



8 December 2021

Our Reference: SYD20/01320/08

Departments Reference: SSD-11070211

Louise Starkey
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Starkey

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

Reference is made to the Department's referral dated 23 November 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 4.15 of the Environmental Planning and Assessment Act (EP&A Act) and against the SEARs issued for this application.

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 'Edmond Platon'.

Edmond Platon

A/Senior Manager Land Use Assessment West & Central
Greater Sydney

Attachment A

Transport and Traffic Assessment

1. Comment

TfNSW has reviewed the letter from *PTC* dated 11 November 2021. TfNSW believes further design considerations are required. As the roads surround the proposed Public School are local roads under the care and control of Penrith City Council. Any devices should be designed to the satisfaction of council.

Recommendation

TfNSW provides the following traffic and safety comments in response to *PTC* letter. Should Council and DPIE (the planning authority) determine that additional information is required to address the following concerns, it is recommend that the following comments are addressed prior to a Construction Certificate being issued to the satisfaction of Council and Local Traffic Committee:

1. 3.1 –
 - a. the provided plan on figure 6 does not show an outline of a bus in bus zone and it is not indicative of whether the sight line encroaches the orange area (bus zone) e.g. is the green line actually overlapping the orange shape? CSD is measured from behind the kerb and not at the face of the crossing/kerb as shown in Figure 3.7 of AGRD Part 4A. It is requested that a more detailed/indicative plan is provided. It is also noted that the proposed design (as per figure 6) is not supported. Any sort of blister island device is also not a kerb extension, but rather a 'splinter island', and so the 'No Stopping' distance and CSD should be measured from the kerb ramp as the zebra crossing would need to extend from kerb to kerb, not where the blister ends;
 - i. However, if the revised design as per attachment 1 is what is proposed, this treatment could be considered a form of kerb extension – see further comments under 3.6;
 - b. there is no mention of peak school bus volumes and the number of buses (relating to school activities) that may be present simultaneously.
2. 3.2 – bus bay length should be designed to accommodate the expected peak volume of buses (i.e. several school buses arriving or requiring to wait at the same time).
3. 3.3 – see response to 3.1.
4. 3.5 – Lane divider flaps would generally not be recommended as a measure in this instance, whereas a median may be more appropriate.
5. 3.6 –
 - a. Figure 1 (and all other figures containing the crossing) should be updated to reflect the design in Attachment 1;

- b. Can it be confirmed whether Attachment 1 is the amended crossing design? There is conflicting information and plans contained within the letter that suggests any raised infrastructure causes flooding issues, yet Attachment 1 appears to suggest a 'blister island';
 - c. Attachment 1 –
 - i. At-grade zebra crossings do not require piano key pavement marking (these are used for raised crossings);
 - ii. Fencing indicated by the 'yellow line' is not an approved device and should not be installed in such a manner. Proposed RMS type 1 Pedestrian fencing on kerb can be extended further to meet at crossing point;
 - iii. Is it proposed to have a kerb ramp where there is a grate across the gutter? This is not clear, please clarify.
6. 3.7 - see response to 3.1
7. 3.8 - Congestion/increased traffic is not an appropriate 'traffic calming' justification. A lower average speed may be prevalent in some instances, but there are periods of the day where traffic will be operating at free flow capacity. It is recommended that speed counts are undertaken post construction.
8. 3.9 –
- a. It is considered that the proposed children crossing location does not provide sufficient sight distance for vehicles travelling south (turning from Deerubbin Drive). Despite having sufficient space to provide the stop line 6 metres from the crossing, and having 7.26 metres of storage, this does not account for the approach sight distance required for drivers turning from Deerubbin Drive to observe the stop line and other associated cues of the children's crossing (see AGRD Part 4a – section 3.3). Provision of ASD ensures that even if there is no pedestrian actually on the crossing, the driver should be aware of the crossing by seeing the associated pavement markings and other cues, and therefore be alerted to take the appropriate action if a pedestrian steps onto the crossing. Provision of ASD should be used for crossings where the pedestrian has the priority;
 - i. Note that ASD should be calculated from where the turning manoeuvre is complete, and not from the holding line of the minor leg at the intersection.
 - b. Noting the response provided for 2.10, the provided design was not accepted by Council and TfNSW during the Transport Working Group meeting held on the 3rd November 2021. The design was never provided to Transport for review and comment prior to the TWG, and it was stated that Transport would require the design plans to be submitted for formal review and comments;
 - c. Whilst there is no specific guideline/standard that prescribes a minimum offset of a zebra crossing (or children's crossing) from an intersection, based

on the principles of ASD provision for pedestrian crossings and taking into account comments provided above, it is considered appropriate that the children's crossing should be located further from the intersection to allow for a design that satisfies the relevant standards and design principles for safe crossing facilities;

