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Department of Planning, Industry and Environment
12 Darcy Street
Parramatta, NSW

Attention: Prity Cleary

**RESPONSE TO ADDITIONAL INFORMATION REQUEST AND CLARIFICATION
SSD 10371 – TRINITY GRAMMAR SCHOOL**

Dear Prity,

This Letter has been prepared by Willowtree Planning Pty Ltd on behalf of Trinity Grammar School, in relation to SSD 10371, being the State Significant Development Application (SSDA) for the Trinity Grammar School Redevelopment.

Specifically, this Letter is provided in response to the Department of Planning, Industry and Environment (DPIE) request for additional information dated 15 April 2021. This Additional Information Response is supported by the following appendices:

- Appendix 1 – Additional Information Request from DPIE
- Appendix 2 – Traffic Impact Assessment

In addition, this Letter provides clarifications with respect to student numbers, to ensure the Conditions of Consent appropriately support the redevelopment of Trinity Grammar School in accordance with the intent of SSD 10371.

The following subsections address the specific matters raised by DPIE and the required clarifications with respect to student numbers. It is noted that this Letter and its appendices also respond to the discussion items from the meeting with DPIE on 19 May 2021.

If you have any further queries, please do not hesitate to contact the undersigned via email on cwilson@willowtp.com.au.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Chris Wilson", written in a cursive style.

Chris Wilson
Managing Director
Willowtree Planning Pty Ltd
ACN 146 035 707

PART A ADDITIONAL INFORMATION RESPONSE

1. TRAFFIC ANALYSIS

Detailed traffic analysis, including SIDRA modelling, has been undertaken for the following intersections:

- Victoria Street and Liverpool Road;
- Harland Street and Queen Street;
- Service Avenue and Harland Street.

The analysis has adopted the current situation (including the current student population) as the baseline scenario, and has proceeded to model the future scenario based on the proposed student population. This allows for the specific impact associated with the proposal to be identified and mitigated accordingly.

The traffic analysis indicates the current and projected intersection performance as follows:

Table 1. Intersection Performance				
Intersection	Current Level of Service (LoS)		Future LoS	
	AM	PM	AM	PM
Victoria Street and Liverpool Road	A	C	B	C
Harland Street and Queen Street	B	A	B	B
Service Avenue and Harland Street	A	A	A	A

In summary, the SIDRA analysis demonstrates that both the baseline and future scenarios for each of the intersections operate at LoS C or better. Whilst the proposed additional students and staff will have a minor impact on intersection operations, the proposed development would not deteriorate the intersection performance below an overall LoS C. Accordingly, mitigation measures are not required for these intersections.

2. MITIGATION MEASURES

Further assessment has been undertaken of the intersections of Old Canterbury Road with Prospect Road and Hurlstone Road. The updated SIDRA analysis indicates the current and projected intersection performance as follows:

Table 2. Intersection Performance				
Intersection	Current LoS		Future LoS	
	AM	PM	AM	PM
Old Canterbury Road and Prospect Road	D	D	D	D
Old Canterbury Road and Hurlstone Road	D	C	D	C

In summary, the updated SIDRA analysis demonstrates that the intersection of Old Canterbury Road and Prospect Road, operates at LoS D, which would continue as a result of the proposed development. The critical movement is the right-turn from Prospect Road onto Old Canterbury Road, which possesses the highest delay and results in an overall delay of LoS D, with only a minor increase in queuing on prospect Road resulting from the proposed development.

In addition, the intersection of Old Canterbury Road and Hurlstone Road, was found to operate at LoS D and C in the AM and PM peak, respectively, with no change to the overall LoS as a result of the proposed development. The critical movement is the right-turn from the minor road at the intersection (i.e. Hurlstone Road) rather than the dominant movement on the arterial road (i.e. Old Canterbury Road).

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It is noted that slightly higher delays faced by the right-turning movement is a common scenario which generally occurs when a major road such as Old Canterbury Road intersects with local roads. As such, the intersection of Old Canterbury Road operates at an acceptable LoS.

As such, the previously-proposed mitigation measures (including peak clearways on Old Canterbury Road and a banned right-turn into Prospect Road in the PM peak) are not required and have been removed from the application.

The updated SIDRA analysis has also demonstrated that the previously-proposed mitigation measure in the form of intersection works at Prospect Road, will have no impact on the LoS in the future scenario, and only a minor impact on queuing. As such, this mitigation is technically not required, but given the intersection works will provide a broader community benefit with improved pedestrian crossing facilities, the School would like to proceed with these works. Specifically, it is proposed to provide a left-turn lane at the approach of Prospect Road, which would be accommodated within the existing kerb alignment. The proposed works at Prospect Road also provide for a splitter pedestrian refuge (designed to Transport for NSW (TfNSW) Technical Direction) to improve the crossing facilities at this intersection.

