

29 June 2021

File No: NTH20/00185/02

Your Ref: SSD-8378620

The Director
Energy, Industry and Compliance
Planning and Assessment
Department of Planning, Industry and Environment

Attn: Jenny Chu – Planning Officer

Dear Sir / Madam,

**RE: Major Projects – SSD-8378620 – EIS – Redevelopment of Kingscliff Public School
Lot 1 in DP 384195 – 12 Orient Street, Kingscliff**

I refer to the Department's referral via the NSW Major Projects Portal of 31 May 2021 requesting advice from Transport for NSW (TfNSW) in response to the Environmental Impact Statement (EIS) for the above mentioned State Significant Development.

Our key interests are the safety and efficiency of the transport network, the needs of our customers and the integration of land use and transport in accordance with *Future Transport Strategy 2056*.

TfNSW can confirm the following statements of fact relevant to our areas of expertise and regulatory powers.

- Orient Street, Sutherland Street, Viking Street, Omar Street and School Lane are public (Local) roads. Tweed Shire Council is the Road Authority for all public roads in the local government area. TfNSW has an interest in road user safety around schools and the safe operation of the road network generally.
- The application seeks consent to increase the number of students attending Kingscliff Public School from 614 to 730 students over a 10 year period, which is an increase of 116 students and is defined as a traffic generating development under Clause 57 of the *State Environmental Planning Policy (Education and Child Care Facilities) 2017 (ESEPP)*.
- In accordance with Clause 57 of the *State Environmental Planning Policy (Education and Child Care Facilities) 2017*, TfNSW is given the opportunity to review and provide comments on traffic generating developments that will result in an education establishment being able to accommodate 50 or more additional students and involves an enlargement or extension of an existing premises or a new premises.

TfNSW considers that in our technical assessment of the EIS, specifically the *Attachment 15 – Traffic and Transport Impact Assessment (TTIA)* and associated annexures, the 'baseline' for the assessment and the predictions of impact are robust, however the overall assessment is still considered incomplete and requires further investigations.

Technical comments are provided in **Appendix A** to assist the applicant in identifying appropriate measures to enable this development to proceed. In response to the draft School Travel Plan (STP) targeted feedback is provided in **Attachment B**.

TfNSW provides comments in regards to the following topics:

- Cumulative impacts on the road network.
- Impacts of the Kiss 'n' Drop facility.
- Reconfiguration of the Kiss 'n' Drop facility and Bus Drop-off / Pick-up infrastructure.
- Proposed pedestrian and cyclist crossing upgrade/s.
- Parking and traffic impacts of construction staff.
- Active Transport facilities.

TfNSW highlights that in determining the application under the *Environmental Planning and Assessment Act 1979*, it is the Consent Authority's responsibility to consider the environmental impacts of any roadworks which are ancillary to the development. This includes any works which form part of the proposal and/or any works which are deemed necessary to include as requirements in the conditions of project approval.

Upon determination of the application it would be appreciated if Department of Planning and Environment could forward a copy of the approval for our records. If you have any further enquiries regarding the above comments please do not hesitate to contact Katrina Wade, Development Services Case Officer or the undersigned on (02) 6640 1362 or via email at: development.northern@transport.nsw.gov.au

Yours faithfully,



for Matt Adams
Team Leader, Development Services
Community and Place | Region North
Regional & Outer Metropolitan
Transport for NSW

Enc: Attachment A – Technical Comments
Attachment B – Targeted Feedback

Attachment A - Technical Comments

For context, this attachment must be read with TfNSW response of **29 June 2021** to SSD-8378620

TfNSW has reviewed the Environmental Impact Statement (EIS) and the Traffic and Transport Impact Assessment (TTIA) including all relevant annexures and provides the following comments to assist the Department and the Applicant in progressing the application:

EIS, TTIA and supporting documents – General Comments

1. The TTIA provides a copy of the *Traffic Network Diagrams (Appendix E)*. The data in these diagrams appears to be incomplete:
 - The “background volumes” sheets do not show any background data for the local streets, Omar, Seaview and Olga Streets. Additionally the diagrams do not accurately represent the street connections or how they may be used by traffic generated by the existing and proposed development.
 - There is no explanation in the appendix to inform where the data has been sourced from.
 - It is unclear if the “with development” volumes for the local streets are demonstrating the additional traffic generated by the increase in new students only, or is intended to also include the existing traffic.

