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Transport Planning, Traffic Impact Assessments, Road Safety Audits, Expert Witness

11th May 2018 Reference: 16575.06FA

Artazan Property Group
Level 8,
210 George Street,
Sydney, NSW 2000
Attention: Cian Fitzgerald

LETTER RESPONSE TO DEPARTMENT OF PLANNING AND ENVIRONMENT WITH REGARD TO THE LORETO KIRRIBILLI SCHOOL AT 85 CARABELLA STREET, KIRRIBILLI

Dear Cian,

Reference is made to your request to provide a response to the comments provided by the New South Wales Department of Planning and Environment (DoP&E) traffic consultant with regards to the proposed staged development of the Loreto Kirribilli School. A response to the DoP&E is provided below. This letter should be read as an addendum to the Traffic and Parking Impact Assessment dated 25 July 2017 by M^{C}Laren Traffic Engineering.

The DoP&E request for information are shown below (italicised) with a response thereafter.

1. *An updated assessment of the proposed development under State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 which has superseded State Environmental Planning Policy (Infrastructure) 2007. (Section 1.2 - McLaren Report)*

MTE Response: Loreto Kirribilli has an existing approval for a total of 1,100 students. The current proposal is for an increase of 30 students to a total of 1,130 students (modified from the original DA submission).

Based upon the above scale, the proposed Stage 1 Masterplan development does not qualify as a traffic generating development under Clause 57 of the newly introduced SEPP (Educational Establishments and Child Care Facilities) 2017 (current proposal is less than 50 additional students). As such formal referral to the RMS is not required and the DoP&E can assess the proposal accordingly.

Regardless of the above, the proposed development was referred to the RMS and that they did not raise any issues around traffic.

2. *Detailed description and analysis of existing school drop off and pick up area on Carabella Street between the junctions of Fitzroy Street and Parkes Street, including analysis and data relating to school pick up and drop off for the busiest period of the year (Sections 1.3 and 4.2 - McLaren Report)*

MTE Response: Considering the proposal is for an increase of some 30 high school students, the pick-up and drop-off parking demand is not expected to change from the current operation. The current use of the pick-up / drop-off area is limited to only Primary School students, and any additional drop-off / pick-up up demand by the additional 30 high school students can be undertaken in the streets surrounding the site such that students can walk the short distance to the school entrance / vehicle.

Considering the proposal does not look to increase the demand of the existing drop-off / pick-up operation, a detailed analysis is not warranted.

Regardless of the above, Loreto Kirribilli is undertaking the following initiatives to improve the existing function of the drop-off and pick-up operations along Carabella Street.

- A new permit system will be implemented, whereby parents will be provided with a card to display in their windshield in order to inform teaching staff on duty of which student is being picked-up by that vehicle. These cards will be provided only to junior school parents and vehicles without a card will not be permitted to pick-up a child. Senior students will not be provided with these cards and will be unable to be picked / dropped off up from Carabella Street.
- The school has recently hired traffic wardens to control traffic along both Carabella and Elamang Street. The traffic wardens will prevent parents from double parking and undertaking unsafe U-turns and will provide traffic control where required to ensure the safe operation of the two roads for both drivers and pedestrians.
- The school will author a formal management plan detailing all the initiatives in place both the discourage the use of private vehicles and to manage the impacts of drop-off and pick-up operations.

It is anticipated that the implementation of the initiatives described above will have the following effects on the operation of the drop-off and pick-up operations of the school:

- The implementation of the permit system will cause a net reduction in vehicles utilising the existing pick-up zone along Carabella Street and reduce or eliminate traffic queues in Carabella Street;
- The addition of suitably qualified traffic wardens to both Elamang Avenue and Carabella Street will increase the traffic flow efficiency and safety of both roads;
- The lollypop man has recently been granted permission by the police to act as a traffic controller in addition to his duties controlling the operations of the pedestrian crossing. Where necessary he will direct traffic to alleviate blockages in Carabella Street.
- The implementation of a management plan will result in a lower overall private car usage and reduce the impact of the school on the surrounding road network.

3. *Could you please confirm the reference criteria for classifying Carabella Street as a local road given the traffic volumes? (Section 2.1 - McLaren Report)*

MTE Response: Collector roads generally provide access from local roads to arterial roads Willoughby Street is not an arterial road. The two-way traffic flows along Carabella Street based upon the tube surveys do not exceed 200 vehicles per hour, traffic flows along Carabella Street are closer to a local road than a collector road.

