



Trinity Grammar Redevelopment Modification 1

State Significant Development Modification Assessment
(SSD-10371-Mod-1)

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Cover image: View of proposed building from the Victoria Street entry (Source: Department's Assessment Report 2021)

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Glossary

Abbreviation	Definition
Applicant	The Council of Trinity Grammar School
CBD	Central Business District
CIV	Capital Investment Value
Commission	Independent Planning Commission
Council	Inner West Council
Department	Department of Planning and Environment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
LEP	Local Environmental Plan
Minister	Minister for Planning
Planning Secretary	Secretary of the Department of Planning and Environment
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
RSA	Road Safety Audit
SEARs	Planning Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SSD	State Significant Development
TfNSW	Transport for NSW

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1 Introduction

This report provides the NSW Department of Planning and Environment's (the Department) assessment of an application to modify the State Significant Development (SSD) consent for the redevelopment of Trinity Grammar School, Summer Hill campus (SSD-10371-Mod-1).

The modification application seeks approval for amendments to conditions B6 and B7 of SSD-10371, by introducing interim traffic mitigation measures to allow for the permitted student numbers within the school to be 1655 (instead of 1500) prior to the expansion of the Jubilee car park (construction stage 2), associated with the approved SSD application for the redevelopment of Trinity Grammar School.

The application has been lodged by The Council of Trinity Grammar School pursuant to section 4.55(1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

1.1 Background

The Trinity Grammar School (the school) is located at 119 Prospect Road Summer Hill, within the Inner West Local Government Area (LGA), approximately 7 kilometres (km) south-west of the Sydney central business district (CBD), as identified in **Figure 1**.

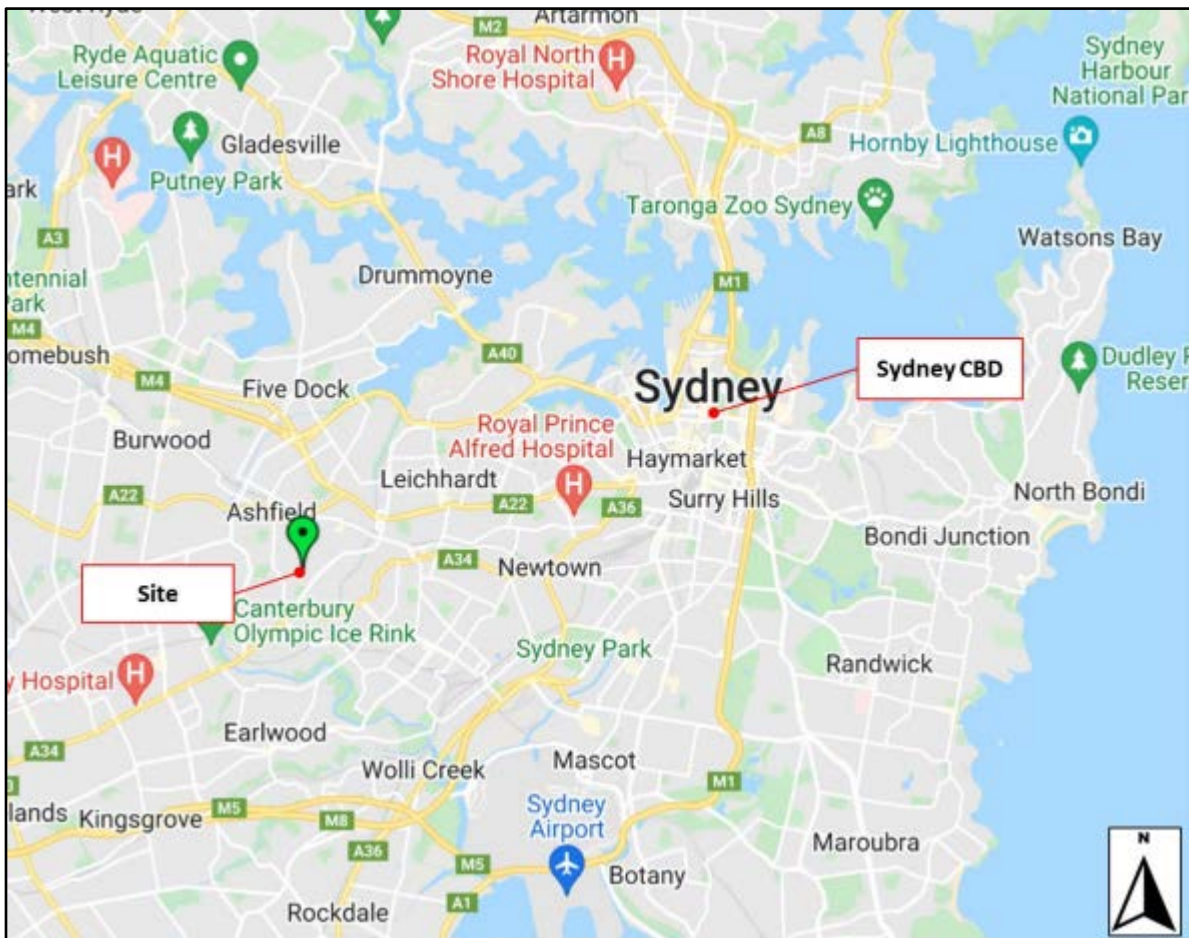


Figure 1 | Regional Context Map (Source: Nearmap 2022)

The site comprises the Trinity Grammar School located at 119 Prospect Road, and the residential properties owned by the school at 50-52 Seaview Street, Summer Hill. The legal description of the site is Lot 11 DP 1171965, and Lots 5 and 6 DP 15765. The site is bound by Prospect Road to the east, Yeo Park to the south, Victoria Street to the west, and Seaview Street to the north.

The site is generally flat with a total area of 65,596 square metres (m²). It currently incorporates a junior, middle, and senior school, with students from kindergarten (K) to year 12; school owned dwellings fronting Seaview Street; and two additional dwellings on 50 – 52 Seaview Street. The site is listed as an item of local heritage significance in the Ashfield Local Environmental Plan (ALEP) 2013. The heritage listing relates to the Headmaster's Residence and the War Memorial Chapel located towards the north eastern boundary of the site fronting Prospect Road. An existing driveway (Chapel Drive) provides access to the heritage items from Prospect Road.



Figure 2 | Local context (Source: Nearthmap May 2022)

The school has three playing fields which facilitate sporting activities. Oval 1 is located at the south-eastern corner of the site. Oval 2 is located to the west and Oval 3 at the south-western corner of the site (south of Oval 2). The local context of the site is identified in **Figure 2**.

Currently, 1655 students attend the school with 277 full-time equivalent (FTE) staff. This is 155 students more than what is currently permitted by the most recent development consent and the previous local development consent granted by the NSW Land and Environment Court (LEC) detailed below.

1.2 Approval History

A development consent was granted by LEC on 7 November 2007 (NSWLEC 733) for works to the school, including a new swimming pool, multipurpose hall, classroom building, and an underground car park. Works under the approval were completed. Conditions imposed by the LEC include conditions limiting the number of students on the campus to a maximum of 1500.

In 2015, the LEC considered a modification application (NSWLEC 1086) which sought to modify condition 5 to increase student numbers to 1700. The modification was refused by the LEC as it was found not to meet the 'substantially the same development test' required for modification applications.

Specifically, the LEC found that the proposed increase in student numbers would generate environmental impacts (particularly traffic, but also noise impacts) of a quantity and quality that would render the modified proposal not substantially the same as the original development approved by the LEC.

The decision of the LEC included a merits assessment of the proposal. The LEC found that the school was already generating unacceptable traffic and amenity impacts and an increase in student numbers by 200 would exacerbate those impacts.

Therefore, the LEC concluded that it would not be in the public interest to approve the modification, even if it met the section 4.55(2) of *Environmental Planning and Assessment Act 1979* (EP&A Act) (substantially the same development) test.

