

Response to Submissions

Shore Physical Education Centre

Prepared for Shore School c/o epm Projects / 19th December, 2016

141522 UTA

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Revision Register

Rev	Date	Prepared By	Approved By	Remarks
0	14/12/16	MB	PY	Draft
1	16/12/16	MB	PY	For issue
2	19/12/16	MB	PY	Following comments

Introduction

The Shore Physical Education Centre (SPEC) project is a NSW State Significant Development (Ref: SSD 7507). The development application and Environmental Impact Statement (EIS) were on public exhibition during the period 28th July to 26th August, 2016. Two submissions were received which referenced the traffic and transport impacts of the development, in addition to comments from the Department of Planning and Environment. This report addresses these responses with regards to traffic and parking issues for the development proposal, on behalf of Sydney Church of England Grammar School (Shore).

1 Department of Planning and Environment

The NSW Department of Planning and Environment response to the development application is provided in Appendix A.

As requested by the Department, the Green Travel Plan (GTP) for the School has been revised. The updated Travel Plan has been developed by Taylor Thomson Whitting. In light of the changes to the Green Travel Plan, the car parking provision on-site has been reviewed. Section 2 details the revised approach to parking within the School and in relation to the Physical Education Centre development.

Site observation was undertaken to observe potential operational traffic issues. Outcomes of these observations are discussed in Section 3.

2 North Sydney Council

North Sydney Council provided a submission in regards to the development application, which has been attached in Appendix B. This submission concerned a number of topics including traffic and parking related to the development.

2.1 Car Parking

The Council noted the high proportion of staff (approximately 71%) travelling to and from the site by car. The revised Green Travel Plan proposes various measures, including car park access restrictions and encouragement of carpooling, to reduce this mode share. The target share is 54% single occupancy and 10% carpool, with an aim to be achieved within 12 months of completion of the SPEC facility and Bishopsgate Car Park. While the availability of public transport in the area is acknowledged, specific requirements of various parking user groups result in a high demand for private vehicle usage. These requirements are detailed below.

The existing total parking provision at the School is 148 spaces¹. The original development application proposed the addition of 38 spaces. This consisted of the removal of 23 existing non-compliant spaces, 54 new spaces in an expansion to the Bishopsgate Car Park, and 7 new spaces in the SPEC basement area. The total provision was originally detailed to be 186 spaces.

2.1.1 Shore Staff

All teaching staff at Shore are required, as part of their contract of employment, to undertake roles in the School's co-curricular program. Staff are responsible for the coaching of boys in sport twice a week after school, as well as attending sporting fixtures held mainly on Saturdays. In addition to drawing on their own experience in sports, many of the staff have

¹ *Shore School Link Road Access Strategy*, TaylorBrammer, 2013

undertaken intensive programs to qualify for national coaching certificates and to update their skills. Staff are also engaged as coaches and supervisors for other activities including music, drama, debating, Cadets, mock trials, chess, and other activities, which are held after school hours. While some of the performing arts activities are held on-site, the School does not have comprehensive sporting facilities at the North Sydney campus. Shore's playing fields are located at the Northbridge, five kilometres north of the main campus, with an additional facility at Gladesville. Most of the training for sports programs are located off-campus at the Northbridge or Gladesville facilities, with a complete list of extra-curricular activities and locations provided in Appendix D.

Students and staff are dismissed directly from after-hours activities, without requiring return travel to Shore. Co-curricular venues are typically located a large distance from the main Shore campus, and public transport is often limited or does not provide travel to the same areas as North Sydney. As such, students are regularly picked up via private vehicle, and many teachers choose to drive home. For this reason, staff drive their vehicle to Shore during the day, creating demand for on-site parking spaces.

Shore currently employs 257 full-time staff, including 14 staff who live on-site and are each allocated a car space, with an additional 2 staff to be employed for management of the SPEC facility. A further 72 part-time staff members teach at the school. Around 30% of part-time staff members, or 22 staff, are present on a normal school day. Shore also employs 2 medical staff, who are each provided with a parking space. One of these staff resides on-site 24 hours a day, 7 days a week, to meet the medical needs of the Boarding community after regular school hours.