4. *Observations from AM peak (8-9am) / School Peak (3-4pm) / PM peak (4-6pm) site visits for validation of SIDRA modelling, to ensure surveys accurately reflect the information to be inserted into the SIDRA models and to demonstrate the current conditions are suitable for use of the school (Section 2.3.3 - McLaren Report)*

MTE Response: As stated within Section 2.3.3 of the M^{C}Laren Engineering report, SIDRA intersection modelling cannot model the impacts of a high turnover of on-street parking or of a pedestrian-dominant environment (as generally exists around schools).

A site visit was undertaken on 1 May 2018 in the afternoon to examine the existing operations of the school during pick-up times. In the experience of *M^{C}Laren Traffic Engineering*, the pick-up operations of a school have a larger impact on the local traffic network than drop-off operations and for the purposes of this advice, a morning site visit was not necessary.

The pick-up operations along the Carabella Street site frontage were observed during the site visit on 1 May 2018 between the times of 2:40 pm and 3:35 pm. The following relevant notes were made:

- Parents were waiting in the pick-up zone at 2:40 pm when I arrived at the site, with the surrounding area at a very high level of parking occupancy.
- The pick-up operations are well managed by teaching or other staff and are efficient, in that students are quickly loaded into their parents' vehicles upon their arrival in the signposted area along Carabella Street;
- The limited length of the sign posted pick-up area, with capacity for approximately six cars, is the limiting factor for the pick-up operations;
- Parents were observed to queue in Carabella Street, effectively blocking two-way traffic flow (due to the narrow width of Carabella Street) between approximately 2:50 pm and 3:20 pm.
- During this time when traffic flow was constrained, it was not observed that any traffic attempted to travel north on Carabella Street, all traffic heading north made a left turn at Fitzroy Street.
- No buses were observed to pick up students along the Carabella Street frontage, though two buses (Route 269) were observed travelling north along Carabella Street between 2:40 pm and 3:35 pm.
- A total of 85 vehicles were observed to pick up students between 2:55 pm and 3:25 pm.
- The pedestrian crossing was controlled by a traffic controller from 2:50 pm until 3:45 pm.
- Due to the traffic queues extending north in Carabella Street, the traffic flow in the road was not inhibited by the crossing operations, despite the lollypop man stopping traffic approximately once a minute.

Subsequent to the site visit it has been noted that some senior students were present at the pick-up facility, which is intended as a junior-school-only operation.

Considering the proposal is for an increase of 30 highs school students, which is approximately 12 additional private vehicles (based upon the existing surveys) arriving to the school is considered minor and will not have a detrimental impact upon the surrounding operation of nearby intersections. Further, with the implementation of the initiatives described in Response 2, the traffic flow along Carabella Street is expected to improve. It should be noted that the drop-off / pick-up facility provided along Carabella Street is restricted to primary school students only. Therefore there will be no additional vehicle trips at the existing pick-up / drop-off facility by the proposed increase in senior students.

5. *Road Hierarchy - (Section 2.1.1 and Section 2.1.2 - McLaren Report) provide information on 40km/h School Zone.*

MTE Response: There currently exists 40km/h school zones within close proximity to the site along both Elamang Avenue and Carabella Street.

6. *Assessment of pedestrian crossing at intersection of Carrabella Street and Fitzroy Street using RMS warrants and how the additional students would be accommodated. (Not included in current McLaren Report)*

MTE Response: The existing pedestrian crossing operates with a traffic controller and allows students to cross approximately once a minute during school pick-up times. The additional 30 students are not expected to add loading above the current operation and a full assessments of RMS warrants is unnecessary.

7. *Assessment of availability of all day parking in the area for residents, staff and visitors. We note that there are 2P restrictions observed on local streets from Google Maps. (Section 2.4 - McLaren Report)*

MTE Response: The current proposal is increasing by 30 students, of which there will be nil (0) additional staff for the operation of the school. Considering this, the additional parking impact is minor and is not expected to change over the existing operation. A detailed assessment in relation to unrestricted parking is unnecessary. It is also relevant to note that the school complies with the parking requirements set out within Council's DCP.

8. *Assessment of bus parking / pick up / drop off area - with 21 dedicated school buses being at the site during the undetermined PM period (Section 2.5 and Table 5 - McLaren Report).*

MTE Response: While the traffic report details 21 dedicated school buses, these do not pick up students directly in front of the school (Carabella Street). The buses collect students from Bradfield Park.