On 24 September 2021, development consent was granted by the Independent Planning Commission (IPC), for the alterations and additions to Trinity Grammar School in construction stages, including changes to staff and student numbers (SSD-10371). The development, as approved, comprises:

- demolition of existing buildings and dwelling houses at 119 Prospect Road and 50 and 52 Seaview Street and part demolition of the existing Music Building and Assembly Hall.
- staged construction of new:
 - building with a basement known as the Teaching and Learning Building.
 - Multi-Purpose Pavilion.
 - Maintenance Building on Seaview Street.
- alterations and additions to existing buildings to create a Performing Art Building.
- refurbishment of the Music Building, New Founders Building, the Assembly Hall, and North Quad Building.

- extension and reconfiguration of the Jubilee car park and the staff car park, to increase the car parking spaces from 312 to 324 and a new underground connection.
- associated landscaping, removal of 29 trees, road and public domain works, ancillary signage.
- staged increase in student numbers from 1500 to 2100 and increase in full time equivalent staff from 277 to 321.

The consent was granted, subject to a deferred commencement condition, which required the Applicant to submit amended architectural and landscape plans incorporating amendments conditioned by the IPC. The Applicant submitted the drawings to the satisfaction of IPC, and consent was declared to be active on 18 January 2022.

Conditions of consent restrict the Applicant from increasing student numbers beyond 1500, prior to the expansion of the car parks and provision of other traffic infrastructure.

During its assessment, both the Department and IPC noted that 1655 students attend the school, being more than 155 students above the approved student numbers. However, due to lack of evidence provided by the application in relation to the implementation of traffic mitigation measures to reasonably support the accommodation of 1655 students on site, with minimal traffic impacts on the locality, the IPC determination stated no student increase beyond 1500 be permitted until conditions B6 and B7 are satisfied. The conditions included the following:

Student Numbers

*B6. This development consent does not permit an increase in student and full time equivalent (FTE) staff numbers in attendance at any one time at Trinity Grammar School - Summer Hill campus (the site as identified in **Schedule 1**) until evidence of the following is provided to the satisfaction of the Planning Secretary:*

- the results of an independent audit, as described in condition B7;*
- the Jubilee carpark and drop-off / pick-up facilities have been completed;*
- all relevant approvals have been obtained in accordance with the plans approved by condition B2 and the conditions of this development consent; and*
- all required external roadworks and public domain works detailed in the approved Supplementary Traffic Impact Assessment have been undertaken to the satisfaction of the appropriate roads authority as per conditions C14, F11 and F12.*

B7. Prior to each staged increase in student and staff numbers as described in the Staging Report in condition B12, the Applicant must submit to the satisfaction of the Planning Secretary the results of an independent audit to verify the performance of the Jubilee car park and the drop-off/pick-up facilities. The independent audit must:

- be prepared by a suitably qualified independent auditor, in consultation with an independent traffic consultant, as agreed by the Planning Secretary;*
- conduct traffic surveys and compare the results against the traffic reports in the EIS to verify that the following operational outcomes have been achieved:*
 - the capacity of the Jubilee car park drop-off/ pick-up facilities can accommodate the pick-up/drop-off demand within the site during peak AM and PM periods;*
 - the demand for queuing spaces at the Jubilee car park is accommodated within the site;*

- (iii) *off-site impacts including but not limited to queuing on Victoria Street is minimised as far as practicable;*
- (iv) *there is adequate capacity in the car park to accommodate an increase in vehicle movements as a result of the proposed staged increase in student numbers;*
- (g) *be completed on three consecutive school days for the duration of the day when all grades (K-12) and students are planned to be on site and must state the student and staff numbers present on the data collection dates.*

The current SSD consent has been subject to two previous modification applications (**Table 1**).

Table 1 | Summary of modifications

Mod No.	Summary of Modifications	Approval Authority	Type	Approval Date
Mod-2	Minor design amendments to the landscape including removal of two existing trees and replacement with new tree planting.	Department	4.55(1A)	26 May 2022
Mod-3	Correction to plan revisions and dates	Department	4.55(1)	30 June 2022

2 Proposed modification

On 2 March 2022, the Applicant lodged a modification application to amend the consent under section 4.55(1A) of the EP&A Act. The proposed modification (SSD-10371-Mod-1), as revised by the Response to Submissions (RtS), seeks to include interim traffic mitigation measures to support and accommodate the ongoing non-compliant 1655 student numbers (rather than 1500) within the school, prior to the expansion of the car park, provision of approved roadworks, and satisfaction of conditions B6 and B7. The Applicant advises the proposed modifications ensure maintenance of the ongoing operations of the school. The modifications are discussed below.

2.1 Interim traffic mitigation measures

The Applicant has advised that several interim traffic mitigation measures have been implemented since 2021 in consultation with Inner West Council to manage 1655 students that already attend the school. As set out below, the Applicant seeks to reinforce the continuation of these existing measures and also proposes further traffic mitigation improvements as described below.

Temporary drop-off zone (existing provision to be amended)

- the provision of a temporary drop-off zone 80m long on the northern shoulder of Old Canterbury Road (**Figure 3**).



Figure 3 | Temporary drop-off zone (Base source: Applicant's Modification Report 2022)

Jubilee carpark management (existing provision to be continued with improvements)

- ongoing prohibition of right turns from the school's Jubilee car park during peak times of 8am-9am and 2:30pm-5:30pm, through the use of a left turn only sign, line marking, and a traffic marshal during peak times.

The school advises it has implemented the above measure since approximately 2019 and introduced traffic marshals in 2021 to further control the car movements to/from the Jubilee car park driveway and Victoria Street. The Applicant seeks to continue this in the future to reduce delays and queuing for vehicles exiting the Jubilee car park and also directing traffic away from Prospect Road which has been identified for two upgrade works as part of SSD-10371 (new raised crossing and modifications to the intersection of Prospect Road/Old Canterbury Road).

Interim Traffic Management Plan (new provision)

- an Interim Traffic Management Plan to include:
 - reconfigured student drop-off and pick-up operations within the Jubilee car park
 - separate drop-off and pick-up areas for different year groups.
 - an increase for on-site queuing reducing traffic queues catering for the existing student population at the school being 1655 students (**Figure 4**).
 - staggered start and finish times outlined below:
 - Years K-2 – Start 8:45am and Finish 3:00pm.
 - Years 3-4 – Start 8:30am and Finish 3:00pm.
 - Years 5-6 – Start 8:30am and Finish 3:15pm.
 - Years 7-9 – Start 8:15am and Finish 3:30pm.
 - Years 10-12 – Start 8:15am and Finish 3:40pm.
 - confirmation that staff/traffic marshals would manage traffic circulation within the car park.
 - appropriate signage and line marking to direct parents/carers to the drop-off and pick-up locations.
 - for siblings, older child would collect the younger child from the student marshalling area and proceed to the appropriate pick-up location.

The Applicant advised that the above management measures were implemented in 2021 and would be continued in the future through a formal plan to ensure better management of the car park.

Increased subsidy of school operated bus travel (existing provision)

- increased funding to the provision of the existing private bus network run by the school servicing the Inner West LGA, southern, and eastern suburbs. The funds allocated would include subsidisation, modification, and addition of routes to increase the use of this service.

