

COMMENTS ON -

**PREFERRED PROJECT REPORT AND
STATEMENT OF COMMITMENTS
SUBMITTED TO NSW DEPARTMENT OF
PLANNING AND INFRASTRUCTURE.**

**EXTENSION OF SHORE SCHOOL ONTO THE
GRAYTHWAITE SITE AT 20 EDWARD
STREET, NORTH SYDNEY.**

SUBMISSION TO THE NSW DEPARTMENT OF PLANNING

On behalf of

The SAD@Graythwaite Community Group

c/- 31-33 Bank St,
North Sydney

APRIL 2012.

I have not made any political donations in the past 2 years.

I do not want my name to be made available to the Proponent, other interested parties or on the Department's website.

6 May 2012

Department of Planning,
23-33 Bridge Street,
SYDNEY

Attn: Heather Wharton/Ben Everleigh

Dear Sir/Madam,

APPLICATION FOR GRAYTHWAITE SITE, EDWARD STREET NORTH SYDNEY.

I am writing to outline concerns regarding the Shore School PPR for the Graythwaite site dated March 12. These should be taken as additional comments to those made in our earlier submissions.

This letter contains some general comments, and summarises the position of the combined community groups.

It also annexes the traffic report of Craig McLaren of McLaren Traffic Engineering dated 23 April 2012.

OUR POSITION:

In so far as it seeks approval to do other than restore the Graythwaite heritage building(s) (Stage 1), the PPR should be rejected for at least the following reasons:

- 1. No traffic solution has been provided (indeed the DPI request relating to traffic has been ignored).**

On 20 December 2011 the DPI requested that the PPR "...be accompanied by a preferred pick up and drop off facility option..." and that this should be done "...in consultation with North Sydney Council."

What is proposed:

- 1.1 is contrary to the DPI request of 20 December 2011, as it relates to pick up only (not drop off)**

One can only surmise that not only is there no workable pick up facility (refer to the annexed report by Mr McLaren), but drop off (in peak hour) would be so bad as to guarantee refusal.

This can be the only reason why **Shore has chosen to ignore drop off, and to disregard the DPI request for a preferred pick up and drop off facility option.**

- 1.2 relates to the prep school only (not the senior school)**

- 1.3 fails to internalise impacts (traffic and buses)**

Shore states that there are to be no buses on site – rather **they will be inflicted on the local community**, and make worse already serious traffic issues.

North Sydney Council has said that it proposes to reduce the bus stops available in Edward St. This has not been addressed by Shore.

Shore has proposed that it will use bus stops in Blue Street. This is astonishing. Not only has no approval been sought from the relevant authorities, but given that Blue St is a major bus/rail interchange serving North Sydney, the prospect of such approval being granted (were it sought) is all but non-existent.

Shore has flagged the prospect of a new bus space in William Street. This has not been taken to the council traffic committee, although Council has indicated that it is unlikely to remove any parking spaces from William Street.

The residents are so concerned about traffic congestion and safety at Union Street and the inadequacy of the proposed PM pick up facility that we engaged a traffic engineer to verify the claims made by Shore.

The attached McLaren Traffic Engineering report (at page 4) has identified that the queuing theory analysis needs to be highly scrutinised as it forms the basis of many subsequent impacts especially relating to traffic on Union Street. It identifies **several important errors** in the Halcrow report including most significantly a 10% reduction in the capacity of the drop off facility (instead of the stated 20%) for contingencies and lack of sensitivity testing. The result is there will be **queuing of cars on Union Street**. Queued vehicles will block any through traffic in both directions. As previously stated, it is standard planning practice that such impacts must be contained on the site and not the public streets. This is especially important for such a narrow collector street within a high density residential area, with limited sight lines available at the crest of the hill.

The other traffic and parking concerns of the local residents are set out in Annexure D of the McLaren Traffic Engineering Report. These concerns have not been addressed in the PPR.

It cannot be said that Shore is unaware of the issues. It is at pains to attempt to warn parents and the school community of the difficulties associated with the current use of the inadequate drop off facility in Edward Street – attached is a copy of the Prep School newsletter of 3 February, 2012 which includes the School's Traffic Management and Safety Policies.

In short, not only has there been no attempt to internalise impacts, entirely unrealistic and untested proposals have been glossed over in the PPR.

1.4 Is contrary to the request by the DPI, and has not been done in consultation with North Sydney Council.

To the extent that the PPR suggests that the preferred traffic option "...is consistent with the key principles identified by Council.." (PPR p6) the PPR is misleading. In its report of 13 April (at page 13) the Council states:

"..Importantly, the matters raised by Council for inclusion in in the DGRs were limited in scope to the original application which did not include the proposed student pick up facility..... **Had this been included in the original application** it is likely that Council would have requested that a master plan be prepared for the development of the entire expanded Shore campus... particularly in relation to traffic and parking for the entire school.... **it is considered that a whole of campus traffic management plan is an essential requirement...**"

1.5 has not been submitted to the North Sydney traffic committee.

2. Until there is a workable traffic solution there should be no approval of any intensification of use or additional student or staff numbers (conditionally or otherwise).

Given the time and obvious expense that Shore has devoted to this application, it may very well be that there is no solution that would permit additional numbers to be accommodated on site.

While this may be unpalatable to Shore, it well knew when acquiring the Graythwaite site of the serious traffic issues in North Sydney – many of which it created – and of the sensitive heritage nature of the site.

