17 June 2021

ptc.

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Dear Christina

1. Mosman High School – Response to Submissions

ptc. has been engaged by Multiplex on behalf of School Infrastructure NSW (SINSW) to address comments received following the State Significant Development Application (SSDA) submission of the Mosman High School project located at 745 Military Road, Mosman.

This letter has been prepared in response to the following documents:

- Letter dated 06/05/2021 from Mosman Council (Council);
- Letter dated 09/05/2021 from Department of Planning, Industry and Environment (DPIE);
- Letter dated 03/05/2021 from Transport for NSW (TfNSW); and
- Submissions made by the community.

2. Council Comments

2.1 Car Parking

Council Comment

Council receives regular feedback from the local community regarding the high demand of parking in the area, generally attributed to staff and students of Mosman High. Council recommends that provision should be made for on-site basement level car parking to cater for the existing and increased demand for parking associated with the use of the site.

Response

Mosman High School is an existing facility and the proposed population increase is minor with only approximately 100 additional students across different year groups and 6 full time equivalent staff.

Dedicated to staff throughout school hours, the existing car park can accommodate up to 33 vehicles. It is not proposed to undertake any changes to the existing arrangement.

SINSW has deployed a process of school upgrades which involves a holistic review of measures that would help decrease the use of private vehicles and instead increase walking, cycling and public transport use to commute to and from the school.

This project is proposing to provide a total of 60 bicycle spaces, which accounts for 5% of students, as well as 6 bicycle spaces and an end of trip facility for staff to promote active transport. From the online surveys, it is known that some staff members are likely to take up walking or cycling with the provision of an end of trip facility, which in turn will reduce parking demand.

A Green Travel Plan has been prepared outlining measures to promote active and public transport and carpooling. SINSW is committed to implementing these plans across all new developments; A travel plan coordinator will be employed to coordinate the implementation of these measures and monitor the mode shift.

Further, the school is committed to enforce the enrolment catchment boundaries more strictly, which will reduce the travel distance and therefore potential car dependency for students.

Lastly, while not part of this development application, SINSW is investigating the installation of a pedestrian crossing facility across Gladstone Avenue at the intersection with Avenue Road. This will increase safety and therefore the likelihood that more students chose to walk or cycle to school.

Considering all the above, it is anticipated that the parking demand will not increase with the proposed development, and therefore, no additional on-site parking spaces should be required.

2.2 Disabled Car Parking

Council Comment

The proposal to rely on-street disabled parking is not supported and a disabled car parking space should be provided off street.

Response

There is currently an on-street disabled parking bay that services the schools' requirements and the project is proposing to maintain this arrangement. This is deemed an equitable solution and has been deemed as the preferential outcome to ensure maximum on-site space is maintained'

2.3 Bicycle Parking and End of Trip Facility

Council Comment

The provision of bicycle parking facilities is noted and supported. Notwithstanding, the provision of only a single shower and change room for a large co-ed school is considered counterintuitive to the stated objectives, not meeting Austroads guidance and Council DCP requirements. A lack of end-of-trip facilities will certainly constrain the School's ability to promote and enable cycling for staff and students.

Response

The development has revised the end of trip facility provision and is now proposing to provide 4 showers and change rooms.

2.4 Pedestrian Facilities

Council Comment

Council notes that School Infrastructure NSW (SINSW) is investigating the installation of a pedestrian crossing facility across Gladstone Avenue at the intersection with Avenue Road. Council supports this upgrade in principle, and would be open to discussions with SINSW in regards to this matter.

Response

SINSW is willing to investigate this matter with Council; however, it is noted that this work lies outside the scope of this SSDA. Further discussions should be held parallel to this submission.

2.5 Construction Traffic Management Plan (CTMP)

Council Comment

The Construction Traffic Management Plan should be referred to Council's Traffic Committee for approval prior to any works commencing. In this regard, Council would prefer that construction vehicles are kept on arterial roads.

Response

It is acknowledged that the CTMP needs to be referred to Council's Traffic Committee for approval prior to any works commencing. The project is willing to work with Council and the community to agree on a construction program and transport routes acceptable for all user groups.

The CTMP has been revised to provide a detailed construction program which takes into consideration Council's and TfNSW's concerns in relation to construction traffic impact on both local and state roads. The construction program proposes to disperse the construction vehicle traffic so that the impact is reduced on any particular road.

3. TfNSW Comments

3.1 Construction Traffic Management Plan (CTMP)

TfNSW Comment

In Section 5.8 of the preliminary CTMP the applicant proposes the relocation of the existing stop line on Belmont Road approach at Military Road. The applicant previously consulted TfNSW regarding this measure when the EIS being prepared. TfNSW raised and reiterated the serious concern of relocating the stop line at this location, due to the significant impact on the Traffic Signal Control (TCS) infrastructure, including underground loop detectors, traffic signal post, pedestrian crossing, access ramps, signage, pavement marking and kerb side parking post and signage.

TfNSW Recommendation

It is requested that the Proponent:

- *Investigates alternate measures for heavy vehicle access.*
- *Alternatively, if this measure proceeds, proper TCS and intersection design with a supportive comprehensive Traffic and Transport Assessment should be submitted to TfNSW for review and approval.*

Response

The project is no longer proposing to relocate the stop line at the Military Road / Belmont Road intersection. Instead, the CTMP has been revised to provide a detailed construction program which takes into consideration Council's and TfNSW's concerns in relation to construction traffic impact on both local and state roads. The construction program proposes to disperse the construction vehicle traffic so that the impact is reduced on any particular road.

TfNSW Comment

The swept path diagrams within the CTMP are not clear enough for TfNSW to complete the assessment and provide comment.

TfNSW Recommendation

It is requested that the Proponent to submit the swept path diagrams in DWG format to TfNSW for review.

Response

The swept path diagrams will be provided in DWG format for TfNSW's assessment.

3.2 Active Transport

TfNSW Comment

Current NSW policies state the importance of walking and cycling to increase access to local centres and integrating transport with land use as part of the whole customer journey. Future Transport 2056 emphasises the importance of walking and cycling for short trips and reinforces the importance of walking and cycling to increase the catchment of public transport as part of the whole customer journey.

Building Momentum - State Infrastructure Strategy 2018-2038 includes recommendations related to walking and cycling, including integrating transport with land use; managing travel demand; unlocking capacity in existing assets; and improving population health outcomes through more active transport.

