



5 October 2021

Our Reference: SYD20/01320/06

Departments Reference: SSD-11070211

Lauren Saunders
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Saunders

**EXHIBITION OF EIS - NEW PUBLIC SCHOOL IN MULGOA RISE - 1-23 FORESTWOOD DRIVE
- GLENMORE PARK**

Reference is made to the Department's referral dated 1 September 2021 with regard to the abovementioned State Significant Development Application (SSDA), which was referred to Transport for NSW (TfNSW) Services for comments.

The proposal seeks development approval for the for construction and operation of a new primary school in Mulgoa Rise (Mulgoa Rise Public School) under section 4.22 of the Environmental Planning and Assessment Act (EP&A Act) and sets out the concept proposal, establishes the framework for future development and Stage 1 works for the proposed industrial hub of land.

The documentation in support of the proposal has been reviewed and comments and recommendations are provided in **Attachment A**.

If you have any further questions, Ms Laura van Putten would be pleased to take your call on (02) 8849 2480 or please email development.sydney@rms.nsw.gov.au. I hope this has been of assistance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Pahee'.

Pahee Rathan

A/Senior Manager Land Use Assessment West & Central

Attachment A

Transport and Traffic Assessment

1. Comment

TfNSW has reviewed the Traffic and transport Assessment and seeks further clarifications and changes to improve its safety and efficacy.

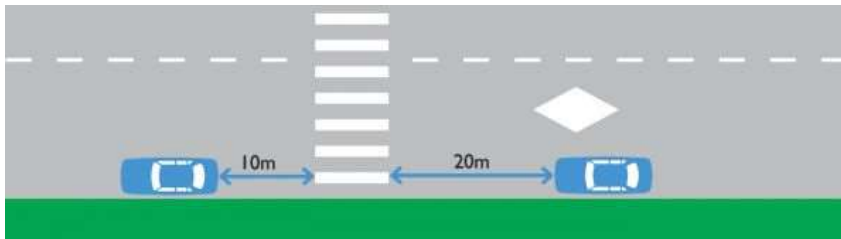
Recommendation

TfNSW provides the following traffic and safety comments to be addressed for further review. It should be noted that several of these issues were raised at meetings with the applicant, Council, Department and TfNSW:

- a. 5.2.4.1 & Attachment 2 (Pedestrian Crossings) – Bus Bays need to be located sufficiently away from the crossing to ensure sight lines are not obstructed in line with Australian Standards (this also needs to consider how many buses may simultaneously be present, especially at bus stop B);

In addition the bus bay is to have sufficient length (consider draw-in length, draw-out length, and maximum number of services expected at any one time) to ensure that buses can be fully contained within bus bay;

- b. 5.1 - The amount of parking spaces shown in Figure 41 will need to be revised as the below minimum buffer is required at zebra crossings;



- c. 5.2.5 – TfNSW questions whether the school drop off/pick up on Deerubbin Drive is going to attract more parents given the proximity to the school buildings, Especially during wet weather days.

TfNSW would not encourage school drop off/pick up or 15min parking for school days along Deerubbin Drive especially due to the proximity to the basement access of the mixed used development opposite the school. Given the narrow road at Deerubbin Drive, kerbside parking for school drop off and right turning vehicles into the mix used development would likely cause queuing and put pedestrian at risk when crossing Deerubbin Drive especially for vulnerable children crossing the road;

- d. 5.2.5 – What measures are proposed to prevent parents from undertaking u-turn manoeuvres? It is noted that the SUH pick-up/drop-off is located on the westbound side of Deerubin Drive and that any parents requiring access to the SUH unit coming from the south would generally just turn right at Deerubin Drive as opposed to driving around the block. This movement may also be more prevalent during wet weather if parents wish to drop their children off closest to a building facility;
- e. 6.4.1 & Attachment 2 (Pedestrian Crossings) – The Crossings need to be designed in accordance with relevant standards, guidelines and supplements. Fencing is not an approved device as part of a zebra crossing. It should be noted that fencing at crossings can obscure visibility of pedestrians (in particular children shorter in height than the fencing). Therefore this design will not be supported by TfNSW;
- f. 6.4.1 – How was location of crossings determined? Sufficient sight distance needs to be achieved for each crossing;

The kerb would need to expand out ~3m up to the edge of the through lane, where the cars are for sight distance compliance;

- g. 6.4.2.2 – It is expected that speed counts are undertaken to indicate that the 85th percentile speed does not exceed 60km/h;
- h. 6.4.2.3 – All proposed crossings will need to be submitted to Local Traffic Committee for recommendation to Council for approval. TfNSW requests clarification as to whether children's crossings are being considered;
- i. Figure 56 & Attachment 2 (Pedestrian Crossings) – The swept path is considered unacceptable (particularly due to the proximity to the pedestrian crossing), the plans indicate that a HRV encroaches over the centreline into the opposing traffic lane on both Darug Avenue and Forestwood Drive. This would result in a B99 vehicle travelling along Forestwood Drive to be forced to occupy the very left of the carriageway which is unrealistic if the vehicle is wishing to travel straight or turn right (and arrives before the HRV);
- j. 6.5.4 – The sight line assessments need to be quantified. Has TDT2002/12C been referred to? Has crossing sight distance (Austroads) been assessed? Not only should motorist's view of pedestrians be considered, but also the pedestrian's view of oncoming vehicles;
- k. 6.6 & Attachment 4 – It should be noted that TfNSW is the only agency with authority to install School Zones. Attachment 4 school zone signage plan should be removed or stamped as indicative (and may be subject to changes by TfNSW post consent) and is not to be considered as an approved plan;

Should consent be provided, the Developer must obtain written authorisation from TfNSW to install the School Zone signs and associated pavement markings and/or remove/relocate any existing Speed Limit signs;

To obtain authorisation, the Developer must submit the following for review and approval by TfNSW, at least eight (8) weeks prior to student occupation of the site:

- i. A copy of Council's development Conditions of Consent
- ii. The proposed school commencement/opening date
- iii. Two (2) sets of detailed design plans showing the following:
- iv. School property boundaries
- v. All adjacent road carriageways to the school property
- vi. All proposed school access points to the public road network and any conditions imposed/proposed on their use
- vii. All existing and proposed pedestrian crossing facilities on the adjacent road network
- viii. All existing and proposed traffic control devices and pavement markings on the adjacent road network (including School Zone signs and pavement markings).
- ix. All existing and proposed street furniture and street trees.