3. The consultation process has been entirely inadequate, token, and dismissive of community concerns.

3.1 Council's concerns and objections have been disregarded. A cursory view of Council's considered report and comments demonstrates this.

3.2 Issues raised at the community meetings have been ignored. By way of example, one of the councillors requested a photomontage showing the impact of the entire west building. That has never been provided. The photomontage images which have been provided appear to be deficient in any event.

The comments in 1.3 and 1.4 above lend further weight to our view as to Shore's approach to the consultation process.

3.3 No site poles for the final design of the West Building were ever erected.

3.4 The suggestion that alternative development options to 'redistribute the building volume' of the West Building would result in a lessening of the setback **betrays the complete inflexibility of Shore, and is indicative of the attitude taken by the school in the so called consultation process.**

4. The West Building is entirely inconsistent with the amenity of the site – is bulky, invasive, unable to be fully screened.

4.1 It has now been suggested that if the preferred design is not accepted there should be an alternative design of the West Building based on the assumption that Shore is entitled to a certain amount of area, and that it should be permitted to play with the design to obtain that area. That is plainly nonsense.

The West Building remains unacceptably close to the adjoining residences and also exceeds the 8.5m height limit.

For all the reasons already given, and in light of the traffic issues consequent upon the PPR, the development should be rejected – conditionally or otherwise – as an overdevelopment of the site.

CONDITIONS OF CONSENT

Whilst the residents' view is that the development as currently proposed is so deficient that it cannot be approved, they are deeply concerned that should it be approved there will be inadequate protection to mitigate the impacts, and that the restoration of the old Graythwaite Mansion and grounds will be not be satisfactorily completed. The conditions of any consent are therefore critical. We have noted the Commitments made by the applicant, but do not think they go far enough in providing the necessary protection against the impacts of the development, and delivery of the promised benefits - namely the restoration of the heritage buildings and grounds.

In addition to the requirements of the other agencies, including the Heritage Council of NSW and the North Sydney Council, and in addition to the undertakings made by the School in its Statement of Commitments the following conditions need to be imposed on any consent.

1. Completion of Conservation Works to Graythwaite buildings and grounds
 - a) No development consent shall be granted for any further works until the works approved in the Stage 1 Project Application are completed in accordance with that consent. This is essential to ensure that these significant heritage assets are properly conserved and protected in a timely manner.
2. Vehicular access.
 - a) The parallel driveways off Union Street must be redesigned to allow one ingress and one egress only from Union Street. The revised vehicular access from Union Street shall be submitted to the North Sydney Council for its approval, and approval granted, prior to the issuing of any construction certificate. This condition is essential for traffic and pedestrian safety reasons.
 - b) Ingress and egress must be available from Edward Street and allow for access to all service areas and carparks currently serviced from Union Street. This is essential to allow for any service vehicle and other vehicle access after hours.
 - c) There shall be no vehicle access to the school from Union Street between the hours of 7.00pm and 7.00am, this being provided, if necessary via the Edward Street access referred to in b) above. This condition is essential is to mitigate the noise impacts on the residents in Union Street, particularly that arising from night time disturbance resulting from garbage and delivery vehicles using the Union Street gate during the early hours of the morning.
 - d) The open space or lower terrace facing Union Street shall not be used for the parking of any vehicles (including coaches) at any time. This is essential to prevent further congestion on Union Street which is operating beyond its environmental capacity, for traffic and pedestrian safety reasons, and to prevent damage to the soft landscaped areas.
 - e) There shall be no vehicular access, including for excavation and construction purposes, within a 20 metre setback from the western boundary to the Bank Street residences and the southern boundary to the Bank Lane and Union Street residences. This is essential to mitigate the noise and privacy impacts of such vehicular movements, and to protect all vegetation in these areas, particularly the root system of the significant heritage fig trees along these boundaries and the new screen planting, which is to be planted in Stage 1, between the boundary and West Building.

At a meeting with the Bank Street residents held on 22 June 2011 the School's representatives were expressly asked if the area along these boundaries (which can be navigated by vehicles) would be used for vehicles during the excavation and construction stages associated with the West Building. The response from the School's architect Peter Mayoh was that this would NOT occur (see Appendix B (Notes of Meeting of 22 June 2011) of the Consultation Report submitted as Appendix O of the Revised EA. The School however seems to have reneged on this important aspect as it has NOT been formally recognised by the School in the Statement of Commitments.

f) There shall be no queuing of vehicles accessing the School on Union Street. This is essential to prevent the blocking of through traffic using Union Street, an important thoroughfare between Waverton, North Sydney, McMahon's Point, Lavender Bay and Kirribilli.

3. Pedestrian access.

a) Except for the purposes of landscaping and landscape maintenance, there shall be no use of, or pedestrian access to, the land within a 20 metres setback of the western boundary to the Bank Street residences and the southern boundary to the Bank Lane and Union Street residences. This is essential to mitigate the noise and privacy impacts on the adjoining residences arising from such use of this area by students and others.

4. Parking management.

a) Students and staff of the school shall not park on the local streets within 1 kilometre of the school. The school shall submit a parking management plan to show how it will manage this, including requiring a register of all student and staff vehicles, a public notification system to enable residents to advise the school of students parking in the area, and the use of detentions or other means to enforce this condition. Other private schools have such policies, which are largely effective. The parking management plan shall be submitted to the North Sydney Council for its approval, and approval granted, prior to the issuing of any construction certificate. This is essential to prevent the overflow parking demand spilling on to local streets and reduce the congestion created by school staff and students circling the area in search of parking spaces.

