

18/12/2018

Department of Planning and Environment
320 Pitt Street
NSW 2000

PLEASE DELETE MY PERSONAL INFORMATION BEFORE ANY PUBLICATION OF THIS LETTER

Dear Sir / Madam

**RE: SAMUEL GILBERT PUBLIC SCHOOL REDEVELOPMENT, CORNER of RIDGECROP DRIVE
and GILBERT ROAD, CASTLE HILL, APPLICATION NUMBER SD9274**

I refer to the letter from the Department of Planning and Environment 19 November, 2018 in regard to the Samuel Gilbert Public School Redevelopment Corner of Ridgescrop Drive and Gilbert Road, Castle Hill (SSD 9274) notifying residents the Development Application for the redevelopment of School was on public exhibition with an invitation to residents to comment on the proposal.

I can confirm to you;

- **I object to the proposal for the reasons outlined below**
- **I have not made any reportable political donations in the last two years**

I would like to qualify this submission by first expressing that I would like to support the developments proposed for Samuel Gilbert Primary School (the School), however I can not do so with the Development Application (DA) in its current form. I believe the school is an important component of our community and having sent a child to the school I am supportive of the School and its growth.

Current Situation

1. Traffic;

The streets surrounding the School experience significant increase in traffic congestions on week days prior to school commencing, immediately after the main School closes, drop off & pick up from child care (commencing approximately 7am until 6pm in evening) and events such school events (Fetes etc. which occur on weekends).

The consequences of the current traffic ques (heading toward Gilbert Road), which occur in every school morning and afternoon prior to the 'kiss & drop zone' already creates delays for public transport, emergency services and frustration to other road users not associated with the School (Hills Shire Council is well aware of these issues).

2. Parking;

At present, with only 26 formal passenger vehicle parking spaces (refer Annex K, Traffic and Transport Impact Statement, 4.2 Parking Provisions) Samuel Gilbert Primary School does not meet the sensitive parking requirements for educational establishment requirements under Part C, Section 1, Table 1 Required Minimum Car Parking Provisions of *The Hills Development Control Plan (DCP) 2012*.

This existing non-compliance has resulted in the following parking behaviours (again, the Hills Shire Council is well aware of this problem);

- Employees of the school use the Ridgescrop Drive resident's street frontage as an extension of the Schools car park for up to 12 hours a day (Monday to Friday). This behaviour significantly, and detrimentally, impacts resident's ability to park outside their own property street frontage, or even, the street.
- Visitors to the school compete with residents and School employees for parking spaces. This often results in Visitors leaving their vehicles parked (and unattended) in designated no parking zones, double parked, parked on the wrong side of the road, parked across residents' driveways or in driveways for the duration of their visit to their School and upon leaving the street often making illegal U-turns to do so. This behaviour is significantly worse during School events (Fetes etc.) which has resulted in instances of parking offenders aggressively abusing residents who are affected by their behaviour.
- The School locks its gates on Ridgescrop Drive on most weekends so Visitors to the School are forced to use the Ridgescrop Drive resident's street frontage to park their vehicles due to the absence of off street school parking.

The writer acknowledges the administrators of the School do attempt to address both traffic and parking on an ongoing basis. However, the NSW Department of Education has through their DA an opportunity to relieve the School, Visitors and Residents of traffic and parking issues/stress by addressing current and future parking/traffic issues as part of the DA.

I object to the Development Application proposal for 2 key reasons;

Objection 1:

Council is aware of the existing traffic issues in the streets surrounding the School. I object to the DA because it does not address known traffic issues and it does not address future traffic issues that will arise as a direct result of the expansion of the School.

I refer to Appendix K–Traffic and Parking Assessment Report of the application. Section 6.2.1, Table 5 SIDRA NETWORK MODELLING ANALYSIS PROJECTED PEAK HOUR INTERSECTION PERFORMANCE identifies existing issues with traffic surrounding Samuel Gilbert Public school, specifically a 'D' grade assessment of the southernmost junction of Gilbert and Ridgescrop

roads. A 'D' grade is defined by the report as (per RMS guidelines) 'Satisfactory but near capacity'.

The statement made on page 19 of the report (Appendix K) is wholly inconsistent with this grade:

"A level of service 'D' represents satisfactory operational performance, with capacity to accommodate additional traffic demand, based on RMS classifications."

The above statement is factually incorrect and not a reflection of the intention of the RMS standards. Near capacity is not a suggestion that traffic can be sustainably increased in the affected area. Rather, near capacity would indicate to a reasonable person that steps must be taken to address traffic issues on the affected roads, where an increase in traffic from a development application, for example, could create significant delays. This is reflected in the modelling provided in the same report whereby the quality score given for expected traffic delays is reduced to 'E' or 'At capacity, incidents will cause excessive delays'.

