21 December 2020

TfNSW Reference: SYD20/00409/02
Client Reference: SSD 10445

Department of Planning, Industry and Environmental
GPO Box 39
SYDNEY NSW 2001

Attention: Brent Devine

EXHIBITION OF EIS - ALTERATIONS/ADDITIONS TO EXISTING AL-FAISAL COLLEGE - 83-87 GURNER AVENUE, AUSTRAL

Dear Sir/Madam,

Reference is made to the Department of Planning, Industry and Environment (the Department) request, dated 24 November 2020, to review the proposed SSD-10445 which was referred to Transport for NSW (TfNSW) for comment.

TfNSW has reviewed the submitted information and provides the following comments to the Department for consideration:

Existing Traffic Condition

1. The current daily and peak hour traffic volume and traffic conditions have not been fully assessed in the TIA.

   It is requested that the applicant should detail the current daily and peak hour vehicle, existing and future public transport networks and pedestrian and cycle movement provided on the road network located adjacent to the proposed development.

Traffic Modelling

2. The traffic impact assessment by using only SIDRA Intersection modelling software is inadequate to represent the existing and future traffic and transport conditions in the vicinity. Transport demand modelling and microsimulation network modelling are more appropriate and should be undertaken for comprehensive traffic assessment.

   It is requested that the applicant should undertake comprehensive traffic impact assessment by using transport demanding modelling and microsimulation network modelling software.

Transport for NSW
27 Argyle Street, Parramatta NSW 2150 | Locked Bag 5085, Parramatta NSW 2124
P (02) 8849 2666 | W transport.nsw.gov.au | ABN 18 804 239 602

Trip Generation

3. The assumption of 30% reduction with the peak spread factor is inconsistent with existing arrival profile of 95% student arriving within the peak hour. And there is no detailed information and data to support the reduction claim.

   It is requested that the traffic impact assessment should consider the worst-case scenario consistent with the existing student arrival profile.

4. The calculation in trip generation table in Appendix F is incorrect. One vehicle should generate 2 vehicle trips (one arrival and one departure). Therefore, the total vehicle trips for IN and OUT should be double to the column of "Student No". The trip generation is underestimated by 50%.

   It is requested that the trip generation should be revised and re-considered in the traffic impact assessment.

Cumulative Impact Assessment

5. The cumulative impacts associated with the development with any other known proposed developments and infrastructure upgrades in the area have not been considered in the traffic impact assessment.

   It is requested that the applicant should undertake the traffic modelling with the consideration of cumulative impacts associated with the development with any other known proposed developments and infrastructure upgrades in the area in traffic modelling.

Data used to Estimate Transport Facilities for the School

6. Section 6.2.4 of the Traffic and Accessibility Assessment (Traffic Report) prepared to support the development application states the following:

   "Reference has been made to travel mode surveys conducted of a nearby school located approximately seven (7) kilometres from the site, operating under similar conditions. Previous surveys at the existing primary school were also reviewed. This data was used as the basis to prepare the modal splits for Al Faisal College. This in turn enabled for the peak hour vehicle trips to be determined. The modal splits for the future scenarios reflect the anticipated uptake of active travel and public transport by students as the area is developed in future scenarios."

   It is requested that the applicant:

   - Provides details of the surveyed schools including name of the schools, results of the surveys, type of the surveys and time / day of the surveys as part of the applicant's response to submissions; and

- Justifies the mode shares for cars (including pick up and drop off), bus passengers, pedestrians and cyclists that have been used for the traffic and transport assessment based on the results of the traffic surveys.

Adequacy of Pick-up and Drop-off Facilities for the School

7. Section 5.6.1 of the Traffic Report states the following:

   "The travel mode surveys of a similar school in the area (as well as the existing school) revealed an average car occupancy rate of approximately two (2) children per vehicle."

   "A travel mode assessment of the future 2042 scenario assumed that 56% of students travel to the school by private vehicles and adopted a car occupancy rate of 2.2 students per car. This yields an expected demand for 711 vehicles."

   "The provision of 54 pick-up and drop-off spaces equates to a rate of 1 pick-up and drop-off space per seven (7) students. In this regard, a single space would be expected to turn over a minimum of 15 cars over a 30 minute period (based on a two minute average dwell time) and therefore the 54 available spaces will provide a theoretical capacity of 810 cars."

   The pick-up and drop off area has been under-estimated due to the following reasons:

   - The surveyed car occupancy rate is two (2) students per vehicle but the rate of 2.2 students per car has been adopted for the estimation for the pick-up and drop-off area; and
   - The average dwell time two (2) minute used would appear to be too short. There is no guarantee that children leave school in the order that parents arrive to pick them up, so cars need to wait at the parking spot longer than two minute during school pick-up.