5. Screens to the West Building

a) Fixed screens shall be provided to the southern, northern and western facades of the building to preclude any potential overlooking of the private open spaces of any residences in Bank Street. This is in addition to any landscape screening between the West Building and adjoining residences. This is essential to protect the amenity and privacy of adjoining residential development, and protect against the failure of any of the planting as a screening device.

6. Acoustic seals to the West Building

a) There shall be no openings to the southern, northern and western sides of the West Building (including open windows, terraces, balconies or other accessible areas. All windows on these facades shall be sealed between the hours of 7.00am and 7.00pm, or at any time the building is occupied. This is essential to mitigate the noise impacts arising from the use of this building and associated circulation areas upon the adjoining residential development.

7. Union Street fence.

a) The fence on the Union Street boundary shall be redesigned so that it does not obscure views from the Union Street footpath into the lower terrace. The amended fence plans shall be submitted to the Heritage Council of NSW and the North Sydney Council for their approval, and approval granted, prior to the issuing of any construction certificate. This is essential to ensure that there is an unobstructed visual connection from the public domain to the Graythwaite Estate so that its heritage significance can be better understood and interpreted

CONCLUSION

For all of these reasons, the proposal – save for Stage 1 – should be rejected.

Yours sincerely



SAD @ Graythwaite

Cc North Sydney Council

North Sydney News, Years 3 to 6

A warm welcome is extended to parents and boys for the start of the 2012 school year. I especially welcome those students and families who are new to the Shore community this year. Thank you to all staff for their industrious efforts over the last fortnight, ensuring that all has been in readiness for this week. However, the school really comes to life with the arrival of the students and it has been a delight to see the smiles and hear the banter of boys excited to be returning to, or commencing at the Prep.

Routines

The first few weeks of any school year are an important opportunity to establish routines that will serve students well throughout the year. The boys have made a great start in their first few days and handled the wet weather disruptions with ease. I encourage parents and boys to work together in these early weeks to ensure the establishment of good habits at school and home. It is important for boys to be on time to school each day and with the correct equipment for the day's lessons. The student diary will be of great assistance in this regard – students use it daily and parents should be ensuring that they sign and sign it each day as well. It is an important avenue of communication between home and school. Prep Peek and the Parent Handbook will also be constant sources of valuable information and I would encourage parents to maintain familiarity with both. 'Lampada' is our on-line portal to facilitate communication and learning – students and parents can access information (including homework) via the school and class pages. No doubt, questions will still arise from time to time. Please, in the first instance, contact your son's class teacher who will be happy to help you with your enquiry or direct you to whomever can provide appropriate assistance.

Swimming Trials & Carnival

Tomorrow morning, all boys will participate in swimming trials in preparation for our Swimming Carnival which will be held on Friday 10 February at 5:00pm. Offers of parental assistance will be welcomed by the Sportsmaster tomorrow morning.

Camps

Next week our outdoor education programme begins with camps being held for Years 3 to 6. Years 3 and 4 will be attending Galston Crusaders Camp; Year 5 will be at Port Hacking and Year 6 will be under canvas at Camp Somerset on the Colo River. Camps are a great way to start the year and serve as an opportunity to develop and extend relationships as well as participate in a wide variety of adventurous activities and challenges. Boys should arrive at school at the normal time on Monday and will be returning to school for the normal dismissal time on Wednesday. Any medication should be given to the class teacher prior to departure.

Thursday Sport – Next Week

Due to camps, Sport at Northbridge will occur on Thursday next week. Boys in Years 4-6 will be bussed to Northbridge before lunch and then can be picked up at 3.10pm. Changes like this are rare but in this case necessary in order to be ready for the first round of sport the following Saturday. After School Care will be available at Northbridge – please contact the Office if you need to make use of this facility.

Traffic Management and Safety

Most parents will be aware that no spaces are ever available for parents to park cars in the Preparatory School. The campus includes a turning circle for the drop off and pick up of boys by car. This will be at its busiest over the first few weeks of the year. There are some procedures which can help make a difficult situation work as smoothly as possible. Your patience and cooperation with these procedures will be greatly appreciated:

- The gates will not open until 3:00pm each afternoon to allow students on foot time to leave the campus safely. Boys will be supervised by the teacher on duty until 3.30pm by which time the congestion will have eased.

- For safety reasons, we ask parents who park on nearby streets to come on foot to the gate to collect students rather than students walking unaccompanied to cars. There are a myriad of laneways and steps in the area that provide access to nearby streets where parking is available. Consider parking nearby and walking into the School.

- When queued in Edward Street waiting to enter the school, *please do not queue directly opposite the exit to the turning circle* as this makes it very difficult for cars to get out of the gate. Waiting at Lord Street until there is opportunity and room to get past the exit gate helps aid the flow of traffic.

- Once your vehicle is in the school grounds, please remain in the line. When you come to a complete stop, your son should approach and enter the car from the pavement side. Please do not linger. *Parents should never leave their vehicle when in the turning circle.* Be mindful of other vehicles also approaching the exit as you pull away.

- Please approach the School via Edward Street rather than coming up Mount Street as congestion in Mount Street is unsafe and an impediment to the buses attempting to transport senior students to Northbridge.

- If you drive a larger vehicle and are not completely confident in manoeuvring it through tight spaces, the confines of Edward Street will provide a challenge for you in the next couple of weeks. Again, please consider parking and approaching the school on foot.

