CITY OF PARRAMATTA

Your Ref	SSD-9579147
Our Ref	NCA/13/2020
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Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2124

27 July 2021

ATTN: Jason Maslen,

COUNCIL SUBMISSION
NOTICE OF EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT FOR THE REDEVELOPMENT OF CARLINGFORD WEST PRIMARY SCHOOL (59-73 FELTON ROAD AND PART OF 183 PENNANT HILLS ROAD, CARLINGFORD)

I refer to the above application and the request to provide advice on the proponent's *Environmental Impact Statement*. Council has reviewed the supplied Environmental Impact Statement and whilst we are supportive of improvements to schools in our area there are several concerns with the current application.

The current school population has been established through a series of ad hoc temporary demountables and far exceeds the capacity of the local road network, causing significant delays and disruption. The current application would formalise school numbers close to current levels and foreshadows further increases.

Given the significant traffic impacts that will result from the permanent use of the site at the proposed enrolment levels, Council **objects** to the proposal as currently documented. In addition, and notwithstanding the traffic concerns, Council would not support any increases in school population beyond the base 1610 accommodated by the new buildings.

Council's detailed comments are as follows:

Traffic and Transport

Based on the analysis and information submitted by the applicant, the proposed development is not supported on traffic grounds for the following reasons:

1. The Traffic and Accessibility Impact Assessment acknowledged that the modelling conducted did not accurately capture all the existing congestion issues known and observed to occur within the road network surrounding the site. It is noted that congestion occurring in downstream traffic was having a flow on effect on school traffic that could not be modelled.
2. There are existing gridlocked traffic conditions in Baker Street, Felton Street and nearby side streets during peak hours which create significant traffic delays.
3. The Hills Police Area Command have previously undertaken a patrol on 26 May 2020 between 3:15pm and 4:30pm and have raised concerns regarding gridlocked traffic in

Baker Street impairing access to emergency vehicles. They noted that it took 30 minutes for the Police Patrol vehicle to turn left from Pennant Hills Road (eastbound) into Baker Street and to travel 300m into Felton Road (Ref. PTC 2011 A10).

4. The existing road network does not have capacity to accommodate a school of this size and the size of the proposed catchment on a permanent basis. The proposed development should reduce the school enrolment capacity and alter the catchment to a level that can be serviced within the existing road network.

A response table is provided with attachment 1 to this response which provides a detailed reasoning behind this objection and general compliance with Traffic and Transport Issues including a link to a video as part of a previous Council arranged video traffic count undertaken on Tuesday, 16 June 2020 which shows the gridlock conditions at the intersection of Felton Road and Baker Street.

Attachment 1 – Detailed Traffic and Transport Comments

Open Space

The current school has 55 demountable classrooms which has significantly reduced open space availability and created a fragmented network of relatively small areas that provide limited recreational capacity for students. The proposal will increase both the quantity and quality of open space by seeking to remove these demountables, with the northern and southern playspaces being the largest spaces with the greatest flexibility for both school and potential community recreational use.

However, whilst the proposed school has been designed to accommodate a base of 1,610 students, current enrolment numbers exceed this and will potentially reduce availability of open space through the retention of demountable buildings as it is expected to take multiple years to allow for a redistribution of the school. The proposed development does not explicitly include the removal of the demountable and acknowledges that there is scope for further increases in the school population at a later date. Notwithstanding concerns in relation to overall school numbers, Council would like some reassurance that this open space will not be progressively reduced again via the installation of new demountables on the open space.

It is also noted that open space will be significantly reduced for approximately 12 months during construction works, with approximately 30 demountables to occupy the southern playing fields as a temporary school. The application therefore needs to adequately demonstrate that open space within the site will be sufficient for the higher number of students to be able to meet their physical activity requirements within the school property during this time.

The Social Impact Assessment recognises continued reliance on nearby Council public open spaces to accommodate sporting activities, this is likely to increase in the future if student numbers continue to exceed permanent school design capacity. Higher student numbers will also likely result in an ongoing dependence upon demountable buildings, which will increase recreational demand whilst reducing the availability and quality of open space within the school site likely below the EFSG benchmark of 10sq.m per student. It also reduces opportunities for community use of school open spaces outside operational hours to offset additional demand on Council open space during school hours. To address these impacts, it is recommended that the following measures are employed pre or post consent:

- *Engagement with the City of Parramatta to investigate community use of the school's open spaces outside operational hours.*
- *Establishment of an operational plan for CWPS's open spaces to ensure their efficient use by students and staff and limit the need to use Council ovals.*

Any further expansion of the school beyond the 1,610 students is not supported and the permanent retention of the schools public open space is recommended to be incorporated as development consent conditions to ensure that impacts on nearby Council open space are minimised.