3. CONSULTATION

Consultation has been carried out with TfNSW and Council, with the results of the SIDRA analysis presented to the respective consultees. Both TfNSW and Inner West Council provided their written in-principle approval.

Given no amendments are being made to traffic signals, no issues or concerns were raised by TfNSW.

Council made some queries regarding traffic distribution from the carpark, and in response it was clarified that the traffic distribution from the carpark will allow left and right turn movements out, and that this will be captured in the Operational Traffic and Management Plan. Council had concerns regarding the previously-proposed clearways and banned right-turn, but given these mitigations are no longer proposed, Council's concerns have been resolved. Council were supportive of the proposed pedestrian refuge and splitter island for Prospect Road, which continues to be proposed. Council also outlined the process to be followed for any proposed traffic works and public domain works.

4. GREEN TRAVEL PLAN

A more detailed Green Travel Plan (GTP) has been prepared and is provided within **Appendix 2**.

In summary, the GTP provides a clearer approach on the actions required to achieve the target 10% shift in mode share toward sustainable travel by 2030. The core of the strategy to achieve the 2030 target is to:

1. Increase travel by active transport through:
 - Improved cycling facilities (creating 96 bicycle parking spaces on campus);
 - Removing barriers to active travel (e.g. building riders skills and confidence through continuing the mandatory Year 9 rider training and a 'bike bus');
 - Advocating for improved infrastructure (e.g. safe pedestrian crossing facilities to access to public transport services);
 - Participating in activities such as National Walk/ Cycle to Work/ School Days; and
 - Creating cycling communities (e.g. Bicycle User Groups).
2. Increase travel by public transport through:
 - Providing shuttle services between Ashfield and Summer Hill train stations in the AM and PM peaks to assist with the 'last mile'; and
 - Incentivising staff to travel by public transport.
3. Increase use of Trinity bus services through:
 - Continued monitoring of patronage and service levels, and increase as necessary

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4. Reducing the number of car trips (particularly single-occupancy trips) by:
 - Implement carpool initiatives for staff;
 - Promoting public and active transport to school events above car travel/ car parking;
 - Continue to implement flexible learning timetables for Senior years;
 - Implement remote working program for support staff; and
 - Not significantly increasing the level of car parking within the school.

5. Engagement and governance on the GTP through:
 - Consistent and deliberate consultation and engagement with staff, students, parents and stakeholders about transport choices and behaviours;
 - Designating the Head of Operations - Summer Hill role as the responsible person for the plan (with support from others);
 - Embedding a regular reporting, review and monitoring framework for the plan; and
 - Ensuring the School Executive and School Council has full visibility of the GTP progress against targets and actions. This revision of the GTP provides greater clarity on the proposed actions, governance and how implementation of the plan will be resourced.

5. CONCLUSION OF ADDITIONAL INFORMATION RESPONSE

The above sections of this Letter, together with the Traffic Impact Assessment at **Appendix 2** (inclusive of the updated Green Travel Plan), comprehensively address all items from DPIE's Additional Information Request.

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PART B CLARIFICATION ON STUDENT NUMBERS

It is acknowledged that a Condition of Consent will be imposed to limit student numbers to ensure that the School operates acceptably and in accordance with the intention of SSD 10371.

To achieve these objectives and ensure the viability of the School's ongoing operations now into the future, the following wording is proposed:

The maximum number of students permitted in attendance on-site, is limited to 1655.

The phraseology of 'attendance' is correct, being the term established by NSW and Federal legislation.

By contrast, the wording of 'enrolled' is inaccurate and imprecise, given that a student 'enrolled' at Trinity Grammar School may attend any one of three campuses; Summer Hill, Strathfield or Woollamia. As noted above, the correct reference to the student numbers sought to be regulated by the SSD condition, is students in 'attendance' at the Summer Hill campus.

With respect to the monitoring and recording of students in attendance, the School already implements a system of counting on-site attendance, which complies with the following State and Federal legislation:

- *The Education Act 1990*
- *The Australian Education Act 2013*

Pursuant to Section 24 of the *Education Act 1990*, the School is required to maintain a register of daily attendances at the School. For each student, this information includes:

- Daily attendance
- Absence/s
- Reasons for absence/s
- Documentation to substantiate reasons for absence/s

The School's compliance with this requirement is a condition of registration as a non-government school. The NSW Education Standards Authority (NESA) is the regulatory and accountability body that oversees the School's compliance with the *Education Act 1990*.

Further, the Australian *Education Act 2013* requires the School to provide Census data in order to receive recurrent funding. Accurate attendance information is required in order for the School to fulfill this obligation. Provision of false or misleading Census information to the Commonwealth is a serious offence and may result in prosecution.