In most cases, our older students should soon be using the excellent public transport options available. However, if you insist on picking your son up, please be mindful of our neighbours who often have to negotiate heavy traffic simply to come and go from their premises.

Important Dates – Term 1

Please refer to the Community Calendar in this week's Prep Peek for many important dates. Parent Information Evening (Week 3) and the North Sydney Cocktail Party would be dates to diarise now!

ACER Testing

In Weeks 3&4, all students will undertake a series of in-class standardised tests in Literacy, Maths and General Capabilities. These tests are used by teachers to assist in tailoring teaching programmes to individual needs and grouping students for learning activities. They also allow staff to monitor student progress from year to year. These can be discussed with your son's teacher during the Parent Teacher interviews scheduled for Week 6.

I look forward to meeting you and wish all Shore students and their families a rewarding and enjoyable 2012.

Mark Dunn
Deputy Head – North Sydney

After School Care - 2012

Families must provide the office with a completed enrolment form for any student/s to be enrolled in ASC, prior to the student/s attending After School Care. After School Care is not permitted to have students without a completed enrolment form. In light of this, any parents that might utilise ASC at any time in 2012 should consider completing and returning the form included with this Prep Peek so that it is on file should your child need care.

After School Care bookings and cancellations are to go through the School Office only. Where possible, please contact the Office before midday for casual bookings.

ASC phone numbers after 4pm are 9956 1176 (North Sydney) 8966 5364 (Northbridge). After 4pm, please use these numbers to advise of a change to collection arrangements or in the exceptional circumstances that a student is unable to be collected by 6pm.

M^CLAREN TRAFFIC ENGINEERING

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3 May 2012

2012/068.L02 CM/sm

SAD @ Graythwaite
C/o 33 Bank Street
NORTH SYDNEY NSW 2060

Attention: Angela Keel / Ian Poole
Dear Angela / Ian,

**REVIEW OF EXISTING TRAFFIC AND PARKING CONDITIONS, PROPOSED SCEGS
INTENSIFICATION & ASSOCIATED TRAFFIC / PARKING IMPACT ASSESSMENT &
PROPOSED TRAFFIC MANAGEMENT PLAN, NORTH SYDNEY – PART 3A REVIEW**

Further to your request we have reviewed the schools traffic / parking report & management plan, undertaken site inspections and held a preliminary detailed on-site meeting with local residents concerning issues surrounding the school, plus attended an initial meeting with North Sydney Council's traffic and planning staff.

In examining the Development Application for redevelopment of the Graythwaite site, by Shore Grammar School, we have detected a number of issues that need further resolution, comprising the following main issues of concern, that will be further exacerbated due to the proposed school population expansion plans:

- PREVAILING TRAFFIC & PARKING CONGESTION ON ROADS SURROUNDING THE SCHOOL.
- PREVAILING OVERSATURATED SET-DOWN / PICK-UP ZONES SURROUNDING THE SCHOOL.
- PREVAILING OVERSATURATED SCHOOL BUS ZONES SURROUNDING THE SCHOOL.
- TRAVEL MODE CHARACTERISTICS OF SCHOOL STUDENTS & STAFF THAT ARE HEAVILY CONCENTRATED TOWARDS PRIVATE CAR USAGE.
- QUEING THEORY UTILISED WITHOUT REGARD TO SENSITIVITY TESTING OF KEY INPUT PARAMETERS.
- THE EFFECTIVENESS OF ANY TRAVEL MANAGEMENT PLAN IS A KEY MATTER OF IMPORTANCE HAVING REGARD TO RECENT LAND & ENVIRONMENT COURT CASE RULINGS ON WHETHER A MANAGEMENT PLAN IS APPROPRIATE FOR A PARTICULAR USE & SITUATION.



The details of the above listed issues are as follows:

1. The site is an area which is presently experiencing high traffic flows and heavy congestion. The typical traffic flows associated with the school are very concentrated, and when school-bound traffic queues on to public roads, the thoroughfare of traffic and safety of both pedestrians and other cars is greatly hindered.

For these reasons, it is imperative that both the current school-generated congestion, and any future increase to it, must be absorbed on to and by the school grounds. This necessity is also to be met for the localised parking demand of the school, which is currently putting heavy strain on the nearby on street parking.

2. The effect of both Drop off and Bus related traffic has not been adequately assessed.
 - *In regards to the current traffic flows in the area immediately surrounding the site,*

"...the School's morning peak period coinciding with general commuter morning peak.

Union Street, which is a collector road, carries less than 500 vehicles per hour. The volume of 500 vehicles is the upper limit for the collector type road."(Page 10, 'Transport & Accessibility Impact Assessment', Halcrow)

The above extract is in blatant disregard to the data later provided in the same report, clearly showing both the peak weekday and 5 day average to have peak hourly traffic flows of 550 vehicles or more (page 11 'Transport & Accessibility Impact Assessment', Halcrow). During the morning peak hour Union St at least is over the recommended capacity, something which should certainly not be added to.

The morning drop off traffic flows at the Preparatory School drop off/ pickup facility have not been analysed in detail, simply stating

"AM – even dispersal of traffic over 1 hour, PM – Concentration of traffic in one 15 minute period".

With a proposed 132 one way student trips (page 58, 'Transport & Accessibility Impact Assessment', Halcrow), and approximately 56% of students being dropped off at the aforementioned facility (Appendix B, 'Transport & Accessibility Impact Assessment', Halcrow), this equates to an approximate increase of 74 student trips to the facility in the morning. Since the proposed Union Street facility cannot operate for morning drop off due to existing high traffic volumes in the morning peak, there is needed to be significant consideration to the increased morning drop off traffic, especially in regards to the Preparatory drop off facility.