TfNSW Recommendation

It is requested that prior to the issue of the first Occupancy Certificate, the applicant be conditioned to provide bicycle parking and end of trip facilities for staff, students and visitors in accordance with Australian Standard AS1742.9:2018 Manual of Uniform Traffic Control Devices - Bicycle Facilities, and Cycling Aspects of Austroads Guides including:

- *Locate bicycle parking and storage facilities in secure, convenient, accessible areas close to the main entries incorporating adequate lighting and passive surveillance and in accordance with Austroads guidelines.*

Response

SINSW has deployed a process of school upgrades which involves a holistic review of measures that would help decrease the use of private vehicles and instead increase walking, cycling and public transport use to commute to and from the school.

A Green Travel Plan has been prepared outlining measures to promote active and public transport and carpooling. SINSW is committed to implementing these plans across all new developments; A travel plan coordinator will be employed to coordinate the implementation of these measures and monitor the mode shift.

As part of the above, this project proposes to provide bicycle spaces for students and bicycle spaces and an end of trip facilities for staff to promote active transport. Bicycle racks for students are accessible via Avenue Road and Gladstone Avenue. Cycling facilities are shown in Attachment 1 in the TIA.

3.3 Public Transport Considerations

TfNSW Comment

Details of current transport networks and current daily and peak hour services in both the TIA and Green Travel Plan are outdated and need to be revised.

Green Travel Plan:

Figure 8 shows an outdated network map;

On page 21 (document page 17) of the routes listed in the 1st paragraph, only the 228 is still operating and the previous route 230 (missing), is also still operating;

Figure 9 is no longer current. The route shown on Avenue Rd as the 244 is the 230;

Table 1 - Summary of Bus Services needs to be updated, as most of the routes no longer exist; and

Figure 10 – Summary of School Bus Services, the 575n no longer operates and is replaced by additional frequency on 100, 114 and 230.

TfNSW Recommendation

The TIA and GTP need to be updated to reflect accurate public transport information. The most current Bus Network Maps may be found at: https://transportnsw.info/travel-info/ways-to-get-around/bus/bus-operator-maps

Response

The bus routes and timetables have been amended in the updated TIA, GTP and CCTMP.

3.4 Green Travel Plan

TfNSW Comment

TfNSW notes the Green Travel Plan prepared by ptc; the Plan includes some measures to encourage mode shift and mode share targets. Some information in the GTP needs to be updated including bus map please review (https://transportnsw.info/document/5202/region-8-map-january-2021.pdf) and School Term Bus pass eligibility (https://apps.transport.nsw.gov.au/ssts/#/termBusPass).

TfNSW Recommendation

The applicant shall prepare an updated Green Travel Plan in consultation with TfNSW. The applicant shall submit a copy of the final plan to TfNSW for endorsement at development.sco@transport.nsw.gov.au, prior to the issue of the first occupation certificate. The Green Travel Plan should include, but not be limited to:

1. *analysis of current travel survey data and school postcode data and discussion of how this data has informed the mode share targets and actions of the GTP;*
2. *identifying the number of staff and students within reasonable walking / cycling distance;*
3. *staged mode share targets for staff, students and visitors which reflect a commitment to increase non-car mode share for travel to and from the site;*
4. *implementation strategy that commits to specific actions (including operational procedures to be implemented along with timeframes) to encourage the use of public and active transport and discourage the use of single occupant car travel to access the site;*
5. *details of bicycle parking and dedicated end of trip facilities including but not limited to lockers, showers and change rooms and e-bike charging station(s) for staff and students to support an increase in the non-car mode share for travel to and from the site;*

6. a Transport Access Guide for staff, students and visitors providing information about the range of travel modes, access arrangements and supporting facilities that service the site;

7. a communication strategy for engaging with students, staff and visitors regarding public and active transport use to the site and the promotion of the health and wellbeing benefits of active and non-car travel to the site;

8. include a mechanism to monitor the effectiveness of the measures of the plan; and

9. the appointment of a Travel Plan Coordinator responsible for implementing the plan and its ongoing monitoring and review, including the delivery of actions and associated mode share targets.

The plan shall be reviewed annually for at least the first five years and involve surveys, evaluation and review.

Transport for NSW has developed a Travel Plan Toolkit designed for the person or group responsible for developing and implementing a Travel Plan. This toolkit provides the steps, templates and resources for developing a comprehensive Travel Plan and may be accessed at: https://www.mysydney.nsw.gov.au/travelchoices/tdm

Response

The bus routes and timetables have been amended in the updated TIA, GTP and CCTMP.

A Green Travel Plan has been submitted as part of the SSDA. Apart from the above, no comments have been received from TfNSW.

All of the points made by TfNSW have been addressed in the Green Travel Plan; Below is a reference of sections in which the individual points have been addressed:

1. Refer to Section 6.1
2. Refer to Section 6.2
3. Refer to Section 6.2 – a staged approach is not seen as required for this school, as active and public transport are already strongly represented.
4. Refer to Section 8
5. Refer to Section 7.2.2
6. This will be provided as part of the operational GTP
7. Refer Section 8.1
8. Refer Section 7.3 and Section 8.4
9. Refer Section 4.1, Section 7.3 and Section 8

4. DPIE Comments

4.1 Parking

DPIE Comment

Mitigation of the temporary removal of parking spaces during construction must be addressed.

Response

School staff will be advised to adopt alternative transport modes for the duration of the construction including carpooling and public transport utilisation.

The contractor will put their usual processes in place to reduce car usage among construction staff. These measures include delivering all tools and equipment required to the site in the morning and removing it in the afternoon so that construction workers are not reliant on a car. As discussed in the CCTMP the workers will be instructed during the inception meeting to use public transport whenever applicable.

4.2 Surveys

DPIE Comment

The traffic surveys and written surveys were undertaken following the completion of year 12. Given the frequency of senior students driving to school, please provide justification as to how the survey undertaken provides a wholistic view of the existing modal split generated by the existing development and the anticipated changes as a result of increased student numbers.

Parking surveys should take into consideration year 12 students driving to the school.

Response

New online surveys have been undertaken in May 2021, and the results and a discussion are presented in the updated TIA and GTP.

4.3 Gladstone Avenue Bus Stop

DPIE Comment

As observed during the traffic survey, multiple buses were observed to arrive simultaneously and queue at the Bus Zone along Gladstone Avenue, which can accommodate two buses only (with five scheduled to arrive simultaneously, which blocks a travel lane). Please provide detail of potential solutions to the queuing and/or justification for the existing operation, particularly given other pick-up/drop-off congestion occurring along Gladstone Avenue.