   It is requested that the applicant provides details of the surveys in relation to the car occupancy and dwell times for school pick and drop off for a similar type of school to verify the average car occupancy rate and the dwell time as part of the applicant's Response to Submissions.

Adequacy of Service Vehicle Provision for the School

8. Sections 4.6 of the Traffic Report states that a total of three (3) service bays would be provided with two (2) service bays for the proposed primary school and a single loading bay for the proposed secondary school. No analysis / surveys have been undertaken to justify the adequacy these service bays**.**

   It is requested that the applicant undertakes surveys at similar school sites to justify that the proposed service vehicle loading bays are adequate for the subject school as part of the applicant's response to submissions.

Adequacy of Bus Bays for the School

9. Section 4.6 of the Traffic Report states a total of 10 bus bays would be provided for both schools. Based on 56% of students arriving by car, the remaining approx. 2,400 students will be walking, cycling or travelling by bus. Due to the large size of the school with relatively few students would be close enough to walk or cycle, the majority of the using non-car mode will be on buses.

   It is requested that the applicant provides further details to justify that the proposed bus bays are adequate to transport students based on the surveys undertaken at similar type of schools as part of the applicant's response to submissions.

Construction Pedestrian and Traffic Management

10. Section 9.1 of the Traffic Report states the following:

    > *A Construction Traffic and Pedestrian Management Plan cannot be prepared until such time as a builder is appointed for each stage of development, noting that the schools do not reach full development until 2042. In particular, traffic conditions in the locality will change significantly over time, with this also depending on the progressive implementation of the road hierarchy and associated infrastructure improvements.*
    >
    > *Accordingly, it is considered essential that CTPMP's be prepared in response to a suitable condition of consent, with a separate Plan to be prepared for each identified stage on each school site.*

    It is requested that the applicant be conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council for approval prior to commencement of any works.

Active Transport

11. Section 9.1 of the Traffic Report states the following:

    > *"The schools provide sufficient space to accommodate end of trip facilities and bicycle parking within the grounds of the two campuses. Bicycle parking arrangements will be provided at CC stage*."

    It is requested that the applicant provides the details of the number of bicycle parking spaces, end of trip facilities and the proposed location of the bicycle parking spaces and bicycle facilities within the development site as part of the applicant's Response to Submissions.

Green Travel Plan

12. Section 9.1 of the Traffic Report states the following:

> *A preliminary Green Travel Plan has been presented in **Appendix E**. It should be noted that pedestrian and cycle infrastructure and public transport availability is expected to increase as the area develops in the future. Therefore this Green Travel Plan is preliminary and can be revisited in the future as conditions improve to promote active travel and increased public transport use. It is also usual for a Green Travel Plan to be prepared in response to a suitable condition of consent, such a condition would be expected to require the GTP to be updated in 2026 and 2036, if not every three (3) years.*

It is requested the applicant be conditioned to prepare a Green Travel Plan in consultation with TfNSW and submit for the plan via sco@transport.nsw.gov.au for TfNSW endorsement, at least six (6) months prior to the commencement of operation of the School.

Safety Assessment of School Transport Facilities

13. Section 9.1 of the Traffic Report states the following:

> *In general terms, as the road network will be upgraded progressively and as the school will also be developed progressively over 20+ years, it is considered appropriate that a road safety audit be undertaken at each stage of development of the school to address any identified safety issues.*

It is advised that the earlier a project is audited the more likely that the road safety issues or risks identified can be significantly reduced or eliminated. As a result this minimises compromises in road safety and costly treatments at later stages of the project.

It is requested that the applicant undertakes a Road Safety Audit as part of the applicant's Response to Submissions for the proposed access and parking arrangements for the following as well as pedestrian and vehicular accesses to schools, in accordance with Austroads Guide to Road Safety Part 6: Managing Road Safety Audits and Austroads Guide to Road Safety Part 6A: Implementing Road Safety Audits by an independent TfNSW accredited road safety auditor;

- Pick-up and Drop-off vehicles;
- Service vehicles;
- Buses; and
- Cars.

Based on the results of the road safety audit, the applicant shall implement safety measures, if required, in consultation with Council and TfNSW.

If you have any further questions, Mr. Felix Liu would be pleased to take your call on 8849 2113 or email development.sydney@rms.nsw.gov.au. I hope this has been of assistance.

Yours sincerely,

Pahee Rathan
Senior Land Use Assessment Coordinator