Likewise, senior school drop off behaviour has not been assessed adequately, and will surely require analysis given the 350 proposed additional senior school students.

- In relation to the school's buses using the existing Mount Street bus zones,

"This bus area is only used for the afternoon transportation of boys to the School's sporting fields at Northbridge...Halcrow has been advised by Shore that the School currently operates a maximum fleet of 5 buses at any one time" (page 21, 'Transport & Accessibility Impact Assessment', Halcrow).

The zone in question is in fact used also by the buses attending Mary Mackillop Place Museum. This historic place has seen increased patronage since the canonisation of Mary Mackillop, and is hence receiving buses of attendants on a more regular basis. While currently there is space for approximately three buses at any one time, this fact cannot be relied upon for some significant reasons:

- "That it be noted that council will reduce the length of the existing bus zone in mount street to accommodate one bus, for use by the Mary Mackillop site" (Page 41, North Sydney Council Report on Part 3A Development Application by Shore Grammar school).
- The current zone can accommodate three regular buses; however as can be seen in the Annexure A, there is at times the use of extended articulated buses, approximately 5m longer than the regular buses. These are both longer and as can be seen in the Annexure A, when not parked properly can block the flow of traffic forcing through traffic to cross to wrong side of the road.
- It is agreed that there is likely to be five buses at any one time. The extra buses, not even accommodated by the current bus zone, are either double parked on Mount street or illegally parked in the 'no parking' zones on Mount St east of William St as seen in **Annexure A**.

There is not enough bus parking currently and with that likely to be reduced in the future, it is necessary that an alternative be sought, such as on site bus parking for the Shore Grammar School. This could alleviate traffic blockages and increase safety to motorists and pedestrians, navigating the congested area.

3. The Halcrow report has a number of deficiencies in order to be reliably utilised. Three different types of mathematical analysis have been used, namely the 'School Travel Survey', 'aaSIDRA' and 'Queuing Theory'. These three tools can produce accurate results only when the correct parameters are used.

- In the case of the School Travel Survey, results were summarised holistically, i.e. total number of positive responses for each option. This is a single layer analysis and can only give minimal accuracy. It is agreed that staff and student have different travel patterns. However, in only a single question has the data given the staff/student distribution, a question specifically asking the respondent if he/she is staff or student. For all other questions it is not possible to determine how many or students answered with each response. A proper analysis of the raw data could give necessary details such as, percentage of driving age students who drive to school and park, staff departure times and distribution of seniors and juniors being picked up. There are many more important details which can be drawn from the raw data but these are simply not possible to determine with the partial survey data provided.

- For the aaSIDRA analysis it is assumed that there is no queue of cars extending from the Union Street car park driveway. This is an assumption based on the queuing analysis and has great variability if that queue does extend onto Union St. Further, no detailed sensitivity testing has been done on this intersection, especially in respect to a possible slow moving queue affecting traffic flow on Union St (Eastbound).
- The queuing theory analysis is a section to be highly scrutinised. It forms the basis of many subsequent impacts, especially relating to traffic on Union St. In the analysis we find the following errors and recommendations:

A survey of the existing pickup facility produced “...*the average loading time per vehicle is 1:05 minutes.*” (Page 9, Preferred Project Report – Transport Aspects, Halcrow), which has been used directly as the service rate for the proposed facility. This does not properly take the following into account:

- Parking space length
- Student arrival variability to the pickup zone due to the new facility being 200m further away than the current
- Comparison of number of spaces available
- The behaviour of parents who arrive early and wait in queue before school finishes
- The sample size of the surveyed service time
- The use of the staff car park by staff in the afternoon peak, adding to the queue length
- The use of the pickup facility by senior school students, this is highly important especially since they report a stated advantage of “*Would provide a pick up facility for the Senior School*” (Page 45, Preferred Project Report – Transport Aspects, Halcrow),
- The potential use of the pickup facility by those currently doing pickups from streets surrounding the school

The report makes mention of “...*a 20% reduction for contingencies...*” (Page 10, Preferred Project Report – Transport Aspects, Halcrow), then inconsistently makes only a 10% reduction for contingencies in the numerical analysis. A 20% reduction results in more than double the queue length of the 10% reduction and we believe this fact is quite significant given the potential traffic congestion of queue spillage onto Union St. Given the high number of variables affecting the operation of the pickup facility we believe a 20% contingency is the minimum with which the ‘queuing theory’ can be given credence. Proper sensitivity testing is always necessary to ensure consistently good operation.

We have undertaken a queuing analysis that projects of some 29 cars in the system (4 in the pick-up bay and 25 queued), as shown diagrammatically in **Annexure C**, which indicates a significant queuing length with some 10 cars queuing in Union Street.

4. Problems to be address in the future stages of the development or by a Workplace Management Plan

As mentioned in point 1 above, the current traffic conditions surrounding the Shore Grammar School are under pressure and have considerable congestion. The future proposed increases in the school student numbers are only going to have a negative effect on these problems.