TfNSW recommends the Consent Authority seek clarification from the proponent in regards to the background traffic volumes, growth rates, generated traffic volumes, for both the existing and the proposed development.

Cumulative Impacts on the Road Network

2. Recent assessments of nearby developments by TfNSW have identified concerns with potential queuing at intersections located along the identified Construction Access Route shown in *Figure 4.1* of the *Preliminary CTMP*.

TfNSW recommends the Consent Authority request further sensitivity analysis be undertaken by the applicant to understand the cumulative impacts on the surrounding road network, during both construction and operational stages, by this proposed development, in addition to the proposed redevelopment of the nearby Kingscliff High School (KHS), Tweed Valley Hospital (TVH) and any other major infrastructure project or development within the immediate Kingscliff region. Where applicable, Austroads turn warrant assessments should be undertaken for all intersections, to consider the merit for any turn treatments and / or central medians to prevent turning movements at key locations.

The Consent Authority should be satisfied that warrant assessments reflect expected demand (individual and cumulative).

Existing Background Traffic and Kiss ‘n’ Drop activity.

3. *Section 6.2* of the *TTIA* refers to background traffic and a survey undertaken on 19 November 2019, which captured this information for four key intersections (shown in *Figure 3.2*) surrounding the approach to the public school, and assessments of the existing trips generated by the existing school have been demonstrated in *Tables 6.1* and *6.2*.
 - The background traffic survey focuses on intersections only and as a result do not appear to identify the midblock queuing occurring in Orient Street and Sutherland Street, which appear to be due to the misuse of the existing Kiss ‘n’ Drop facilities in both streets.

- It is noted that the PM peak hour traffic shows a difference in volume to the AM peak hour, in both the survey traffic volumes and the Existing Trip Generation totals shown in *Tables 6.1 and 6.2*. The change appears to occur for the KHS Non-staff traffic volumes only. This may be due to the Kiss 'n' Drop facility being misused in the afternoons, as observed in *Section 3.5* of the *TTIA* where it states, "*Parents / carers began to arrive for pick-up approximately 45 minutes before school concluded*".

TfNSW recommends that further investigations be undertaken to determine if the misuse of the Kiss 'n' Drop facilities are the potential cause for the difference in traffic generated by the KPS Non-Staff during the AM and PM peak hours in the background traffic data, as a result of parents arriving earlier than the designated PM peak hour period.

TfNSW further recommends that Kiss 'n' Drop facilities be addressed further in the School Travel Plan (STP), to include communications to parents informing on the appropriate use of the facility. TfNSW notes that this is a behavioural issue that is not uncommon, however, in order to implement the STP appropriately, this should be addressed and mitigation measures proposed with ongoing monitoring to prevent future misuse of the facility.

Proposed Works in the Road Reserve

4. TfNSW notes the below works in the road reserve identified in the *TTIA*:

Reconfiguration – Bus Drop off / Pick up and Kiss 'n' Drop facilities.

Section 1.3 and Section 3.5 of the *TTIA* identifies a number of safety concerns in both Orient and Sutherland Streets. These concerns include but are not limited to mid-block U-Turn maneuvers, intersection congestion, informal parking arrangements, vehicles queueing and causing conflicts with designated Bus zones and school crossing locations, constrained two-way traffic movements and informal street crossings occurring away from the designated school crossing.

