to access the site: for staff and students

Response

This is specifically covered in the Green Travel Plan report in **Section 6.4**.

Include the provision of bicycle parking, dedicated end of trip facilities including but not limited to lockers, showers and change rooms and e-bike charging station(s) for staff and students to support an increase in non-car mode share for travel to and from the site

Response

The College currently has trip end facilities available as noted in the GTP at **Section 6.4.2**. Provision of dedicated facilities – over and above the current change rooms and showers – is not a sustainable suggestion, using scarce resources to duplicate existing facilities and imposing unnecessary costs on the College. This is particular the case for this specific proposal with no increase in staff or student demands.

Provision of an e-bike charging station on site – could be investigated further and GTP amended. There is a mechanism in the GTP at Section 6.4.2 to monitor bicycle demand and to provide additional parking spaces, if justified by demand.

Prepare a Transport Access Guide for staff and students providing information about the range of travel modes, access arrangements and supporting facilities that service the site

Response

The College currently provides travel information on its website (refer to **Sections 6.1** and **6.4.1** of the GTP). This is updated from time to time to reflect improvements and downgrades to the transport network around the school and has been updated to reflect the recent reinstatement of the previously withdrawn ferry services.

The GTP currently recommends the development of a Transport Access Guide for the College (refer **Sections 6.4.1, 6.6.3** and **6.7** of the GTP).

Determine a communication strategy for engaging with students, staff and visitors regarding public and active transport use to the site and the proportion of the health and well-being benefits of active and non-car travel to the site.

Response

The GTP provides an outline of plan operation and interfaces for communication with site users at **Section 6.7**.

The GTP also indicates the potential for part of a PDHPE class to look at health benefits of active transport at **Section 6.4.1**.

The communications strategy can be fleshed out further.

The Applicant shall submit a copy of the Green Travel Plan to TfNSW at development.sco@transport.nsw.gov.au and Council for endorsement prior to the issue of the first Occupation Certificate.

Noted

I trust the above assists and I look forward to discussing further in the future.

Yours sincerely



DEAN BRODIE

Managing Director