



**Transport
for NSW**

Our Reference: SYD21/00666/03
DPIE Reference: SSD-27208140

07 December 2021

Ms. Kiersten Fishburn
Director, Social and Other Infrastructure Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Nahid Mahmud

Dear Ms Fishburn,

**ST ALOYSIUS COLLEGE, ROZELLE CAMPUS
48 VICTORIA ROAD AND 2A-2B GORDON STREET, ROZELLE**

Thank you for requesting Transport for NSW (TfNSW) to review the Environmental Impact Statement and Appendices for SSD-27208140 St Aloysius College, Rozelle.

TfNSW has reviewed the submitted documentation and provides the Department comments for consideration in **TAB A** and suggested conditions of consent in **TAB B**.

If you have any further inquiries in relation to the above, please contact Brett Morrison, Development Assessment Officer via email at: development.sydney@transport.nsw.gov.au.

Yours sincerely,

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

Brendan Pegg
Senior Land Use Planner
Planning and Programs, Greater Sydney Division

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TAB A – General comments

Traffic Model

Comment:

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).

Shuttle Bus

Comment:

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.

School Operation Management Plan

Comment:

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.

School pick-up and drop-off Arrangement

Comment:

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.

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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.

Swept Paths

Comment:

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.

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TAB B – Suggested conditions of consent

40km/h Speed Zones

Comment:

A significant number of vehicles and pedestrians will access the site at the start and end of the school day. School Zones must be installed along all roads with a direct access point (either pedestrian or vehicular) from the school. School Zones must not be provided along roads adjacent to the school without a direct access point. Road Safety precautions and parking zones should be incorporated into the neighbouring local road network.

Recommendation:

TfNSW requests that the following condition is included in any consent issued by the Department:

TfNSW are responsible for speed management along all public roads within the State of New South Wales. That is, TfNSW is the only authorised organisation that can approve speed zoning changes and authorise installation of speed zoning traffic control devices on the road network within New South Wales.

Therefore, the Developer must obtain written authorisation from TfNSW to install the School Zone signs and associated pavement markings and / or remove / relocate any existing Speed Limit signs. To obtain authorisation, the Developer must submit the following for review and approval by TfNSW, at least eight (8) weeks prior to student occupation of the site:

- A copy of the development's Conditions of Consent
- The proposed school commencement / opening date

Two (2) sets of detailed design plans showing the following:

- School property boundaries
- All adjacent road roadways to the school property
- All proposed school access points to the public road network and any conditions imposed / proposed on their use
- All existing and proposed pedestrian crossing facilities on the adjacent road network
- All existing and proposed traffic control devices and pavement markings on the adjacent road network (including School Zone signs and pavement markings).
- All existing and proposed street furniture and street trees.

School Zone signs and pavement marking patches must be installed in accordance with TfNSW approval / authorisation, guidelines and specifications.

All School Zone signs and pavement markings must be installed prior to student occupation of the site.

The Developer must maintain records of all dates in relation to installing, altering, removing traffic control devices related to speed.

Following installation of all School Zone signs and pavement markings the Developer must arrange an inspection with TfNSW for formal handover of the assets to TfNSW. The installation date information must also be provided to TfNSW at the same time. Note: Until the assets are formally handed over and accepted by TfNSW, TfNSW takes no responsibility for the School Zones / assets.

Green Travel Plan

Comment:

TfNSW has reviewed the Traffic Report including a reference to a Green Travel Plan (GTP) for the proposed development, noting that the Applicant has a plan to undertake a GTP. TfNSW provides the following advice for consideration in preparing the GTP:

- Objectives: TfNSW notes the objectives of a GTP provided in the TIA. When preparing a Green Travel Plan, measures must ensure that non-private vehicular modes of transport are the preferred mode of travel to / from the project site. The GTP should include objectives to reduce the proportion of single-occupant car travel by staff and students to and from the site and increase the mode share of public transport and active transport for the life of the development. These objectives need to be met within the subject development's Implementation Strategy (listed below) and Implementation Plan initiatives.