Response

The queuing of the buses is an existing issue and its resolution is not part of this development application. It is noted that the proposed development is largely an asset replacement project, which is not expected to exacerbate the bus queuing issue.

However, it is currently being investigated to stagger bus arrival times to address the issue of buses queuing along Gladstone Avenue. Consultation with TfNSW and the bus operator has been initiated and will be followed through alongside this submission.

Alternatively, the bus zone can be extended to accommodate additional buses. Consultation with Council will be undertaken in due course.

4.4 Modelling

DPIE Comment

Additionally, the capacity of Gladstone Avenue is modelled as LoS A. If the lane is periodically blocked by buses, additional justification of a LoS A is requested.

Response

The video footage and site observation indicated that during the afternoon peak there is a queue of buses arriving at the same time at the bus stop located in Gladstone Avenue between Keston Avenue and Avenue Road; however, the queue does not extend to the intersection, which may be one of the reasons why the intersection is shown to be operating with a LoS A.

Further, the original SIDRA model was undertaken using default settings including the peak flow factor, which simulates the highest concentration of traffic within the peak hour. With a default factor of $0.95q_p$, the model increases traffic volume by 5% during the default 30-minute peak period. This time period is considered appropriate for the purpose of pick-up and drop-off; however, in order to simulate the potentially higher traffic demand due to the school operation, the SIDRA model has been rerun for the Gladstone Avenue / Keston Avenue intersection with a modified peak flow factor of $0.75q_p$, increasing the peak volume by 25%. The SIDRA results with the default parameters are shown in Figure 1 and the results of the modified model are presented in Figure 2.

The SIDRA results obtained by reducing the peak flow factor do not significantly differ from the results obtained with the default SIDRA parameters.

While the SIDRA modelling shows that the intersection has the capacity to accommodate the existing traffic, the issue of buses queuing is acknowledged, and the project is currently in discussions with TfNSW and the bus operator to try to resolve this by staggering the bus arrival times. Should this not be possible, an alternative will be to extend the existing bus zone, which would be discussed further with Council.

MOVEMENT SUMMARY

▽ **Site: 104b [4b. Gladstone Avenue/Keston Avenue - Existing PM Peak]**

Survey Date: 7th Nov 2019
Existing Network PM Peak: 2:45pm - 3:45pm
Site Category: (None)
Giveway / Yield (Two-Way)

Movement Performance - Vehicles

Mov ID	Turn	Demand Flows Total veh/h	Demand Flows HV %	Deg. Satn v/c	Average Delay sec	Level of Service	95% Back of Queue Vehicles veh	95% Back of Queue Distance m	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed km/h
South: Gladstone Avenue (S)												
1	L2	2	0.0	0.041	3.4	LOS A	0.0	0.0	0.00	0.01	0.00	40.3
2	T1	77	1.4	0.041	0.0	LOS A	0.0	0.0	0.00	0.01	0.00	39.8
Approach		79	1.3	0.041	0.1	NA	0.0	0.0	0.00	0.01	0.00	39.8
North: Gladstone Avenue (N)												
8	T1	161	7.2	0.099	0.0	LOS A	0.1	1.0	0.05	0.06	0.05	38.4
9	R2	21	0.0	0.099	3.8	LOS A	0.1	1.0	0.05	0.06	0.05	38.8
Approach		182	6.4	0.099	0.5	NA	0.1	1.0	0.05	0.06	0.05	38.5
West: Keston Avenue (W)												
10	L2	16	0.0	0.014	3.6	LOS A	0.1	0.4	0.16	0.45	0.16	36.3
12	R2	4	0.0	0.014	4.5	LOS A	0.1	0.4	0.16	0.45	0.16	35.8
Approach		20	0.0	0.014	3.8	LOS A	0.1	0.4	0.16	0.45	0.16	36.2
All Vehicles		281	4.5	0.099	0.6	NA	0.1	1.0	0.04	0.07	0.04	38.5

Site Level of Service (LOS) Method: Delay (RTA NSW). Site LOS Method is specified in the Parameter Settings dialog (Site tab).
Vehicle movement LOS values are based on average delay per movement.
Minor Road Approach LOS values are based on average delay for all vehicle movements.
NA: Intersection LOS and Major Road Approach LOS values are Not Applicable for two-way sign control since the average delay is not a good LOS measure due to zero delays associated with major road movements.
SIDRA Standard Delay Model is used. Control Delay includes Geometric Delay.
Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).
HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

Organisation: PARKING AND TRAFFIC CONSULTANTS | Processed: Thursday, 3 June 2021 11:03:47 AM
Project: Z:\PCI - PROJECT WORK FILES\NSW\SI\NSW - Mosman High School\4. DA Stage\3. Modelling & Surveys\SIDRA Modelling\200317 - SIDRA - Mosman High School - Network Model (AP Update).sip8

Figure 1 – SIDRA Results for Gladstone Avenue / Keston Avenue intersection with default parameters

MOVEMENT SUMMARY

Site: 104b [4b. Gladstone Avenue/Keston Avenue - Existing PM Peak]

Survey Date: 7th Nov 2019
Existing Network PM Peak: 2:45pm - 3:45pm
Site Category: (None)
Giveway / Yield (Two-Way)

Movement Performance - Vehicles

Mov ID	Turn	Demand Flows Total veh/h	HV %	Deg Satn v/c	Average Delay sec	Level of Service	95% Back of Queue Vehicles veh	Distance m	Prop. Queued	Effective Stop Rate	Aver. No. Cycles	Average Speed km/h
South: Gladstone Avenue (S)												
1	L2	3	0.0	0.052	3.4	LOS A	0.0	0.0	0.00	0.01	0.00	40.3
2	T1	97	1.4	0.052	0.0	LOS A	0.0	0.0	0.00	0.01	0.00	39.8
Approach		100	1.3	0.052	0.1	NA	0.0	0.0	0.00	0.01	0.00	39.8
North: Gladstone Avenue (N)												
8	T1	204	7.2	0.126	0.1	LOS A	0.2	1.3	0.06	0.06	0.06	38.4
9	R2	27	0.0	0.126	3.9	LOS A	0.2	1.3	0.06	0.06	0.06	38.8
Approach		231	6.4	0.126	0.5	NA	0.2	1.3	0.06	0.06	0.06	38.5
West: Keston Avenue (W)												
10	L2	20	0.0	0.019	3.7	LOS A	0.1	0.5	0.18	0.46	0.18	36.2
12	R2	5	0.0	0.019	4.8	LOS A	0.1	0.5	0.18	0.46	0.18	35.7
Approach		25	0.0	0.019	3.9	LOS A	0.1	0.5	0.18	0.46	0.18	36.1
All Vehicles		356	4.5	0.126	0.6	NA	0.2	1.3	0.05	0.07	0.05	38.4