Therefore the present situation will have to be dealt with by the school, as well as contingency for the potential future issues. Unfortunately the reports for Shore Grammar School state with great frequency that issues will be addressed with stages 2 and 3 or by a Management Plan, despite already having issues requiring reparation. Without a full Management plan completed or presented its validity cannot be measured against those statements made by Commissioner Brown, as outlined in **Annexure B**. These proposed future fixing of problems are outlined in the below extracts:

"With regard to the other local traffic implications, it is noted that the Stage 1 Project Application would not increase student or staff numbers. Any future increase in School population on the Graythwaite site (i.e. Stage 2 and Stage 3) will be considered in detail as part of future development applications. This is considered appropriate as the timing of Stage 2 and Stage 3 development is still conceptual, and the detailed proposal will need to consider the traffic and parking conditions at that future time." (Page 34, 'Transport & Accessibility Impact Assessment', Halcrow)

"The revised Concept application has included the identification of alternative and additional pick up and bus stop arrangements which could be implemented as part of Stage 2 or Stage 3 works, The Concept Application traffic report noted that detailed consideration of the capacity and operation of drop off / pick up facilities will need to be undertaken as part of the Stage 2 and Stage 3 project applications." (Page 35, 'Transport & Accessibility Impact Assessment', Halcrow)

"As such detailed assessment of the pickup facility options, including selection of a preferred option, would be undertaken as part of a Stage 2 or Stage 3 Project Application." (page 46, 'Transport & Accessibility Impact Assessment', Halcrow)

"It is considered that alternative bus stop facilities should be considered for Stages 2 and Stage 3 of the concept plan when student and staff numbers are envisaged to increase." (page 50, 'Transport & Accessibility Impact Assessment', Halcrow)

"It is noted that students with driver's licenses, like other members of the community, are entitled to drive on the public road and park on local streets where legally permitted." (page 66, 'Transport & Accessibility Impact Assessment', Halcrow). This does not mean the school does not have to accommodate them.

Annexures D & E presents local resident concerns and the CV for the undersigned.

Please contact the undersigned should you require further information or assistance.

Yours faithfully

M^CLAREN TRAFFIC ENGINEERING

Craig M^CLaren
Director

BE Civil. Graduate Diploma (Transport Eng) MAITPM MITE
RTA Accredited Road Safety Auditor
Traffic Control Plans (Red Card)



ANNEXURE A: Extract from North Sydney Council Report regarding Shore Grammar School Part 3A Development Application, meeting held 05-12-11



(Page 37)



(Page 39)

ANNEXURE B:
Statement by Commissioner Brown in Reference to Management Plans

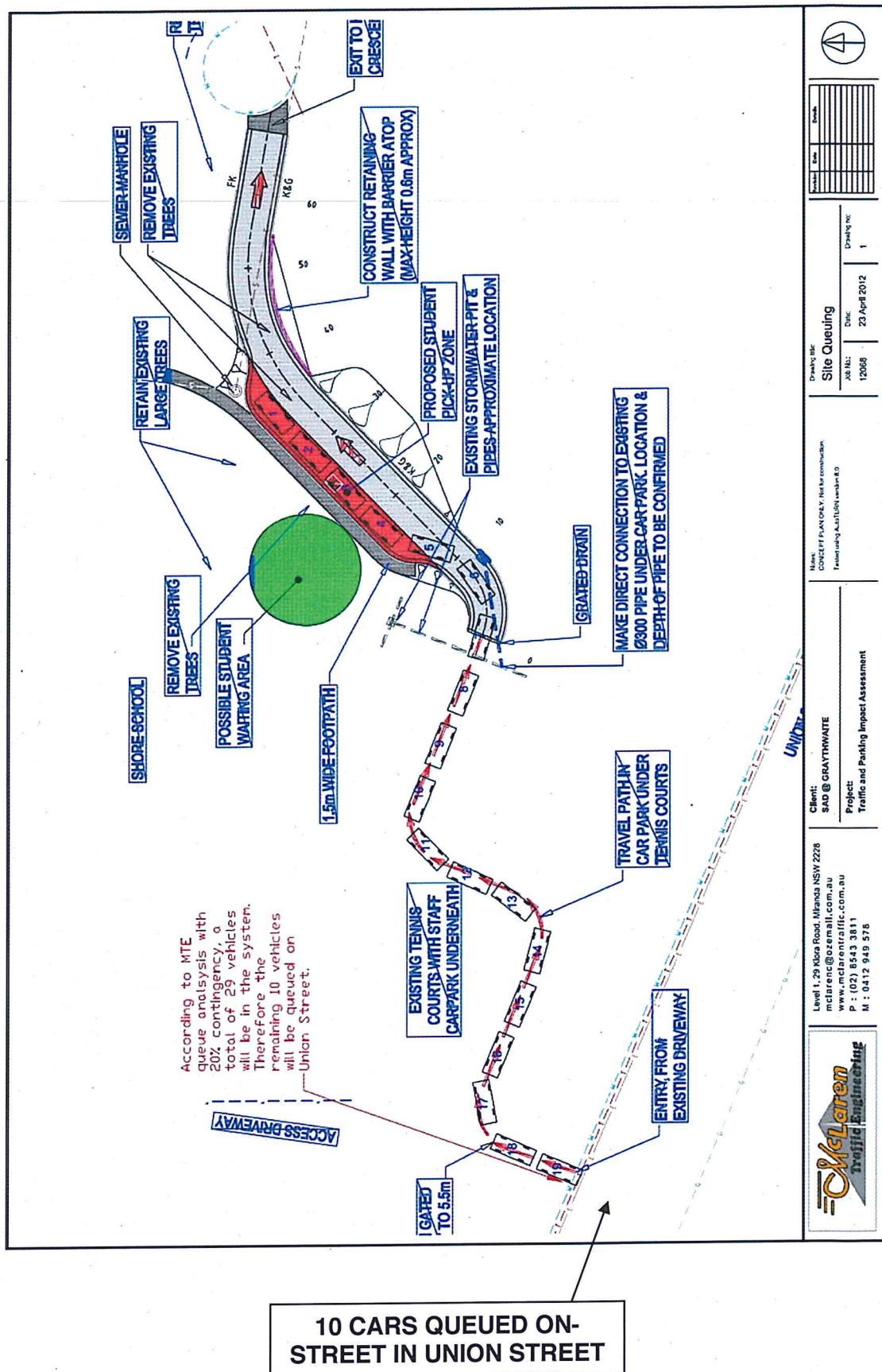
M^CLAREN TRAFFIC ENGINEERING notes the following statement of Commissioner Brown in the Oatley Coles case:

