



Reference: 21.185r02v02

9 May 2022

St Aloysius
C/- PMDL
PO Box 1456
CROWS NEST NSW 2065

Attention: Mr Andrew Pender, Practice Director

Re: St Aloysius – Rozelle Campus
Response to Request for Information

Dear Andrew,

We refer to the subject property and proposed school development. TRAFFIX has been forwarded comments from the Department of Planning, Industry and Environment, Transport for NSW and Inner West Council concerning the proposal.

TRAFFIX has reviewed all relevant comments and has responded to each issue below. This is with reference to the Traffic and Accessibility Impact Assessment (TIA) report, which accompanied the Development Application (Ref: 21.185r01v06 dated 29 April 2022).

Additional comments were provided by the Department of Planning, Industry and Environment on 21 April 2022, and this has also been addressed within this statement.

DPIE Response

Item 1. Traffic and Transport and Parking

- *"The Department has reviewed the submitted a Transport and Accessibility Impact Assessment (TAIA) and agrees with the concerns raised by Transport for NSW and Inner West Council in relation to the overall traffic generation, inadequacies of the drop-off/pick-up zones and subsequent impacts on the on-street parking. Consequently, the Department requests that you comprehensively address all of these matters and those raised in the community submissions."*

TRAFFIX Response:

This statement addresses the concerns raised by the Transport for NSW and Council in conjunction with the update TAIA. This includes responses to the drop off and pick up arrangement and on-street parking.



- *“Additionally, the Department notes that the traffic and on-street parking surveys were conducted during COVID-19 lockdown period on 7 October 2021. Therefore, the results may not reflect the usual amount of traffic and available on-street parking. The Department considers that the traffic surveys should be re-conducted due to this reason and the TAIA amended accordingly.”*

TRAFFIX Response:

Additional parking surveys were conducted in the streets surrounding the proposed development on 10 February 2022 and reference should be made to the updated TAIA which analyses the recent survey results. It should be noted that the surveys reinforced the availability of parking along the western kerbside of Maney Street to allow for the on-street parent pick up and drop off. Therefore, the proposed on-street pick up and drop off zone does not significantly impact on-street parking availability.

- *“The EIS does not include any details of the use of the ground floor of 2A-2B Gordon Street, nor does it indicate how many parking spaces would be required to cater for the other uses within the site including the church use. The TAIA also does not assess how the overall car parking area would operate with the concurrent uses on the site and whether the available car parking spaces are sufficient to cater for all of the uses within the site. Consequently, the Department requests that you submit a parking layout plan and mark the nominated parking spaces for the proposed development as well as all of the other uses within the site.”*

TRAFFIX Response:

As detailed within the updated TAIA, the school will be leasing four (4) spaces from the existing on-site carpark at 2B Gordon Street, Rozelle. Section 7.1 of the TAIA has been revised to address the other uses on site and how the peak parking demands of these uses will not coincide with the school use. Additionally, the four (4) spaces will be signposted for school use only during school hours. Please refer to the plan of management and the updated TAIA which addresses this arrangement in further detail. Therefore, the proposed parking arrangement will accommodate all existing and proposed demands on-site.

TfNSW Response

Traffic Model

- *“The report does not include evidence of any model calibration and validation to enable a critical assessment of the traffic impacts of the intersection at Victoria Road and Gordon Street. When validating the model, the Applicant should demonstrate that the model meets the requirements of TfNSW Traffic Modelling Guidelines.”*

Recommendation: The Applicant should submit details to TfNSW for acceptance, of the baseline conditions and will be assessed to be satisfactorily validated for the various school time periods of the day, in accordance with the procedures set out in the models' reference publication. TfNSW requests an electronic copy of the SIDRA modelling files for review and verification, to be provided as part of the 'Response to Submissions' (RtS).

TRAFFIX Response:

The TAIA has clarified the intersection modelling by INCLUDING Section 7.2 Existing Intersection Operation with analysis of how the model of the existing intersections was calibrated and validated. The following methods were used to ensure the model reflects the current intersection operations:



- SCATS traffic volume data was obtained for the intersection of Victoria Road and Gordon Street for 17 October 2019. This data was used to ensure pre-COVID traffic volumes were accounted for in the model by scaling the intersection turning counts based on the higher volumes observed in 2019.
- The model used accurate phasing times based on the 2019 SCTAS data which accounts for pre-COVID conditions.
- Queue length surveys were conducted in addition to the intersections surveys and the model accurately reflects these queue lengths. Reference should be made to the TAIA report which contains the queue length surveys as an attachment.

