Moriah College SSDA

I write this submission as a resident of Queens Park and one directly impacted by the proposal to further expand Moriah College.

Firstly, I should say that I support and reinforce the statements made to the Independent Planning Commission on 15 August 2021 by Peter Cohen on behalf of the Queens Park Precinct Committee.

Should the SSDA be approved, the consequential growth in staff and student numbers will generate more traffic and on street parking demand and it will increase student drop offs and pickups and the demand for evening event parking in our local streets.

Despite the efforts of the College through its Transport Traffic and Parking Plan, students continue to park and parents continue to drop off and pick up in the limited parking facilities of the surrounding residential streets, disregarding College requirements for obligatory compliance by students, staff and parents, with students continuing enrolment at risk in the event of breach.

Having a Transport Traffic and Parking Plan might tick a requirement box but its effective implementation to mitigate College generated traffic impact requires as a minimum, commitment, management, and budget. Without these three things the Plan is unlikely to ever be successful and the ongoing problems that the Plan is then unable to address will continue to strain the relationship between the College and local residents.

The Traffic Peer Review by Bitzios Consulting refers to a number of concerns arising from documents submitted as part of the State Significant Development Application, including the Applicant's Transport and Access Impact Assessment (TIA) that need to be further considered and addressed. I raise these in the order they appear in the Bitzios Report:

2.2 Refers to traffic conditions being extremely poor between 7.40am and 8.40am. High delays, long queues, blockages, aggressive drivers, traffic so poor that the site inspector had difficulties joining the queue from the Darley Rd/York Rd traffic signals west approach.

3.1.1 Bitzios contradicts the TIA statement that operations are generally satisfactory and that queues are wholly contained on-site. Bitzios states to the contrary, noting on multiple occasions that queues extend onto York Rd evidenced by photographs provided in the report.

3.1.2 Bitzios notes 9 buses were observed queueing in the Baronga Avenue layby at 3.45pm on the inspection day, with no capacity for additional services.

The buses queued through No Stopping restrictions near a pedestrian crossing.

The proposed increase in bus services would potentially result in queueing outside the layby resulting is safety risks for pedestrians due to limited sightlines.

3.3.1 Existing Travel Patterns & Existing Mode Share

- Bitzios considers a 26% response rate from staff on existing travel patterns relatively low for the purpose of determining existing travel patterns. This is important given Bitzios report the College currently has 286 staff and Bitzios also notes a very high percentage of staff travel to work by car and that 71% are single person occupancy cars.

- Bitzios say that to achieve a person to vehicle rate of 2.6 as reported in the TIA would require at least 7 persons per vehicle which is understood to be not possible.

- Bitzios states clarity should be provided on the calculation of average car occupancy numbers and how they have been derived from the survey results.

3.3.2 Peak Hour Generation Rate

Bitzios states:

- No justification is provided as to why the scaling up of student enrolments is not accompanied by a commensurate increase in staff numbers who would presumably increase the number of car trips.

- The peak hour trip generation profiles do not appear to reflect the staff and student travel pattern proportions shown in the TIA.

- As the source data is unavailable it is unclear whether the discrepancy is with the reported numbers or the plotted figures.

- The methodology for how the peak hour vehicle trip generation was calculated in the TIA is unclear and Bitzios notes sole passenger trips were not included in the calculations.

Bitzios also states

- It is unclear if it is a reasonable assumption that all car passengers are school students.
- That deviations from this assumption would increase the number of vehicles generated by the School.
- That uncertainties in the traffic generation methodology, the peak hour profiles, average car occupancy statistics, the method of calculation of the values in the TIA and all assumptions should be clarified before any meaningful judgement on appropriateness can be made.

3.4.1 Existing Car Parking

According to the travel questionnaires undertaken by the Applicant, 265 out or 286 staff members currently drive to work. This is substantially higher than the number of existing parking spaces allocated to staff which is 171 parking spaces.

As such, it is anticipated that some portion of staff members must be parking off site presumably in on-street parking. The Transport Traffic and Parking Plan (TTPP) places no limitations on staff parking.

The data from the travel questionnaires estimates 52 secondary school students arrive at the school as a car driver with no passengers. There are no on-site parking spaces for students.

The effect of parking behaviours has not been commented on in the TIA beyond the overarching statement on the high percentage of parking occupancy of the surrounding streets and it is noted that school related parking will be a contributing factor in parking demand.

3.4.2

Only 15 additional car parking spaces are to be provided on site to cater for the increase of 26 staff members.

Bitzios states on site parking should consider the poor state of on street parking capacity around the school.

The development proposal represents:

- an intensification of use of the school site;
- a future under provision of on-site staff parking
- no restrictions on staff parking off site
- resulting in an expectation of further deterioration of the nearby street parking affecting resident and public amenity.

Furthermore, while it is acknowledged that Year 12 students are prohibited by the TTPP to park in the local vicinity, there will be an increase in parking demand and neither enforcement methods nor compliance with the TTPP have been verified and it is unclear whether the TTPP will be sufficient in mitigating parking impacts.

3.5 Pick up and drop off facilities

Detailed queueing analysis does not appear to have been undertaken to determine the average number of vehicles in the traffic system in the future development scenario.

Bitzios suggests this is undertaken to demonstrate that growth in school capacity will not result in an increase in queues including on to York Rd Gate #1 such as to impact south bound traffic.