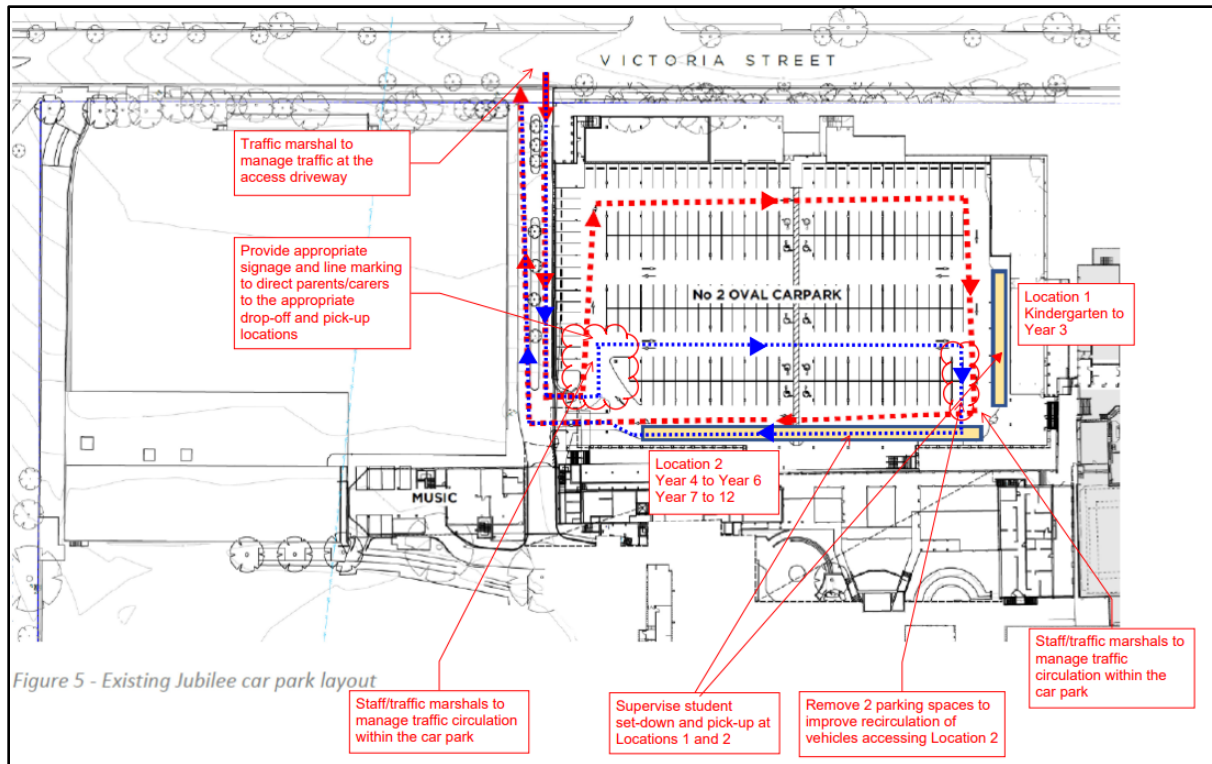


Figure 4 | Interim Management Plan detail (Source: Applicant's Modification Report 2022)

Applicant's justification to the proposed modification

The Applicant provided the following justifications for the proposed modification, that the:

- proposed change in the student and staff numbers aligns with the current numbers at the school, with increased traffic mitigation measures.
- requirements of condition B6 and condition B7 of SSD-10371 in terms of upgrades to the Jubilee car park and external roadworks are still intended to occur as part of the staggered increased in student and staff numbers.
- proposed traffic mitigation measures as outlined in the Traffic Report (TR) would ensure that the impacts of the current student and staff number of the school are effectively managed with minimal impact to the external road network.
- proposed modification does not alter the development and is proposed to improve the operations and function of the school resulting in a consistent proposal with the existing use, function and general appearance across the site as approved under SSD-10371.

2.2 Amended conditions

The Applicant proposes the following amendments to conditions (including new condition) to reflect the proposed traffic measures:

Additional condition

B6a. The mitigation measures outlined in the Report Reviewing Appropriate Interim Traffic Measures prepared by Colston Budd Rogers & Kafes dated January 2022 are to be implemented immediately and not cease until evidence of Condition B6b and B7 being

satisfied. The maximum student numbers are to be 1655 and full-time equivalent staff are to be 277 until this time.

Amended conditions B6 and B7

B6b. This development consent does not permit an increase in student **numbers from the existing 1655** and full time equivalent (FTE) staff numbers **from the existing 277** in attendance at any one time at Trinity Grammar School - Summer Hill campus (the site as identified in **Schedule 1**) until evidence of the following is provided to the satisfaction of the Planning Secretary:

- (a) the results of an independent audit, as described in condition B6;
- (b) the Jubilee car park and drop-off / pick-up facilities have been completed;
- (c) all relevant approvals have been obtained in accordance with the plans approved by condition B2 and the conditions of this development consent; and
- (d) all required external roadworks and public domain works detailed in the approved Supplementary Traffic Impact Assessment have been undertaken to the satisfaction of the appropriate roads authority as per conditions C14, F11 and F12.

B7. Prior to each staged increase in student and staff numbers **(from the base number of 1,655 students and 277 staff (FTE))** as described in the Staging Report in condition B12, the Applicant must submit to the satisfaction of the Planning Secretary the results of an independent audit to verify the performance of the Jubilee car park and the drop-off/ pick-up facilities. The independent audit must:

- (a) be prepared by a suitably qualified independent auditor, in consultation with an independent traffic consultant, as agreed by the Planning Secretary;
- (b) conduct traffic surveys and compare the results against the traffic reports in the EIS to verify that the following operational outcomes have been achieved:
 - (i) the capacity of the Jubilee car park drop-off/ pick-up facilities can accommodate the pick-up/drop-off demand within the site during peak AM and PM periods;
 - (ii) the demand for queuing spaces at the Jubilee car park is accommodated within the site;
 - (iii) off-site impacts including but not limited to queuing on Victoria Street is minimised as far as practicable;
 - (iv) there is adequate capacity in the car park to accommodate an increase in vehicle movements as a result of the proposed staged increase in student numbers;
- (c) be completed on three consecutive school days for the duration of the day when all grades (K-12) and students are planned to be on site and must state the student and staff numbers present on the data collection dates;

3 Strategic context

The development, as modified, remains consistent with the assessment of the strategic context in the original application and would not alter the key components or outcomes of the final proposal. The Department considers the development, as modified, would remain consistent with the relevant provisions of the:

- *Greater Sydney Region Plan, A Metropolis of Three Cities*, as it proposes the redevelopment of an existing school to meet the growing needs of Sydney.
- relevant priorities of the *Eastern City District Plan*, as it would provide education services and infrastructure to meet the needs of the community.
- *NSW Future Transport Strategy 2056*, as it limits the increase in on-site parking and provides facilities to support active transport travel options and encourages the use of non-car modes of travel.

4 Statutory context

4.1 Scope of modifications

The Department has reviewed the scope of the modification application and considers that the application can be characterised as a modification involving minimal environmental impacts as the proposal:

- would not significantly increase the environmental impacts of the project as approved.
- is substantially the same development as originally approved.
- would not involve any further disturbance outside the already approved disturbance areas for the project.

Therefore, the Department is satisfied the proposed modification is within the scope of section 4.55(1A) of the EP&A Act and does not constitute a new development application.

Accordingly, the Department considers that the application should be assessed and determined under section 4.55(1A) of the EP&A Act.

4.2 Consent authority

The IPC is the consent authority for the application under section 4.5(a) of the EP&A Act. However, under the IPC's delegation dated 14 June 2022, the Director, Social and Infrastructure, may determine the application as:

- a political donations disclosure statement has not been made.
- there were less than 15 public submissions by way of objection.
- the relevant local Council has not made an objection.

4.3 Mandatory matters for consideration

Section 4.55(1a) of the EP&A Act requires the matters listed in **Table 2** to be considered by the consent authority for an application involving minimal environmental impact.

Table 2 | Consideration of the proposal against the objects of the EP&A Act

Matter	Consideration
Whether the proposed modification is of minimal environmental impact	The proposed modification is considered to be of minimal environmental impact and will not involve any significant impacts outside of the approved disturbance area.
Whether the development to which the consent as modified related is substantially the same development	The development, as proposed to be modified, is considered to be substantially the same development for which the consent was originally granted.