Transport Planning

Council's Transport Planning department consider the proposed through site link which straddles the southern boundary of the site to be confusing and not a great outcome overall. While a direct through site link aligned with the central Felton Rd walkway has not been accepted by the applicant previously it is reiterated that this is a greater quality outcome overall and aligned with the principles of the Parramatta Ways strategy. Council welcomes further discussion in addressing this issue if the applicant were to consider opportunities for greater public access outside of school hours.

If the indirect path is proceeded with, Council also recommends a condition of consent prior to the Crown Occupation Certificate that grant Council an easement for public access along the southern boundary for a 3m wide path (with 1m maintenance buffer each side), this could be a wider "zone" because of the switchback to the east. A condition is also recommended that the paths being constructing to be at least 3.0m wide at either end.

It is also requested that further consultation with Council is done so the path can be modified to pass through the carpark to provide a more legible connection at the western end, below is the potential link that was identified in the Transport Working Group. A Wayfinding strategy is recommended to be conditioned for each end of the pathway to ensure that it is clear to the public can access the through site link.

Social Outcomes

Noise
Provision of basketball courts for the students is supported, however their current location is likely to cause noise impacts and associated stress on the residential neighbours to the North and West site boundaries. It is recommended that the location of basketball courts is reviewed

further by DPIE, or at a minimum, details of noise minimisation measures are provided to Council in the Response to Submissions stage.

To increase community access further consideration is to be given to how the courts could be accessed from Felton Road West, or the cycleway. This will assist in future proofing the site as an opportunity for the Share Our Space program. Creating multipurpose courts e.g. basketball, netball, handball, futsal would also maximise recreation opportunities for both the school and wider community use. The school uses Council's nearby Peggy Womersley Reserve, which is also relied on by three other schools; inhibiting community access and contributing to overuse of the reserve.

Enrolment numbers & future proofing
Data provided by NSW Education Data Hub identifies that of the 1,618 NSW Government primary schools, Carlingford West Public School had the highest enrolment number at 1,654. It has now surpassed previously higher enrolled schools, Westmead Public School, Matthew Pearce Public School, Chatswood Public School and Hurstville Public School. CWPS also has the 15th highest enrolment of the 2,271 NSW Government Schools, noting that 11 of the 14 with greater enrolment numbers than CWPS are high schools which typically have enrolment caps of 2,000 students. CWPS has a current enrolment cap of 555 but last year was exceeded by 1,099 students.

Council Staff understand the importance for children to equitably access high quality education in modern school buildings, however, along with the community, Principal, and Parents & Carers Committee, we raise concerns of future use of demountables to support the rapidly increasing population in Carlingford. On page 22 of the SIA, it is stated there is a

"lack of certainty about the future number of students the CWPS campus is expected to cater for, particularly given the rapid growth in student numbers from 762 to 1,678 between 2015 and 2021 and the population growth projections for Carlingford. It is uncertain whether the proposed changes to the school catchment will sufficiently mitigate the risk of significant ongoing growth in student numbers at CWPS. This uncertainty, and the potential for demountable classrooms to be required following the redevelopment works, reduces the positive impact of the new facilities from 'high' to 'moderate'.

Council Officers seek assurance that demountable classrooms will not be placed on open space following redevelopment, which would result in a below benchmark provision, increased pressure on Council's assets and decreased quality of education for students. Council objects to any further expansion of this school beyond the 1610 students proposed in the permanent buildings.

Open Space
Page 10 of the Architectural Plans identifies the following breakdown open space 6,220sqm south play space; 1400sqm quad; 3,200sqm north play space; 2680 sqm secret garden and; 1500sqm quad. This totals 15,000sqm. However, according to page 17 of the SIA, *"the proposal will result in a total of 18,450sqm of open space on the CWPS campus. This equates to approximately 11.5sqm of open space per student. The EFSG states that designs for a major upgrade of an existing school must aim to achieve a minimum of 10sqm of open space per student. The proposed provision of open space exceeds this benchmark."* If the total open space is 15,000sqm, the open space per student for 1,600 students will fall below benchmark to 9.34sqm.