Site Level of Service (LOS) Method: Delay (RTA NSW). Site LOS Method is specified in the Parameter Settings dialog (Site tab).
Vehicle movement LOS values are based on average delay per movement.
Minor Road Approach LOS values are based on average delay for all vehicle movements.
NA: Intersection LOS and Major Road Approach LOS values are Not Applicable for two-way sign control since the average delay is not a good LOS measure due to zero delays associated with major road movements.
SIDRA Standard Delay Model is used. Control Delay includes Geometric Delay.
Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).
HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

Organisation: PARKING AND TRAFFIC CONSULTANTS | Processed: Wednesday, 2 June 2021 5:43:00 PM
Project: Z:\PCI - PROJECT WORK FILES\NSW\SINSW - Mosman High School\4. DA Stage\3. Modelling & Surveys\SIDRA Modelling\210601 - SIDRA - Mosman High School - Network Model.sip8

Figure 2 – SIDRA Results for Gladstone Avenue / Keston Avenue intersection with reduced peak flow factor

DPIE Comment

Noting that Military Road is often congested, clarification on the level of service outputs provided by modelling should be further justified and the existing congestion in the local area should be acknowledged. This should include detail of the contribution of the existing school operation to the congestion and the anticipated changes to this both during construction and operation or the proposed development.

Response

It is acknowledged that Mosman area, and Military Road in particular, often experience high traffic volumes, which is noted to be an existing condition. The congestion is likely related to the wider road network, i.e., the Spit Junction, which is known to be oversaturated.

The following is noted in relation to traffic flows in roads surrounding the school (also shown in Figure 3):

- Military Road is congested throughout the peak period, not only during the school drop-off, pick-up hours (refer to the red line in Figure 3);
- The congestion on Military Road results in periodic queueing along Belmont Road and Avenue Road due to vehicles trying to enter Military Road (refer to the orange dotted line in Figure 3);
- Queues on Military Road / Avenue Road intersection were noted due to vehicles waiting to give way to pedestrians on the zebra crossing, particularly during the school peak hours (refer to the green circle in the figure);
- Increased vehicular / pedestrian activity was noted on Gladstone Avenue during the school peak hours; however, this does not result in significant changes to the adjacent intersections.

Figure 3 – Traffic in the Roads Surrounding Mosman High School

The SIDRA modelling indicates that the intersections are able to process the demand flows in isolation of other influencing factors, e.g., a down-stream congested intersection (Spit Junction). What this tells us is that the intersections around the school do not need to be upgraded to increase capacity, as this does not address the broader issue of congestion along Military Road. Furthermore, the slight increase of traffic associated with the school does not alter this outcome, i.e. the modelled intersection can accommodate the additional volumes within the capacity.

In regard to the future traffic conditions, the proposed school expansion is expected to generate 19 and 9 additional trips during the AM and PM peak hours respectively, which lies within daily traffic fluctuation (refer to the TIA).

As outlined in the CCTMP, it is expected that up to 10 vehicles will need to access the work zone per day, resulting is approximately 2-4 trips per hour.

5. Public Comments

5.1 Submission 1

Public Comment

There is a major omission in the application for the Mosman High School Upgrade, and that is any detailed consideration of both the impact on the availability of on-street parking in the area surrounding the site of the school, both during construction and after completion of the proposed upgrade.

During construction it can be anticipated that there will be a demand for both cars associated with construction workers and for teachers who will be displaced from the high school site, as a result of areas that will be required for site sheds and storage of building materials. Almost all the surrounding streets have time-limited parking during working hours, and as a consequence the requirement for this additional parking will place unreasonable pressure on the longer-term parking available to residents. This will result in prolonged local conflict and inconvenience for all users, that will probably last for the construction duration.

Response

Refer to Section 4.1 above and the CTMP.

Public Comment

After completion of construction, the projected increase in teacher and student numbers will again place pressure on available street parking in the longer term. A significant number of senior students attend from outside the immediate area, and many of these drive cars, as is evidenced by the fact that nearby streets with unlimited parking are frequently parked out during school hours.

The documents related to the proposed school upgrade make brief mention of the need for teacher and student parking, and simply offer the platitude that it is State Government policy to not provide parking for some staff and all students, on the basis that public transport is generally available. This is simplistic and ignores the realities of living in a high density area.

It is particularly questionable when some years ago a single-storey covered play area was constructed on the Gladstone Avenue frontage, without inclusion of any underground car parking area that could have been provided at minimal cost.

Mosman Council will need to give careful consideration to the reasonable needs of local residents, where residential parking zones may need to be introduced to allow existing amenity to be maintained.

Response

Refer to Section 2.1 above.

5.2 Submission 2

Public Comment

Relocating the main entrance to Belmont St is sensible, but raises some traffic issues. Travel by car would involve either a right turn at Military Road, or children crossing Belmont Road. Drop off parking zones should be added on each side of the road (Mon - Fri) to ensure safe access. The existing zebra crossing, while currently well sited, may be too far from the new entrance & tempt short cuts, so consideration should be given to a subsidiary entry point aligned with the crossing, separated from the staff parking area.

Response

It is not anticipated that the relocation of the main entry will resolve in major changes to traffic behaviour. As shown in Figure 4, the current main pedestrian entry along Military Road (pink arrow) is proposed to be relocated to Belmont Road (green arrow), while all other access points will be retained at their current location (orange arrows). There will still be an access point off Military Road for students arriving from the south.

The zebra crossing across Avenue Road remains aligned with the access point off Military Road. The zebra across Belmont Road will provide the same connectivity as it currently does to the pedestrian gate off Belmont Road. An additional zebra crossing is being investigated across Gladstone Avenue to improve the pedestrian connectivity between the school and the area towards the west. There is a pedestrian access gate located on Gladstone Avenue near the proposed zebra crossing. The school will remain to provide pedestrian access points on three frontage roads, and all students do not need to access the site via main pedestrian access gate.