Matter	Consideration
<p>Whether notification has occurred, and any submissions have been considered</p>	<p>In accordance with the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation), the notification requirements for an application under section 4.55(1A) of the EP&A Act do not apply if the application is in respect of SSD.</p> <p>Notwithstanding, the modification application was exhibited for a period of 14 days on the Department’s website and referred to Inner West Council (Council) and TfNSW for comment. The Department’s engagement is discussed in Section 5.</p>
<p>Any submission made concerning the proposed modification has been considered</p>	<p>Submissions were received from Council and seven members of the public. The Department received advice from TfNSW. These were considered as part of Department’s assessment of the modification application in Section 6.</p>
<p>Any relevant provisions of section 4.15(1) of the EP&A Act</p>	<p>The Department conducted a comprehensive assessment of the project against the mandatory matters for consideration as part of the original assessment of SSD-10371.</p> <p>All NSW State Environmental Planning Policies (SEPPs) were consolidated into 11 policies on 1 March 2022, with the exception of SEPP (Housing) 2021, which commenced on 26 November 2021. The modification application was lodged after the consolidation of the SEPPs.</p> <p>The SEPP consolidation does not change the legal effect of the repealed SEPPs, as the provisions of these SEPPs have simply been transferred into the new SEPPs. Further, any reference to an old SEPP is taken to mean the same as the new SEPP.</p> <p>The Department considers this modification application does not result in significant changes that would alter the mandatory matters for consideration under section 4.15 of the EP&A Act, including the relevant consolidated SEPPs as the provisions remain unchanged, and conclusions made in the original assessment.</p>

Matter	Consideration
Consideration of the reasons for the granting of the consent that is sought to be modified	<p>The Department has considered the findings and recommendations of the Department's Assessment Report and the IPC Statement of Reasons for SSD-10371.</p> <p>The Department is satisfied that the key reasons for the granting of consent continue to apply to the development, as proposed to be modified.</p>

5 Engagement

5.1 Department's engagement

Section 105(4) of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation) specifies that the notification requirements of the EP&A Regulation do not apply to section 4.55(1A) modifications with minimal environmental impact applications.

Notwithstanding, the Department exhibited the modification application between 9 March 2022 and 22 March 2022(14 days) on its website and notified local landowners, occupants, and previous submitters. The modification application was referred to Council and TfNSW for comment.

5.2 Summary of advice received from Government agencies

The Department received advice from Transport for NSW (TfNSW), summarised in **Table 3**. A link to the copy of the advice is provided in **Appendix A**.

Table 3 | TfNSW advice on the Modification application

Transport for NSW (TfNSW)	
Modification Report	TfNSW reviewed the modification application, raised no objection and advised that it is satisfied that the Applicant has previously been conditioned to require preparation of a Road Safety Audit (RSA) to identify and mitigate any road safety concerns and that this condition remains applicable.
RtS	TfNSW reviewed the RtS and stated that this modification does not guarantee post consent approval of any temporary drop-off zone under the provisions of the <i>Roads Act 1993</i> . TfNSW recommended an Independent RSA be undertaken as part of the Construction Pedestrian and Traffic Management Plan, in consultation with TfNSW, to ensure this drop-off zone does not result in any safety concerns during construction.

5.3 Summary of submissions

The Department received a total of eight submissions on the modification application, including one comment from Council. Of the seven public submissions received, six objected while one provided comment. A summary of Council and community submissions are provided in **Table 4** and **Table 5**, and a link to the submissions is provided in **Appendix A**.

Table 4 | Summary of Council submissions

Council	
Modification Report	Council advises it does not object to this proposal subject to implementation of appropriate traffic mitigation measures as required.
RtS	<p>Council reviewed the RtS and requested:</p> <ul style="list-style-type: none"> • clarification that the “informal” drop-off zone means no new parking restriction signage would be required and that it applies only in the morning, so as to not interfere with the afternoon bus activity near this location. • if no right turns are prohibited in the interim traffic management plan and during construction, then a condition be recommended requiring a Traffic Impact Assessment to be undertaken within 3 months of the prohibition taking effect to assess the impacts of maintaining the no right turn. • the increased staggering and separation of student drop-off and pick-up and traffic management of the drop-off and pick-up activity in the carpark be conditioned or form part of any future Operational Traffic Management Plan. <p>Council also confirmed that the ‘no right turn’ has been implemented for the past 4-5 years, but with no visible improvements.</p>

Table 5 | Summary of community submissions

Issue
<p>Traffic concerns</p> <ul style="list-style-type: none"> • traffic around the site would worsen through congestion and construction traffic (industrial vehicles, machinery, construction supplies and debris, trucks/heavy vehicles). • the queue on Victoria Street is often more than 300m, contradictory to the findings of the TR • parents ignore the ‘no right turn’ from the car park unless the exit is supervised. • ancillary approvals have resulted in increased traffic issues which have not been addressed • TR has been prepared when all of year 12 were not in attendance. • TR does not assess the new street-based drop-off and pick-up facility, staff and students attending ancillary facilities, or provides updated travel modes and traffic counts (noting new zone on Old Canterbury Road). • the proposed temporary drop-off zone on Old Canterbury Road impacts a bus stop and the front of people’s properties. • area west of the bus stop is used for up to 10 buses to park while waiting for the correct time to enter Prospect Road as only two buses can be accommodated at any one time. • Victoria Street cannot be used by locals during peak school times to drop their children at Yeo Park Infant School because of the queuing.
<p>Parking</p> <ul style="list-style-type: none"> • limited on-street parking options for residents would result in additional burden on the residential community and residential amenity.

-
- burden is imposed on neighbours on evenings and weekends when inter-school events for sports occur.
 - the current car park cannot cope with the volume of school generated traffic.
-

Mitigation measures

- Covid safe measures (staggered start/finish times and 'no right turn' from Jubilee Drive) were in place since 2019 and are not new.
 - mitigation measures have done nothing to mitigate the 100m of queueing on the western boundary of the school.
 - staggered start and stop times do not work.
-

Safety

- it is dangerous crossing the front school gate at Prospect Rd and Hurlstone Ave due to heavy vehicle circulation.
 - narrowing Hurlstone Avenue at the Prospect Road end would allow cars and buses through but make pedestrians more visible.
 - sight lines out of Holwood Avenue are obscured.
-

Student numbers

- student numbers should remain capped at 1500 by way of the LEC ruling.
 - student numbers (1655) are the same as they were in 2019.
 - currently student and staff numbers are in exceedance by 10 percent from the approved 1500 students and 251 staff, and this would continue to increase further
 - the term enrolment should be referenced in any determination.
-

5.4 Response to Submissions and TfNSW advice

The Department reviewed the modification application and requested the Applicant clarify:

- condition amendments being sought.
- the length and capacity of the drop-off and pick-up zone situated on Old Canterbury Road, as well as potential impacts of the zone on driveways, street signs and no stopping/bus zones.
- how students would safely access the site from the drop-off and pick-up zone.
- the physical infrastructure associated with the 'no right turn' out of Jubilee car park.
- whether there is a change to the overall car parking across the site.
- impacts of the reduction to the drop-off zone along Old Canterbury Road.
- traffic data relied on to ascertain the suitability of the proposed measures.
- interactions between school buses and the drop-off location.

The Department requested evidence be provided of traffic observations that demonstrate improvements due to the implemented measures, clarification of the reduction to the drop-off zone along Old Canterbury Road and its impacts, interactions between buses and the drop-off location, and confirmation of traffic survey data relied upon.