Section 6.7 further addresses the conflicts between the Kiss 'n' Drop facilities and the Bus zones on both Sutherland Street and Orient Street, in addition to Sutherland Street potentially reaching and exceeding its capacity in the forecasted years.

TfNSW understands the development recommends a reconfiguration of both the Kiss 'n' Drop facilities and the Bus zone locations. This reconfiguration appears to be consolidating all Kiss 'n' Drop facilities to be located on Orient Street, and all Bus zones to be solely located on Sutherland Street. It is noted however that no plans have been included in the development application demonstrating the proposed reconfiguration.

TfNSW supports this reconfiguration in principle, through the separation of heavy vehicles (buses) from light vehicle activities, reducing the potential for conflict between buses, vehicles and children. Clearer detail is required however, to understand the extent of the proposed works to be built in the road reserves of both Sutherland and Orient Streets.

TfNSW recommends that the Consent Authority request further detailed drawings of the proposed works occurring in the road reserves of the surrounding streets relevant to the school. These drawings should be informed by information gathered through further consultation with the bus operator Surfside Bus Lines, TfNSW and KPS to determine what infrastructure is needed for both the proposed reconfiguration design and to accommodate the proposed increase in students (further addressed below).

Upgrades – Footpaths, student crossings, central medians and delineation

TfNSW supports the observations made in the application that there are numerous gaps in the active transport network surrounding the school, including a lack of continuity in footpath links, narrow footpaths, minimal shared paths being available and insufficient safe crossing locations, in particular on Sutherland, Orient, and Omar Streets.

Section 3.4.1 and Figure 3.6 List a number of Active Transport Deficiencies (numbered D1 to D12) within the immediate vicinity of the school.

- Items D3, D4 and D10 are identified as being included in the KPS redevelopment scope of works. All other items are “*expected to be (but not confirmed) to be included into the revised PAMP and Bike Plan.*” This is supported by TfNSW, but is recommended to be confirmed by in further consultation with Council.
- Section 5.2 of the TTIA further addresses concept designs for D6 and D10.
 - D6 is shown in Figure 5.2, demonstrating a concept design for the relocation of an existing pedestrian refuge on Sutherland Street. It is unclear why such detail has been addressed in the TTIA for D6, when it is not proposed to be included in the scope of works for the redevelopment and has been identified as being “*undertaken as part of a separate project by Council.*”
 - D10 is shown in Figure 5.3, demonstrating a concept design for an additional dedicated school crossing on Orient Street.

TfNSW supports the proposal to improve student safety in the immediate vicinity of the school on Orient Street by identifying the need to provide a school crossing location further to the west than the existing crossing, to support students crossing the street midblock.
- Sections 3.4.1 and 3.5.1 of the TTIA refer to observations of pedestrians crossing the road midblock at informal locations along Orient Street and the paths fronting the school not being wide enough for shared use.

TfNSW recommends that further investigations be undertake in consultation with both Council and TfNSW to identify where the informal crossings are occurring, which directions the active transport users are arriving and departing from, which mode they are travelling by and whether there is a need for both an upgrade to the existing crossing and / or a new crossing to be located away from the existing.

TfNSW further recommends, prior to developing concept designs any further for all works in the road reserve, in addition to the abovementioned consultations, all of the proposed treatment/s and works in the road reserve (including the Bus reconfigurations) should be referred to the Local Traffic Committee for review and comment on all relevant regulatory facilities.

Parking

5. The redevelopment proposes to increase the number of students and teachers (over a 10 year timeframe). TfNSW notes that the redevelopment does not propose to support this proposed increase by providing any further parking onsite, however does propose to support it with the implementation of the *School Travel Plan (STP)* to encourage both students and staff to use active transport modes.

Although a STP has been developed with proposals to reduce the percentage of students and staff travelling to and from school via the use of individual private vehicle/s, further education with the staff appears to be required to ensure the existing staff car park is utilised 100% to avoid unnecessary overflow out onto the street when off-street parking is still available.