2.1.2 Facilities Management

The School has an in-house Facilities team with 2 vehicles used to service the site. The School has also outsourced services across all campuses for cleaning, catering, and grounds maintenance, with 3 head contractors each requiring on-site parking due to the nature of their work. These 5 vehicles are each allocated one parking space. It is anticipated that the Facilities fleet will be increased to 3 to assist with management of the SPEC facility, and this vehicle will be housed within the SPEC loading area.

An additional 2 electrical vehicles are used for maintenance purposes and require dedicated parking to allow for charging on-site.

2.1.3 Co-curricular Activities

Shore operates 2 vehicles for co-curricular and educational purposes, which are parked on-site. A minibus and a four-wheel drive are used by staff for sport, excursions, and community service activities at other campuses and locations. The minibus leaves Shore as early as 5am, with space to carry up to 25 students. The minibus is used for before- and after-school co-curricular activities, and to transport Boarders to activities on the weekend.

2.1.4 Regular Visitors

In addition to Shore's full-time academic and administrative staff group, regular visitors to the School include volunteers, tutors, examiners, contractors, and various specialist professionals to assist with the teaching and learning program. They provide essential support services to Shore's 1,468 students, including the 210 boarding students. A number of regular volunteers typically receive clearance at the beginning of the school year and do not necessarily use the School's sign-in system at the site on a daily basis.

Visitor type	Number of visitors	Duration / frequency
Library volunteers	8	School hours – all terms
Exam supervisors	14	School hours – all terms, peak demand during exams
Exam special provisions assistants	5	School hours – all terms, peak demand during exams
Specialist music teachers	30	Peak demand arises before and immediately after school hours
Teachers' aides	20	School hours – all terms

2.1.5 Irregular Visitors

On average, 14 visitors sign in to the North Sydney reception each day. This can reach as high as 25 visitors on busy days (during a week of observation). This does not include the number of regular visitors as described above. A further 7 contractors sign in to the School on an average day, and as high as 15 on a day during observation. Contractors typically require large parking areas to lay down materials and equipment. Approximately 30% of visitors and contractors, or 7 guests, typically overlap during the middle of the day.

Regular and irregular visitors park informally on a non-compliant grass embankment on the eastern side of the Bishopsgate driveway. This area will be replaced with a designated pedestrian pathway to the extended Bishopsgate Car Park to reduce conflict between vehicles and pedestrians.

A number of parents also visit the school during the day for ad-hoc meetings with staff members, or for various administrative duties. This number can vary depending on the activity.

2.1.6 Shore Community Functions

During school hours, Shore community events include Chapel Services (up to 300 guests), and New Boys and Orientation Days (up to 500 guests). After hours events, where staff also require parking, include parent/teacher evenings, subject selection information evenings, concerts, and performances (up to 500 guests for each). Other events include Memorial Day and Grandparents Day (with many elderly visitors attending), Speech Day, Anzac Day services, and Old Boys and Alumni Reunions.

Shore hosts competition sports events during both weekdays and weekends. Expansion of the SPEC may increase parking demand for guests.

2.1.7 Wider Community

Wider community events out of school hours are also held at the same time as Shore events when staff parking is required. These included performances and concerts at the same time as House Functions, and an annual Careers Evening for all Lower North Shore Schools. These are occasions where all or nearly all staff parking is required, and significant numbers of community guests require simultaneous parking.

As noted in the Environmental Impact Statement, Shore has previously advised North Sydney Council that the School would be willing to discuss continued and future opportunities for community access to Shore's facilities.

2.1.8 Parking Summary

When the 7 allocated visitor spaces at Graythwaite (including one disable space) are at full capacity, vehicles park along the Bishopsgate embankment, which is to be replaced with a pedestrian area.

Further parking locations include Shore's grass areas and basketball courts. For larger events, the School oval is used (weather permitting) for overflow parking. Parking in these areas is impractical and impedes on recreational area provided for students. A reduction of parking in these areas would improve safety for students and visitors.

Parking in the SPEC basement area is to be used as a loading area only, and has now been reduced to 6 loading spaces. Revised architectural plans from Cox Richardson (A-DA-2190 and 2191, dated 01/12/16) indicate that the expansion to the Bishopsgate Car Park has also been reduced by 6 spaces (with the originally proposed 54 spaces being reduced to 48).