"Management Plans (or similarly named documents) provide further details on the operation of a particular use that may not necessarily be appropriate as conditions of consent. Management Plans are a well known concept in environmental law (Transport Action Group Against Motorways Inc v Roads & Traffic Authority [1999] NSWCA 196 at par 122) and can be used in a range of different circumstances. Often, and is the case in this application, the contents of a Management Plan are critical to the decision of whether a development application should be approved or refused.

In considering whether a Management Plan is appropriate for a particular use and situation, the following questions should be considered:

- 1. Do the requirements in the Management Plan relate to the proposed use and complement any conditions of approval?*
- 2. Do the requirements in the Management Plan require people to act in a manner that would be unlikely or unreasonable in the circumstances of the case?*
- 3. Can the source of any breaches of the Management Plan be readily identified to allow for any enforcement action?*
- 4. Do the requirements in the Management Plan require absolute compliance to achieve an acceptable outcome?*
- 5. Can the people the subject of the Management Plan be reasonably expected to know of its requirements?*
- 6. Is the Management Plan to be enforced as a condition of consent?*
- 7. Does the Management Plan contain complaint management procedures?*
- 8. Is there a procedure for updating and changing the Management Plan, including the advertising of any changes?"*

ANNEXURE C: EXTENDED VEHICLE QUEUE LENGTH EXPECTATION



ANNEXURE D: RESIDENT LOCAL TRAFFIC & PARKING CONCERNS

The main traffic, parking and associated issues for the residents are:

1. The failure to provide adequate facilities on site for the loading and unloading of students on to coaches hired by the School to transport students to sports. Currently this occurs 4 afternoons a week on Mount Street, and conflicts with buses accessing the adjoining Mary McKillop centre. The school is apparently refusing to provide this facility on the extensive school grounds. The school proposes an extra on-street bus stop on William Street, and use of the public bus stops outside the North Sydney train station (which is already heavily utilised by the public buses).
2. The failure to provide adequate facilities for the drop-off and pick-up of students for both the Preparatory School and the Senior School. Currently there is just the one facility for the Prep School off Edward Street and it is not coping with the current demand. The worst time is the pm pick up, but the am drop-off is also highly congested. The PPR has included a new pick-up facility ONLY (not am drop off), for the use of Prep School students ONLY (not Senior School Students) that is accessed off Union Street. The data suggests that a morning drop off could not work due to congestion on Union Street, which is CURRENTLY operating at capacity. This will be exacerbated by the right turning traffic into the School from Union Street which is rather narrow – one lane in each direction and one parking lane). There are also pedestrian safety concerns associated with vehicles entering the site.
3. The parking by students in local residential streets, which is already an big issue, and how this will be exacerbated by the large increase in student numbers. On-street parking by staff is also a concern.
4. The traffic impacts generally on the narrow streets, particularly as the school's own surveys show a high proportion of the students and staff travel by private vehicle, notwithstanding the accessibility to the train station.
5. The impact on resident amenity for residents in Union Street of service vehicles accessing the site via the Union Street driveway, particularly during early hours of the morning.
6. The design and adequacy of the single lane driveway off Union Street that is meant to serve the new basement car park (under the Stage 2 buildings) and visitors to the administration offices to be located in the restored mansion house. This is an historic drive that is to be retained as a single lane (with some passing bays), and must keep the avenue of trees. The concerns include the conflicts between in-coming and out-going vehicles, the poor sight lines at the crest of Union Street, the banking up of traffic in Union Street caused by traffic trying to turn right into the site (particularly in the am peak, and particularly when it is held up with egressing traffic and the steady number of pedestrians using on this footpath towards the North Sydney train station.

ANNEXURE E: Curriculum Vitae

(Page 1 of 2)

CRAIG M^CLAREN

Qualifications:

Bachelor of Civil Engineering, University of New South Wales, 1985
Graduate Diploma in Traffic Engineering, University of New South Wales, 1991
RTA Accredited Road Safety Auditor, 1998
RTA Accredited Traffic Control Planner (Red Card), 2009

Affiliations:

Member, Australian Institute of Traffic Planning and Management
Member, Institute of Transportation Engineers

Fields of Special Competence:

Traffic impact assessments; traffic engineering; transport planning; special event transport planning; local area traffic management; road safety and expert evidence at Land and Environment Court and Commission of Inquiry.

Experience:

M^CLAREN TRAFFIC ENGINEERING, AUSTRALIA

1995 to date:

Director and experienced traffic engineer responsible for the conduct of all facets of traffic impact assessment ranging from report preparation, design advice and giving evidence at the Land and Environment Court, as an expert witness and as a Court Appointed Expert Witness.