Page 17 of the SIA also states *"It is assumed CWPS will continue to use Council owned open space for some activities."* While the applicant states that the open space prevision over student exceeds benchmarks, the continued reliance on Council's already over-capacity open space, determines that the open space provided within CWPS is not sufficient for the student population.

Council officers seek clarification of the total open space to be provided within CWPS (15,000sqm or 18,450sqm). Council Officers seek that the applicant provide sufficient open space for students to meet curriculum needs within the school.

Catchment Engineering
Council's systems have indicated that the site is affected by overland flooding which has previously been conveyed to the applicant in a meeting on the 13th May 2021, prior to the lodgement of the EIS. The submitted flood memo suggests that since the proposal will not have an impact on local flooding, further flood modelling is not required, it is presumed that this was prepared prior to the meeting. It is important to note that this is not agreed, and the following flood mitigation measures must be considered in the Response to Submissions. The findings of this meeting have been sent to the project engineer by Council's Catchment Engineer and have been reproduced for DPIE's clarity below:

The proposal requires a detailed flood modelling, impact assessment and risk management study due to the following reasons:

1. *The existing Council flood model just includes the 5% AEP and 1% AEP flood extent and depth. However, at least PMF information is required to demonstrate compliance with Flood Planning Controls including emergency plans and to ensure that the development does not have an impact on local flooding for a full range of storm events.*
2. *The existing flood model just includes the major overland flooding along the existing Council pipe system; however, two additional upstream catchments affect the subject site. Considering the extent and sensitivity of the proposed development, a detailed flood assessment must be undertaken to include the whole upstream catchment.*
3. *The existing Council model is based on ARR1987 methodology and should be updated.*
4. *The impact of Climate Change must be considered.*
5. *A section of the proposed car park will be within the flood affected area and blockage of the open subfloor may impact local flooding. This needs to be further assessed.*

***Important note:** Considering the above concerns and others issues, a detailed flood study must be provided. In the absence of the flood modelling results and report, Council cannot provide further comments on whether the proposal is acceptable and compliant and can be supported.*

The flood study should include:

1. *Flood modelling of the existing condition (Base Case scenario) by updating the existing Council's flood model. The design of the buildings must be in respect with the Base Case flood information;*
2. *Flood modelling of the Post-development scenario to include the proposal (proposed buildings and cut/fill amount) to assess the impact of the proposal on local flooding. The architectural design may need to be revised to eliminate adverse impacts.*
3. *Risk assessment and management plan to demonstrate that the development and its occupants will not be put at risk by flooding and that the development will not interrupt the free passage of floodwaters, nor cause an increased risk of harm to people and adjoining properties. The report shall demonstrate that the proposed development is compliant with the flood controls of the relevant Development Control Plans (DCPs).*

A further meeting was held on the 9th July 2021 between Council' catchment engineer and the applicant's flood team from WSP to discuss the details of the required flood study. The following table provides Council's response on the proposed flood modelling methodology as discussed in the meeting.

Item ID	Item	Council's response

1, 2, 3 and 4		Accepted
5	TUFLOW topography	Generally acceptable. However, a detailed site inspection is required to identify any local changes in topography and structures that may have not been represented in the existing DEM. Detailed survey data should be also included in the model and model DEM to be adjusted accordingly. Also, proposed structures and cut/fill amounts must be included in the post-development scenario. All proposed buildings to be assumed 100% blocked even the open sub-floor of the proposed car park.
6, 7 & 8		Accepted
9	Pipe blockage	All pipes smaller than 750 mm and pits connected to these pipes must be excluded from the model (assumed 100% blocked). For pipes larger than 750mm, a 50% blockage factor can be considered. A sensitivity analysis should be undertaken assuming 100% blockage of all pit and pipe systems.
10, 11, 12, 13, 14, 15, 16, 17 & 18		Accepted
19		Accepted - Initial and Continuous loss for larger storm events (>1% AEP) to be assumed as zero
20	Filtration of Raw data	Filter the rain on grid data as follow: • Remove areas where Depth <0.01m AND V x D < 0.125 m2/s • Remove areas where V x D < 0.02 m2/s • Retain areas where depth > 0.3 m even if the V X D is low • Remove islands of 50 -100 m2 area (based on the flood engineers' judgment)
21	Flood hazard	See the following section about Flood Risk Management. Also, hazard maps for all sensitivity scenarios must be presented as well as changes in hazard conditions as the result of the development.
	Climate change	To be considered in accordance with the ARR2019 guidelines.
	Range of acceptable afflux	Council has a restricted policy with regards to afflux on adjoining properties. There should be no afflux on private adjoining properties as the result of the proposal. Afflux on roads shall be minimal and not changing the serviceability of the roads.