Therefore, through the above methodology, the SIDRA 9 model has been appropriately calibrated and validated.

Shuttle Bus

- *"It is proposed that pick-up and drop-off by the private coach, be conducted from the public bus stop located along the southern side of Victoria Road at Evans Street (Stop ID: 203922)."*
- *"Safety and Performance is one of the six key outcomes identified in Future Transport 2056. With the release of the NSW Road Safety Plan 2021, TfNSW has set a long-term goal for a trauma-free transport network by 2056 and a 'Towards Zero' vision for NSW."*
- *"The westbound kerbside lane of Victoria Road is subject to Clearway Restrictions between 0600-1000 and 1500-1900 Monday to Friday and between 0800 to 2000 Saturday and Sunday. Dwell times associated with the boarding and alighting of students would cause unacceptable delays. Furthermore, there is no layover area for a pick-up and the marshalling of any buses on the classified road network is unacceptable."*

Recommendation: As part of the RtS, the Applicant should detail how school shuttle buses can be accommodated near the school without undertaking these activities on the classified road network – such as the local road network.

TRAFFIX Response:

The school is now proposing to use two 7.7m long Mitsubishi Fuso Rosa vehicles for the shuttle service between the Kirribilli and Rozelle campuses, which will drop off and pick up the students within the car park at 2B Gordon Street. Therefore, the proposed school will not be using bus stops along Victoria Road for the school shuttle. Further details regarding the operation of the bus can be found in the updated TAIA.

School Operation Management Plan

- *"The proposed development relies on managing students from Victoria Road by bus and those crossing Gordon Street which have to be encouraged to cross at Victoria Road. It is unlikely that this can be safely managed and relies on a staff member to be always present. The consequences are that students may cross midblock between stationary vehicles queued back from Victoria Road."*
- *"The traffic model output indicates that queues will extend down Gordon Street beyond the school. Furthermore, it is noted that Levels of Service (LoS) leaving Gordon Street on approach to Victoria Road is LoS(E) and LoS(F) which is an environment inappropriate for students where the footpaths are narrow."*

Recommendation: TfNSW requests that the Applicant addresses this as part of the RtS."



TRAFFIX Response:

The TAIA and Plan of Management have been updated to provide information on where staff supervision will be occurring during student arrival and departure to ensure the safety of students and minimise the impact of the students on pedestrians and other road users. In addition, the school will limit the number of times students are required to cross Gordon Street for class to a maximum of once per day in each direction, which will also be conducted under staff supervision. Therefore, the school is expected to safely manage students when arriving and departing the school and walking between site as well as minimise the impacts on other road users.

The SIDRA model has now also been updated to reflect the expected number of pedestrians during the peak period being the afternoon pick-up period. The modelling shows satisfactory operation of the intersection with the increased pedestrian volumes. The details of the updated modelling can be found within the TAIA.

School Pick-up and Drop-off Arrangement

- *"There is no identified location where students can be picked up or dropped off either by car or bus. The pick-up and drop areas should be located where pedestrian and vehicular conflicts are minimised. The location should consider and incorporate all aspects of student safety, convenience, and comfort."*
- *"Drop off and pick up zones should be exclusively available for use during the facility's operating hours with spaces clearly marked accordingly, close to school to avoid unnecessary circulation and re-entering the classified road network."*
- *"All access for students should be provided via the local road network and the access point on the local road should be as far as possible away from classified road (Victoria Road) and existing signalised intersection (Victoria Road / Gordon Street)."*

Recommendation: It is requested that the Applicant be conditioned to undertake a Road Safety Audit (RSA) for the school pick-up and drop off area in accordance with Austroads Guide to Road Safety Part 6: Managing Road Safety Audits and Austroads Guide to Road Safety Part 6A: Implementing Road Safety Audits. The RSA is to be undertaken by an independent, TfNSW accredited, road safety auditor. Based on the results of the Road Safety Audit, the applicant shall review mitigation measures for the operational plan, bus shuttle operation, and determine a suitable pick-up / drop-off location for students.