The existing pick-up / drop-off area is located on Gladstone Avenue and no changes are proposed this arrangement; the access will continue operating as per the existing situation. The vehicles accessing the drop-off / pick-up area will continue the existing behaviour and the relocation of gates is less likely to have any effect on it. The investigation of pick-up and drop-off demand indicates that the existing facility is sufficient. This aligns with the principal's observations.

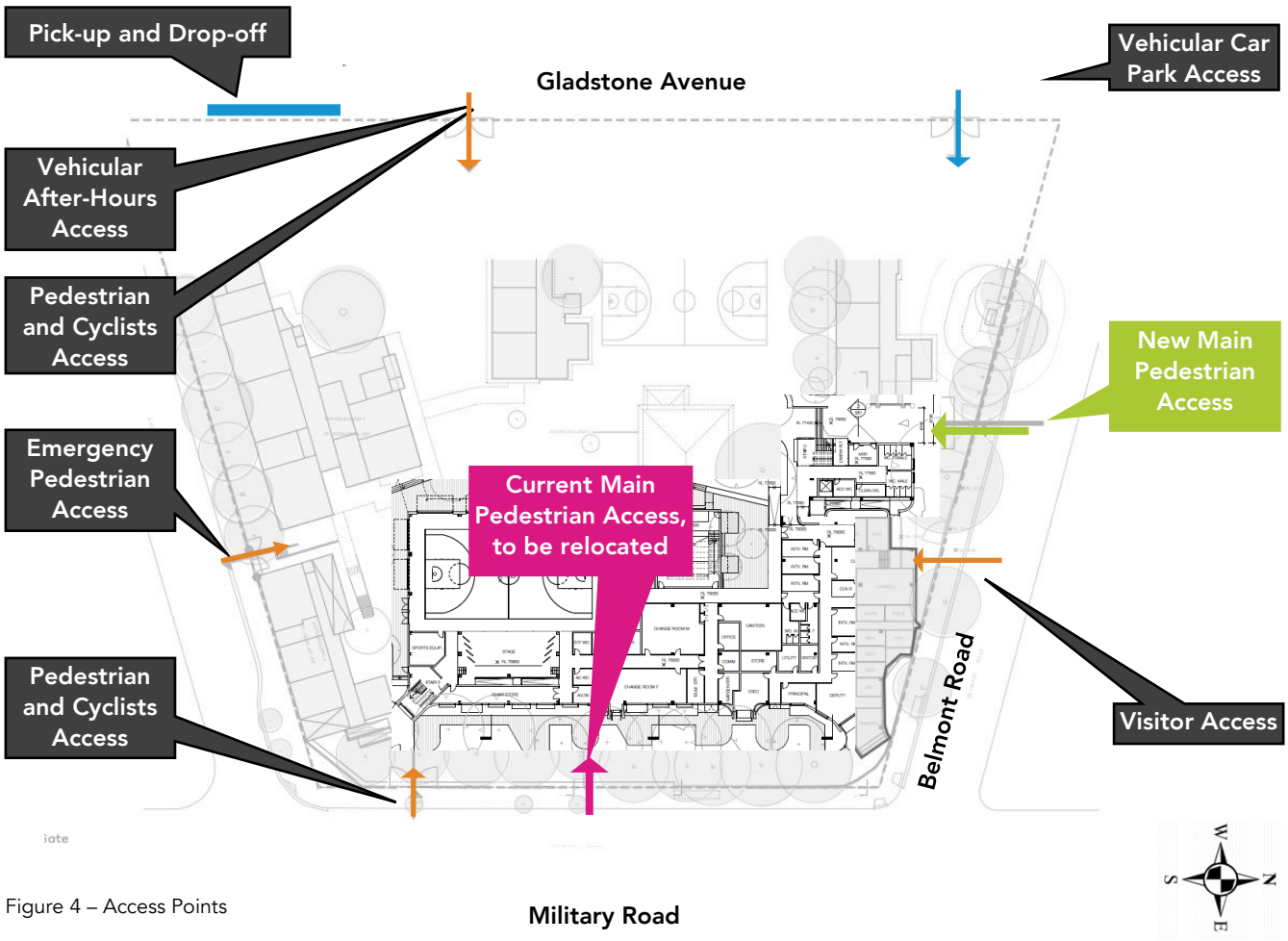

Figure 4 – Access Points

5.3 Submission 3

Public Comment

I do not believe the traffic study has seriously considered the already overcrowded traffic situation outside the high school at pick up and drop off times. In particular it fails to take into account the fact that there are a number of schools close by doing the same thing at the same time.

Response

The traffic surveys have been undertaken on a typical weekday outside of school holidays, and therefore, the analysis includes vehicle traffic from all land uses, including the nearby schools at the surveyed intersections.

Refer to Section 4.4 above for further detail on modelling results.

Public Comment

Also, the plan to put the buses from Military Rd to Belmont Rd ignores the fact that Mosman Public School has an entrance on Belmont Rd only a few hundred metres away.

Response

The project is not proposing to relocate the bus stop from Military Road.

Public Comment

Also, the car parks provided total 33 and should be 91 for 1,200 students and there will now be over 1.300 students.

Response

The project proposes to increase the student population by approximately 100 students to a maximum of 1,200, and the full time equivalent staff number by 6, from 85 to 91.

Dedicated to staff throughout school hours, the existing car park can accommodate up to 33 vehicles. It is not proposed to undertake any changes to the existing arrangement.

SINSW has recently put processes in place to ensure that all school developments investigate measures that can be implemented to increase active and public transport and decrease car usage for both staff and students.

A Green Travel Plan has been prepared outlining measures to promote active and public transport and carpooling. SINSW is committed to implementing these plans across all new developments; A travel plan coordinator will be employed to coordinate the implementation of these measures and monitor the mode shift.

Public Comment

The survey was also made after HSC students had left school.

Response

New online surveys have been undertaken in May 2021, which include Year 12 students, and the results are presented in the updated TIA and GTP.

Public Comment

Finally, it is no solution to direct staff to surrounding public paid parking. The fundamental point is that Military rd is already at a standstill around the time school starts and finishes and the High School extension will only make it worse. I ask you to take the traffic issues much more seriously!

Response

The project is not proposing to direct staff to surrounding public paid parking.

SINSW has recently put processes in place to ensure that all school developments investigate measures that can be implemented to increase active and public transport and decrease car usage for both staff and students.

A Green Travel Plan has been prepared outlining measures to promote active and public transport and carpooling. SINSW is committed to implementing these plans across all new developments; A travel plan coordinator will be employed to coordinate the implementation of these measures and monitor the mode shift.

