

14 June 2021

Thank you for the opportunity for a submission to SSD-8873789, regarding the proposed new Epping South Primary School.

After reviewing the planning documents, and in particular *Appendix 23 'Transport Access Impact Statement'*, we and many other residents of Second Avenue have serious concerns regarding the traffic flow. As residents of Epping for 40+ years, we feel this planning has not been considerate or respectful to the residents of Second Avenue. Our objections can be summarised as below:

1. The traffic flow is funnelled onto Second Avenue, an existing quiet cul-de-sac;
2. Second Avenue has been a longstanding quiet cul-de-sac that has always opposed the opening of Grimes Lane;
3. The additional unnecessary carpark access from Second Avenue;
4. The impact to street parking for residents;
5. The land use and road network assumptions made in *Appendix 23 'Transport Access Impact Statement – NPES'*.

We accept that a new primary school is essential in the Epping area, and we also accept that the proposed site is available, however the traffic flow, and in particular the consideration of Second Avenue has been sorely overlooked.

With regards to the *Transport and Accessibility Impact Assessment*, we are critical of the following:

1. The Public Transport assessment clearly states that Metro, Heavy Rail and Buses are not desirable means of access.
 - a. Rail and metro are too far away and there is no recommendation for a bus service from rail to school, to serve the students.
 - b. It is assumed that most students will be within the desirable radii of the school. Yet it is reported that buses will be less attractive for them.

"Most students, however, are within the 1.6 km or 2.3 km STSS catchment area where bus travelling is not free. This makes buses a less attractive mode for students to travel to school."
 - c. There is also a gross assumption that the majority of students will be within this catchment. Presently, homes are established residents, typically with families already attending/attended schools. So, they clearly have made other schooling arrangements and are unlikely to change. Therefore, at least for the next decade, it is reasonable to assume that many students will be from out-of-the-area.
 - d. To report that public transport inside and outside the radii is undesirable, clearly indicates that the majority of activity will be by private vehicles. This poses a significant concern to the serviceable capacity of the local roads.
2. All surrounding streets in the suburb are local roads. Serviceable capacity of undivided single lane (in each direction) roads is low (*Local or Access roads provide access to individual properties; an upper speed limit of 50 km/h will normally apply; these roads usually carry less than 1,500 to 2,000 vehicles each day*). To ensure the capacity to service higher demands of traffic (minor collector road status), substantial upgrading in offsets, line marking, sight-distance and clearance are required. This is for the safety of residents to access their properties as well as pedestrians, cyclists etc.
3. Calibration and Validation Criteria – The consultants have reported 'Degree of Saturation and Delays', however nothing has been reported on queue lengths (modelled queue lengths vs.

observed queue lengths). This is crucial in understanding the future impacts of the area, as the majority of the intersections are priority controlled and likely to experience substantially higher queue lengths (and obstructed access). In particular, Second Avenue, where the majority of the 2026/2033 vehicles are forecast to turn right onto Dunlop Street (Minor Road onto Major Road), will experience significant queuing and delays.

4. There is an absence of visualisations and outputs (SIDRA Intersection screenshots, queue length visuals, tabulated lane/movement summaries) within the body of the report. Additionally, the *Existing Conditions Assessment* states '*The SIDRA results show that the intersections in the road network surrounding the New Public School in Epping operate at an acceptable level of service and has remaining capacity during AM and PM peak hours*'. Obviously, it operates within capacity, nothing is there, and the activity has remained the same for many years. What is particularly concerning, is the scarcity of reporting regarding Second Avenue, specifically the ingress and egress of traffic onto Dunlop Street. The fundamental change to the network is the permitted access and opening of the cul-de-sac on Second Avenue to Grimes Lane, as well as the one-directional traffic flow forcing vehicles on to this street. We strongly object to the opening of the cul-de-sac on Second Avenue and instead encourage the exploration of viable alternatives.
5. Hornsby DCP was used to inform the required parking in the report, despite the development residing in the Parramatta LGA. The report indicated that 2-3% car spaces are to be available and therefore that 54 spaces are needed in total. The GTA Consultants report stipulates that on **average 10%** is needed for primary schools. The **minimum is 3% (max can be up to 21%)**, which implies that a lot of on-street parking in the area will occur, if campus capacity is insufficient. As such, no stopping/ resident permit areas should be seriously considered for curb-side parking.
6. The surrogate study of Epping West Public School is greatly misleading for the following reasons: it directly interfaces with a major road, there are more bus-services in proximity, dedicated angled parking along the perimeter of the school and it is within 1.3km of Epping Station. It would be expected that a vastly different proportionality of pick-ups and drop-offs for a more "connected" school would occur – as opposed to the proposed school with limited accessibility. Despite its intended student enrolment of 1,000, it does not give a good indication of how the prospective school will operate.
7. Of the Trip Generation Rates SCT adopted from the GTA Traffic Generation report – the *Transport and Accessibility Impact Assessment* adopted the lower end of these generations: 0.55, 0.40 (AM, PM), whereas the GTA report averages were 0.88 and 0.71 for Primary Schools. Given the limited accessibility of this site and the greater need for private vehicles to access the school, these values are overly optimistic. The potential difference could be between 550 and 880 vehicles (which is a major difference in network operation over an hour). Additionally, the traffic generated by the surrounding developments is easily another +300 vehicles in the peak hour. Therefore, the report presents an underestimated analysis of the network.
8. This leads to the access issue – the one-way westbound operation on Grimes Lane pushes all the school's traffic onto Second Avenue. From the Kiss and Ride points and accesses to the carpark, majority of this traffic will traverse Second Avenue, exceeding the serviceable capacity of this street (notwithstanding the issues of parking capacity, likely to push staff or families to park on Second Avenue as well). This issue is concerningly vague within the report, as no further assessment of Second Avenue has been pursued and yet it is the most

significant change to the network. Once again, we object to the opening of the cul-de-sac at Second Avenue and the absence of planning regarding car-parking requires further exploration.

9. All the intersections in the area are priority controlled. We strongly disagree with the **LoS A** performance for the 2033 horizon. Considering the amount of traffic and directionality, delays of 5 seconds are far too “good”, without scrutinising the model. The report states something to the effect ‘150 vehicles leaving Second Avenue in the AM peak (36 Left and 113 right)’. Over two hours this may be 275 vehicles (and this is adopting the lower forecasted rates). As such, queueing will result in Second Avenue, impeding the access of residence and disturbing current tranquillity of the area. It is worth noting that the quoted number of vehicles does not even mirror the modelling which indicates 60% of the 1,000 students plus staff will be arriving by car. Even allowing for siblings and car-pooling, this would be more than 500 cars for drop-off and pickup. There are inherent risks in this analysis by adopting the lower traffic generation rates – should it manifest in the future that a higher proportionality of private vehicles access the school, the current network will not be adequate in servicing the demand. Furthermore, the lack of examination and treatment of Second Avenue, will result in further disruptions to traffic operation and residents.
10. The report itself presents no alternative options to network connectivity. Ideally, a suite of recommendations and designs are put forward in a *Transport and Accessibility Impact Assessment*. Yet, the report presents a single deterministic option, funnelling traffic onto Second Avenue, which will significantly deteriorate the operation of the local network.

There are several alternative traffic flow options that could direct traffic in multiple directions and not disrupt the existing quiet cul-de-sac of Second avenue. These solutions could include widening Grimes Lane to allow for a turning circle and two-way traffic, access to the new carpark from Grimes lane and opening other proximal streets that are in higher density areas such as Ferntree place. We eagerly await your response to these concerns.

Yours sincerely,

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