

February 3, 2015

Ms Megan Fu
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001



Dear Ms Fu,

Re: SSD 6339 St Catherine's School Campus Master Plan

Eastern Suburbs Local Area Command on behalf of the New South Wales Police Force welcomes the opportunity to provide comment on the above development application submitted and currently under consideration.

This submission is predominantly providing comment on areas of concern held regarding the foreseeable transport and road network impacts the proposed development application will have. Eastern Suburbs Local Area Command does not object to the development application per se however, would like to make comment on these individual areas of concern in anticipation of a solution being developed as part of the development consent.

Road Network Congestion

The location occupied by St Catherine's School encompasses two major arterials those being Macpherson Street, linking the area to Bronte, Clovelly and the suburbs further to the south; and Albion Street which provides a link to Frenchmans Road, Carrington Road and Darley Road. Accordingly the road network experiences heavy vehicle traffic during extended peak periods daily, inclusive of weekends. While not attributing this road network congestion to St Catherine's School, this is exacerbated at school drop off and pick up times. Vehicle movements approaching the School, along with the unlawful actions of drivers cause obstruction to the free flow of traffic, and increase the level of risk to other road users.

The development application currently does not adequately address these issues instead indicates that there will be an increase in vehicle movements as a result. Consideration needs to be given to the encouragement in the use of public transport services which frequent the area. Bus stops are provided adjacent to school entrances on both Leichhardt and Albion Streets with links into the surround suburbs and to the Bondi Junction Rail Interchange.

Further consideration needs to be given to significantly increasing the use of bicycles as a mode of transport. The provision of fifteen bicycle spaces (circa 1% provision compared to the School's future capacity) is insufficient for the school to effectively encourage the use of bicycles nor does it provide an incentive to students and/or staff to change their mode of transport.

Eastern Suburbs Local Area Command

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ARUP's own report identifies that there will be an increase of 134 vehicle movements in the mornings and an increase of 106 vehicle movements in the afternoon to and from the School. These figures only take into account the increase in student and staff numbers and not the increase in use of facilities offered by the school.

School Drop Off and Pick Up Safety

Eastern Suburbs Local Area Command have identified the area in the vicinity of St Catherine's School as being one of concern in relation to this traffic congestion along with the incidence of school zone parking offences involving the daily drop off and pick up, as identified by ARUP. Some of these offences, such as non-compliance with school zone No Stopping restrictions within in the vicinity of intersections and pedestrian/school crossing create an unacceptable level of risk to school students and road users.

In relation to the ARUP Assessment, the following is submitted:

- Eastern Suburbs Local Area Command agrees with ARUP that school zone No Parking zones should be standardised around the School and should be concurrent with the signposted school zone speed zone times
- P5 parking restrictions should not be implemented due to the adverse impact this will have on the drop off and pick up school line. The priority needs to remain with encouraging a free flowing and efficient school line. No Parking during the aforementioned times allows drivers to stop for a period not exceeding two minutes to drop off and/or pick up. This has extensively been proven to be effective
- Eastern Suburbs Local Area Command notes that part of ARUP's strategy is the circulation of educational material to drivers as to the road rules within school zones. The effectiveness of this strategy is questionable as seen from previous efforts by the School
- It is further noted that enforcement is identified as a strategy to increase safety at the School during drop off and pick up times. It is submitted that this strategy should not be relied upon as an alternative to an appropriate engineering solution. Enforcement is the final strategy failing all other reasonable efforts to alleviate an identified issue. The opportunity exists now to suitably address this

The development application has identified that there will be a 23% increase in the student capacity to 1200 however, has not made a provision to alleviate the relative increase in vehicle movements. This increase will not only be during the drop off and pick up period but an increase throughout the day.

Eastern Suburbs Local Area Command consider this to be a significant issue given the school drop off and pick up times coincide with peak hour vehicle movements and the increased peak hour bus services. With the increase in student capacity and relevant vehicle movements, serious consideration needs to be given to the provision off street 'loop' style drop off and pick up facilities on the school grounds. This will provide a benefit to the school by increasing security and safety for students therefore a potential reduction to the schools staffing commitment in providing this service; a benefit to those persons involved in the drop off and pick up through the provision of additional vehicle spaces and a potential increase in school line efficiency; and a benefit to the wider road network by reducing the number of vehicles queuing to enter the school line, along with a reduction in unsafe driving practices and vehicles 'circling' on the road network waiting for an opportunity to enter the school line.

Eastern Suburbs Local Area Command does not believe that any development approval should be granted without this deficiency being addressed in the plans.