3.6.1 Future Traffic Generation

The methodology for calculating peak hour trip generation rates is questioned.

It is unclear how the ‘Reduction’ scenario net increase in vehicle trips was derived and clarification should be provided on the calculation methodology and assumptions.

3.6.2 Background Traffic Growth

Due to the uncertainty in the method of application of background growth, all growth rate assumptions should be detailed in the assessment report.

3.6.3 Future Traffic Distribution

Evidence should be provided to demonstrate the assumption that the expected path of travel is for vehicles is to enter the network southbound at York Rd and Queens Park Rd.

4.0 Traffic Modelling

4.1 No evidence of base model calibration is provided. Calibration details should be clarified to justify that base models are fit for purpose for future testing.

Based on Bitzios site observations, there does not appear to be agreement that the base model reflects traffic conditions.

The scope of the modelled road network is limited to just 3 main intersections and these should not be modelled in isolation of other intersections due to related downstream impacts.

The pedestrian crossing at the mid point of Baronga Ave has not been modelled. The crossing is very close to Gate 3 of the School and frequently used during peak hour periods causing traffic to stop to allow pedestrians to cross. This impacts traffic queueing and road capacity.

York Rd (West) and Queens Park Rd (east) have both been modelled as having 2 approach lanes although there is only one.

The modelling does not reflect typical peak hour traffic from the west approach on York Rd.

4.5.3

Improvements have only been modelled for the 2036 scenario. Given the poor performance of the traffic intersections and the proposed staged development of the school it is likely improvements will be necessary at an earlier stage and modelling these stages is suggested.

4.6 Modelling Recommendations

Provide evidence of model calibration and validation to real life conditions to ensure confidence in a robust existing base model.

Widen scope of modelling to include:

1. Darley Rd/York Rd traffic signals
2. Pedestrian Crossing on Baronga Avenue
3. Adjust York Rd/BAronga Rd geometry to remove short turning lane on west approach – otherwise provide evidence of road utilisation in this manner.
4. Model intersections together with SIDRA Network, per the SEAR's, to replicate the effect of queue pushback
5. Clarify the adopted background growth rates for the modelled network.
6. Clarify the adopted traffic distribution for development generated traffic.
7. Prepare a 2036 Ultimate + Improvements scenario to demonstrate future intersection performance where aspirational mode shift targets are not met.
8. Consider preparing 2023 Stage 1 + Improvements and 2030 Stage 2 + Improvements scenarios to inform required staging of upgrades.
9. Present modelling results for each intersection on a By-Approach basis to ensure clarity of information.

5.4 Travel Demand Measures

The TIA via questionnaire finds that the majority travel via car out of convenience.
The TIA says a restriction of onsite parking is one underlying measure to reduce this. Bitzios states this is unlikely to reduce the convenience of car travel for parents and students. For staff it is also unlikely to result in reduced demand whilst on street parking in surrounding streets and Centennial Park remains. A reduction in on site parking without further measures is likely to only shift the parking demand from on-site to the surrounding streets.

The travel demand measures including putting public transport timetables on noticeboards, the provision of Opal Cards and discussions with TfNSW for more buses appear unlikely to be effective, according to Bitzios.

The TIA finds convenience is the greatest contributor to travel it is unlikely that there can be an appreciable shift.

The proposed 10% modal shift appears to be more of an aspirational target than a realistic estimate.

Response To Submissions

Green Travel Plan
The lack of off road bike paths that connect Moriah and the suburbs may limit the uptake of bike riding.

In response to a request to demonstrate that the increase in student and staff numbers will not further increase demand for drop off and pick up activities, the response states the school will implement travel demand management measures to minimise impact on the surrounding road network and that these measures are expected to reduce school car use by 10% and **will ensure** traffic levels post development are similar to the existing scenario.

In response, Bitzios states a gross increase in traffic will result from the development proposal, that a 10% mode shift is an optimistic estimate and should be treated as an aspirational target.

Additional shuttle bus services between Bondi Junction and the school have been included in the updated GTP however Bitzios indicates buses operate well below capacity and it is unclear whether additional services will result in increased bus usage. Further, the bus zone on Baronga Avenue is already ay capacity during the afternoon peak. The impact of additional bus queueing needs evaluation.

Regarding the proposed slip lane treatment at York and Baronga Rds, Bitzios states due to deficiencies in the modelling it is unclear whether this will resolve traffic issues at this intersection.

The discouraging effect has been proposed via a restriction of on-site parking however this may not result in an decrease in car usage, demand may continue to be met in the local residential streets.

On street parking impacts have not been evaluated clearly as part of the proposal.

Seagull treatment of York Rd/QPR/ and pedestrian refuge appears not assessed.

The Applicant indicates traffic and parking can be managed. Bitzios says deficiencies in modelling methodology is not providing a clear picture of the future.

Council's Infrastructure Services Department recommends meaningful consultation with residents.

In summary, based on the Bitzios peer review:

1. Expansion of the school will increase traffic congestion and increase demand for car parking in adjacent residential streets.
2. School visitors prefer to travel by car for convenience.
3. Bus transport is available but under-utilised.
4. Significant increase in bike travel is unrealistic.
5. The 10% mode shift is optimistic and aspirational.

In conclusion:

I suggest a review and update of the TIA in consultation and agreement with Bitzios to resolve issues raised in the Peer Review.

Along with other residents I would welcome an invitation to attend regular College led consultation meetings relating to current and future traffic management in our residential streets.