9. *Assessment of the adequacy of the 40km/h school zone and road safety assessment as 85th percentile speed is greater than 40 km/h during all periods. This should be broken down into AM 8am-9am, School 3pm-4pm and PM Peak 5pm-6pm (Not included in current McLaren report).*

MTE Response: In our view this is not necessary for the proposed development. Rather if people are exceeding the posted speed limit of 40km/h during school zones this is a matter for the NSW police.

10. *A breakdown by school grade by mode of survey considering the different requirements for Student Opal card requirements for all students. (Section 3.1 - McLaren Report)*

MTE Response: A detailed breakdown by school grade is unnecessary for an increase of only 30 students. The summary of transport modes summarised for K – Year 6 and Year 7 – Year 12 is considered satisfactory.

11. *Clarification on the Educational Facilities and Standards Guide (EFSG) and its use on a non-Government school (Section 4.1.2 - McLaren Report)*

MTE Response: The EFSG provides information to assist in the management, planning, design, construction and maintenance of school facilities. The EFSG is not a minimum standard, but would be rather a guideline. Regardless of the EFSG, the planning controls are based upon Council's DCP. The existing development and Stage 1 development exceeds Council's minimum car parking controls. The EFSG only strictly applies to Government Schools, however can be referred to as a guide / benchmarks for non-government schools.

12. *Upon a response to Point 7 above, a re-assessment of Parking Impacts (Section 4.1.3 - McLaren Report) would be required*

MTE Response: Refer to point 7.

13. *Analysis of existing loading zone and information on how vehicles that are greater than 5.2 metres are to travel on to and off the site in a forward direction. (Section 4.4 - McLaren Report) and the proposed loading bay as part of the Stage 1 Works (as referred to in Ethos Urban EIS Page 69 Section 7.3). There is no reference to the assessment provided in Annexure I. More details on the Servicing Movements (as specified in Table 12 of Ethos Urban EIS), "once per term" is not specific enough for an assessment. Needs an assessment under AS2890.2.*

MTE Response: There will be no change to the existing operation of the site within the loading zones and waste collection areas along Elamang Avenue and Carabella Street. A detailed analysis of this is unnecessary. In relation to the new learning hub building, this will include a loading area with access via the existing driveway to Carabella Street. The constraint of the loading area is limited to a 5.2m length vehicle as insufficient turning area is available for larger vehicles. As detailed in Section 4.6 of the traffic report, **Annexure I** shows the operation of the proposed on-site loading area under the forward entry / forward out arrangement. It is expected that deliveries to this loading zone will occur outside of peak school periods and will be of low scale, up to 5 deliveries per day.

14. *Further details to be provided on make up of traffic volumes, i.e. time periods noting which peak is referred to in Table 13 (Section 5.4 - McLaren Report).*

MTE Response: The peak volumes in Table 13 of the traffic report refer to the largest average volume surveyed within the peak AM and PM period. These time periods are 11:00am and 17:00pm along Carabella Street and 11:00am and 12:00pm along Elamang Avenue. These do not overlap with the peak school periods (typically 8-9am and 2:30-3:30pm), although were used as a conservative measure showing a worst-case scenario for residential amenity. As indicated within the traffic report, the future two-way volumes are within the environmental goal volumes of the RMS.

15. *Compliance and provision of Persons with a Disability parking as per North Sydney Council DCP and AS2890.6-2009 - Off-street parking for people with disabilities (Section 4.5 - McLaren Report)*

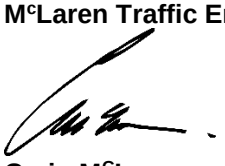
MTE Response: Refer to Section 4.5 of the traffic report for disabled parking rates for North Sydney Council DCP. Considering there is no change to the existing car parking layout or additional on-site car parking proposed, the existing provision and operation for disabled car parking will be unchanged.

16. *Notwithstanding the on-site car park not being modified, as a Development Application is proposed to change the site, consideration would need to be given to ensure that the existing car park meets AS2890.1, this should be provided (Section 4.6 - McLaren Report)*

MTE Response: It is considered unnecessary to update the car parking areas to meet AS2890.1. There are no changes proposed to the car parking area and the car park will continue to operate as per the existing operation.

Please contact Matthew M^{C}Carthy or the undersigned on 02 8355 2440 should you require further information or assistance.

M^{c}Laren Traffic Engineering



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