In response to the Department's clarification request, TfNSW advice and public submissions, the Applicant submitted a Response to Submissions (RtS) on 19 July 2022, which was made publicly available on the Department's website, and included:

- updated traffic information including TR confirming:
 - the drop-off zone would be situated along the western side of Old Canterbury Road, 80m in length, and accommodate 10 cars.
 - the drop-off and pick-up zone on the eastern side of Old Canterbury Road has been removed as it was underused. Its removal would not impact on the efficiency of student drop-offs, queuing, or access to private property.
 - to further manage the 'no right turn' out of Jubilee car park, the following measures would be implemented:
 - sign indicating left-turn only (between 8am to 9am and 3pm to 5pm) onto Victoria Street.
 - line marking on the exit lane indicating left-turn only.
 - a traffic marshal during drop-off and pick-up periods.
- an updated modification application confirming the amendments to conditions.
- appendices providing evidence of traffic observations undertaken.
- confirmation that traffic survey information was adopted from SSD-10371 data.
- confirmation that two car parking spaces within Jubilee car park would be removed temporarily to accommodate interim drop-off and pick-up movements. Upon completion of construction works for SSD-10371, the two car parking spaces would be reinstated.
- clarifications regarding:
 - the TR relied on traffic data that included Year 12 in attendance.
 - traffic count data was adopted from traffic survey information undertaken in 2019 (under SSD-10371) catering for the existing school population of 1655 students and 277 staff.
 - observations confirmed the eastern portion of the Old Canterbury Road drop-off zone is underused.
 - survey data relied upon was adopted from the traffic and parking survey data undertaken in 2019 and this recorded the number of vehicles entering and exiting the school carpark confirming the peak periods.
 - public access to Yeo Park would not be affected as a result of this modification as all vehicles exiting the school are required to turn left onto Victoria Street.
 - construction traffic impacts would be managed through the Construction Traffic Management Plan to be implemented as part of SSD-10371.
 - the average number of students at the school (Summer Hill campus) in 2022 is 1426. Notwithstanding, this modification seeks to regularise the baseline of 1655 students underlying future projected growth.
 - observations confirmed that the staggering and separation of student drop-off and pick-up effectively reduces the number of vehicles at the school at any one time.
 - the TR provides interim measures for the student population during construction under SSD-10371, rather than any ancillary approvals.
 - the bus waiting area on Old Canterbury Road is for the afternoon. Thus, it would not impede on the morning drop-off zone, nor would it impact on private properties.

- no changes are proposed to on-street parking or weekend parking during inter-school events and any illegal parking should be raised with the local police.
- appropriate pedestrian crossing infrastructure is provided along Prospect Road and upgrade works would be completed in the early stages of the approved SSD-10371. As such, narrowing of Hurlstone Avenue was not part of the original application and is not warranted.
- the staggering start and finish times of the year groups has been increased from the 2021 measures and drop-off and pick-up zones have been separated within the Jubilee car park reducing the number of vehicles present at any one time.
- sight lines at all nearby intersections remain unchanged post implementation of the traffic measures within Jubilee car park.

The RtS was referred to TfNSW and Council for comment on 19 July 2022. Council and TfNSW comments are discussed in **Section 5.2**. On 12 August 2022, the Department requested the Applicant to address Council's comments on the RtS and sought clarification on the staggered start and finish times proposed to be operated by the school prior to the 2021 measures.

A member of the public provided feedback that the RtS did not satisfactorily address the concerns raised in relation to the narrowing of Hurlstone Avenue to improve pedestrian movements. The pedestrian crossing referenced by the Applicant in the RtS services Prospect Road and not Hurlstone Avenue. Thus, the Applicant's argument does not address safety measures on Hurlstone Avenue.

These comments are further addressed within **Section 6**.

In response to the Department's request, the Applicant submitted further additional information on 18 August 2022, which was made publicly available on the Department's website and included:

- clarification that the staggered start and finish times prior to Covid times were:
 - Pre-school – 9am to 2:45pm.
 - K to year 2 – 8:30am to 3pm.
 - Years 3 to 6 – 8:30am to 3:15pm.
 - Years 7 to 12 – 8:25am to 3:40pm.
- the drop-off zone on Old Canterbury Road would be maintained as a temporary informal zone for drop-off of students during the construction works only. Therefore, no signage or line marking is proposed as vehicles will drop-off students within the kerbside lane with no impacts on the bus zone.
- the right turn prohibition from Jubilee carpark through signage has been in effect since pre covid times. A traffic marshal was introduced in 2021 and is to be maintained as part of this modification.

The Applicant also noted and accepted Council's request for a condition to be imposed requiring a traffic assessment to be undertaken within a certain interval of implementation of the proposed interim, mitigation measures to demonstrate whether the measures have resulted in improvements to the traffic situation satisfactorily catering for 1655 students.

On 6 September 2022, Council recommended that the morning drop-off zone along Canterbury Road should not be signposted as a formal drop-off zone as this may impact on the general parking provisions on the street. Council also advised that should the drop-off zone be signposted then; it be temporary; on the north-western side of Old Canterbury Road only; TfNSW arrange community

notification prior to implementation of the zone and provide the reasons for allowing the signage to Council's traffic committee.

Council also advised that the Applicant should monitor the impacts of the 'no right turn' at Jubilee car park on the queuing at the intersection of Harland Street/Queen Street and ensure that additional measures are implemented if queuing is observed.

6 Assessment

The Department has considered the modification application, issues raised in submissions and the Applicant's RtS in its assessment of the proposal. Consideration of the proposed modifications are discussed below.

6.1 Interim mitigation measures

The modification application includes a TR which outlines the interim traffic measures proposed to accommodate 1655 students and 277 staff at the school, with minimal impacts on the surrounding road network.

The TR states that the previous traffic assessment for the original application measured and reported on traffic effects already experienced by a student population of 1655 and staff numbers of 277. Further, in consultation with Council, the Applicant has implemented several measures in 2021, including staggering and separation of drop-off and pick-up within the main Jubilee car park for Years K - 12, 'no right turn' from Jubilee car park between 8am to 9am and 2:30pm to 5:30pm, and a temporary drop-off zone on the northern side of Old Canterbury Road (**Figure 6**).

The Applicant states that through implementation of the above measures, drop-off and pick-up operations have improved compared to 2019 operations.

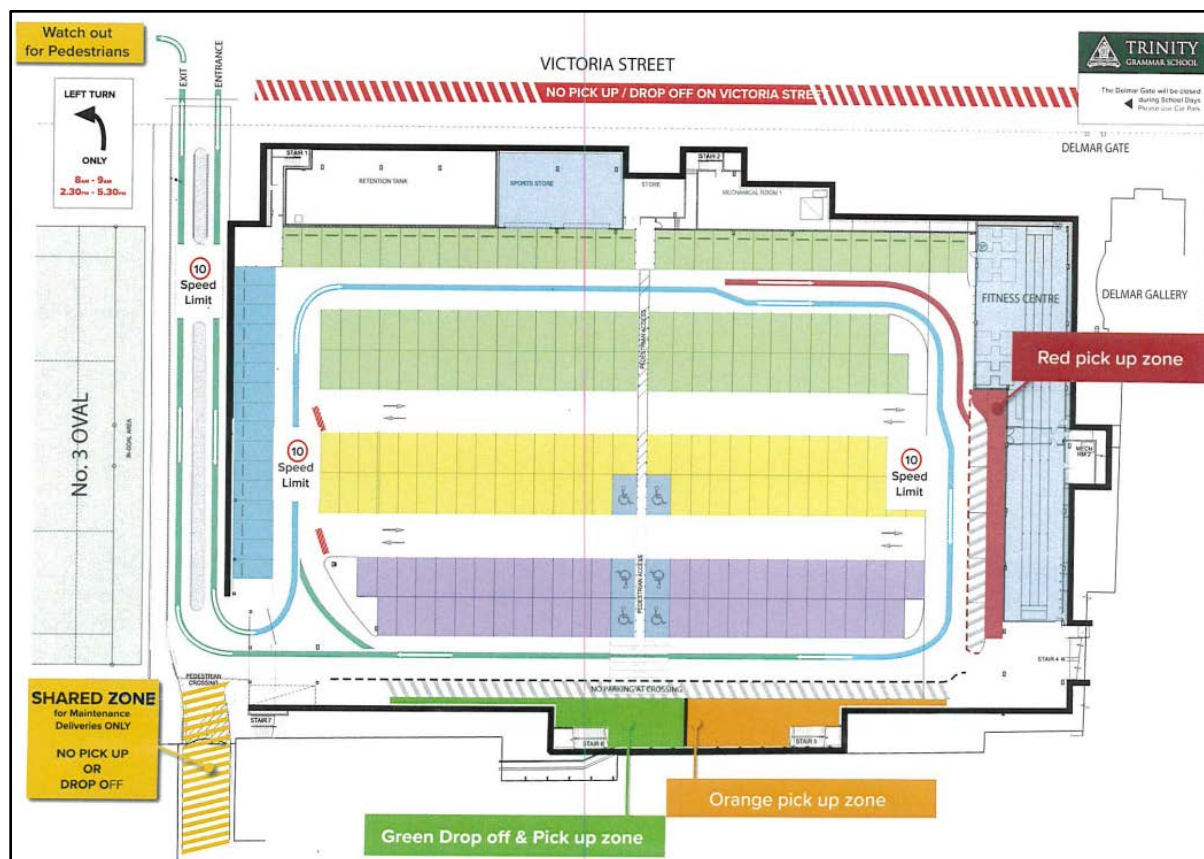


Figure 5 | Drop-off and pick-up locations within Jubilee car park (Source: Modification Report 2022)

The Applicant seeks to maintain the staggered start and finish times and drop-off and pick-up management measures for the entire school as provided in **Section 2**. The proposed drop-off and pick-up management measures are provided in **Figure 4**.