The Flood Risk Management Plan shall cover the following:

a) The potential risk of flooding on the future users (in this case students, staff and parents). **If the number of students increases beyond 1610 students, this will increase the risk to human life by exposing additional people to the risk of flooding.** This issue has to be addressed in the Flood Risk Management plan to show how the elevated risk will be reduced by introducing practical and meaningful mitigation measures. The residual risk considering the mitigation measures to be

discussed. Please note that as detailed in Section L of the FDM (2005), the provisional hazard of flooding is not equivalent to the true hazard. The provisional hazard values to be used in conjunction with other factors to determine the true hazard and the risk.

b) The risk of flooding on the proposed structures to be discussed in the plan. All relevant flood controls summarised in Part C Section 6 of the Hills DCP for sensitive uses should be addressed including the required FPLs for habitable and non-habitable floors and the parking area including the driveway.
c) The flood risk management plan shall include details of the proposed evacuation plan including horizontal and vertical evacuation routes, safe access route for parents or how they will be notified to not approaching the site during the flood, emergency services access to the site during the flood event, staff training and drills, warning system details and required maintenance. If Shelter in Place (SIP) is also proposed, this should be above the PMF. The SIP shall be large enough to accommodate all occupants at any time based on the maximum capacity of the facility. Details of the SIP including location, size, access, required equipment and facilities such as emergency kit, first aid kit, toilets, portable radio with batteries, candles and waterproof matches, list of emergency contact details, food, water etc. to be included in the report,
d) The risk of the proposed structures on local flooding to be discussed in the plan. No structure even suspended to be proposed within the floodway, flood storage and medium to high hazard area as a result of a 1% AEP storm event. If a very small portion of a suspended structure is proposed over the mentioned areas, the structure should be considered fully blocked for the purpose of flood modelling to investigate the impact on the adjoining properties.
e) A similar risk assessment should be considered for the proposed temporary school.

Stormwater Management Plan

The submitted Stormwater Plans were reviewed and due to lack of information, it is not clear whether the submitted plans can be supported or not. The following design consideration should be included.

1. There is a ridge within the site and as a result, the site naturally drains into two catchments. The stormwater plans to be revised so catchment diversion will not occur.
2. Identification and management of upstream overland flow to be considered.
3. Providing a large rainwater tank for building J is not efficient as enough water supply will not be provided for the tank which will result in an empty tank for the majority of the time. It is better to have two or three rainwater tanks to capture the majority of roof areas (buildings J, X and Y). Also, the tanks should be sized using efficiency curves and considering the supply and use. This means that a larger retention volume may be required which is very beneficial for the local hydrology. Please refer to the WSUD section for more details.
4. OSD tank 1 is located under Block J. This is not acceptable as the OSD tank must not be under any habitable floor and it should be easily accessed for inspection and maintenance.
5. The OSD tank emergency overflow shall not rely on a pipe system. The emergency overflow path shall be in form of surface runoff without causing any nuisance.
6. Enough access to OSD tanks shall be provided in accordance with the UPRCT handbook.
7. Access to OSD tanks shall have grated cover to provide easy inspection and cross-ventilation.
8. Cross-sections and plan views of OSD tanks are required to understand the internal configuration of the tanks.
9. The potential for drowned orifice needs to be explored considering the 1% AEP downstream flood level.

10. OSD calculations must be based on the UPRCT handbook (4th edition) and to consider the drowned orifice and orifice size adjustment as detailed in City of Parramatta's Technical Design Guide for Stormwater filter Concept Design.