As can be seen in the table below, there is no increase in spaces proposed for staff. Furthermore, management of parking restrictions (in the form of more detailed swipe card access or similar) is to be investigated and optimised to ensure that the allocated staff spaces are available and correctly used.

There is a net increase in total provision of 25 spaces, as a result of the addition of 48 spaces in the Bishopsgate Car Park and relocation of 23 spaces along the driveway. These spaces will be available for contractors, volunteers, and visitors, and also loading areas. The parking provision at Shore will be a total of 173 spaces.

Parking use	Existing	Original EIS	Revised
Total site provision	148	186	173
On-site staff (residing on site)	14	14	14
Medical staff (residing on site)	2	2	2
Shore vehicles	4	<i>Not specified</i>	4
Facilities and management	5	<i>Not specified</i>	5
SPEC loading spaces	-	<i>Not specified</i>	6
Visitors, volunteers, and contractors	6	6	25
Total Non-Resident Staff	117	164*	117

**The original EIS did not clarify the separate uses of car parking spaces.*

The provision of 117 total spaces for non-resident staff represents around 68% of the overall available parking on-site, with the remainder for various facilities, loading, visitor purposes and resident staff.

The existing vehicle usage rate is around 71%, which has remained steady since 2010. The revised Green Travel Plan aims to reduce staff parking to 54% single-occupant and 10% carpool. Shore is currently developing a revised Transport Access Guide to support this Green Travel Plan that is expected to be provided on the School website prior to the commencement of the 2017 school year.

As outlined previously, Shore will employ 259 full-time staff and 72 part-time staff upon completion of the SPEC facility. With a 30% daily attendance rate of part-time teachers, total

daily population is around 281 staff. At the existing vehicle usage rate of 70%, this results in a parking demand of 201 spaces (inclusive of 14 spaces for on-site staff). At the Green Travel Plan target rate of 54% single-occupant vehicles and 10% carpool (assuming 2 staff per vehicle), the parking demand is reduced to 171 spaces. Visitors, volunteers, contractors, and facilities management vehicles further increase this demand for parking spaces.

With only 117 spaces to be available for staff, on-street parking will still be required in order to cater to the overall vehicle demand. To reduce the parking rate to 17% (as per the DCP parking rate of 1 space per 6 staff members) would present an unreasonable change to travel behaviour and result in a high demand for on-street parking spaces.

Given Council's continued and recent investigations into No Parking zones and Car Sharing schemes, it is evident that demand for local parking is high. The provision of parking at Shore will reduce the usage of on-street parking spaces by staff and guests, resulting in greater amenity and improved convenience for local residents and visitors.

2.2 Drop-off and Pick-up

The Council also noted that the existing drop-off and pick-up facility has been seen to queue onto Union Street during the afternoon pick-up period. Vehicles queued or parking on this section of this road would cause eastbound traffic to cross the centre line in order to pass.

Site observations were undertaken by TTW across three days to assess the queuing and operation of the pick-up area during the afternoon peak. While the internal queuing area was noted to reach near capacity at the busiest times, no vehicles were required to queue along Union Street. Teachers on-site noted that demand typically increases on rainy days, and it appears that the site image submitted by Council was taken during a rainy period. Site monitoring by a Shore representative made similar conclusions. Over four days of this monitoring, queuing was only observed during one rainy period. The facility is a 'kiss and ride' area, and parents do not leave the vehicle at any time. Shore staff are responsible for coordinating students to ensure vehicles are moved along the queue as quickly as possible.

To assist with traffic management in Union Street, Shore will provide formal training to staff who are positioned in this area in periods of expected high traffic volumes (such as during rain or special events). It will be the responsibility of these staff members to encourage local traffic circulation rather than illegal stopping.

Shore is also to begin trials in using the pick-up area loop road as a vehicle queuing zone. This area is currently used as a delivery vehicle access during the day, and is not used during pick-up times. An estimated 3-4 vehicles may be able to queue in the area, and will be directed to move to the area and vacate the main pick-up zone if their child is not ready to be collected. A design assessment of the area including circulation width and vehicle manoeuvring space would be required pending the outcome of trial usage.