While the original traffic assessment of SSD-10371 was based on an expansion of 1655 students and 277 staff to 2100 students and 321 staff, the TR identifies that an expansion from 1500 to 1655 students and 251 to 277 staff would result in:

- additional traffic generation of 70 vehicles per hour (two way) in the morning and afternoon peak hours for students.
- traffic generation of 20 vehicles per hour (two way) in the morning and afternoon peak hours for staff.

This would result in an additional 45 vehicles per hour (two way) on Victoria Street, additional 10 to 20 vehicles per hour (two way) on Seaview Street, and additional 30 vehicles per hour (two way) on Harland Street.

The TR identified these increases in flows would have no noticeable effect on the operation of the surrounding road network. The changes represent less than 10% increase in existing flows, and therefore the carpark expansion and road works on Prospect Road would not be required to cater for 1655 students.

To further manage any traffic and parking impacts interim traffic mitigation measures are proposed, as discussed in **Section 2**.

TfNSW and Council raised no concern with the proposed mitigation measures and the accommodation of 1655 students within the site prior to the expansion of the car park and/or roadworks. However, TfNSW requested an independent RSA in relation to the drop-off zone along Old Canterbury Road if it is in operation during construction works under SSD-10371. Council reviewed the RtS and requested clarification of the "informal" drop-off zone. Further, Council also confirmed that the 'no right turn' has already been in place in the past years with no visible improvements to Victoria Road. Consequently, an additional Traffic Impact Assessment should be undertaken by the Applicant following implementation of all the measures to demonstrate that proposed measures are successful in reducing queuing impacts on Victoria Street. Council also recommended that staggering and separation of students and drop-off within the Jubilee carpark be stipulated through a condition of consent as well as required that the Applicant monitor the impacts of the 'no right turn' on Harland Street/Queen Street intersection.

Public submissions raised concern with the traffic impacts of permitting additional students on the site prior to the required traffic measures under SSD-10371. The public submissions also raised concern with the interim mitigation measures proposed, regarding reduced parking availability in the neighbourhood, worsening of traffic and queuing, the functionality of the drop-off zone and its impacts on private property, safety concerns, the adequacy of the TR, and validity of the measures proposed.

In response, the Applicant submitted a RtS including updated traffic information, an updated modification report, and evidence of observations undertaken. The Applicant provided supplementary information which addressed Council comments on the RtS, as discussed in **Section 5**.

The Department has reviewed the submissions, Council and TfNSW advice. The Department's assessment of the relevant matters is below.

Student numbers and safety

This modification application seeks approval to maintain school numbers at 1655, similar to that existing in 2019. While this is contrary to the IPC decision, the TR demonstrates that the traffic impacts on the site and the surrounding road would not significantly increase as a result of 1655 students compared to 1500 students. This is confirmed by the RtS, where evidence of observations confirmed that there are no extensive queues along Victoria Street. In response to the concerns raised in public submissions, the RtS confirmed the traffic assessment included valid data and traffic generated including Year 12 students.

The Department notes that while the majority of these measures were implemented approximately between 2019 and 2021, the Applicant did not provide this information clearly to the Department or IPC during the assessment of SSD-10371. Consequently, based on the information presented at that time, the Department's traffic assessment concluded that school should not be allowed to accommodate more than 1500 students prior to completion of the carpark and traffic infrastructure works.

Based on the information submitted under SSD-10371-Mod-1, the Department notes that the Applicant has already implemented traffic management measures towards the end of 2021 to manage the existing school traffic with 1655 students. However, these measures are informal and have not been stipulated through any management plans. The Applicant would continue to implement these measures until the car park expansion occurs along with the roadworks. In response to concerns in public submissions regarding parents ignoring traffic rules, the Applicant's RtS confirms that the 'no right-turn' from Jubilee car park would be managed by a marshal who would ensure parents abide by the road rules. The temporary drop-off zone along Old Canterbury Road in the morning would also continue to assist in reducing queuing and impacts along Victoria Street and maintain public access to Yeo Park, with no impacts on private properties or the bus stop.

Based on the RtS, the Department agrees:

- the interim traffic management measures would not impact on sight lines of drivers on surrounding streets.
- as the student numbers of 1655 are reflective of the traffic data utilised the TR, it appropriately reflects accurate information and the TR data is valid.
- mitigation measures proposed as part of this modification are interim, to manage movements associated with 1655 students only. The additional drop-off and pick-up spaces within the Jubilee car park, the roadworks and the operational traffic and access management measures, as approved by SSD-10371, need to be completed prior to student numbers of 2100, to manage the traffic impacts at that stage.
- safety of pedestrian movements would be managed through existing pedestrian crossings and future infrastructure upgrades approved and conditioned under SSD-10371.
- narrowing Hurlstone Avenue is outside the scope of this application. The interim traffic management measures do not impact on pedestrian safety or movements on Hurlstone Avenue.

The impacts on the surrounding road network due to 2100 students have been previously considered in SSD-10371 (the original application) and conditions recommended accordingly. The Department supports the interim measures proposed by the Applicant to manage traffic within and around the school to safely accommodate 1655 students and 277 staff members until the time the car park and

traffic infrastructure are delivered along with long term operational transport and access management measures (approved under SSD-10371). The Department also notes that Council and TfNSW have not raised concerns regarding the proposed accommodation of 1655 students within the site, subject to the implementation of these measures and appropriate conditions.

The Department notes Council's and the submitters' comments that the 'no right turn' has been implemented for the past 4 – 5 years with no visible improvements. However, the Department notes the Applicant's observations and the TR which confirms that there is no queuing on Victoria Street at this time. During the site visit, the Department's representatives observed that the 'no right turn' is not implemented properly and that illegal right turns by parents occur.

Notwithstanding, the Department considers that a further traffic assessment following the approval of the modification application would not be necessary.

Instead, the Department considers that the Applicant should provide evidence of success of the interim measures through the implementation of the interim Operational Transport and Access Management Plan (interim OTAMP) which would include opportunities for monitoring of the measures when implemented and the impacts on Harland Street/Queen Street intersection.

Given the above, the Department is satisfied that the site can accommodate 1655 students and 277 staff prior to the expansion of the Jubilee car park and road works, subject to the following conditions:

- preparing an ITAMP summarising all of the proposed interim management measures, which would be implemented until the final Operational Transport and Access Management Plan (OTAMP) is prepared under SSD-10371.
- obtaining approval from the Department, of the interim OTAMP within 2 months of the determination of the modification application.
- implementing of the proposed interim traffic management measures in the interim OTAMP, within 1 month of the approval.
- undertake monitoring and preparing a monitoring report to demonstrate that these measures have been satisfactorily implemented, within 2 months of the implementation of the interim measures. Such evidence would include observations at peak school hours, monitoring queuing lengths on Victoria Street, monitoring safe student movements around the site, drop-off movements on Old Canterbury Road, and registering complaints.
- making the monitoring report publicly available on the school's website.
- an independent RSA implemented as part of the drop-off zone on Old Canterbury Road.