TfNSW recommends the Consent Authority be satisfied that the local streets can support all future parking needs, both onsite and on-street, for the proposed increase in students and staff and works with the proposed reconfiguration.

Construction Traffic Management Plan (CTMP)

6. TfNSW key concerns during the construction process is around the safety and efficiency of the key intersections, and any potential impacts on pedestrians and cyclists coming and going from the school. It is noted that the CTMP is of a preliminary nature, as such, a construction contractor and finer detail around the construction methods are not (yet) available.

Notwithstanding this, TfNSW notes that it is unclear what impacts the traffic generated by construction staff will have on the surrounding road network. *Figure 4.1 and Section 4.4.4* address the Construction Access Route. It is understood by TfNSW this route is addressing the construction design vehicles listed in *Section 4.2.1*. It is unclear if this is also intended to be the transport route for construction staff as the identified parking locations are located beyond the school site.

Although the number of Construction staff is unknown, including their generated traffic volumes and movements, TfNSW supports the recommendations in *Section 4.3.3* of the *Preliminary CTMP*, that construction staff be encouraged to carpool to work, to reduce the number of worker vehicles and that “*The availability of on-street parking should be considered when determining the peak work force.*” TfNSW further supports the recommendation to utilise existing public car parks located within walking distance of the development site, accessible by a network of public footpaths and stairs.

Section 3.3.2 in the *Preliminary CTMP* identifies the existing crossover from Orient Street to School Lane as being the primary construction access to the development site. It should be noted this crossover is located in the immediate vicinity of the designated school crossing and interacts with an existing footpath along Orient Street. *Section 4.3.4* states that “*Any impacts to pedestrian pathways or cycle routes will be managed under the CTMP*”, however no mitigation measures have been proposed at this stage to manage the potential for conflict between pedestrians or cyclists and construction vehicles arriving or departing the site.

TfNSW recommend the Consent Authority conditions the applicant, to prepare the final CTMP in consultation with TfNSW and Tweed Shire Council, prior to the secretary’s acceptance of the document. The updated CTMP should further detail the expected construction traffic volumes / trip generation. The start and finish times for the construction staff should be included in this updated information and further include any mitigation measures to prevent conflicts between construction vehicles, other vehicles, pedestrians and / or cyclists around the School Lane crossover and during drop-off and pick-up times.

Notwithstanding the above requested additional information, TfNSW recommends that a final updated CTMP should be consistent with the Consent Authorities typical format for SSD and be a requirement of any project approval. The final document should to include a Driver Code of Conduct (DCoC), be prepared in consultation with the relevant Road Authorities and approved by the Consent Authority prior to the commencement of vehicle movements associated with the major project.

Buses

7. TfNSW notes that the current school bus operator is Surfside Bus Lines and notes consultation was undertaken as part of the *TTIA* development.

The bus services are addressed throughout the *TTIA*, in particular in *Section 3.4.2* which addresses public transport servicing both public and school bus services, *Section 3.6* which addresses the current breakdown of both students and staff utilising the bus services and states that “*buses are generally well used by students and during the site visit several school buses were observed to be at capacity. However, there is little opportunity to further increase public transport mode share without new services.*” and in the assessment summary *Section 9.1* where it states that the existing bus services generally experience high occupancy rates.

TfNSW support the implementation of the STP to encourage an increase in students taking up active transport options, however TfNSW notes, a review of the existing Surfside services had not been undertaken for some time.

TfNSW recommend the Consent Authority request the proponent to further consult with TfNSW and the bus operator to understand the impacts both the increase in student numbers will have on the current bus services, in addition to the increase in overall students taking up the bus services on implementation of the STP.

Bicycle and end of trip facilities

8. The TTIA states the school currently has provision for approximately 90 bicycle parking spaces located against the northern wall of the home economics building, fronting the Oxford Street cul-de-sac, and will provide additional bicycle parking spaces as the population of the school increases.