The School will remind parents regularly via the Shore Weekly Record and the Prep Peek of the No Stopping zone in Union Street and encourage local circulation for orderly traffic flow.

3 Union Precinct

Union Precinct provided a submission regarding the development application, following discussions at their meeting of 7th September, 2016. Union Precinct is a community group representing residents and businesses in the area directly adjacent to Shore. The submission is attached in Appendix C.

The main concern highlighted by the Precinct is in regards to traffic management along Union Street. The driveway entry at Gate 22 provides access to three areas, only one of which is a prohibited movement. Vehicles travelling to the Bishopsgate Car Park or further up the driveway are permitted to turn right into the entry. A No Right Turn restriction applies

for vehicles entering the drop-off and pick-up area. This is currently sign-posted at the Bishopsgate driveway entrance.

With the partial restrictions in place, it is difficult to police vehicles performing illegal manoeuvres in its current form. Shore will investigate appropriate management to prevent illegal movements at Gate 22. Site observations showed that the presence of a visible observer or coordinator along Union Street, such as that proposed in Section 2.2, is useful in discouraging illegal manoeuvres into the site. Drivers were typically seen to change course and circulate the area to enter legally, when aware that they are being observed.

The School will remind parents regularly via the Shore Weekly Record and Prep Peek of the access restrictions at the drop-off and pick-up zone.

Prepared by
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Authorised By
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Technical Director

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Appendix A – Department of Planning and Environment

Response to Application



Ms Kathy Dickson
Sydney Church of England Grammar School
PO Box 1221
North Sydney NSW 2059

Our ref: SSD 7507

Dear Ms Dickson

**Shore School Physical Education Centre (SSD 7507)
Response to Submissions**

The exhibition of the State significant development application, including the Environmental Impact Statement (EIS), for the above proposal ended on Friday 26 August 2016. All submissions received by the Department during the exhibition of the proposal are available on the Department's website (<http://majorprojects.planning.nsw.gov.au>) under project title reference 'SSD 7507'.

In accordance with clause 85A of the *Environmental Planning and Assessment Regulation 2000*, the Secretary requires the applicant to respond to the issues raised in these submissions. Please provide your response to the Department as soon as possible.

Please also be aware that North Sydney Council has advised the Department that it intends on making a submission on the application shortly. A copy of its submission will be forwarded once received by the Department.

The Department has also undertaken a preliminary assessment of the EIS and requests that you submit a revised green travel plan that adopts appropriate sustainable transport mode share targets for staff and students, including a reasonable shift towards sustainable transport modes given the accessibility of the site to public transport. The green travel plan should identify the staff and student targets with consideration of schools with comparable travel characteristics, including accessibility to public transport.

The proposed car parking should then be reviewed in light of the revised mode share targets and reduced accordingly. You should also consider the potential for the delivery of additional drop-off/pick-up facilities within the site to address ongoing operational traffic issues, for example where car parking is being removed in the vicinity of the Bishopsgate Car Park.

Note that under clause 113(7) of the *Environmental Planning and Assessment Regulation 2000*, the days occurring between the date of this letter and the date on which your response to submissions is received by the Secretary are not included in the deemed refusal period.

If you have any questions, please contact Megan Fu, who can be contacted on (02) 9228 6531 or via email at megan.fu@planning.nsw.gov.au.

Yours sincerely

 5/9/2016

Kane Winwood

**A/Director, Social and Other Infrastructure Assessments
as delegate for the Secretary**

Appendix B – North Sydney Council

Response to Application



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ABN 32 353 260 317

David Gibson
Team Leader Social Infrastructure Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Megan Fu

GJY(CIS)

Your ref: SSD7507

29 August 2016

Dear Sir,

**Re: Sydney Church of England Grammar School (Shore)
Physical Education Centre (SSD7507)
Blue & William Streets and Hunter Crescent, North Sydney**

I refer to your letter received on 26 July 2016 inviting Council to comment on the above project.

The following comments are provided:

1. Traffic and parking

Car Parking

The proposed development involves the demolition of existing buildings and construction of a Physical Education Centre and a carpark resulting in a net increase of 38 parking spaces.

The report indicates that approximately 70% of staff travel to and from the site by car. This is a high proportion of staff particularly for a site with excellent access to public transport.