TRAFFIX Response:

The proposed drop-off and pick-up spaces have been shifted north in location along Maney Street along the school building frontage. This will ensure that any queues do not impact the intersection of Quirk Street and Manney Street. In addition, the school proposes to station a staff member at this location during the drop-off and pick-up times to ensure cars do not park in these spaces for longer than the signposted period. The updated TAIA includes the proposed management arrangement.

With regard to the times required for the drop off and pick up zone, other schools in the local area provide a 30 minute period before and after school. This is considered sufficient for the proposed school campus which will be actively encouraging students to use alternative modes of transport to and from school. Therefore, it is not considered necessary to have this zone reserved for all day use by the school as it can be used for public on-street parking outside of the times or resident parking as Maney Street is part of the resident parking scheme in the local area.



With regard to pedestrian access, students from the drop-off and pick-up zone will be directed along the local road network to enter the school so students do not use Victoria Road. Students will be required to walk along and across Victoria Road to access the city bound bus stops.

A road safety audit can be prepared for the drop-off and pick-up zone as part of an appropriate condition of consent.

Swept Paths

- *"TfNSW notes that the submitted swept paths for vehicles entering the two locations on Gordon Street are not acceptable in their current form (appendix E and F in the Transport Impact Assessment)."*

Recommendation: TfNSW requests that the Applicant addresses this as part of the RtS in which the swept paths showing vehicle entering and exiting the roadway using the current driveways and line-marking through Gordon Street.

TRAFFIX Response:

The updated swept paths are included in the updated TAIA report.

Council Response

Traffic Signals and Pedestrian Safety

- *"Objection to the proposal as an intersection modelling assessment, at the Gordon Street and Victoria Road traffic signals, addressing the additional pedestrian movement between the two school buildings throughout the operating hours of the proposed campus, has not been provided. Additional movement is expected to impact the level of service on Gordon Street."*
- *"The issue of pedestrian safety has not been addressed for students or staff moving between the two sites as there is a likelihood of pedestrians jaywalking."*

TRAFFIX Response:

As per the response above the school will limit the number of times students crossing Gordon Street during school hours and will conduct these transfers under staff supervision. However, as the transfers will occur outside of network peak periods the impact will not significantly impact network performance during the critical peak periods. In addition, the pedestrian movements across Victoria Road during the student arrival and departures have been incorporated into the model.

Finally, as the transfers will be conducted under staff supervision students will not be permitted to jaywalk when crossing between the two sites.

Pick-up/drop-off Area and Congestion

- *"Objection to the proposed pickup/drop off area provided in Maney Street, as this would result in the loss of existing 2P Resident Parking Scheme areas."*
- *"Additionally, this arrangement would create the possibility of vehicles queuing in Quirk Street and blocking off the street. The same queuing issue also applies in Gordon Street, which is a Regional Road carrying about 3,000 vehicles per day."*



- *"The TAIA only depicts one pick-up/drop-off route to the proposed pick-up/drop/off area in Maney Street, i.e., via Victoria Road. No details regarding alternative routes and potential impacts on existing traffic have been provided should staff or students arrive from other directions."*

TRAFFIX Response:

The school will manage the drop-off and pick-up area by ensuring that a staff member is always stationed at this location during the half hour period in the morning and afternoon during which set down and pick up occurs. The staff member will ensure that cars do not parking in that space and only stop for the allocated amount of time, ensuring that vehicles are kept moving.

Further, a secondary parking survey was conducted in the vicinity of the school outside of any Covid restrictions. The parking surveys showed there were sufficient vacancies in on-street parking during the morning drop off period and the afternoon pick-up period to accommodate the three (3) proposed on-street set down spaces. In addition, the zone was relocated further north along Maney Street away from the intersection with Quirk Street to minimise any potential for queuing. The updated TAIA contains a sensitivity analysis of the capacity of the on-street drop-off and pick-up spaces which shows that the spaces are able to accommodate a demand of 45 vehicles in 30 minutes based on a two-minute dwell time, this demonstrated that all expected demand will be met by the provision of these three (3) on-street spaces.