Provision of Parking

The most recent Census data from 2011 shows that the suburbs of Bronte and Clovelly have 3347 and 2335 garaged (including on street parked) motor vehicles (not including motor cycles) respectively. On street parking in the vicinity of St Catherine's School is very limited at best and while it is acknowledged that the on street parking can have the capacity to provide some parking facilities for attendees of the School, it is submitted that this should not be relied upon, especially to accommodate the Schools expansion. While an increase of 19 car spaces is being provided in the development application, it is submitted that this is greatly insufficient.

The proposed Aquatic Centre is predicting an increase in attendance of 175 persons per hour with operation times extending as follows:

- Main Pool: from a latest closure of 6.30pm to a closure of 8.00pm weekdays; in addition there is a proposed extension of operating times on weekends from 2.00pm to 6.00pm
- Main Pool: the addition of operating on Sunday's between 8.00am and 6.00pm
- Shallow Pool: an increase in operating times from between 3.20pm and 6.00pm to between 7.00am and 7.00pm weekdays along with the addition of weekend operation between 8.00am and 6.00pm

This increase in operation times and hourly person movements will ultimately place more pressure on the road network and upon on street parking. Weekend's will see a decrease in available on street parking therefore the pressure on the available on street parking will be impacted without a significant increase in off street parking provided by the School.

As a result of the proposed development, it is anticipated that there will be an increase in events and resultant vehicle movements. The proposed development has provision for 75 vehicles off street, however, it is anticipated that there will be an average of 160 vehicles seeking parking. This results in an average of 113 vehicles attempting to utilise on street parking. With knowledge of the local area, Eastern Suburbs Local Area Command respectfully submits that this number is significantly underestimated; hence the demand placed upon on street parking and the road network is also underestimated. It is more realistic to estimate that the number of vehicles seeking parking would be more in the region of 250. Notwithstanding this, the figures provided highlight the lack of off street parking being proposed.

The events that are expected to see these numbers of vehicles are scheduled to conclude at 9.30pm or 10.00pm; utilising the 'Parking Occupancy' data provided by Lyle Marshall and Associates, on street parking occupancy peaks at 95% shortly before 9.00pm. Without the extended operating hours and increased capacity of function areas within the School, these figures show that on street parking is currently under pressure. Without a significant increase in off street parking being provided by the School, it can reasonably be anticipated that the wider community and residents living within close proximity (at least within five minutes walk of the School) will be adversely and unreasonably impacted by the proposed development.

With an increase in demand placed on the available on street parking, comes an increase in demand on the road network with vehicles 'circling' on the road network attempting to locate available parking.

Eastern Suburbs Local Area Command submits that off street parking will need to be increased to an appropriate figure not less than 200 to accommodate the increase in functions and the capacity of venues within the School. This will ease the pressure on the road network and the available parking therefore reducing the impact on the non-school community.

Reported Crash Rates

Reference has been made to the reported motor vehicle crash rates in the vicinity of the School. It is to be noted that the reportable crashes generally involve an increase in vehicle speed (not necessarily unlawful). Crashes not requiring a vehicle to be towed, not involving a person being injured and where all persons are not affected by alcohol and have exchanged details were up until recently considered P5 crashes. These crashes were and remain non-reportable crashes. Given the congested road network and the relatively low impact speeds, it can reasonably be submitted that crashes in the vicinity of the School and on surrounding arterials fall into this category.

Furthermore, the intersection of Albion Street and Macpherson Street has regularly flagged in the top ten motor vehicle blackspot report and is currently ranked equal second.

Eastern Suburbs Local Area Command submits that using low crash rates as a mechanism to provide support for this development application is unreliable.

Access to and from RPAC Car Park

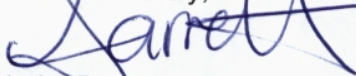
Due to the previously mentioned road network congestion and the increase in vehicle movements to and from the RPAC, it is submitted that the car park entrance operate on a 'left turn in, left turn out' basis. This will prevent west bound vehicles being obstructed waiting for another to conduct a right turn into the car park, and would also prevent vehicles attempting to turn right out of the car park effectively forcing their way out into traffic. This will increase the free flow of traffic on Macpherson Street, improve road safety by requiring vehicles to utilise round-a-bouts installed at either end of the block and will go towards preventing conflict with the relevant vehicle movements.

To enforce this, Eastern Suburbs Local Area Command submits that a raised concrete median strip be installed adjacent to the car park entrance and the relevant signs be installed.

Once again, Eastern Suburbs Local Area Command wishes to thank the Department for the opportunity to make comment on this development application and respectfully ask that consideration be given to this submission.

Should anyone from the Department wish to discuss this submission further, feel free to contact the undersigned on 02 9369 9899.

Yours sincerely,



Luke Barrett
Sergeant
Traffic Services