Refer to Section 4.4 above for further detail on modelling results.

5.4 Submission 4

Public Comment

The site is a very tight one and surrounded by intense traffic issues. What is the justification for planning to increase the school numbers further? These numbers have already increased greatly in the last 20 years.

It appears that the Mosman school catchment includes areas (Zones 6 and 7) in the North Sydney municipality. Has there been an appropriate assessment of enlarged school facilities in North Sydney? The local Mosman community has been told simply that the Mosman High School needs to take more students. But there has been no explanation for the catchment.

The significant increase in student will put further pressure on what the NRMA recently found to be one of the most congested suburban streets in Sydney.

Response

The project proposes to increase the student population by approximately 100 students across all year groups to a maximum of 1,200.

The comment on the enrolment catchment is noted; however, the amendment of it does not build part of this development application.

Public Comment

Related to the traffic issue, while a front School entrance in Belmont Street is reasonable for pedestrians, it would be quite unsuitable for buses or for immediate motor vehicle drop-off.

Response

While the main entry has been proposed to be relocated, all other entries will be retained at their current locations. The bus stop at Military Road is located 70 meters from the proposed main entry, compared with the 50 meters to existing main entry. The pick-up and drop-off area is not proposed to be relocated from Gladstone Avenue and the existing entry off Gladstone Avenue is being retained. Therefore, the relocation of the main entry is not expected to have a negative effect on travel behaviour.

Public Comment

Parking is a further major issue. The public document asserts that more parking in the site is not necessary because there is adequate parking on the local streets. Maybe staff and students can find parking. But the local streets, Gouldesbury, Keston Avenue, Avenue Road, Archer Street and the east end of Wolger Road are completely parked out in school hours largely by school staff and students to the detriment of local residential amenity and convenience. The failure to provide any more parking (already grossly short of requirements) is a major local problem.

Response

Refer to Section 2.1 above.

5.5 Submission 5

Public Comment

PTC TRAFFIC ASSESSMENT – General. The report contends that traffic will increase by 19 vehicles in the morning and 6 in the afternoon. As a minimum 71.4% of all staff (+ 120 people: Teachers, Admin, Temporary and Departmental visitors) drive to school. They all require permanent business car parking. A count today in the staff parking was 29 cars fully parked with 1 car double parked.

Response

Refer to Section 2.1 above for discussion about car parking and measures that have been put in place to reduce car dependency by both staff and students.

Public Comment

Very few students ride bicycles to school – the addition of Motor/Electric Bike parking at school is welcomed (However, PTC report 7.6 is incorrect). Students like riding motor bikes and motor scooters and these have not been counted accurately. Any new development will expand this vehicle demand further and consideration should be made for future EV car charging/bike/scooter trends.

Response

It is acknowledged that currently only few students ride to school, this is supported by the online surveys undertaken as part of this assessment, which is described in the TIA. However, the principal has informed us that there is an increasing demand for cycling. With the proposed additional bicycle space provision and the commitment by SINSW to implementing and actioning the Green Travel Plan, an increase in cycling is expected.

The online surveys do not indicate that students use scooters to commute to and from school, hence no provision of specific scooter racks has been made. The DCP does not stipulate the provision of EV car / bike / scooter parking.

As stated in the TIA, there is an area within the school car park dedicated to motocycle parking, please see the below figure showing the signposted area.

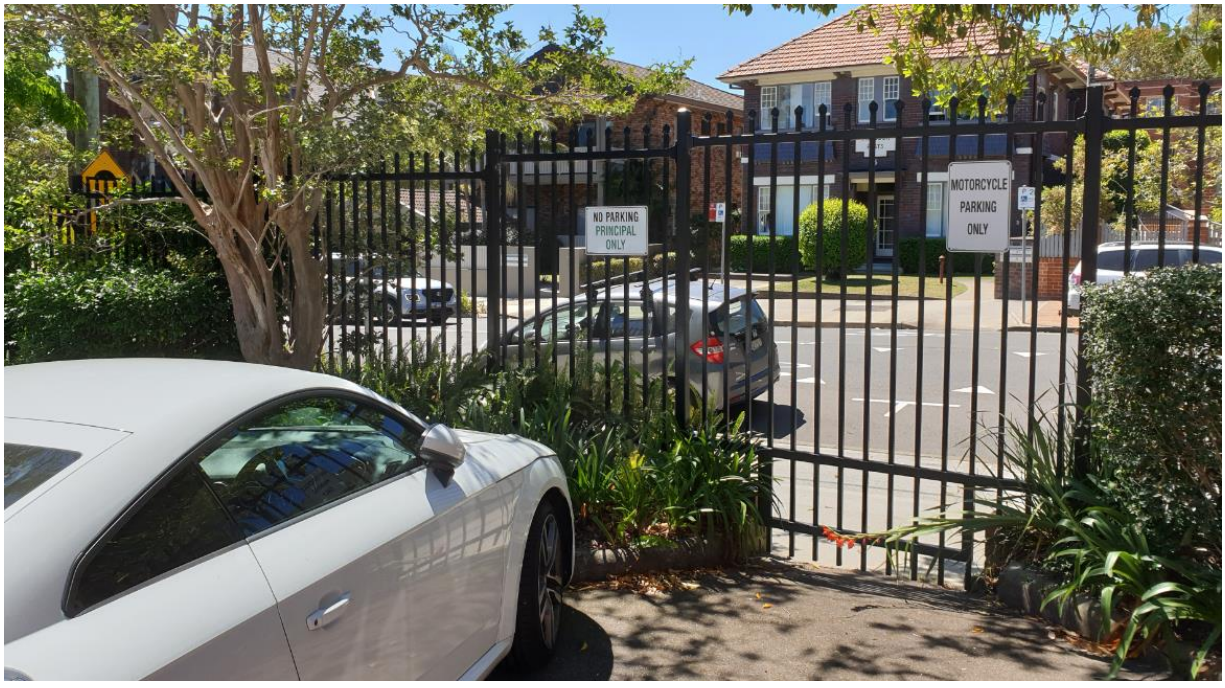

Figure 5 – Photo of signage dedicating an area to motorbike parking within the school's car park

Public Comment

The report also makes no account of after hours usage of the school. Evidence: Adult night school, parents attending meetings, school concerts, and alternate use market stalls or elections. Practically everyone drives for these use cases particularly considering recently reduced local STATE & LOCAL COUNCIL bus services. On our calculation the plan is missing 100 on site car spaces.