WSUD Design

The proposed WSUD plan only relies on the end-pipe treatments. With such a large-scale project, Council highly recommends the design to incorporate measures reducing stormwater volume including raingardens or other constructed ecologies which can detain, retain and reuse stormwater. Open space and green area to be designed to assist with stormwater management and maximising infiltration. The opportunity of having raingarden or Tree pits are to be explored.

It should be noted that the treatment targets to be in accordance with the following:

- GP reduction 95%
- TSS reduction 85%
- TP reduction 60%
- TN reduction 45%

The WSUD plans must include the location and number of proposed ocean guards, MyCelx and oil baffles. With regards to the proposed storm filters, the design must be in accordance with Attachment B.

With regards to the proposed rainwater tank, the MUSIC model to include

1. Daily rainfall data for Parramatta North (Mason Drive, station 066124) for the period 25 December 1984 to December 2007.
2. Re-use to be considered only for toilet flushing and irrigation.
3. Each rainwater tank is modelled separately.
4. A maximum of 80% of the physical capacity of the rainwater tank to be used for modelling.
5. Internal re-use (toilet flushing) should be modelled as an average daily demand based on 0.06 kL/day per toilet unit. Where the site is only occupied 5 days per week, the daily usage rate is to be proportioned by 5/7.
6. Irrigation of landscape (excluding turf) to be based on 0.4 kL/year/m2 and to be modelled as PET-Rain under annual demand. The PET is to be based on the values presented in Attachment B.
7. The rainwater tank must be sized efficiently using efficiency curves based on the provided supply and the demand.

Accessibility

Due to the topography of the land this application has been reviewed by Council's Universal Access Officer. The following comments are provided following this review:

1) Please ensure continuous accessible paths of travel are provided from the accessible parking spaces.
2) The areas of tiered seating throughout the proposal have no allowances for wheelchair seating as per ***BCA Table D3.1 Requirements for access for people with a disability - Access requirements.*** *To wheelchair seating spaces provided in accordance with* ***D3.9.*** Suitable seating areas are shown in AS1428.1 figures 54.
3) All common areas of the school are required to be accessible as per ***BCA Table D3.1 Requirements for access for people with a disability. Access requirements:*** *To and within all areas normally used by the occupants.* Therefore, access is required to all the play areas including but not limited to the basketball courts, quads, northern and southern play spaces and rugby fields.
4) It is requested that all areas where services are provided to the students including but not limited to sign in areas, canteens will require accessible features suitable for a transaction by a person that may have a mobility impairment.

Please note that these comments are in addition to the requirements within the access report by Morris Goding Accessibility Consulting. These additional comments do not replace those mentioned within the access report and does not relinquish the applicant from its obligation to provide a fully compliant detailed universally accessible design.

Conclusion
It is noted that this is the recommendation of Council officers and this submission has not been endorsed at a Council meeting.

Council appreciates the opportunity to comment on the above application and are supportive of the continued investment in school infrastructure in the City of Parramatta, however, we have serious concerns in relation to the impacts that the proposed permanent school population will have on the local area and the fact that there is no certainty that the school will not continue to expand in the future.

It is noted that traffic signals are proposed at the intersection of Baker Street and Pennant Hills Road, Carlingford. This may have an impact on the capacity of the precinct to accommodate higher volumes of traffic associated with Carlingford West Public School than would otherwise be the case. Whilst it is unlikely that this improvement would facilitate the numbers currently proposed, one way forward may be for the applicant to use an appropriate form of traffic modelling and build in the proposed signalisation of this intersection to determine the traffic volumes that the area can accommodate. In turn this information could then be used to establish the appropriate number of students that can be accommodated on site.