SINCLAIR KNIGHT MERZ, AUSTRALIA

1994 to 1995:

Executive Traffic Engineer. Responsible for the conduct of all facets of traffic impact assessment ranging from report preparation, design advice and giving evidence at the Land and Environment Court.

TRANSPORTATION PLANNING WORKSHOP, AUSTRALIA

1989 to 1994:

Senior Associate. Responsible for the conduct of a vast number of traffic impact assessment report and gained invaluable experience in giving expert evidence before the Land and Environment Court.

ROADS AND TRAFFIC AUTHORITY, NSW, AUSTRALIA

1988 to 1989:

Traffic Engineer, Traffic Engineering Section, involved in traffic/transport research, policy development and assisting councils in the application of the Authority's guidelines.

OVE ARUP TRANSPORTATION PLANNING, AUSTRALIA

1985 to 1988:

Traffic Engineer. Involved in the preparation of traffic impact reports for a wide range of projects.

GUTTERIDGE HASKINS & DAVEY, AUSTRALIA

1980 to 1982:

Trainee Civil Engineer. Involved in assisting with road and subdivision design and field surveying.

Papers at Conferences

“Safe & Liveable Communities, Can You Have Both?”

Georgia Institute of Transportation Engineers, St Simons Island, Georgia USA July 1999.

Expert Evidence at Land and Environment Court

1990 to Current - Numerous Appeals for developers and councils with respect to:

- ☐ Commercial developments (including large scale Bulky Goods stores, Fast Food etc)
- ☐ Residential developments (eg medium density, high density and mixed development).
- ☐ Mixed Use developments.
- ☐ Residential subdivisions.
- ☐ Schools.
- ☐ Hospitals.
- ☐ Shopping Centres & Retail developments.
- ☐ Child Care Centres.
- ☐ Seniors Living / Aged Care developments.
- ☐ Extractive Industries.
- ☐ Alterations to developments
- ☐ S94 plans.
- ☐ Land Acquisition cases.
- ☐ Valuation & shop rental cases.

Court Appointed Traffic Engineering Evidence at Land and Environment Court

- . Industrial site, truck access during school hours ... Parramatta City Council ats PSM Recyclers Pty Ltd. Oct '09.
- . Marrickville Tavern ... Marrickville Council ats JPR Legal, Feb 2009.
- . Islamic School Expansion ... Arkana College v Hurstville City Council, Nov 2007.
- . School Annex - NEWCASTLE GRAMMAR SCHOOL V NEWCASTLE CITY COUNCIL, July 2007.
- . Child Care Centre ... LEICHHARDT ats UNIVERSAL CHILDCARE : 153-159 Balmain Rd, Leichhardt, June – Nov 2007.
- . Child Care Centre ... MOSMAN ats UNIVERSAL CHILDCARE : 74-82 Bradleys Head Rd, Mosman. (Appeal Did Not Proceed)
- . Proposed Residential Development – Car parking Quantum. FIVEX PTY LTD -Vs- WOOLLAHRA MUNICIPAL COUNCIL, April 2007.
- . Proposed Car Stacker & Garage ... ROBINSON Vs LEICHHARDT COUNCIL : 40 Cove St, Birchgrove, Dec 2006
- . Child Care Centre ... MAMARI Vs PARRAMATTA CITY COUNCIL : 1 CLIFF AVE, WINSTON HILLS, Nov 2006.
- . Extended Hours of trading of café ... MILLET Vs LEICHHARDT COUNCIL : 731-735 DARLING ST, ROZELLE, Oct 2006.
- . Islamic School Expansion ... HB Noori -Vs- STRATHFIELD COUNCIL, Oct 2006.
- . Townhouse car parking ... CITY OF SYDNEY -ats- LIENTAGE INVESTMENTS PTY LTD : 41-43 FORSYTH ST, GLEBE, Aug 2006.
- . Mixed Residential / Retail High Rise Development, Burwood ... PROGRESS & SECURITIES BUILDING PTY LIMITED Vs BURWOOD COUNCIL, Aug – Dec 2006.
- . Mixed Residential / Retail Development, UlladullaMINISTER FOR PLANNING -ats- ELDERSLIE PROPERTY INVESTMENTS PTY LTD, May 2006
- . Child Care Centre ... BAZOUNI & KURUC -Vs- HOLROYD COUNCIL, May 2006
- . Child Care Centre ... JOHN WILLIAM HEPBURN -Vs- HORNSBY COUNCIL, May 2006
- . Child Care Centre ... QUINN HOMES -Vs- PARRAMATTA CITY COUNCIL, March 2006
- . Child Care Centre ... DOUNIS Vs KOGARAH COUNCIL, 2005
- . Subdivision ... MIRVAC HOMES (NSW) Pty Limited V BLACKTOWN CITY COUNCIL, 2005.
- . Medium Density ... SUTHERLAND SHIRE COUNCIL & TILT DEVELOPMENTS, 2004
- . Medium Density ... SUTHERLAND SHIRE COUNCIL & ARCHIWORKS, 2004

Expert Witness at Liquor Licensing Court

- . Bass Hill Plaza objection, May 1996
- . Emus Plains Cellars, Emu Plains, 1990

Supreme Court

- . Kathryn Davies Vs Ku-ring-gai Council, Concerning roundabout impact on resident driveway, Feb 2003.

Commission of Inquiry

- . Raymond Terrace Retail Expansion, Raymond Terrace, June 1994