Maney Street is accessed via a small number of routes, noting that Gordon Street is restricted to one-way traffic north of Prince Street and Quick Street at Victoria Road is currently closed off to traffic due to WestConnex construction. These routes are further detail in the TAIA.

On-Street Parking, Traffic Movement and Congestion

- *"Parking availability during morning and afternoon peak hours on surrounding streets indicates about 70% occupancy. This reflects a parking threshold where an increasing proportion of vehicles are looking for a parking space in the area.*

Objection is raised as there are narrow end-end streets with inadequate turning areas, such as Prince Street and Quirk Street (west of Gordon Street), which will result in unnecessary localised congestion as the narrow width of these streets do not allow for two-way passing."

TRAFFIX Response:

The additional parking surveys conducted in the streets surrounding the proposed development on 10 February 2022 show that there is sufficient capacity to accommodate the three (3) proposed drop off and pick up spaces. Refer to the updated TAIA for the detailed survey analysis. The revised location for the drop-off and pick-up spaces are along the site frontage to Maney Street, away from the intersection of Quirk Street.

Vehicle routes to and from the drop-off and pick-up zone are provided within the TAIA and in the response above demonstrate how parents can access this set down area.

The use of the relocated drop off zone is not expected to cause queuing on Maney Street. A sensitivity analysis has been conducted within the TAIA to demonstrate the capacity of the zone is much more than the expected use of the zone.

The proposed on-street parking area would be signposted for use for half an hour in the morning and afternoon before and after school as per other schools in the area. This is expected to have limited



impact on the resident parking scheme as the Maney Street frontage is not fully utilised during the times proposed and as such not currently used for resident parking during these times.

Therefore, the proposed drop off and pick up zone is not expected to significantly impact on-street parking violability in the area.

- *"The TAIA does not discuss the loss of existing parking on the site."*

TRAFFIX Response:

There is no loss of parking on-site. The approval for the Genesian Theatre required the existing car park to be line marked to provide a compliant parking arrangement in accordance with AS 2890.1. This arrangement provides 16 parking space of which four (4) will be leased and allocated to the school during school hours only.

As discussed above, signage will be provided for these four spaces to indicate that they are to be used by the school only during the school hours. The other uses on site will not have their peak parking demands occur concurrently with school operating hours.

Shuttle Bus Provision

- *"Objection is raised to the proposed use of Bus Zones in Victoria Road for set down or pickup of passengers. Private coaches are not permitted to use these Bus Zones and no alternative has been provided."*

Note: Gordon Street has an existing truck load limit of 4 tonnes. Allowing shuttle bus movements will affect residential amenity and would further exacerbate congestion and vehicle movement."

TRAFFIX Response:

As discussed above in this statement, the arrangements for drop-off and pick-up by private coach using the bus zone on Victoria Road have been altered. The school now proposes to accommodate a Mitsubishi Fuso Rosa within the carpark at 2B Gordon Street, Rozelle. Two (2) Fuso Rosa vehicles will conduct a trip each in both the morning drop-off period and the afternoon pick-up period. The proposed operational arrangements of this service are detailed within the TAIA.

Traffic and Parking Comments

- *"Assumption of the traffic distribution is based on the Kirribilli campus and certain proportion of students with shorter travel distances that would opt to be driven to the proposed college."*
- *"The peak car travel in the AM is 44 vehicles. The report mentions that the proposal will result in 8 vehicles arriving during a 30-minute period, which is considered conservative. In particular, the proposed new Campus may result in additional students from the locality, which may not use the proposed shuttle bus service or public transport."*

TRAFFIX Response:

The school does not expect that the new campus will alter the existing catchment of the school, noting that the expected population would be one year group out of the school cohort and therefore student will spend most of their schooling at the Kirribilli campus. Travel mode surveys indicate that an



overwhelming majority of students catch public transport to the campus in Kirribilli and this behaviour is not expected to significantly alter for the proposed campus.

