

28 January 2020

Mr Jim Betts  
Planning Secretary  
Department of Planning, Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Attention: Andrew Golden

Dear Mr Betts,

**EXHIBITION OF EIS (SSD10325)  
THE KINCOPPAL SCHOOL AT ROSE BAY**

Thank you for referring the abovementioned development' Environmental Impact Statement (EIS) to Transport for NSW (TfNSW) for comment. TfNSW has reviewed the EIS and the associated Transport Impact Assessment (TIA) and provides advisory comments in **TAB A**.

If you have any further inquiries in relation to this development application please contact Vic Naidu, A/Senior Land Use Planner via [development.sydney@transport.nsw.gov.au](mailto:development.sydney@transport.nsw.gov.au).

Yours sincerely,



**Brendan Pegg**  
A/Senior Manager Land Use Assessment  
Planning and Programs, Greater Sydney

## TAB A

### SIDRA Modelling and Traffic Generation

#### Comment

The TIA states that “*no intersection improvement works are required to cater for the additional development traffic*”. However, SIDRA modelling provided by the applicant indicates negligible impacts to the classified road network as the analysis has adopted varying cycle lengths and phase splits for the base and proposed scenario.

TfNSW developed a similar SIDRA based on the proponents to understand the impacts of the proposed development’s traffic generation to the classified road. In TfNSW analysis, the right turn movement from New South Head Road onto Vaucluse Road as a result of the development will cause safety and efficiency issues on the classified network.

#### Recommendation

The applicant should consider the provisioning of a dedicated right turn bay and the removal of parking on the eastern side of New South Head Road to allow two exclusive through southbound lanes. The provision of an exclusive right turn phase is not supported by TfNSW at this stage without further investigation.

The implementation of the abovementioned right turn treatment and parking restrictions with the development can produce delays similar to the existing situation, based on TfNSW’s SIDRA analysis. The applicant is to consider this treatment or other mitigation measures at the subject signalised intersection. It should be noted that the mitigation measures would require TfNSW approval under Section 87 of the *Roads Act 1993* and concurrence under Section 138 of the *Roads Act 1993*.

#### Comment

TfNSW raises significant concern regarding the likelihood of vehicular queuing on Vaucluse Road from increased traffic generation. The cumulative impact of vehicles exiting the Junior and Senior Schools along with traffic exiting from the MTC centre is not adequately assessed.

#### Recommendation

A comprehensive review should be undertaken of the existing traffic signal operation to limit queuing that restricts vehicles being able to exit the site through right hand turns. Modelling and traffic assessments should analyse queuing impacts from the intersection of Vaucluse Road and New South Head Road and possible risks of queuing on preventing vehicles from being able to exit the site and consequently creating on site queuing.

#### Comment

SIDRA modelling does not accurately reflect current site operations.

#### Recommendation

SIDRA modelling should be undertaken with a cycle time of 120 seconds instead of 91 seconds which has been used in the current data. In addition to such, no SIDRA layout or phasing for existing and future model provided. A copy of the traffic control signal layout and operation should be provided to TfNSW for review.

#### **Transport for NSW**

27-31 Argyle Street, Parramatta NSW 2150 | PO Box 973, Parramatta NSW 2150

P (02) 8265 6962 | W [transport.nsw.gov.au](http://transport.nsw.gov.au) | ABN 18 804 239 602

### Comment

Traffic volumes used do not show the date that survey data was collected.

### Recommendation

This should be clarified to ensure that surveys were taken during the school term.

## **Swept Paths**

### Comment

Swept paths for the proposed basement staff parking in the Senior School do not show vehicles being able to enter and exit car spaces. Particular concern is raised for car spaces 7, 16 and 23.

### Recommendation

Swept path modelling should demonstrate that all car spaces able to be accessed safely and efficiently in accordance with Australian Standard AS/NZS 2890.1.2004

## **Construction Management**

### Comments

Kincoppal – Rose Bay School may coincide with Kambala School Sports Precinct Redevelopment (SSD – 10385) during construction phase. The outbound stop on New South Head Rd (TSN 203082) is critical for maintaining public transport access to the Kambala School Sports Precinct Redevelopment during its construction phase.

### Recommendation

The proponent should avoid any potential issues where successive bus stops are lost due to temporary construction needs of the two Schools. It is requested that these requirements are reflected in the Construction Management Plan.

## **Green Travel Plan**

### Comments

The Traffic Impact Assessment submitted does not address the requirements in the SEARs as at present, there is only a brief mention of a Green Travel Plan (GTP) within Sections 3.11-3.24 of the TIA. The submission states a GTP will be developed in the future, as opposed actually submitting a polished GTP with clear actions. This is acknowledged in Section 3.14 which states:  
*“The GTP will comprise a package of measures designed to address the specific travel needs of the site.”*

### Recommendation

Prior to the issue of the first occupation certificate, the proponent should prepare a stand-alone, holistic Green Travel Plan (GTP) to meet the requirements of Section 8 of the SEARs, in consultation with Transport for NSW. The GTP should be based on current and projected student catchment data including the number and/or proportion of students living in each postcode. Analysis of the travel survey and school catchment data should be used to inform mode share targets and actions for implementation under the GTP.

## **Transport for NSW**

27-31 Argyle Street, Parramatta NSW 2150 | PO Box 973, Parramatta NSW 2150

P (02) 8265 6962 | W [transport.nsw.gov.au](http://transport.nsw.gov.au) | ABN 18 804 239 602

The Green Travel Plan should include, but not be limited to:

- including analysis of staff and student travel survey data and school postcode data and discussion of how this data has informed the mode share targets and actions of the GTP;
- identifying the number of staff and students within reasonable walking / cycling distance;
- staged mode share targets for staff and students which reflect a commitment to increase non-car mode share for travel to and from the site, and strategies to deliver those mode share targets;
- include strategies that encourage the use of public and active transport and discourage the use of single occupant car travel to access the site; for staff and students;
- include the provision of bicycle parking, 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;
- Prepare a Transport Access Guide for staff and students providing information about the range of travel modes, access arrangements and supporting facilities that service the site; and
- Determine a communication strategy for engaging with students, staff and visitors regarding public and active transport use to the site and the proportion of the health and wellbeing benefits of active and non-car travel to the site.

The Applicant should submit a copy of the final GTP to TfNSW at [development.sco@transport.nsw.gov.au](mailto:development.sco@transport.nsw.gov.au) for endorsement, prior to the issue of the first Occupation Certificate. TfNSW is also happy to meet with the proponent to discuss the above requirements.