Response

The parking surveys undertaken as part of the assessment (refer to Section 4.3 in the TIA) indicate that there is sufficient unrestricted parking in the vicinity of the school to accommodate any after-school activities, with more than 50 vacant spaces recorded after 5pm.

Public Comment

PTC TRAFFIC IMPACT ASSESSMENT. (SECTION 4.1). This document is misleading and factually wrong. To be fair the report acknowledges the basic structural error of the school survey in Section 4.1. Evidence: An entire year of students (year 12 HSC) had graduated at the survey date. At that time of survey the school was missing 16% or more of the student population (4.1.1.1) possibly as much as 50% of all student parked cars - They nearly all drive to school by HSC exams. As the calendar year progresses, more class years of students qualify for "P's". The volume of student parked cars expands every month in the surrounding neighbourhood streets. Increase students – Increase parked cars. Not 6 afternoon vehicles – a rubbish statistical "fun model fact" based on a flawed transport survey 6.2 SIDRA model. This model is factually incorrect and the PTC TRAFFIC ASSESSMENT should be rejected by the planning authorities and courts.

Response

New online surveys have been undertaken in May 2021 which include responses from Year 12 students. The results are presented in the updated TIA and GTP.

Figure 6 shows responses from Year 12 students to the question "How do you travel to / from school on a typical morning" and it is shown that 16.2% drive. With a student population of 1,200 students and an assumption of an even distribution of students between the year groups, 32 students are expected to drive to school and therefore generate parking demand.

With a potential increase of Year 12 students by 16 (out of the 100 overall increased student population) and with a car usage of 16%, this would result in an increased parking demand generated by the development by 3 cars.

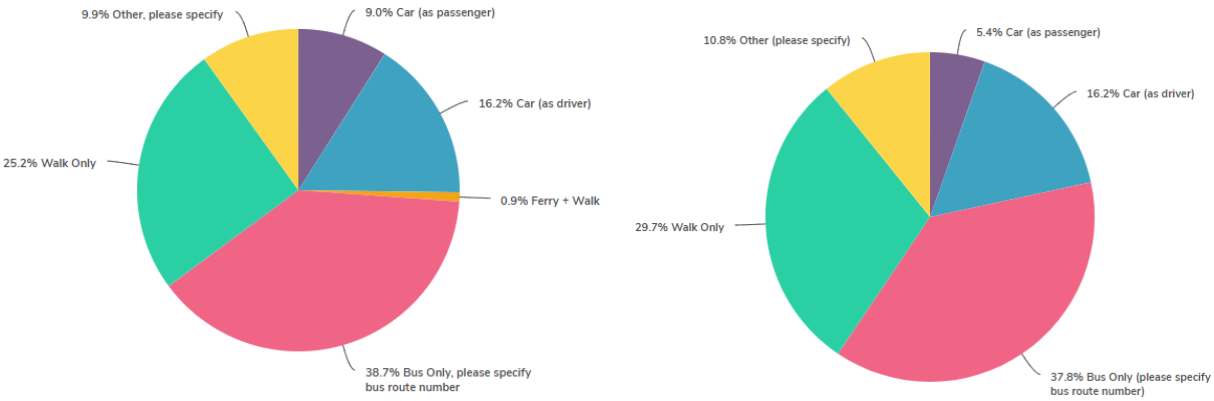

Figure 6 – Year 12 responses to "How do you travel to / from school on a typical day" (l: AM, r: PM)

In any case, as discussed in Section 2.1 above, SINSW has deployed a process of school upgrades which involves a holistic review of measures that would help decrease the use of private vehicles and instead

increase walking, cycling and public transport use to commute to and from the school. It is anticipated that the car usage will be reduced in the future.

Public Comment

PTC TRAFFIC ASSESSMENT. 3.2.3. This study was so erroneous and rushed that the authors don't even know the location of our local ferry. They state the closest ferry is Taronga Zoo. Evidence: Closest ferry is Mosman Bay (1270m) and is used regularly by the school community.

Response

The name of the ferry wharf has been amended in the updated TIA.

Public Comment

The report significantly understates vehicle use, a minimum of 6-18% students are driven to school, limited account is taken of student & staff parked cars.

Response

The number of staff and student vehicles driven to school has been accounted for in the traffic and online surveys.

The online surveys confirm that 18.8% of students are driven to school in the morning and 8.8% are picked-up in the afternoon. This is presented in the TIA.

Public Comment

Furthermore, official place of residence and actual place of residence for a leading public performing arts high school is not the same thing. Parents support students commuting long distances to attend this prestigious public high school. Many need cars to reduce this commuting overhead. The Year 7 school information pack reflects this truth: Bus origination to school (Avalon, Chatswood, Wynyard), then in later class years they drive.

Response

The school is committed to enforce the enrolment catchment boundaries more strictly, which will reduce the travel distance and therefore potential car dependency for students.

Public Comment

From personal observation, very few cars have multiple student occupants.

Response

The car occupancy of 1.2 / 1.3 is based on responses received from the online surveys. This aligns with many other schools.

Public Comment

Error: PTC Report: Figure 40. Titled Existing AM peak pedestrian volumes (morning) when clearly base traffic photo is late afternoon after school. This intentionally understates and confuses readers on the known traffic & pedestrian impact on the surrounding streets caused by the proposal. Evidence: Look closely at traffic volume at Corner of Belmont and Military Road.

Response

The background photo is taken from SIX Map aerial imagery, it is not intended to represent the actual picture on the surveyed day.

Public Comment

MAIN ENTRANCE MOVE TO BELMONT ROAD. OBJECTION. This should not impact East West traffic flows as Military Road pavement is better suited to manage student peak flows due to historical consideration of this need and requirement. Retain Military Road main student entrance.

Response

Refer to Section 5.2 above.

Public Comment

NO MENTION OF IMPACT OF STUDENT PARKING ACROSS HOUSEHOLD DRIVEWAYS IN KEMBLE LANE.

Response

It is acknowledged that there is an issue with students parking across driveways. This should be taken up with Council so that stricter enforcement is implemented.

Public Comment

GLADSTONE AVENUE BUS PARKING. Retain. No change required.

Response

Noted, no changes are proposed to the Gladstone Avenue bus parking. However, it is currently being investigated to stagger bus arrival times to address the issue of buses queuing along Gladstone Avenue.