For more clarity the exact definition of the relevant 'Levels of Service' applicable in this instance (as defined by the RMS):

Level of Service D.

This level is close to the limit of stable flow but is approaching unstable flow. All drivers are severely restricted in their freedom to select their desired speed and to manoeuvre within the traffic stream. The general level of comfort and convenience is poor, and small increases in traffic flow will generally cause operational problems.

Level of Service E.

This occurs when traffic volumes are at or close to capacity and there is virtually no freedom to select desired speeds or to manoeuvre within the traffic stream. Flow is unstable and minor disturbances within the traffic stream will cause a traffic-jam.

Level of Service F.

This service level is in the zone of forced flow. With it, the amount of traffic approaching the point under consideration exceeds that which can pass it. Flow break-down occurs and queuing and delays result.

Traffic Quality traffic issues arising as a result of the DA (surrounding roads at or near capacity) have not been substantially addressed (see Appendix K – Traffic and Parking Assessment Report) and no significant attempt to resolve or mitigate identified traffic quality issues has been made.

Furthermore, the increase in delays will only be afforded an 'E' score by 0.5 seconds. On the balance of probabilities, where traffic cycles fluctuate, it is entirely reasonable to suggest that

the proposed application will result in instances of traffic that would regularly be afforded an 'F' score which is defined as an 'Extreme Delay, unsatisfactory'.

The report also fails to substantially consider the ongoing traffic impact of the DA. Per the Traffic and Parking Assessment Report:

“ • The application is expected to result in an increase in the school population from 780 to 1,000 students and from 45 to 58 staff ”

Per this point, an increase in the number of students by 220 (even if gradual) will mean the long-term impact of the DA will be to significantly increase the amount of 'peak time' traffic. The immediate traffic management related to commercial vehicles using the site for the purpose of construction will be readily replaced by vehicles that require access to accommodate the needs of the increase in student population.

It is entirely reasonable to object a DA that identifies potential E and F grade traffic quality impacts, but states;

“...there are no parking and traffic related issues associated with the proposed development...”

This statement is a blatant misrepresentation of the facts. By the report's own assertion the SIDRA is an objective assessment. At present the traffic score for the southernmost Gilbert and Ridgeway intersection (in peak times), by definition is;

- Approaching unstable flow
- Drivers are severely restricted (speed, manoeuvres)
- Level of comfort and convenience is poor
- Small increases in traffic will generally cause operational problems

The proposed *Operational Traffic Management Plan* offers no attempt to address these issues. Section 9.7 Traffic Impact suggests that despite the outlined issues, motorists are afforded a reasonable level of service, and all impacts to traffic can be reasonably accommodated.

As per the definitions of the traffic level of service this is not correct. This plan, in conjunction with the Green Travel Plans offers no empirical or substantiated solutions to the traffic problems that have been identified.

Objection 2

Council is aware of the existing parking issues in the streets surrounding the School. I object to the DA because it does not address the current parking issues (the School currently does not comply with the sensitive parking requirements within Part C Section 1 for educational establishment requirements of the Hills DCP, 2012) and it does not address the projected shortfall of 66 off street vehicle parking spaces Councils requires it meet DCP, 2012.

The report clearly states its intention regarding non-compliance with DCP, 2012:

“• The existing access arrangements and off-street car parking provision are proposed to remain unaltered as part of the subject proposal”

The above statement is contrary to the DCP 2012 which requires the School to provide a minimum of 92 car parking spaces. The DA does not include a plan to create the additional 66 off-street parking spaces (required according to the Traffic and Transport Impact Statement, Section 4.2.1 Traffic and Transport Impact Statement) concurrently with the other facility works.

The projected shortfall of a further 66 off street vehicle parking spaces will further compound and exasperate existing parking space stress (and poor parking behaviour) in the Schools surrounding streets unless the new car parking spaces are created simultaneously with the other expansion works. It is not reasonable to expect residents to tolerate increased parking stress if minimum parking requirements of 92 car parking spaces is not a part of the DA approval.

The opportunity for drivers to walk, car pool, ride a bike (bike usage is noted in the report as “negligible”), catch public transport or use public off-street parking currently exists. There is no empirical evidence included in Annex K, Traffic and Transport Impact Statement that these opportunities are currently providing any relief to the Schools existing parking space shortage, and there is no evidence that promotion of these alternatives are unreliable options regarding parking space relief.

Recommendations

Based on the above objections, I recommend the following course of action;

- The DA is rejected until it includes a proven traffic management plan, to be implemented prior to the commencement of the School expansion in order to alleviate existing and future traffic, congestion.
- The DA is rejected until the application includes the minimum of 92 off street car parking spaces required by Council (DCP, 2012) is included in the application.

(END)