



25 June 2020

SF2019/030664; WST17/00108/03

Lennox Tweneboa
Department of Planning Industry & Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Tweneboa,

SSD-9872: Lot 40 DP 756894; 48 Broadhead Road, Spring Flat; Educational Establishment (St Matthews Catholic School Mudgee – Secondary Campus)

Thank you for referring SSD-9872 to Transport for NSW (TfNSW) for comment. I note SSD-9872 has been referred to TfNSW pursuant to Clause 57 of *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* (Education SEPP) and Clause 104 of *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP).

TfNSW has reviewed the documentation submitted with the application and provides the following advice:

1. Traffic Generation Assumptions

The traffic generation calculations include an assumption that an increased proportion of students will travel to school by bus and active transport compared to existing mode splits and commensurately the proportion of students travelling by private motor vehicle will reduce. Concern is raised as to the likelihood of this occurring due to the location of the school out of town which has the potential to increase access by private motor vehicle instead of travel by bicycle or foot.

In this regard, the traffic generation calculations are considered to underestimate the realistic traffic generation and should be revised.

2. Traffic Distribution Assumptions

The traffic assessment provides the assumption that all development traffic will access the site from the west and that no development related traffic will access the site from the east. This is considered to be an unrealistic assumption.

Whilst the bus routes are able to be controlled, private motor vehicle access cannot, and, in this regard, shortest/easiest route is usually selected. Therefore it likely that the site will be accessed from the east, including, but not limited to the 4% of traffic that has been allocated to the right turnout of Lions Road to head south along the Castlereagh Highway (HW18).

3. Development Impacts

- (a) Based on the above comments, the SIDRA analysis for the intersections should be revised to reflect the altered traffic generation and split assumptions.
- (b) Concern is raised regarding the proximity of the two proposed driveways (ingress for kiss and ride and ingress/egress driveway for carpark) in terms of confusion for drivers and safety, particularly during peak hours.
- (c) With the increased traffic from the eastern end of Bruce Road, the design of the intersection with the access driveways to the development is to ensure westbound through traffic on Bruce Road is not impacted. A SIDRA analysis should be prepared for the functioning of this intersection.
- (d) Further details are to be provided to demonstrate how the bus turning bay will function safely, particularly with the right turn out of the site and also considering the additional traffic accessing the site from the east.
- (e) It is not clear from the information provided that buses turning left out of Broadhead Road into Bruce Road can undertake the turn movement in a lane correct manner. Swept path plans are required to demonstrate that turn movements are achievable in a lane correct manner. If the turn movements cannot be made within the correct lanes, an upgrade to the intersection to accommodate the turning movements is required.

4. Parking

- (a) The application is proposing to provide a car park that would accommodate 75 car parking spaces. Mid-Western Regional Council's (MWRC) DCP requires provision of 94 to 103 parking spaces (based on the range of staff and students). Parking calculations based on the demand outlined in the traffic report (excluding the 5% reduction for the reasons outlined above) would require between 84 to 92 parking spaces, excluding provision for canteen workers.

Based on these calculations it is considered that insufficient parking has been provided on site for the development. The proposed designs for road upgrades fronting the subject site will not facilitate on-street parking. As such concern is raised as to the impact of overflow parking on the local road network.

- (b) The design of the car park does not allow for circulation of traffic. In particular it provides for a dead-end aisle that is 16 parking spaces in length. AS 2890.1 only permits dead end aisles with a maximum length of 6 parking spaces unless provision is made for cars to turn around and drive out in a forward direction. In this regard, the car park is to be redesigned to comply with AS 2890.1.
- (c) The location and the design of the car park being surrounded by the 'kiss n drop' facility is not considered to be an efficient design as it:
 - (i) will create congestion within the carpark for vehicles trying to exit the carpark during the peak use of the kiss n drop facility; and
 - (ii) does not provide for any ability to expand the carpark. Consequentially any additional parking provided on site will need to be provided in a new separate location.

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5. Loading Dock

The use of the loading dock will require vehicles to reverse some 45 metres to position to load/unload or collect waste. The development should be designed to ensure that all vehicles can enter and exit the site in a forward direction. The current design does not allow for this.

6. Bus Bays

Consideration should be given to the provision of weather protection for students waiting for buses.

7. Pedestrian & Cyclist Access

- (a) It is intended to connect the pedestrian and cyclist access from the development to the existing footpath on the western side of Broadhead Road. This footpath is not a shared path. Concern is raised as to the safety of users of the footpath with the funnelling of cyclists onto this existing undersized footpath. Furthermore, children over 16 years of age are not permitted to cycle on a footpath.
- (b) For any proposed pedestrian crossing, including the internal crossing, it needs to be demonstrated that the warrants outlined in the *Roads and Maritime Supplement to AS1742.10-2009: Manual of Uniform Traffic Control Devices – Part 10: Pedestrian control and protection*, are met.
- (c) If an internal pedestrian connection point is to be maintained, further details shall be provided to demonstrate how pedestrian access will be managed from the car park to ensure that conflicts are not created with the kiss n drop facility through the creation of informal desire lines.
- (d) Pedestrian crossings are to be designed to ensure that:
 - (i) drivers can see pedestrians on or about to use the crossing; and
 - (ii) pedestrians have adequate sight distance at or near the kerbside.

The design of the internal pedestrian crossing provides for drop off bays directly adjacent to the crossing and as such does not achieve these requirements. In this regard the pedestrian crossing is to be redesigned to achieve compliance with *AS1742.10-2009 Manual of Uniform Traffic Control Devices Part 10: Pedestrian Control and Protection* and the associated *Roads and Maritime Supplement to AS1742.10-2009: Manual of Uniform Traffic Control Devices – Part 10: Pedestrian control and protection*.

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8. Kiss n Drop Facility

- (a) As a result of 7(d) above, the Kiss n Drop facility is required to be redesigned. The redesign needs to demonstrate that:
- (i) sufficient drop off spaces will be provided to support the development; and
 - (ii) sufficient queuing area will be provided to ensure the facility does not impede through traffic on Bruce Road.

Where works are to be carried out on Castlereagh Highway, before Council can issue an approval under section 138 of the *Roads Act 1993*, concurrence is required from TfNSW. Whilst the application is not proposing any works on the Castlereagh Highway as a result of the initial impact assessment, further assessment as outlined above is required in order to determine whether the development will require any upgrade works on the highway including any intersections.

Please confirm with TfNSW that SSD-9872 will not be determined until TfNSW has had an opportunity to undertake a thorough assessment of the proposed development, following provision of the above-mentioned additional information. If the department determines that it will not require the requested additional information, it is requested that TfNSW be provided with the opportunity to provide recommended conditions of consent for this development.

If you have any queries or wish to discuss this matter further, please contact me on (02) 6861 1453.

Yours faithfully



Andrew McIntyre
Manager Land Use Assessment
Western Region

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