- *"The proposed four (4) off-street parking spaces are in conflict with other uses on the subject site. In this regard, the TAIA does not provide details with regard to the existing and approved uses at No. 2A and 2B Gordon Street. The TAIA does not provide details of how the off-street parking spaces at this site will be allocated between the proposed school, out-of-hours uses of the church and school, and rehearsals and events at No. 2A and 2B Gordon Street, St Joseph's Church and any other uses on site. On-street parking in surrounding streets are in high demand throughout the day. The TAIA does not provide sufficient details with regard to construction traffic impacts and management.*
- *Insufficient information has been provided with regard to predicted construction vehicle movements, in particular larger vehicles and trucks that cannot access the two sites and how this will be managed in coordination with other construction occurring in the area, and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated as required by SEARS. It should be noted that works for WestConnex Rozelle Interchange and the Rozelle Parkland will continue beyond 2023."*

TRAFFIX Response:

As detailed above, the school will be leasing four (4) spaces from the existing on-site carpark at 2B Gordon Street, Rozelle. This site consists of several buildings which include a place of worship, community college and a theatre development. The other use will not have significant parking demands occur during the school operational hours and therefore the 16 spaces on-site will be sufficient to accommodate all parking demands during school hours.

Most construction works will be fit out and finishes of the existing buildings which will be primarily by subcontractors who can park within the sites. The construction will only require trucks during the structure stage for the lift core and concrete pours for the playground. These works will require additional traffic management arrangements but are likely to be short term and out of peak hours as road closures on Gordon Street may be required. However, this particular stage of works will be subject to separate traffic management which will be reviewed by Council and TfNSW as part of an appropriate condition of consent. Therefore, no additional is considered at this stage and cannot be provided until such time the builder is engaged.

- *The TAIA should be updated to include measures proposed to ameliorate adverse impacts on the traffic movement, congestion and on-street parking. In addition to the objections and concerns raised above, a list of works that should be considered are:*
 - *Quality end-of-trip bicycle facility (e.g., lockers, showers, changing rooms, repair equipment) be provided to students, staff and visitors.*
 - *A sheltered bicycle rack area*

TRAFFIX Response:

Based on previous surveys of the existing school campus cycling has had an almost negligible uptake and therefore the proposed bicycle parking and end of trip facilities are considered sufficient for the expected demand.



- A Green Travel Plan be provided, which should be required to be updated at regular intervals to encourage the use of the existing bicycle and walking network.

TRAFFIX Response:

The Green Travel Plan to be provided as part of a condition of consent will detail targets for alternative transport use and will be reviewed regularly to ensure targets are being met and to adjust strategies as necessary, as detailed in the TAIA.

- Kerb extension be provided in the east side of Gordon Street and an RMS spec pedestrian fencing be provided to stop jaywalking. Council will not consider approving a crossing facility across Gordon Street.

TRAFFIX Response:

As this affects the operation of an intersection under Transport for NSW's authority this would be subject to their approval process and is not necessary for the approval of this development.

- Additional requirement for a 40km/h school zone in Gordon Street be provided.
- In this regard, should the development be approved, an application to Transport for NSW will be required for necessary school zone implementation.

TRAFFIX Response:

This will be subject to a separate process with Transport for NSW that will proceed once the school is approved.

- Provision for EV charging facility (3-phase power) and car share spaces within the off-street carpark.

TRAFFIX Response:

The carpark is already approved as part of a separate DA application, which did not require electric vehicle infrastructure and no design changes are proposed to the approved carpark as part of this application. In addition, the spaces are only for school use during school hours and outside of these uses will be for other uses on site. Therefore, the development is not able to provide electric vehicle infrastructure for the proposed development.

Similarly, car share spaces will not be possible as only four spaces will be leased and outside of the operating hours of the school, will be required for other uses on-site.

DPIE Response to Submissions

- "Pedestrian routes - Please amend the TAIA to include details of the footpath widths and also include such details on the site plan."



TRAFFIX Response:

Section 4.3.1 of the updated TAIA has been amended to provide additional information regarding footpath widths. This includes a figure showing the respective widths of all the key footpaths that will be utilised by students for access to and from the school and the drop-off and pick-up area.