Public Comment

Police the existing 40/50 Km speed restriction to reduce "Rat-Run speeds".

Response

This should be taken up with Council.

Public Comment

Considering KESTON AVENUE is a historic quiet residential street, we OBJECT TO ANY INCREASE IN PARKING OR TRAFFIC considering the 336 vehicles an hour reported on PTS table 4. (SITE: 4 peak hourly traffic). We also note there is no "Spare Capacity" as stated in the report because this is intended to remain a quiet historic residential street, not a highway.

Response

The future traffic analysis indicates that 19 additional vehicle trips may be undertaken during the AM peak hour, which is not expected to cause a significant change in the existing traffic on Keston Avenue.

Public Comment

CONSTRUCTION MACHINERY AND CONSTRUCTION WORKER PARKING.

The report fails to recognise potential loss of site parking during construction. Construction worker parking should be provided on site. Machinery will need locations to stand and should not be allowed to stand, impede or damage historic weight sensitive streets. All damage should be promptly repaired with contracted new full seal road paving, pedestrian path walk ways and repaired service ducts. The PTC TRAFFIC assessment of impact as "insignificant" remains factually incorrect and insulting to local residents. Our submission rejects all heavy vehicles on non residential transit movements on Keston Avenue or Kemble Lane.

Response

It is not proposed to any direct construction traffic to Keston Avenue or Kemble Lane. Instead, it is proposed to locate a work zone along Belmont Road.

Refer to Section 4.1 above regarding parking and the updated CTMP for further comment on vehicle routes and the number of vehicles anticipated to be required during the construction.

Public Comment

SCHOOL CAR PARKING. Objection.

Three quarters of all staff drive to work, most do not live in Mosman. That is currently 88 cars a day searching for all day parking before we add students. The SIDRA MODEL (6.2.1.2) fails to recognise part time staff (using misleading FTE) drive to work. The STATE has a responsibility to provide parking and not burden residents with their operating business problems. Where do they park now ? The report states over 47% park in Gladstone, Avenue and Military Roads. That is both unlikely and illegal if it was true. Parking is time limited to support Bus parking and retail shopping in these streets. The result is massive overflow into Keston Avenue & neighbouring streets that is rarely mentioned in the faulty PTC report. If the school grows, so do staff numbers and Year 11 and 12 car requirements (possibly as many as 150 – 190 Cars). The answer is clear, if this proposal was to proceed the employer must provide effective matched parking under the school to support their expanded business operations. The STATE claims to provide 33 school car parks. On inspection today there were 30 cars parked on site. This parking is not shared with the community as school gates are now regularly locked at night and prohibited access to the school site has been signposted and fenced. Fix the proposals public parking.

Response

The FTE number refers to "Full Time Equivalent", which accounts for both full-time and part-time staff. This measure is an industry standard figure used to determine traffic and parking rates.

The location of parking has been derived from the online surveys distributed to staff, and the numbers stated in this comment are percentages of the overall parking demand, not individual roads. However, it is acknowledged that Keston Avenue is being utilised by staff and students. On-street parking is a Council asset, which is being regulated by Council. Unrestricted parking is free to be utilised by any user group.

The project proposes to increase the student population by approximately 100 students across all year groups. With a potential increase of Year 12 students by 16 (out of the 100 overall increased student population) and with a car usage of 16%, this would result in an increased parking demand generated by students by 3 cars. With 6 additional FTE and a 71.4% car utilisation, this would result in a car parking increase of 4. Overall, the increase in parking demand of the proposed development would be 7.

The existing car park has been found to be able to accommodate up to 33 vehicles.

Refer to Section 2.1 above in regard to parking.

5.6 Submission 6

Public Comment

TRANSPORT AND PARKING:

Firstly, why was the Traffic study done in November -December, when all the school leavers had finished their HSC year and were no longer at school? These Traffic study dates do not give any confidence that the assessment has been carried out correctly!

This timing would certainly not give an accurate – or fair – estimation of what actually happens with traffic and parking in the immediate area. Mosman High School is in the middle of a shopping precinct which has a village atmosphere. It is on a main road (Military Road) and main secondary roads (Belmont Road and Avenue Road) which service through traffic to the city, Taronga Zoo and Balmoral Beach and are already grossly overcrowded with cars, and trucks servicing the shops and restaurants.

Response

The online surveys have been repeated in May 2021 and the results updated (refer to the TIA).

Public Comment

The Council car parking areas are already insufficient for the number of people shopping and eating at restaurants, which all generates additional traffic.

The Green Travel Plan idea is a myth. Most teachers drive to school and park in the already overcrowded nearby streets - such as where I live.

The parking area in the existing school is completely inadequate and is totally full, having taken over some of the school's previous playground years ago, with double parking and parking on the grass verge near the school fence.

There is no all-day Council car parking available in the area at all, leaving teachers to find and utilise parking spaces used by residents who live in the vicinity, creating considerable disharmony and loss of amenity to those who actually pay rates. It is already extremely difficult for local residents to park anywhere near their own home.

Yet the Mosman High School Upgrade proposal does not provide any extra parking spaces, even though there is to be an increase in both departmental staff and students.

Further, as soon as students qualify for their Provisional Driving Licence, many drive to school rather than catch public transport or have their parents drop them off, creating additional lack of available parking. This creates an HSC year of drivers, not public transport users or walkers, which was not measured in the transport study.

Response

As discussed in Section 2.1 above.

Public Comment

CONSTRUCTION PHASE:

The positioning of demountable classrooms (and in all probability construction offices) to take up the present staff car parking area is ludicrous.

Where does the developer propose teachers and staff will park? And indeed, their own construction staff?

Nearby streets are already full and Mosman Council has just yesterday discontinued parking on Mondays in a nearby lane to allow for garbage to be collected. This is clear evidence of overcrowded parking.

No consideration whatsoever has been given to the affect this construction will have on the amenity of local residents. (Noise, parking, additional cars and heavy construction traffic.)

The four roads surrounding this school area already heavily utilised (and patrolled regularly by Council Parking Rangers).

The number of construction jobs created at any one time will be minimal and last for only a projected two years.

Response

Refer to Section 4.1 and the CTMP.

We trust that this letter assists in the assessment of the application. For any further enquiries, please contact our office on (02) 8920 0800.

Kind regards,

Kasia Balsam

Team Leader

Document Control: Prepared by *PS* on *17 June 2021*. Reviewed by *KB / AM* on *17 June 2021*.