The following provides an outline of the processes implemented by the School to effectively fulfil these requirements (and which would also ensure compliance with the SSD conditions):

Roll marking process for Kindergarten to Year 6 (K-6):

- Every student's attendance is recorded in the online School Management System by the classroom teacher by 9am.
- These entries are then checked and cross-referenced by administration staff to validate the data.
- All late arrivals and early departures are recorded in the online School Management System by the receptionist as they occur.
- These entries comprise the Register of Attendance for K-6 students.
- On the basis of the Register of Attendance, the School is able to state with absolute confidence, the number of Trinity Grammar K-6 students to have attended the Summer Hill site on any one day.

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Roll marking process for Year 7 to Year 12 (7-12):

- Every student's attendance is recorded in the online School Management System by the classroom teacher at the start of each lesson. This occurs six times in a normal school day.
- If the roll is not completed within ten minutes of the start of the lesson, an automated reminder is sent to the teacher. In Periods 1 and 5, if the roll is not completed by the halfway mark of the lesson, an administrative assistant visits the classroom to remind the teacher to do so.
- All late arrivals and early departures are recorded in the online School Management System by Student Services as they occur.
- These entries comprise the Register of Attendance for 7-12 students.
- On the basis of the Register of Attendance, the School is able to state with absolute confidence, the number of 7-12 Trinity Grammar students to have attended the Summer Hill site on any one day.

Attendance data is recorded in Synergetic, which is the School Management System (SMS) used by Trinity Grammar. As this data constitutes a legal record of Trinity Grammar School, it is held in perpetuity in the School's digital archive.

The School has created a dashboard, using Microsoft Power BI, which makes the attendance data visible. Current practice is to synchronise this data once per day at midnight.

Using the dashboard, the School is able to monitor, interrogate and report on attendance data at the Summer Hill site with varying levels of granularity, as demonstrated on the following screenshot.

A screenshot of the School's database is shown in **Figure 1**, clearly demonstrating how student numbers are counted and recorded.

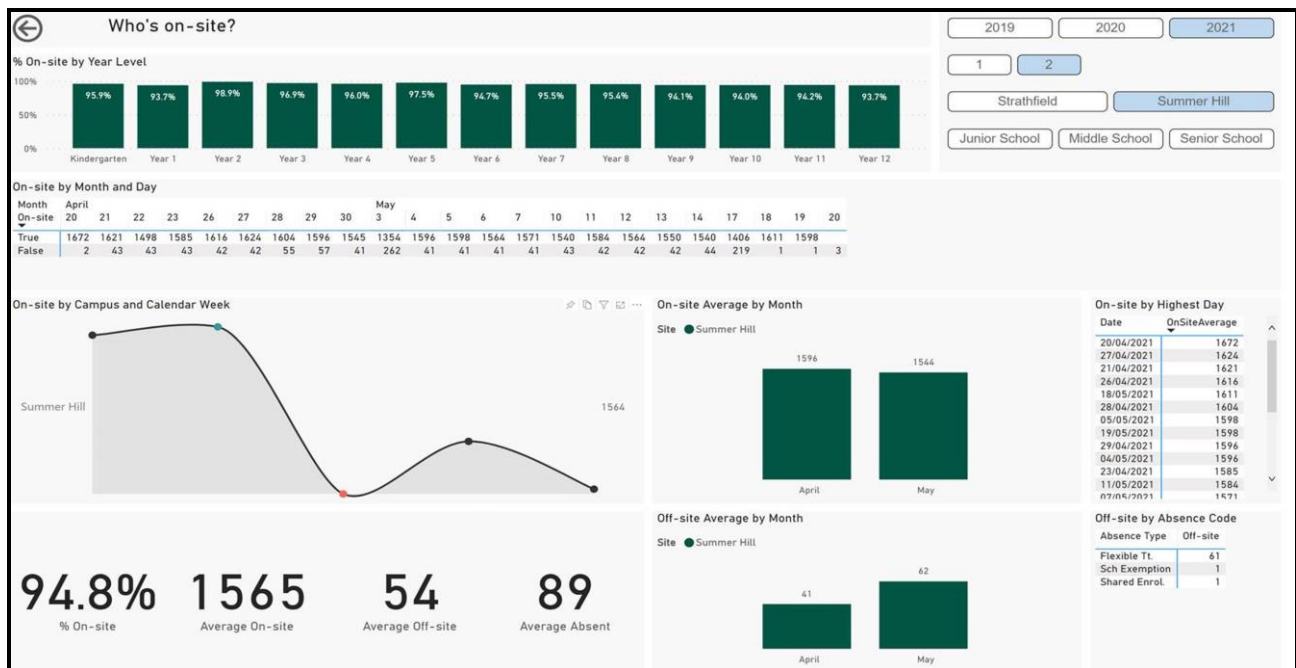


Figure 1. Sample of School's Database

The above section of this Letter adequately justifies the adoption of the wording 'in attendance on-site' with respect to student numbers, and is requested to be included in the Conditions of Consent.