The existing parking provisions already significantly exceed the maximum requirements set out in the North Sydney DCP 2013 (269%). The development proposes an additional 38 parking spaces above the existing provision, which will further exceed the maximum requirements set out in the North Sydney DCP 2013. This is 338% of what is permitted under the DCP.

Council has developed this section of the DCP in accordance with its policies on traffic minimisation. Further, Council's adopted Community Strategic Plan aims to minimise the impact of the private motor vehicle. By restricting the supply of parking, employees are encouraged to consider other forms of transportation which in turn reduces congestion which benefits all road users, particularly pedestrians, cyclists and public transport users.



Permitting any development to increase their parking spaces by 3 times the DCP would entirely undermine the intent and purpose of Council's DCP. North Sydney Council has recognised that increased traffic flow, congestion and parking demand can lead to a loss in residential amenity. Further, congestion leads to reduced levels of service for public transport, through longer journey times and loss of fleet efficiency. For pedestrians and cyclists increased traffic means more difficulty in walking and increased noise levels on roads. This can result in roads that are intimidating environments for pedestrians and cyclists.

It is strongly recommended that the car parking provision be reduced to comply with the limits set out in North Sydney DCP 2013.

Existing Pick-up and Drop-off Facility

The Traffic Report does not assess the operation of the existing pick-up and drop-off facility. Inspections by Council staff have found that vehicles queue significantly onto Union Street during the afternoon pick-up. The internal pick-up queue exceeded the capacity with up to 9 vehicles queuing on Union Street. There are serious safety concerns with these operations as the queue blocks eastbound traffic on Union Street. East-bound vehicles were forced to overtake the queue of 9 vehicles on the wrong side of the road.

This operation should be reviewed as part of the proposed development and plans should include a reconfiguration of the drop-off and pick-up facility to ensure that all queuing occurs on site.



Fig. 1 Queues for pick-up facility extending onto Union Street. Other vehicles overtaking on wrong side of road.

Green Travel Plan

The Shore School Transport Access Guide should be reviewed to place more emphasis on alternatives to driving. The first line of the TAG should state that the School is conveniently located close to public transport hubs. Car parking should be listed at the bottom of the TAG as a last resort, rather than the top.

Conclusion

1. THAT there be no net increase in parking above existing levels (148 spaces)
2. THAT the School be required to review the operation of the existing drop-off and pick-up facility and include a reconfiguration of the drop-off and pick-up facility to ensure that all queuing occurs within the School site and not onto the public road, as part of the proposed development.
3. THAT the Shore School Transport Access Guide be reviewed to place more emphasis on alternatives to driving.
4. THAT a Demolition and Construction Management Program be prepared and submitted to Council for approval by the North Sydney Traffic Committee prior to the issue of a Construction Certificate. Any use of Council property shall require appropriate separate permits/ approvals.

2. Heritage

Heritage Significance

The subject property, being the Shore School, is listed as a heritage item within NSLEP 2013, significant for being: *"Important private school regionally and occupying the property mostly associated with Bernhard Holtermann. Contains a replica of Holtermanns Tower rebuilt in the early twentieth century. A range of buildings occupy the site, the chapel being the most interesting architecturally, the others of less design merit but typical of the type and period, including interesting Inter-War buildings. The newly acquired Graythwaite estate is State-heritage listed. Significance of the school is largely sociological and symbolic. Traces of the original house are believed to be incorporated into one of the buildings. The landscape setting of the school adjacent to the chapel and in front of the Holtermann tower as well as the original Graythwaite site is of significance."*

Significant buildings on the site include:

- The Chapel
- The Dining Hall
- Middle Block
- War Memorial Hall
- School House
- Upton Grange
- Robson House
- Hodges House
- Barry House
- State Listed Graythwaite House is located on a separate site at the western side of the Shore School Campus, physically separated by some distance from the development area.
- The Chapel and Chapel Lawns are adjacent to the development site on its western side

Appendix C – Union Precinct

Response to Application

UNION PRECINCT



unionprecinctns@gmail.com PO Box 7041, North Sydney 2059.

To NSW Planning and Environment

Submission - Shore Physical Education Centre. SSD 7507

Union Precinct represents the residents and business of the area immediately adjacent to Shore School, and in fact Shore School is part of the Precinct. We apologise for a late submission but as we meet only monthly it was not possible to submit before now.

