

Our Ref: 17106
10 May 2017

Department of Education
Level 4,
35 Bridge Street
Sydney NSW 2000

For the attention of Natalie Bevan

Dear Natalie,

RE: BALLINA PUBLIC SCHOOL

Further to your recent request, the Transport Planning Partnership (TPPP) has reviewed the traffic reports in relation to the above school and their subsequent letters addressing several authority responses.

For clarity, I have summarised the key transport elements of the proposal

- The proposal involves a redevelopment of the existing high school to cater for
 - 1000 students (an increase of 607 from the existing 393)
 - 93 staff (an increase of 51 from the existing 52)
- There are currently 32 parking spaces on the school grounds, with access off Cherry Street. There is also an informal gravel car park located on Clement Park, also with access off Cherry Street, with capacity for approximately 18 cars.
- It is proposed that all parking for the school (up to 76 spaces) is now provided on street
- Ten pick up / drop off spaces for students will be provided on Cherry Street outside the school

Having read the consultation responses, it is clear that there are 3 main issues: -

- Staff Parking Provision
- Provision of drop off facilities
- Traffic Impact

Consultation Responses

RMS's response requires the traffic report to be updated to address some of the issues raised in their letter but also, more fundamentally requires 110 parking spaces to be provided on site.

The proposal seeks to remove all on-site car parking spaces, which will transfer all existing parking demand onto surrounding local streets. The *Interim Guidelines for the Planning and Design of School Traffic and Pedestrian Facilities* recommends the provision of adequate on-site parking and that the design of the school should provide for the appropriate separation of pedestrians and cyclists from vehicular traffic. Further consideration should be given to providing on-site parking to reduce pedestrian activity on surrounding streets and minimise interactions between people and vehicles.

Roads and Maritime surveys of NSW schools has identified average car parking rates of approximately 0.11 per student. This would equate to an average demand of 110 parking spaces required for the proposed development, which is significantly higher than the 70 spaces identified in the supporting TIAs.

The supporting TIAs identify the parking capacity on surrounding streets, but not the existing peak hour demand generated by nearby developments. Further assessment is required to determine whether sufficient peak hour capacity will be available to accommodate the cumulative parking demand of existing and proposed development in the area.

The Ballina Shire Council response in relation to parking is shown below and this concurs with the RMS view.

Whilst the servicing and surrounding street system has the capacity to safely handle the traffic generated by the redeveloped school and the future indoor sports and community centre should it proceed, the submitted plans to remove all off-street parking from the site and provide for the school's teacher, student, and visitor parking, set-down and pick-up, entirely within the surrounding streets is unacceptable. The application's proposed approach would create a severe and avoidable impact on the established amenity of residents living in the immediate locality of the school and to the current safety and availability of on-street parking servicing the existing adjacent sports and community facilities.

The Council supports the submission of NSW Roads and Maritime Services dated 31 January 2017 in its entirety and recommends as an essential element that any consent issued be conditioned to require the provision of a minimum of 110 off-street parking spaces for the school (preferably having access from Cherry Street). These spaces should include the provision for weather protected disabled parking in accordance with the Australian standards to assist students, staff and visitors to the school.

Ideally, pick-up and set-down facilities for students should also be provided on-site as opposed to within the street system.

It is a fundamental requirement for new developments, particularly those that have the capacity to increase traffic and parking demand, to make proper provision for off-street parking and, simply, this application doesn't do so.

We have therefore reviewed each of these issues in turn.

1. Staff Parking Provision

The premise of the difference in opinion is that Ballina Shire Council / RMS require all parking to be provided on site whereas the Department of Education are of the view that it is a waste of the valuable on-site education space to provide parking spaces on site when there are significant levels of unoccupied on-street car parking surrounding the site.

The RMS Guide does not have any data for parking requirements for schools. The Ballina DCP specifies the following parking requirements for education establishments (secondary) - 1 space per 10 students + 1 space per 2 employees. Based upon the Ballina Shire Council requirement, there would be a need for 76 parking spaces as shown below.

Land Use	Parking Demand	Development Level	Parking Requirement
Educational establishment	1/10 students (>17yo)	289 students	29
Staff	0.5/staff	93 staff	47

We note that RMS have referred to the unpublished RMS study of schools in NSW undertaken in 2014 which suggests an average of 0.11 spaces per student and as such 110 spaces should be provided. As the author of that unpublished RMS document, the undersigned would point out that whilst this 0.11 (as shown the extract from the RMS report) was an average value of all sites, the range of parking rates was from 0.03 to 0.21 and this depended very much on the school and its particular location. It is also noted that RMS, even if using this argument, should have used 0.10 for their calculation not 0.11.