We are happy to discuss the matter further with both the Department and the applicant. Should you require anything further, please contact Paul Sartor (Development Assessment Officer) on 9806 5740 or at psartor@cityofparramatta.nsw.gov.au

Yours sincerely

Myfanwy McNally

Myfanwy McNally
Manager, City Significant Development

CITY OF PARRAMATTA

Attachment 1 – Detailed Traffic and Transport Comments

Description/ Development Control/Design Requirements	Proposal	Comments	Compliance
Hills DCP: 1 space per employee and 1 space per 30 students enrolled for visitor parking. Parramatta DCP: Does not specify a car parking rate for schools. Staff surveys indicated that 95.4% of staff arrive to the school by car with 90% of staff parking on-site or nearby. The remaing staff were dropped off by car.	The proposal is to provide 53 parking spaces, which is approximately 1 space for every 2 staff members. It is noted that approximately 90% of staff arrive by car and park either on-site or nearby as per the travel mode survey. The TIA did not differentiate between staff and parents when illustrating the reasons why the survey respondents were choosing to travel by car. Accordingly, it is unclear why staff members are choosing to arrive by car as they do not represent the majority of the survey respondents.	The claim within the TIA that providing one space per employee would conflict with the strategy for the development, which seeks to reduce levels of private vehicle usage is refuted especially considering that this has had virtually no impact on current staff practices. Instead, a reduced rate for off-street parking is causing parking to overload onto nearby local streets, which is impacting the residential amenity of the area. However, regard is given to the fact that the proposed car parking rate is an improvement to the existing conditions where up to 75% of staff are currently parking on-street. Furthermore, measures such as giving staff committed to carpooling priority car parking spaces is supported. As such, even though it is strongly recommended that car parking rates be enough to ensure all staff can be catered for on-site, the current proposed rate can still be accepted as it improves the existing conditions. It is noted that the preferred on-street parking zones for staff have not been covered in the TIA as was advised in the TWG. This item can be addressed in	Yes – If the proposal is approved a Green Travel condition is to be included.

		the Green Travel Plan.	
Bicycle parking spaces – Hills DCP: • 1 space per 5 pupils over year 4. **Total = 3 bicycle spaces**	80 spaces are proposed for students (to cater for 5% of students) and 6 secure spaces for staff (to cater for 5% of staff). Lockers for 20 staff and end trip facilities are also provided.	The proposed bicycle parking rates are in line with the objective of increasing both staff and student usage to 5% (currently less than 1%). Therefore, the proposed bicycle space numbers are considered satisfactory.	Yes
Parking Spaces – Layout and dimensions (Figures 2.2 of AS 2890.1-2004; AS 2890.6-2009) On-site manoeuvring (AS 2890.1-2004 Clause B3; Figures B3 and B7)	Dimensions of the car park have not been provided to confirm that it meets the requirements of the Australian Standards. However, the TIA claims the car park complies. All on-site car parking spaces will be allocated to specific staff members and therefore, will remove unnecessary traffic movements within the car park.	The car park layout generally looks acceptable, although no dimensions are provided to confirm that it complies with the Australian Standards. This is to be conditioned.	If approved a condition requiring the parking to be to Australian Standards is to be applied.
Kiss and Ride Provisions	The travel mode surveys indicated that more than half of the student population are arriving or leaving the school by car and only 0.5% arrive to the school via a bus and 0.7% of students leave the school via a bus. The surveys indicated that 45% of children were picked up or dropped off at Felton Road East and 45.9% of children were dropped off at Felton Road West. Parents also utilised Hilar Avenue and Blenheim Road, which had usage rates of 9.4% and 12.3%1 respectively. The TIA proposes to install a median island in Felton Road West to discourage unsafe midblock U-Turns and 3-point turns.	The proposed works in Felton Road East and West are supported and are likely to provide road safety benefit. However, they only accommodate a small proportion of pick up activity. The proposed works in Felton Road West will require community consultation and approval through the Parramatta Traffic Committee process for the proposed median island. It is noted that there will minor impact to residential driveways. For Felton Road East, the swept path of a mini-bus will not work while the kiss and drop area is in operation. Accordingly, the arrival of the mini-bus will need to be coordinated with the start of the kiss-and-drop start times/gate opening times. The kiss and ride facilities accommodate only a small proportion of pick up and set down activity. Most of the activity occurs in surrounding streets, which are	Yes in regards to the design of the facilities. This can be conditioned if approved.