- d. If there is concern that locating the crossing further from the intersection may lead to pedestrians crossing away from the provided facility due to desire lines, other measures can be considered to minimise that occurrence i.e. planting, fencing etc. Otherwise, reconsideration should be given as to whether a children's crossing is required at this location (as opposed to providing just a zebra crossing);
- e. It should also be noted that children's crossings cannot be provided on roads where the 85th percentile speed exceeds 60km/h one hour before or after school hours, and is generally intended for local and lightly trafficked roads.

9. 3.10 – Consideration should be given to providing barrier line on approach to intersection on Deerubbin Dr and straightening out dividing line on Forestwood Drive.

10. 3.11 –

- a. Assumption of V=50km/h for the 85th percentile school zone does not account for the fact that crossing is still operational outside of school hours. Based on this assumption, V should be readjusted to a higher value to reflect the permanent speed limit of 50km/h;
- b. Proposed 'kerb extension' design is not supported;
- c. Figure 6 – Note 4 of figure 7 in TDT 2002/12c contains a further note that stipulates that the provision of note 4 does not apply when 'splinter islands' are used, as it would still allow the crossing to commence at the kerb line. As per the provided design, this would not be considered a kerb extension, and so No Stopping distance is to be revised (which would impact bus stop location);
- d. Children's crossing sign would be obscured by stationary bus;
- e. Also, see comments for 3.1.

11. 3.16 – As stated previously, the design as provided in Figure 10 is not supported. It is unclear whether this is the design or the design provided in Attachment 1. As per comments provided in 3.6, piano keys are not to be provided for at-grade crossings, they are intended for raised crossings. Change in pavement colour is also not supported for at-grade crossings. They should not be trying to imitate a raised crossing or shared zone if they are not one as this may confuse drivers, and lead to non-compliance for these types of treatments (raised crossing/shared zones).

12. 3.17 – See comment for 3.6

13. 3.26 – 15 minute parking should not necessarily be relied upon for bus use if it is anticipated that more than 1 bus would be used for events - additionally the buses would also be restricted to parking/waiting for 15 mins;

2. Comment

TfNSW has reviewed the EIS document which includes the School Travel Plan Travel Plan and provides the below recommendation for this development application.

Recommendation

Subject to The Department's approval and the following requirement being included in the development consent:

A School Travel Plan (STP) detailing travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel and the provision of facilities to increase the non-car mode share for travel to and from the site is to be submitted to TfNSW for review and approval prior to the issue of a Construction Certificate. The STP should as a minimum include a Travel Access Guide (TAG) which includes maps and times of all modes of transport, bikes, bus, train, walking and car-pooling options; details of end of trip facilities; details of mode share; and a parking management strategy.

3. Comment

A significant number of vehicles and pedestrians will access the site at the start and end of the school day. School Zones must be installed along all roads with a direct access point (either pedestrian or vehicular) from the school. School Zones must not to be provided along roads adjacent to the school without a direct access point.

TfNSW is responsible for speed management along all public roads within the state of New South Wales. That is, TfNSW is the only authorised organisation that can approve speed zoning changes and authorise installation of speed zoning traffic control devices on the road network within New South Wales.

Recommendation

Subject to The Department's approval and the following requirement being included in the development consent:

Road Safety precautions and parking zones should be incorporated into the neighbouring local road network:

- 40km/hr School Zones are to be installed in Darug Avenue, Forestwood and Deerubbin drives in accordance with the following conditions.
- Council should ensure that any parking, drop-off / pick-up zones and bus zones incorporated are in accordance with TfNSW standards.

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:

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