Schools	Location	Average	Minimum	Maximum
All	All	0.10	0.03	0.21
	Metropolitan	0.11	0.03	0.21
	Regional	0.10	0.07	0.15

However, the DCP remains the only published information on the parking needs for a school in this location and, as such, the 76 spaces suggested by the DCP is the more relevant figure.

As no spaces are being provided on site, there is a perceived shortfall of parking provided on-site.

In justifying why such parking isn't being provided, the traffic report stresses that the Department's 'Educational Facilities Standards and Guidelines' actively encourages the use of sustainable means of transport. Section PS610.17 Services Zone states:

"In order to ensure that the available site area for teaching, learning and play is maximised, to enable community use and to encourage the use of sustainable means of transport to and from the school, on school site parking should be kept to a minimum".

Furthermore, TTPP are aware from other sites that the Motor Vehicle Policy for NSW Government Agencies which "does not entitle parking spaces for private use vehicles" stating "for 100% private use vehicles (whether owned, novated or 100% Departmental or Agency packaged) are not entitled to a parking space on Government leased or owned premises."

Noting these Departmental ambitions, GHD has provided a Green Travel Plan also known as a Workplace Travel Guides (WTPs). Although not explicitly described, it presumably would be the intention for all staff, students, visitors and parents/carers be issued with a Transport Access Guides (TAGs) to reduce car dependence at the school and to minimise the need for parking.

Whilst the Green travel plan for staff is the correct means for delivering staff modal change away from private car, the plan contains many descriptive measures (provide bus timetables, encourage cycle use etc.) but it does not promote any direct actions which would fundamentally change the modal split.

Notwithstanding this, the traffic report goes on to demonstrate that there are a significant number of on-street / potential on-street parking spaces close to the site. These are: -

- 26 spaces in Martin Street on the existing bitumen. It is proposed that these be line marked.
- 12 spaces in Cherry Street north of Burnet Street, where there is currently no line marking. It is proposed that these be line marked.
- 38 spaces are available in other sealed parking areas in Cherry St (opposite the school, and both north and south of the site), both Burnet and Swift St (west of Cherry St), and Swift St (east of Martin St).

Ardill Payne's response to the concerns raised by RMS and Ballina Shire Council undertook a review of the existing arrangements and looked at the potential capacity of the off-site parking.

Whilst in many other contexts this might be considered unreasonable, the situation in Ballina is quite different. As can be seen from the aerial photograph below, most of the blocks in the vicinity have angled parking provided along the road, mostly on all 4 sides of the block. This parking is then generally used by the residences and businesses on that block.



The block around the school is similarly used, to a large extent, by the school which is the “island” located between the roads with the angled parking. It is quite reasonable to assume that the parking has been provided to facilitate the adjacent use (i.e. the school). If it is not, it is unclear why such high levels of parking have been provided.

On this basis, the traffic report has assessed the potential capacity of these parking areas and has identified that with some sealing and line marking, the existing parking around the perimeter of the site has capacity for 122 spaces as shown below.



Ardill Payne has then undertaken an occupancy count of these spaces and with this information has concluded that the maximum number of spaces that were occupied is 32 spaces. There is an available capacity of 90 spaces at any time.

No. of Occupied Bays and Utilisation Rates

Source Photograph	No. of Occupied Bays	No. of Vacant Bays	% Utilisation
Google Earth Aerial Thursday 16 th May 2013	22	100	18.0%
Google Earth Aerial Monday 6 th June 2016	32	90	26.2%
Google Earth Aerial Tuesday 9 th August 2016	15	107	12.3%
Google Earth Aerial Thursday 25 th August 2016	25	97	20.5%
Nearmaps Aerial Tuesday 29 th July 2014	22	100	18.0%
Nearmaps Aerial Thursday 12 th May 2016	22	100	18.0%
APP Parking Counts Monday 10 th April 2017 (total of Locations 2, 4, 6, 8)	8:30AM: 3 11:00AM: 4 3:15PM: 7	119 118 115	2.5% 3.3% 5.7%
APP Parking Counts Wednesday 12 th April 2017 (total of Locations 2, 4, 6, 8)	8:30AM: 1 11:00AM: 3 3:15PM: 17	121 119 105	0.8% 2.5% 13.9%