The Department notes that one public submission has advised that the word 'enrolment should be used instead of 'students'. However, to maintain consistency with the original development this report refers to 'student numbers' rather than enrolment.

Impacts of ancillary approvals, construction, and access

During exhibition of the modification application, public submissions raised concerns with additional traffic due to ancillary approvals being granted; traffic and queuing worsening due to construction vehicles; queuing and impacts on private property; and access to Yeo Park.

The Department is satisfied that ancillary approvals (under separate planning pathways by Council) provide for additional buildings to cater for the school, with no change to student or staff numbers. As a result, the ancillary approvals are not expected to increase traffic beyond that assessed by SSD-

10371 and as proposed in this modification application. In addition, the Construction Traffic and Pedestrian Management Sub-Plan conditioned under SSD-10371, as well the proposed interim mitigation measures, would manage the traffic and queuing concerns until construction is completed.

Based on the RtS, the Department is also satisfied that public access to Yeo Park would not be compromised by this modification.

To reinforce the proposed measures, the Department recommends that the ITAMP requires a traffic marshal at Victoria Street and within the carpark is present during both morning (8am – 9am) and afternoon peak (2:30pm – 5:30pm) periods to manage the traffic impacts.

Parking concerns

Public submissions raised concerns with additional burden on the available on-street car parking on the surrounding streets during inter school events on weekends and evenings.

The Applicant's RtS confirms that no changes are proposed to the existing events within the school as part of this modification. The RtS did confirm there is a loss of two car parking spaces within the Jubilee carpark, however, this is temporary and upon completion of construction the car parking would be reinstated.

The Department supports the Applicant's argument that there are no expected changes to the on-street parking surrounding the development as a part of this modification. The temporary reduction of two car spaces within the Jubilee carpark is acceptable as they would be reinstated upon completion of construction. The Department acknowledges that there may be on-going issues with availability of on-street parking during out-of-hours school events. However, these would be better managed in the future through the out of hours event management plan, which is required under SSD-10371.

Functionality of the mitigation measures

Public submissions raised concerns regarding the effectiveness of the mitigation measures proposed, particularly the staggered start and finish times.

The Department has reviewed the Applicant's RtS and considers that the proposed traffic mitigation measures within the car park and the driveway would ensure its effective operation. The subsidy to the bus travel and the temporary drop-off zone would reduce the pressure on the car park and the queuing on Victoria Street until the expansion of the car park occurs. Given that TfNSW requested an independent RSA for the drop-off zone only and had no other concerns, the Department accepts these proposed measures.

Conditions are recommended to ensure the delivery of the proposed interim mitigation measures within the car park and are discussed under the heading 'student numbers and safety'.

The Department notes that the Applicant proposes to use Old Canterbury Road as an 'informal drop-off zone' during the construction works. Council requested clarification on whether the functioning of this zone would require any signage. Council also advised that it does not prefer installation of signage identifying this zone formally as it may have implications on the general parking and bus activities in this area. In this regard, the Department remains concerned that without appropriate signage, this zone would not function properly and may lead to parents parking rather than dropping students off.

Consequently, the Department has recommended a condition requiring the Applicant to install all appropriate signage in this zone in relation to limiting parking during the drop-off period and acknowledges that this may either need approval from TfNSW (Old Canterbury Road being a classified road) or from Council's local traffic committee. The Department has also recommended that the signage be removed once the reconstructed car park (under SSD-10371) is operational.

Conclusion

The Department has reviewed the modification application, submissions, RtS and additional information, and recognises that the original LEC approval granted approval for a maximum of 1500 students. However, the IPC approved increased student numbers up to a capacity to 2100 students through staged increases that are reliant on the delivery of the car park and the traffic infrastructure approved by SSD-10371. The Department acknowledges the Applicant's advice that the school has been operating at a capacity of 1655 students since 2019. Although the IPC report stated the Applicant had not demonstrated that traffic impacts could be appropriately managed based on student numbers and the existing car park design, this modification application updated traffic information and interim measures to demonstrate that traffic impacts can be managed. This information has been reviewed by Council and TfNSW, who have raised no concerns to the proposed student capacity of 1655, subject to recommended conditions regarding monitoring measures at the car park in the future, and an independent RSA to be part of the conditions to manage the interim drop-off zone along Old Canterbury Road.

The Department's original assessment identified that any increase in student numbers to 2100 can only be permitted after the internal drop-off and pick-up associated with the Jubilee car park is completed. This does not change as a result of this modification.

The Department supports the proposed interim traffic measures as they would maintain and improve the measures provided in 2021, to alleviate traffic and queuing issues relating to 1655 student numbers, would provide alternative pick-up and drop-off options for parents, additional sustainable transport options, and ongoing management of these measures. The Department supports increased subsidisation of the private bus service to encourage sustainable travel initiatives and promote the reduction in private vehicle use.

In conclusion, the Department is satisfied that the concerns raised in submissions have been adequately addressed and would be managed through the interim mitigation measures and amended conditions of consent.

6.2 Condition variations

The proposal seeks to modify conditions B6 and B7 of the consent. These conditions were imposed by the IPC on the original determination for the following reasons (as summarised in the Statement of Reasons):

Condition B6

- the Applicant had not adequately demonstrated that potential traffic impacts can be appropriately managed in relation to current student numbers (which at the time of assessment were based on 1655 students) and the existing car park design.

- the proposed car park upgrade should be completed before the school is permitted any increase in students (2100) and full-time equivalent staff (321).

Condition B7

- the Applicant should demonstrate that the Jubilee car park and drop-off and pick-up facilities are operating effectively and that impacts to Victoria Street are mitigated prior to any increase student numbers.

The Applicant's proposed amendments to the conditions are outlined under **Section 2.2**.

The Department acknowledges the Applicant's request for amended conditions and is satisfied that the changes would not conflict with the intent of the conditions of consent under SSD-10371.

However, to ensure the effective implementation of the mitigation measures, the Department has recommended the preparation of an interim OTAMP, an independent Road Safety Audit during the construction works pursuant to SSD-10371, and a traffic assessment upon implementation of the interim measures. The recommended additional changes to the conditions would not affect the ability of the development to comply with all conditions of consents. Amendment to the conditions of consent ensures the measures are adequately implemented to manage the traffic concerns associated with the development and ensure that the interim measures are followed.

7 Evaluation

The Department has reviewed the Applicant's Modification Report, RtS and additional information, and assessed the merits of the modified proposal, and is satisfied that environmental issues associated with the proposal have been thoroughly addressed.

The approved development would not significantly change as a result of the proposed interim traffic mitigation measures and modified conditions. However, it would enable the Applicant to maintain the student numbers at 1655 until the conditions of consent under SSD-10371 are complied with. The proposed modification would not impact upon the environmental amenity of the surrounding area and the development would remain consistent with the original development consent. The Department's existing conditions of consent, as modified, ensure the ongoing environmental management of the development.

The Department considers that the modification application is consistent with the objects of the *Environmental Planning and Assessment Act 1979* and continues to be consistent with strategic directions for the State as the delivery of the proposal would not significantly increase traffic movements and congestion; continues to meet the growing needs of Sydney by providing education services and infrastructure to meet the needs of the community; and limits the increase in on-site parking providing support of alternative travel options.

The Department concludes that the impacts of the proposed modification are acceptable. Consequently, the Department considers the modification application is in the public interest and should be approved.

8 Recommendation

It is recommended that the Director, Social and Infrastructure Assessments, as delegate of the Minister for Planning:

- **considers** the findings and recommendations of this report.
- **determines** that the application SSD-10371-Mod-1 falls within the scope of section 4.55(1A) of the EP&A Act.
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to approve the modification.
- **modify** the consent SSD-10371.
- **signs** the attached instrument of approval of the modification (**Appendix B**).

Prepared by:



Ingrid Berzins
Planning Officer
School Infrastructure Assessments

Recommended by:



Aditi Coomar
Team Leader
School Infrastructure Assessments

9 Determination

The recommendation is **Adopted** by:

A handwritten signature in black ink, appearing to read 'KH', with a long horizontal flourish extending to the right.