At our monthly meeting on Sept 7 the Precinct considered the impacts of the proposed development. We have been previously briefed of the development by Shore so have considered the likely impacts carefully, and whilst there is some concern of the building bulk and its impact on residential flat buildings on the east side of William St, that is not our major concern.

The Precinct's major concern is that of **traffic management, and especially the long term arrangements for Union St.** North Sydney Council, as a condition of a previous Development Consent, banned Right Turns from Union St into the "kiss and drop facility" driveway. Signs were erected accordingly, but observations from the residents on the south side of Union St clearly show that the ban is not being followed, nor policed.

The problem arises as the single driveway entrance from Union St is a shared driveway with 3 functions;

- entry to the drive heading north to behind the Dining Hall and other buildings, used for staff parking and service vehicles and food supply vehicles
- entry into the existing staff parking structure
- entry into the kiss and drop access drive by virtue of a hard right turn once in the driveway.

Clearly, it is impossible to police an illegal right turn into a driveway when 2 out of the 3 activities are legal. Right turns at the top of the Union St hill also are a dangerous activity - afternoon sun glare is a serious issue, route 265 buses cannot pass as parking as allowed on the south kerb, and long queues are not uncommon in the afternoon pick up.

In previous submissions to North Sydney Council, the Precinct has consistently called for access into the Union St drive entrance to be LEFT HAND TURN only, with a painted medium strip and/or double lines installed to encourage that.

This development application increases the staff parking structure numbers by 38 additional cars, with the only access from the existing opening for the Union St driveway. So traffic activity is clearly increased at a critical point - the right turn into the Union St driveway. These increased traffic movements result in the Precinct formally repeating our previous demands that, as a Condition of Consent, a condition be inserted as follows -

" Access into the Union St eastern driveway will be LEFT HAND TURN ONLY, and the entrance will now be signposted on both sides accordingly, and a painted and striped medium strip will be installed on the verge of Union St carriageway to enforce correct use of the driveway entrance"

Regards

Warren Marsh
Co-Chair
Union Precinct, North Sydney LGA.

Appendix D – Co-curricular Activities

Locations of Off-site School Co-Curricular Activities

Where Staff attend training on a twice- and sometimes thrice-weekly basis:

Gladesville Boatshed, Wharf Road, Gladesville
Shore's Playing Fields, Northbridge
Hornsby Rifle Range, Rosamund Street, Hornsby
Long Reef Surf Club, Collaroy
Tennis World, 16-18 Epping Road, North Ryde
Rock Climbing, 12 Fredrick Street, St Leonards
Rooftop Basketball Courts, Crow Nest
Koola Park, Killara
O H Reid Reserve, Chatswood West
Middle Head Oval, Mosman
Killara Park/WA Bert Oldfield Oval, Roseberry Road, Killara

These are the venues that staff visit for Saturday seasonal competition:

AAGPS Schools

Sydney Grammar School, Darlinghurst
The Scots College, Bellevue Hill
St Ignatius' College Riverview, Lane Cove
Newington College, Stanmore
The King's School, North Parramatta
The Armidale School, Armidale
St Joseph's College, Hunters Hill
Sydney Boys High School, Surry Hills

CAS Schools

St Aloysius College, Milsons Point
Barker College, Hornsby
Cranbrook School, Bellevue Hill
Knox Grammar School, Wahroonga
Trinity Grammar School, Summer Hill
Waverly College, Waverly

These are the venues staff would visit three to five times a year for interschool competition:

Sydney International Rowing Centre, Penrith

Sydney Olympic Park Aquatic Centre, Homebush

ES Marks Oval, Anzac Parade, Kensington

Academy of Sport and Recreation, Wakehurst Parkway, Narrabeen

Blacktown International Sports Park, Eastern Road, Rooty Hill

Hen and Chicken Bay, Cabarita,

Iron Cove Rowing, Nicholson Street, Balmain East

Bat and Ball Oval, Moore Park

Acron Oval, St Ives

ELS Hall Park, North Ryde

Tramway Oval, Moore Park

Mahoney Park, Marrickville

Anzac Rifle Range, Franklin Street, Malabar