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- Mode share targets: TfNSW notes that the Traffic Report provides a mode share table to identify and provide existing and future mode share targets for staff and students to take sustainable active and public transport travel to and from the site. Given the very close proximity of the site to buses and pedestrian routes, TfNSW recommends that a mode share table be done for both short and long term goals for students, staff and visitors to the site. Please consult TfNSW website [Travel Plan Toolkit](#) and [Travel Plan template](#) for further information.
- Parking management strategy: TfNSW requests that the GTP also considers implementation of a parking management strategy that prioritises use by staff on a needs basis, and that the strategy actively encourages staff to use the sustainable transport options that are available.
- Travel Access Guide: TfNSW requests that a separate TAG be placed as an appendix in the GTP. The TAG should include separate route maps of all modes of transport; buses (private and public), trains, walking, as well as times for these public transport options. The TAG should also:
 - Include a map and key messages/rules around the Kiss and Drop zone rules for parents and students.
 - Provide information advising students and staff that additional information about service routes and timetables for buses and trains is available on the Trip Planner at transportnsw.info/
 - Provide information advising students that additional information about walking routes is available on the Trip Planner at transportnsw.info/
 - Update number and location of End of Trip facilities (bike racks, showers, lockers, change rooms) and locate on map.
 - Provide times and stop locations for shuttles from Kirribilli Campus to Rozelle Campus.
 - For further helpful information – please check this link [How to Create a Travel Access Guide doc here](#).
 - Monitor and measure the GTP through an annual travel survey, and these should be undertaken with a focus to establish travel patterns including mode share of trips to and from the site. These surveys should be undertaken every year and when future transport upgrades take place. To further help monitor and measure the increase in public transport use, TfNSW would recommend:
 - An additional weekly report of patronage using Opal data to and from the school (as well as data from private bus companies running additional buses).
 - Traffic volumes can also be assessed on the road network within the school area, before and after school. These could be monitored to assess whether:
 - Students and staff are re-moding private vehicles to buses.
 - Traffic volumes during peak hours had reduced.
- End of trip (EOT) facilities: TfNSW requests that the development includes proposed school end of trip facilities such as bike racks, showers and change rooms. The locations of the end-of-trip facilities such as bike racks, showers, lockers and change rooms should be promoted in the Travel Access Guide (TAG). This will enable staff and students to store their teaching material/resources and exercise gear in a safe and secure location. Given the hotter temperatures in summer, we recommend the proposed numbers of showers to be 4 showers and 2 change rooms (total). This would mean 2 x showers plus 1 x change room for staff and the same amount for students. These facilities should be promoted within your Implementation Plan listed below. Please also find a resource from our website on this link for [end of trip facilities](#).
- Implementation Strategy: TfNSW requests that the GTP includes an Implementation Strategy with an Implementation Plan of tasks and actions for the subject development's sustainable transport initiatives and incentives, timing and completion dates, who from the school will be completing the tasks and when they will be completing them. The Implementation Plan should include your communications tasks, and who will do the tasks. The idea of Travel Plan Coordinator and supporting team is encouraged here to make sure these actions are completed. Tightening up the Implementation Plan with these steps will ensure the overall effectiveness of the GTP. This Implementation Plan should be updated both on an annual basis, and when future transport services and pathways eventuate. The GTP Implementation Plan should include your stakeholder engagement strategy (including all stakeholders, key messages and the channels you will use to engage your stakeholders).
- Incentives: TfNSW suggests that the following incentives is included in the Implementation Strategy further possible incentives for staff to use active and public transport such as:

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- Pre-loaded Opal cards during orientation.
- School subsidised panniers or backpacks for staff committed to active travel.
- Time in staff meetings to share tips and support for staff wanting to start walking to and from school.
- Wayfinding at the school for End of Trip facilities locating where showers, lockers and change rooms are.

Additional initiatives to promote additional use of active travel, such as:

- Holding competitions and offering prizes for staff and students that walk to school e.g. September.
- Promoting active travel as a means to support staff and student's health and wellbeing.
- Promoting to parents the potential of active travel to school as an opportunity to stay active themselves.
- Cycling education initiatives within the school in the Implementation Plan for the GTP, potentially integrated with the physical education curriculum.

Please consult the TfNSW MySydney website for more examples of proven travel demand measures for active and public transport for the preparation of the GTP soft activities and hard activities.

Recommendation:

TfNSW requests that the Applicant is conditioned to prepare a GTP and submit the finalised plan to TfNSW prior to the issuing of a completion certificate.

Please send to development.sco@transport.nsw.gov.au.

Construction Pedestrian and Traffic Management Plan (CPTMP)

Comment:

To mitigate any construction impacts to the surrounding classified road network and multiple active development sites, including the State Significant Infrastructure (SSI) projects of Sydney Metro, TfNSW recommends that the Applicant is conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP).

Recommendation:

TfNSW recommends that the Applicant is conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW. The CPTMP shall ensure include the following matters including, but not limited to, the following:

- A description of the development.
- Location of any proposed work zone(s);
- Details of crane arrangements including location of any crane(s) and crane movement plan.
- Haulage routes.
- Proposed construction hours.
- Predicted number of construction vehicle movements, detail of vehicle types and demonstrate that proposed construction vehicle movements can work within the context of road changes in the surrounding area, noting that construction vehicle movements are to be minimised during peak periods.
- Construction vehicle access arrangements.
- Construction program and construction methodology, including any construction staging.
- A detailed plan of any proposed hoarding and/or scaffolding.
- Measures to avoid other construction worker vehicle movements in the area.
- Consultation strategy for liaison with surrounding stakeholders, including other developments under construction and TfNSW, Contractor(s) and Operator.
- Identify any potential impacts to general traffic, cyclists, pedestrians, bus services and any light rail within the vicinity of the site from construction vehicles during the construction of the proposed works. Proposed mitigation measures should be clearly identified and included in the CPTMP.
- Identify the cumulative construction activities of the development and other projects within or around the development site, and private developments. Proposed measures to minimise the cumulative impacts on the surrounding road network should be clearly identified and included in the CPTMP; and

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- Provide the builder's direct contact number to TfNSW and small businesses adjoining or impacted by the construction work to resolve issues relating to traffic, public transport, freight, servicing and pedestrian access during construction. The Applicant is responsible for ensuring the builder's direct contact number is current during any stage of construction.

Submit a copy of the final plan to TfNSW for endorsement via development.sco@transport.nsw.gov.au.

The Applicant should submit a copy of the final updated plan to TfNSW for endorsement within two weeks of being notified by TfNSW to update the plan.

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