	A central island is also proposed within the cul-de-sac of Felton Road East to provide safe vehicle marshalling.	generally narrow. This activity contributes to traffic congestion in the area at pick up times and results in complaints from local residents.	
Traffic Generation	SIDRA modelling has been undertaken at the following locations: 1. Felton/Baker (A - Satisfactory) 2. Pennant Hills/Baker (F - Unsatisfactory) 3. Pennant Hills/Tintern (F - Unsatisfactory) 4. Pennant Hills/Westminster (A - Satisfactory) 5. Felton/Arcadian (A - Satisfactory) The TIA noted that the SIDRA modelling did not accurately identify delays for the right turn from Tintern Avenue into Pennant Hills Road during the AM peak. The TIA also acknowledged the following limitations with the SIDRA modelling: - Congestion occurring upstream outside the scope flowed back to the study area creating downstream effects - Pedestrian movements at pedestrian crossings was not accurately captured due to the short-term period of high volume movements.	The proposed development does not satisfactorily address the existing congestion issues that are experienced during school pick up and drop off times. On the contrary, it is proposing that the increased student enrolment numbers be made permanent which will cement this issue. As such, the traffic generation impact of the proposed school is not considered acceptable for the below reasons: 1. The Traffic and Accessibility Impact Assessment acknowledged that the modelling conducted did not accurately capture all the existing congestion issues known and observed to occur within the road network surrounding the site. It is noted that congestion occurring in downstream traffic was having a flow on effect on school traffic that could not be modelled. 2. There are existing gridlocked traffic conditions in Baker Street, Felton Street and nearby side streets during peak hours which create significant traffic delays. 3. As part of previous investigations Council arranged a video traffic count undertaken on Tuesday, 16 June 2020 which shows the gridlock conditions at the intersection of Felton Road and Baker Street. A link to this video is provided here: https://parracity-my.sharepoint.com/:f:/g/personal/bsaleh_cityofparramatta_nsw_gov_au/EhiRjwiUXIxLrut9edHCfPIB9cOg2xuCvt2P_GhEMVkWIg?e=Jdkjvj 4. The Hills Police Area Command have undertaken patrols and have raised concerns in writing with Council regarding gridlocked traffic in Baker Street impairing access to emergency vehicles. They noted that it took 30 minutes for the Police Patrol vehicle to turn left from	No

		Pennant Hills Road (eastbound) into Baker Street and to travel 300m into Felton Road (Ref. PTC 2011 A10) in their report to Council. It is understood that this is not an isolated incident. 5. In particular, the modelling for the intersection of Felton Road and Baker Street is not considered to be accurate due to the impact of pedestrians stopping traffic at the 2 pedestrian crossings that are at the roundabout. The traffic volumes at this intersection are also lowered in the peak periods due to the congestion downstream from the roundabout in both the west and south directions that queues back into the roundabout. 6. The existing road network does not have capacity to accommodate a school of this size and the size of the proposed catchment on a permanent bases. The proposed development should reduce the school enrolment capacity and alter the catchment to a level that can be serviced within the existing road network.	
Proposed Pedestrian Facilities	To increase the uptake of walk-only travel mode to the site, the following pedestrian facilities are proposed as part of the development: - New raised pedestrian crossings on Blenheim Road and Dunmore Avenue at their intersections with Baker Street - Modifications to existing traffic signals at Westminster Avenue and Pennant Hills Road to provide a pedestrian phase at the eastern leg of the intersection	It is noted that in the Transport Working Group meeting minutes, it was previously proposed to also provide a raised pedestrian crossing in Barons Avenue at Felton Road West. However, this crossing has not been included in the TIA.	Yes This can be conditioned if approved.

Construction Traffic and Pedestrian Management Plan (CTPMP)	An interim CTPMP has been provided in the TIA.	Construction vehicle access into the site is restricted due to the geometry of the roads leading up to the site. The CTPMP proposes to remove the landscaping in roundabout at the intersection of Bettington Road and Felton Road and replace this with linemarking. It is not clear if the entire roundabout is being replaced with linemarking or just the inner annulus. If the entire roundabout is being replaced, it should be noted that this will not be an acceptable solution and is likely to impact on the safety of this intersection as vehicles may not slow down when travelling through the roundabout. The construction route must ensure that all construction vehicles can access the sight without mounting any median islands or kerbs or crossing any centre linemarking. Traffic control may be required at some intersections to stop traffic to allow certain vehicles to safely travel through an intersection without damaging Council assets. The applicant may wish to consider lodging an application with Council for temporary 'No Stopping' signage at certain intersections to improve manoeuvring space.	This can be conditioned if approved.