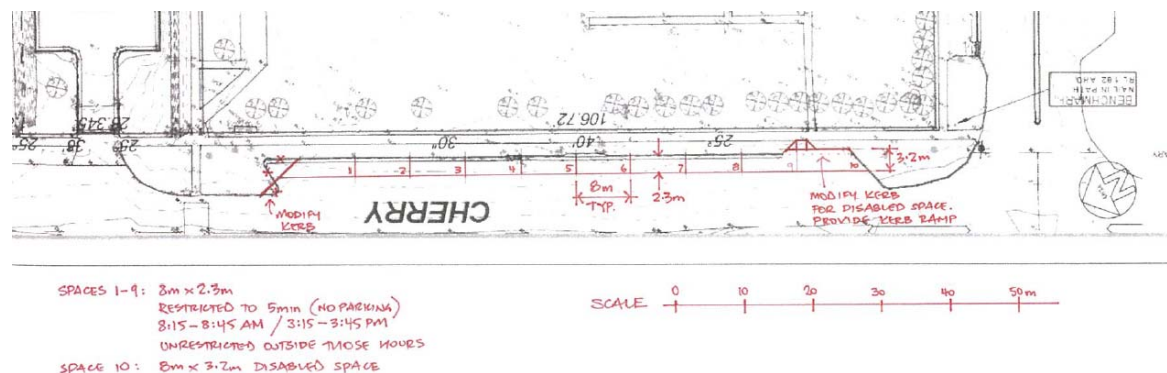
It is TTPP's view that it is not sustainable to provide 76 (or 110) spaces on site when there are some 90 regularly unoccupied parking spaces already provided around the perimeter of the site. These parking spaces clearly provide little benefit at the moment and their use, during school hours, would be a sustainable use of this parking. Furthermore, excavation of some 3000m² of a valuable site to re-provide these levels of parking on-site when there is available and unused parking space around the perimeter of the site is not sustainable. The use of this parking and the loss of these spaces to the wider public during school hours would be negligible as stakeholders, other than the school, do not appear to use these spaces to any great extent.

TTPP conclude that all of the parking requirements for the school could easily be provided in parking areas already located around the perimeter of the site. It seems unsustainable to build a car park on site of between 76 and 110 spaces in site in order to replicate these 99 unused parking spaces around the perimeter of the site. There is little current demand for these on-street parking spaces – what little demand there is during the day is probably as a result of parking demand at the school – and it is my view that other stakeholders would not be affected by the school using these parking spaces.

2. Drop off

Whilst the drop off element of the parking number has been accounted for in the calculation of 76 parking spaces, there is merit in providing some “kiss and ride” spaces.

The location chosen are those spaces in Cherry Street directly in front of the school. These spaces would be remarked for short term parallel parking to facilitate such student pick-up and set-down. A disabled parking space will also be provided in this area, with modifications to kerbing and paths to comply with AS 2890.6.



TTPP are of the view that 10 spaces which could turn over every 2 minutes or so would mean that each space can accommodate 30 vehicles per hour and as such 10 spaces would have capacity for 300 vehicles per hour.

TTPP are of the view that the number of drop off spaces on Cherry Street is adequate (bearing in mind that other spaces around the periphery of the site are available for drop off) and that the location of these spaces on Cherry Street is reasonable.

3. Traffic Modelling Intersection Performance

There have been a significant number of traffic/layout/parking issues raised by TfNSW, RMS and Ballina Shire Council. There are however two references to traffic in the submissions and the response to those submissions which should be noted.

1. Ardill Payne state that *“The Traffic Impact Assessment (TIA) considered a combination of previous school studies in the area, a current traffic survey of Ballina High School staff and students, historical data, and published interstate and overseas traffic generation data to estimate the traffic generation rate. The adopted rate sits near the upper end of the range of all these surveys and studies. The total estimated increase in traffic was applied in full to all streets and intersections. **Modelling indicated that all streets and intersections were within acceptable performance standards with the applied increase.** Sensitivity modelling of intersections was undertaken (but not reported in the TIA) with increased flows. This modelling showed no reduction in performance standards”.*

2. Ballina Shire Council state in their consultation report that *“the servicing and surrounding street system has the capacity to safely handle the traffic generated by the redeveloped school and the future indoor sports and community centre should it proceed”*. This confirms that council are of the view that the traffic impact is acceptable.

Of the remaining comments, most relate to the parking issue described in Section 1 above and there are a number of other layout issues which either seem acceptable as they are or seem resolvable and a number of issues upon which clarification is sought.

TTPP are of the view that the proposed traffic modelling indicates that there do not appear to be any locations in the close vicinity of the site where traffic capacity would be a significant issue even with the development of the school.

I trust that is sufficient for your needs but should you wish to discuss further, please feel free to call me at this office.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ken Hollyoak', written in a cursive style.

Ken Hollyoak
Director