TfNSW Recommend prior to the issue of the Construction Certificate, the Consent Authority condition bicycle parking and end of trip facilities be provided for staff and students 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.

Attachment B – Targeted Feedback

For context, this attachment must be read with TfNSW response of **29 June 2021** to SSD-8378620

Active Transport Considerations

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.

The Traffic & Transport Impact Assessment (TTIA) includes adding an additional 4 staff and 33 student bicycle parking spaces, then incrementally adding additional bicycle spaces as school enrolment increases to meet the requirements of the Lake Macquarie Development Control Plan (DCP), 2014. Bicycle parking will be monitored yearly as part of the School Travel Plan.

Recommendation

It is requested that prior to the issue of the Construction Certificate, the applicant be conditioned to provide bicycle parking and end of trip facilities for staff and visitors in accordance with Lake Macquarie Development Control Plan, 2014 and 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.

School Travel Plan (STP)

TfNSW has reviewed the School Travel Plan (STP) provided in Appendix B of the TTIA. Current NSW policies state the importance of walking and cycling to increase access to local centres. The STP has a good foundation, but it should be a priority for the proponent to secure funding, human resourcing (including an appropriately trained and resourced travel plan co-ordinator) and an agreed timeframe for completion of key actions identified in the GTP to support sustainable transport outcomes. The recommendations below are meant to improve the initial STP and the proposed initiatives to encourage sustainable transport to the site.

Recommendations

Prior to the issue of the first Occupation Certificate, the Applicant should finalise the STP in consultation with TfNSW. The School Travel Plan should include, but not be limited to:

- Includes maps with the school catchment area, cycling infrastructure, isochrome lines for walking and cycling distances, staff suburb/location data;
- Includes staged aspirational mode share targets for staff and students;
- Include the provision of existing and staged bicycle parking for students and staff, 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;

- Considers more incentives for staff to use active and public transport such as:
 - School subsidised panniers or backpacks for staff committed to active travel;
 - Salary sacrifice options for purchases bikes or other micro-mobility options;
 - Time in staff meetings to share tips and support for staff wanting to start cycling;
 - An active travel champion who models active travel and shares experiences and positive messages;
 - Bike maintenance equipment for use onsite & bike lights for emergency loans;
- Considers more incentives for students to use active and public transport such as:
 - Bikes buses (which are similar to walking school buses but for cycling);
 - Gamification for students using and promoting active and public transport;
 - Activities for students to create and share transport photos/videos/stories/art/maps from their trips to school;
 - Regular events, such as active transport breakfasts and trips after school with bike buses, walking buses and real buses departing school with students, parents and teachers;
 - Cycling skills and bike maintenance courses;
 - Promoting to parents the potential of active travel to school as an opportunity to stay active themselves;
- Considers how educational material that explores the benefits and potential of sustainable transport can be incorporated into classes for different stages in the curriculum;
- Includes an enhanced Travel Access Guide (TAG) with:
 - Recommended cycling and walking routes to key destinations (such as beaches, parks and shops) with indicative times and from different directions within the school catchment area;
 - More information on the buses (are there bus stops missing from the map?);
- Explores different channels to communicate transport information and advice such as:
 - Transport noticeboard at key location within the site in the form of a travel access guide;
 - School assembly;
 - Newsletter and website;
- Includes a comprehensive communication strategy which includes communications activities related to all the initiatives, the channels that will be used and who will be responsible; and
- Include details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the STP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of users of the development.

The School Travel Coordinator is to be required to submit yearly progress reports to TfNSW at development.sco@transport.nsw.gov.au.

TfNSW would welcome further discussions with the proponent regarding these matters to ensure the best outcome for the Kingscliff Public School Redevelopment School Travel Plan. To initiate further discussion, please email development.sco@transport.nsw.gov.au