Karen Harragon

Director

Social and Infrastructure Assessments

as delegate of the Minister for Planning

Appendices

Appendix A – List of referenced documents

The following supporting documents and supporting information to this assessment report can be found on the Department and Planning and Environment's website as follows.

1. Modification report

<https://www.planningportal.nsw.gov.au/major-projects/projects/modification-1-regularisation-student-numbers>

2. Submissions and Government Agency advice

<https://www.planningportal.nsw.gov.au/major-projects/projects/modification-1-regularisation-student-numbers>

3. Applicant's Response to submissions

<https://www.planningportal.nsw.gov.au/major-projects/projects/modification-1-regularisation-student-numbers>

4. Additional submissions from Council, Government agencies and the public received after close of exhibition

Provided under separate cover

Appendix B – Instrument of Modification

<https://www.planningportal.nsw.gov.au/major-projects/projects/modification-1-regularisation-student-numbers>

Appendix C – Consolidated consent

<https://www.planningportal.nsw.gov.au/major-projects/projects/modification-1-regularisation-student-numbers>

Appendix D – Community views for draft notice of decision

Issue	Consideration
<ul style="list-style-type: none"> • Traffic concerns <ul style="list-style-type: none"> ○ traffic around the site would worsen, through congestion and construction traffic. ○ queuing along Victoria Street and limiting access to Yeo Park. ○ the queue on Victoria Street is often more than 300m. ○ parents ignore the ‘no right turn’ from the car park unless the exit is supervised. ○ ancillary approvals have resulted in increased traffic issues which have not been addressed. ○ the Traffic Report (TR) has been prepared when all of Year 12 were not in attendance. ○ the TR does not assess the new street-based drop-off and pick-up facility; staff and students attending ancillary facilities; or updated travel modes and traffic counts. ○ the proposed temporary drop-off zone on Old Canterbury Road impacts a bus stop and the front of private property. ○ area west of the bus stop is utilised for up to 10 buses to park while waiting for the correct time to enter Prospect Road as only two buses can be accommodated at any one time. ○ the Applicant should monitor the impacts of the ‘no right turn’ at Jubilee car park on the queuing at the intersection of 	<ul style="list-style-type: none"> • The Applicant submitted an RtS including updated traffic information, an updated modification report, and evidence of observations in response to public submissions. • The Department is satisfied that: <ul style="list-style-type: none"> ○ no extensive queues along Victoria street would result from this modification that seeks approval to maintain current school student numbers at 1655. ○ the traffic assessment has included valid data and traffic generated, including Year 12 students. ○ the ‘No right-turn’ from Jubilee car park would be managed by a marshal who would ensure parents abide by the road rules. ○ the temporary drop-off zone situated along Old Canterbury Road in the mornings would assist in reducing queuing and impacts along Victoria Street, maintain public access to Yeo park, with no impacts on private properties or the bus stops. ○ the imposition of signage (if approved by the relevant roads authority) would ensure orderly use of the drop-off zone. ○ the ancillary approvals (under separate planning pathways) provide for additional buildings to cater for the school, with no change to student or staff numbers. ○ the construction traffic management plan conditioned under SSD-10371, as well the proposed the interim mitigation measures, would manage the traffic and queuing concerns until construction is completed. ○ the mitigation measures proposed as part of this modification are interim, to manage movements associated with 1655 students only. The additional drop-off and pick-up spaces within the Jubilee car park, the roadworks and the operational traffic and access management measures, approved by SSD-10371 must be completed prior to student numbers of 2100 to manage the traffic impacts at that stage.

Harland Street/Queen Street and ensure that additional measures are implemented if queuing is observed.

- no signage for the informal drop-off zone on Old Canterbury Road.

- if monitoring of the Jubilee carpark operations occurs post implementation of the measures then impacts of the measures on the surrounding intersection can be estimated.

- Conditions include:

- preparation of an interim Operational Traffic and Access Management Plan (interim OTAMP) summarising all of the proposed management measures, which would be implemented until the final Operational Traffic and Access Management Plan (OTAMP) is prepared under SSD-10371.
- obtaining approval of the interim OTAMP from the Department.
- implementation of the proposed interim traffic management measures within two months of the interim OTAMP being approved.
- monitoring of the interim OTAMP for a period of two months after implementation.
- preparation and implementation of an independent Road Safety Audit (RSA).

- Parking

- limited on-street parking options for residents resulting in additional burden on the residential community and residential amenity.
- burden is imposed on neighbours on evenings and weekends when inter-school events for sports occur.
- the current car park cannot cope with the volume of school generated traffic.

- The Department is satisfied that there are no expected changes to the on-street parking surrounding the development as a part of this modification.
- The temporary reduction of two car spaces within the Jubilee carpark is acceptable, as they would be reinstated upon completion of the constriction.
- The Department acknowledges that there may be on-going issues with availability of on-street parking during out-hours school events. However, these would be better managed in the future through the out of hours event management plan, which is required to be implemented under SSD-10371.

- Safety

- it is dangerous crossing the front school gate at Prospect Road and Hurlstone Avenue due to heavy vehicle circulation.
- narrowing Hurlstone Avenue at the Prospect Road end would allow cars and buses through

- The Department is satisfied that pedestrian movements would be managed through existing pedestrian crossings and future infrastructure upgrades approved and conditioned under SSD-10371.
- Narrowing Hurlstone Avenue is outside the scope of this application. The interim traffic management measures do not impact on pedestrian movements on this street, and as such, impacts on the surrounding road network due to student numbers of 2100 were

but make pedestrians more visible.

- sight lines out of Holwood Avenue are obscured.

considered in SSD-10371 and conditions recommended accordingly.

- The interim traffic management measures would not impact on sight lines.

- Mitigation Measures

- Covid safe measures (staggered start/finish times and 'no right turn' from Jubilee Drive) were in place since 2019 and are not new.
- mitigation measures have done nothing to mitigate the 100m of queueing on the western boundary of the school.
- staggered start and stop times do not work.

- The Applicant has confirmed the staggered start and finish times have been in place prior to 2021, however the proposed measures as part of this modification application have been increased and improved since originally implemented.
- In addition, a traffic marshal was introduced to manage the 'no right turn' from Jubilee carpark.
- The Department has reviewed the Applicant's RtS and additional information, and considers that the mitigation measures would ensure an effective operation of the car park. The subsidy to the bus travel, and the temporary drop-off zone, reduce the pressure on the car park and the queueing on Victoria Street until the expansion of the car park occurs.
- The Department notes that Council requested a traffic assessment be undertaken and that TfNSW requested an independent Road Safety Audit (RSA) for the drop-off zone along Old Canterbury Road only and no other concerns regarding the mitigation measures.

- Conditions include:

- preparation and approval of an interim OTAMP summarising all of the proposed measures.
- implementation of the interim OTAMP, ensuring ongoing management and application of the staggering and separation of start and finish times and the independent RSA.
- installation of signage in the drop-off zone as needed.
- providing evidence to the Department, within 2 months of the implementation of the interim OTAMP, that the measures have resulted in the desired outcomes (such as less queueing, student safety).

- Student Numbers

- student numbers should remain capped at 1500.
- student numbers (1655) are the same as they were in 2019.

- The Department acknowledges that this modification seeks to enable school student numbers to be maintained at 1655 students, similar to that existing in 2019.
- While this is contrary to the IPC decision, the TR demonstrated traffic impacts on the site and the

- currently student and staff numbers are in exceedance by 10 percent from the approved 1500 students and 251 staff, and this would continue to be exceeded further.
 - the term enrolment should be referenced in any determination.
 - surrounding road would not significantly increase as a result of 1655 students, compared to 1500 students.
 - To maintain consistency with the original development this report and conditions refer to 'student numbers' rather than enrolment.
 - The Department is satisfied that this modification application includes updated traffic information and interim measures to demonstrate that traffic impacts can be managed.
 - Conditions include:
 - amend conditions B6 and B7 to limit the student numbers to 1655 and staff numbers to 277.
-