- *"Drop Off and Pick Up (DOPU) - A DOPU zone is proposed on the western side of Maney Street. In this regard, please provide a scaled plan to indicate the accurate location and length of the proposed DOPU zone."*

TRAFFIX Response:

As part of the updated TAIA, a scale plan has been prepared showing the location of the proposed drop-off and pick-up area. This is provided within Section 11.3 of the updated TAIA.

- *"Car parking spaces - Insufficient information has been provided to clarify the allocation of car parking spaces on the subject site. Appendix G states that the peak parking demands of other uses on the site will not coincide with the school use. However, according to the Operational Plan of Management, the other uses of the site operate during school hours. The TAIA should provide the details of allocated parking for each use on the site including the number of parking spots allocated for the use of the unit which is proposed to be used as the school in the future. In addition to clarifying the allocation, the TAIA should also assess the impacts of allocation of 4 spaces to the school, on the other concurrent uses within the site. This information was requested during EIS exhibition, but has not been provided."*

TRAFFIX Response:

The school has prepared a parking plan which provides an overview of the parking demands at different times during the week. This plan demonstrates the parking demands for the different uses on the site do not exceed the parking existing parking provision of 19 spaces. Therefore, the four spaces required by the school can be accommodated within the existing parking provision and the concurrent parking demands. Further details can be found in Section 7.1 and Appendix D of the TAIA

- *"Mitigation measures – Should the TAIA identify that the allocation of 4 spaces for school use may result in adverse impacts on the other uses within the site, the RfS should then identify the measures that will be taken to minimise such impacts on the other users and neighbouring properties."*

TRAFFIX Response:

As per the above response all existing and proposed parking demands will be accommodated on-site. As such, no adverse impacts from the proposed development are expected to result.

- *"The revised TAIA should also include the consideration of the other DOPU alternatives, if Council does not agree to the proposed DOPU zone."*

TRAFFIX Response:

Council raised no concerns regarding the proposed drop-off and pick-up area in the meeting held with them to discuss the DOPU arrangements. As such, no alternative DOPU arrangements are considered necessary.



- *"Appendix G refers to residential development. It needs to be amended to reflect the correct proposal."*

TRAFFIX Response:

This has been addressed above in this updated response.

- *"Please provide an electronic copy of the SIDRA modelling files as previously required by TfNSW.."*

TRAFFIX Response:

The relevant SIDRA file will accompany the updated TAIA and updated RFI statement submission for review by DPIE.

- *"TAIA proposes that the shuttle service between the Kirribilli and Rozelle campuses will drop off and pick up the students within the car park at 2A/B Gordon Street. The updated swept paths for vehicles entering and exiting 2A/B Gordon Street show that the vehicle body envelope will collide with the bollards around the existing pad mount (See the screenshot below), which is unacceptable. Additionally, it is better to consider a 600mm Clearance Envelope for the shuttles. Please provide additional information to address this issue.."*

TRAFFIX Response:

The swept paths have been revised to be clear of the bollard area and this is provided within Appendix H of the revised TAIA. The swept path analysis shows satisfactory movements with no encroachment of bollards into the manoeuvring area for the vehicle.

- *"Council stipulates that Gordon Street has an existing truckload limit of 4 tonnes. In this regard, the RtS should verify whether the Shuttle bus complies with this limit."*

TRAFFIX Response:

Based on discussions with TfNSW, this restriction only applies to through traffic not traffic with a specific destination on Gordon Street. Nonetheless we have reviewed the shuttle bus vehicle being a Mitsubishi Fuso Rosa and as per manufacturers specifications, it weighs 3,955 kilograms unloaded.

- *"TAIA, on page 26, states that the development proposes 12 space bicycle rack; however, on page 37, the provision of 10 space bicycle rack is presented. Please rectify the inconsistency within the document."*

TRAFFIX Response:

This has been clarified on Page 26 and page 37 of the amended TAIA. A total of 12 bicycle parking spaces are provided in the form of bicycle racks.



Summary

The proposed development complies with the relevant parking requirements and is expected to operate satisfactorily with minimal traffic impacts. Continued support is therefore given on transport planning grounds.

We trust the above is of assistance and please don't hesitate to contact the undersigned should you have any queries.

Yours faithfully,

Traffix

Hayden Dimitrovski
Senior Engineer