School Zone signs and pavement marking patches must be installed in accordance with TfNSW approval/authorisation, guidelines and specifications.

All School Zone signs and pavement markings must be installed prior to student occupation of the site.

The Developer must maintain records of all dates in relation to installing, altering, removing traffic control devices related to speed.

Following installation of all School Zone signs and pavement markings the Developer must arrange an inspection with TfNSW for formal handover of the assets to TfNSW. The installation date information must also be provided to TfNSW at the same time. Note: Until the assets are formally handed-over and accepted by TfNSW, TfNSW takes no responsibility for the School Zones/assets;

- I. 6.7.1 – How long will it take before the proposed target travel mode share is achieved? Has comparisons been undertaken with other schools in this area (with similar characteristics) to see what the travel mode share is like;
- m. Figure 66/67 – It is assumed that no traffic generated by the development will seek to access Deerubin Drive from the south – how realistic is this, noting that any disabled students would seek to gain access via Deerubin Drive;

- n. Attachment 2 (Car Park Design review ptc-004) – right turn movements into car park should be reviewed as to whether sight distance to oncoming vehicles from north is sufficient. Parking spaces adjacent to driveway should also be removed to enable sight distances for vehicles leaving the driveway;
- o. Attachment 3 – Figure 81 shows a surface change at a raised intersection (which does not have pedestrian priority). Is there justification as to why a surface treatment is being considered as an isolated treatment at crossings? Surface treatments are generally used as a threshold treatment or to highlight the presence of something. Zebra pavement markings already indicates the pedestrian priority at crossings, addition surface treatments may detract from the zebra pavement marking;
- p. Attachment 3 – a fence is not considered an appropriate alternative to kerb build outs and is not supported by Australian Standards. Figure 82 shows fencing in what appears to be car park location and the TfNSW spec fencing is located on the footpath.
- q. Attachment 4 – Should consent be provided, parking signage plan is to be submitted to Local Traffic Committee for review/recommendation to council.

School Transport Plan

2. Comment:

TfNSW has reviewed the School Travel Plan and seeks further clarifications and changes to improve its efficacy.

Recommendations:

TfNSW recommends that the Proponent update the School Travel Plan to address the following items, in consultation with Transport for NSW, to improve its safety and efficacy:

- a. Identify whether there are opportunities to provide pedestrian and cycling access at Gate 5, given it's potential as a desire line for journeys from the south east (linking the pedestrian and cycling network at Mulgoa Rise Fields);
- b. Specify when the first school student travel survey will be conducted;
- c. Noting that the school is proposed to expand to around 1000 students, identify a strategy to ensure there is sufficient bicycle and scooter parking provision to meet that demand, noting a 35% mode share target applicable to those modes.

Consideration could be made to the opportunity to provide vehicle and e-bike charging station at the site as these modes of vehicles becomes more popular;

- d. 3.2 – what enforces that students arriving from the north “shall” use the northern pick up/drop off and similarly for students on the south using the southern pick up/drop off;
- e. 4.2.2 – how is this strategy going to be managed across 4 different gates? Are parents and students assigned to a specific gate;
- f. 4.2.2 – How does gate 3 operate? The gate is located towards the northern end of the 15 min parking zone. Will kids being held behind the gate, waiting for the parents/caretaker being at the front of the queue similar to drop off/pick up zones? It is noted that the parking along Darug Avenue is marked as a 15min parking zone and not a school pick/drop off zone;
- g. 4.2.2 – “vehicles are not to undertake U-turns across the local roads” - how is this being enforced;
- h. 4.2.4 – What prevents or deters motorists from undertaking U-turn or 3-point manoeuvres;
- i. 4.3 – How many large buses are anticipated for school events? It is unclear if the buses can be accommodated for in the proposed bus zones without impacting the safe operation of the crossing.

Prior to occupancy, the Proponent shall update the School Travel Plan to address the following items, in consultation with TfNSW:

- j. Provide a copy of the Program Evaluation Report to TfNSW;
- k. Provide a final version of the Travel Access Guide to TfNSW.

Preliminary Construction Traffic and Pedestrian Management Plan (PCTPMP)

3. Comment

TfNSW has reviewed the PCTPMP and seeks further clarifications and changes to improve its efficacy.

Recommendation

The Proponent shall address the following traffic and safety comments, prior to Construction certificate being provided:

- a. 5.6.2 / Figure 23 – traffic controllers would be required to stop traffic in both directions on Darug Avenue, the plan should be updated to reflect this;

- b. 5.6.2 / Figure 24 – Truck turning right requires to occupy the left side of the road, however it is still required to give way to vehicles travelling eastbound. This will cause issues as the truck would either be obstructing the entire westbound carriageway as it waits for an appropriate gap, or the left side of the road, which causes further issues for other traffic navigating this intersection. Traffic would be required to be controlled on all legs, as truck coming out of Darug Avenue is required to still give way to vehicles travelling east along Bradley Street. This arrangement is not supported and TfNSW requests that smaller construction vehicles are used to improve safe outcomes for road users.