

4 June 2018

Reference: 16575.08FA

Artazan Property Group Level 8, 210 George Street, Sydney, NSW 2000 Attention: Cian Fitzgerald

#### LETTER RESPONSE TO DEPARTMENT OF PLANNING AND ENVIRONMENT WITH REGARD TO THE LORETO KIRRIBILLI SCHOOL AT 85 CARABELLA STREET, KIRRIBILLI

Dear Cian,

Reference is made to your request to provide a response to the comments provided by the New South Wales Department of Planning and Environment (DoP&E) traffic consultant with regards to the proposed staged development of the Loreto Kirribilli School. A response to the DoP&E is provided below. This letter should be read as an addendum to the Traffic and Parking Impact Assessment dated 25 July 2017 by *M<sup>c</sup>Laren Traffic Engineering* (document reference 16575.01FA) and the letter by *M<sup>c</sup>Laren Traffic Engineering* dated 11 May 2018 (document reference 16575.06FA).

The DoP&E request for information are shown below (italicised) with a response thereafter.

## 1 Management of Kiss and Drop Operations on Carabella Street

It is noted that the applicant is responding to Council's position in regards to traffic generation and site constraints in regards to an on-site pickup area. However, how is the proposed school management plan to stop parents from picking up their students on Carabella Road? This is a public road and the School and its administration have no control over parents who may wish to pick their children up;

Section 1.2.2 School Initiatives notes that "junior school students and vehicles without a card will not be permitted to pick up a child". This proposed initiative would work if the pickup and drop off areas were on school property. However, the above point notes that the School and its administration have no control over a publicly accessible road. What is the applicant's response to this?

Further to the above, the note that "Senior Students will not be provided with these cards (referring to authority to pick up a child) and will be unable to be picked up from Carabella Street". This does not pass a reasonability test as noted above. This is a public road with only NSW Police being able to stop vehicles due to an accident or incident. Does the applicant intend on closing access to Carabella Street, as this is not legally enforceable?



To provide some clarification, the management plan and "card" system proposed will apply to the existing time-restricted pick-up and drop-off zone along Carabella Street along the frontage of Loreto Kirribilli, rather than the entire public road. It should be noted that no drop-off or pick-up operations are proposed other than in this time restricted zone. It is acknowledged that the school cannot prevent vehicles from using Carabella Street and this is not proposed, the scope of the management plan with regards to restricting senior students applies only to the existing time-restricted pick-up and drop-off zone.

As per the existing operation of the drop-off and pick-up area, school staff will be positioned to manage the kiss and drop operations and, where necessary, turn away parents that are not in possession of a card. The school and its staff will take note of the names and license plates of any students/vehicles that use this area in contravention of the Plan of Management and will follow up the transgressor with educational materials to discourage repeat offences.

#### 2 Implementation of Honour System

To limit the number of senior students being picked up, an honour system could be implemented. This more suitable and reasonable solution may be that Junior Students are to be issued with passes for each school day, approximately 200 per year and Senior Students are only to be issued with 40 passes a year. This would allow for pick up after school for Senior Students' extracurricular activities requiring special equipment, such as sports days, band practice or other such activities. This system would need to be included in a Traffic Management Plan to be developed by a qualified person or organisation as part of the Development Application.

The implementation of such a system would result in a net increase in the number of students being picked-up and dropped-off. Currently the time restricted area along the Carabella Street frontage of the site is restricted to junior school students only during peak drop-off and pick-up times and any system which expressly permits senior students to use this facility would result in a significant deterioration of traffic conditions, particularly on days of inclement weather. Senior students are able to manage their travel to and from school under the existing arrangements and no change to this operation is proposed as part of this application. It is understood that such a system may be suitable for some schools, however the specific characteristics of Loreto Kirribilli (particularly the existing high use of public transport) make such a system unsuitable and potentially detrimental.

## 3 Bradfield Park Bus Stop Access

Could the applicant please confirm how existing school students (junior and senior) access the Bradfield Park location where the school special buses operate to and from in the AM and PM periods respectively?

Students currently walk to and from the Bradfield Park bus stop location and no change to this operation is proposed.

## 4 Internal Loading Operations

The Ethos Urban Report Loreto Kirribilli State Significant Development Application Environmental Impact Statement | September 2017 notes in Section 7.3.3 that only vehicles of up to 5.2 metres can be accommodated by the loading area in the new Learning Hub. Table 12 shows that all vehicles loading at the site will be greater than 5.2 metres in length. Can the applicant please explain this discrepancy?



Deliveries in vehicles of greater than 5.2m in length will be accommodated in the existing loading zone along Carabella Street, as per the existing operation of the site. No changes to the loading or servicing practices of the site are proposed as part of this application and the addition of a loading area is to serve any occasional deliveries of learning materials to the new learning hub and gymnasium buildings.

# 5 External Loading Operations

Further to this the letter dated 11/5/2018 from McLaren Traffic Engineering states that the existing loading dock "will occur outside of peak school periods". Could the applicant please confirm hours of operation for the loading zone? Could the applicant confirm if they "7:00am to 6:00pm Monday to Saturday" or would they be outside of school peak periods i.e. say from 10:00 am to 2:00 pm (as per McLaren Engineering advice)? Therefore, a loading zone would only be required to operate during these times and be a no parking or no stopping zone outside of these times.

Deliveries will occur outside of school peak periods i.e. between 10:00 am and 2:00 pm. The existing loading zone on Carabella Street is restricted to "8:30 am - 4:00 pm Mon-Fri" and no changes are proposed.

Please contact Tom Heal or the undersigned on 02 8355 2440 should you require further information or assistance.

## M<sup>c</sup>Laren Traffic Engineering

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Craig M<sup>C</sup>Laren Director BE Civil. Graduate Diploma (Transport Eng) MAITPM MITE [1985] RMS Accredited Level 3 Road Safety Auditor RMS Accredited Traffic Management Plan Designer [2018]