

Submission on
Concept Plan (MP10-0f 49) for the extension of
Shore School onto Graythwaite Site

Prepared by

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Summary

From a transport point of view, the Concept Plan as presented is neither socially nor environmentally sustainable/responsible. It is at odds with (a) the North Sydney community's desire for liveable neighbourhoods, (b) the school's own stated aims for child development and wellbeing, and (c) numerous state and local strategies, plans and policies.

In particular, despite a large increase in staff and student numbers (550), the Concept Plan includes no initiatives for reducing the school's already high mode share for car travel. Most concerning of all is that, despite Shore School being located next to a major transport hub, and the fact that 70% of staff currently drive to work, the proponent wishes to provide 48 new parking spaces for 50 additional staff, thereby increasing the number of car spaces per 100 staff members across the school from 63 to 68.

The simple business as usual approach to transport adopted in the Concept Plan will see the private car continue to be the principal mode of transport for both students and staff. Not only will this affect student wellbeing and development, but it will further intensify the impacts that the traffic generated by the school already has on the local community and environment. In return, the local community will receive little benefit from the project.

I see the Concept Plan as presented as a missed opportunity for improving travel arrangements at the school, and for containing its impact on the local community.

I propose that:

- (a) A condition be attached to any consent to the Concept Plan, whereby the proponent must demonstrate a genuine commitment to maintaining the number of car trips generated by the school at or below the current level, through reducing its car travel mode share and/or increasing ride sharing. This condition might be satisfied by the development of a School Green Travel Plan with binding targets.

- (b) The number of new parking spaces be restricted to the seven “existing use right” spaces.

Student travel

46% of students currently arrive at the school by car and 33% depart by car. These figures are high considering that the school is located next to one of Sydney’s principal transport hubs (North Sydney train station and bus interchange), is close to two ferry wharves, and has excellent pedestrian access.

Currently the average number of students per car is only 1.2. This occupancy rate is poor considering that most cars are designed to accommodate four or more passengers.

Given the above, there is considerable potential to achieve a major mode shift away from the private car towards more active/sustainable transport modes such as public transport and walking, and to increase the level of ride sharing.

I am therefore disappointed to note that, despite the proposed increase in student numbers of 500 (35%), the proponent is planning for transport mode share distribution and vehicle occupancy levels to remain the same. The Concept Plan does not include any initiatives for increasing the proportion of students that ride share or use more active/sustainable transport options.

I note in Shore’s prospectus and website that its aims include “equipping students to participate in the wider community”. However, children who are driven to school lag their peers in developing independence and responsibility. They miss out on valuable exercise as well as opportunities for exploring their environment, making friends and socialising during their journeys to and from school.

Although Shore’s publicised mission and aims do not mention care or regard for the local community and environment in which it operates, I would hope that it is conscious of the social and environmental consequences of such a high proportion of its students being driven to school, and how these will intensify given the current proposal for 500 additional students:

- Additional congestion on the road network, slowing down the journeys of people who need to drive.
- Greater accident risk around the school.
- Increased vehicle noise.
- Toxic exhaust emissions that cause reparatory diseases and increase the risk of cancer.
- Contamination of beaches and waterways from road runoff.
- Greenhouse gas emissions.

I propose that a condition be attached to any consent to the Concept Plan, whereby the proponent must demonstrate a commitment to maintaining the

number of car trips generated by the school at or below the current level. This would require either:

- Reducing the mode share for car travel from 46% to 35% in the morning and from 33% to 25% in the afternoon, or
- Increasing the level of ride sharing, or
- A combination of both.

These target mode shares are comparable to those achieved in other inner-city schools. In order to comply with this condition, it is suggested that the proponent be required to develop a School Green Travel Plan (with binding targets) that includes initiatives for encouraging active and sustainable travel, for example:

- A “Part Way is OK” program, whereby students are driven to nominated drop off points at least 500m from the school, and they walk the rest.
- Walking school buses.
- Student travel pass subsidies.
- Active participation in events such as Walk2School Day.
- Ride sharing scheme.
- Development of a travel access guide, detailing public transport options and walking and cycling routes to the school.
- An anti car idling campaign, whereby parents are encouraged to switch off car engines whilst waiting for children.
- Cycling proficiency courses.

Staff travel

Currently 70% of Shore staff drive to work and there are 151 on-site parking spaces (0.63 spaces per staff member). These figures are very high considering the school is located next to one of Sydney’s principal transport hubs (North Sydney train station and bus interchange), is close to two ferry wharves, and has excellent pedestrian access. (By comparison, only about 27% of North Sydney Council Chambers staff drive to work.)

The Concept Plan proposes 48 additional parking spaces for 50 additional staff (0.96 spaces per staff member). This is well in excess of the North Sydney DCP limit of 0.17 spaces per staff member. For the whole school the number of parking spaces per staff member will increase from 0.63 to 0.68, about *eight times* the DCP limit. Given that parking supply is a major factor in individual transport mode choice, this can only have the effect of encouraging even a greater percentage of staff to drive to work, meaning even more impact on local traffic, amenity and environment.

I note that the proponent offers the following justifications for the excessive increase in parking space numbers and ratio:

Justification	Comments
“The travel needs of staff which include early starts, late finishes and flexible / part time hours.”	<ul style="list-style-type: none"> • This is true of other workplaces in the locality which manage with significantly lower parking ratios. • Train and bus services run regularly from early morning until after midnight (the first train arrives North Sydney at 4.27am and the last one departs at 12.54am). • When staff work too late to get home safely by public transport/walking, taxi vouchers can be offered. • The school already has 151 parking spaces (0.63 per staff member), significantly more than most other local employers.
“Traffic that would otherwise circulate on local streets searching for on street parking can be accommodated on site with access for a local collector road.”	<ul style="list-style-type: none"> • This is true of other workplaces in the locality. • Parking restrictions and costs tend to discourage parking in surrounding streets.

I propose that the number of parking spaces for the project be restricted to the seven “existing use right” spaces, given that:

- The justifications offered for exceeding this number are neither valid nor convincing.
- A substantial increase in the number of parking spaces would encourage even more staff to choose to travel to work by car.
- A parking space allowance above the DCP limit would set an unsustainable precedent. If every employer in North Sydney were allowed 0.68 parking spaces per staff member, the impacts on congestion, local amenity and air quality would be immense.
- The school is well-served by public transport and walking routes.

As an alternative to providing additional parking, I suggest that the School Green Travel Plan discussed above could also include initiatives for active and sustainable staff transport, for example:

- Staff travel pass subsidies.
- Assistance with bicycle purchase.
- Active participation in events such as Walk to Work Day and Ride to Work Day.
- Provision of end-of trip facilities for walking and cycling (e.g. bicycle parking, showers and lockers)

Local traffic impact

The school already generates a significant amount of traffic and congestion within the surrounding road system. With the proponents offering a simple business as usual approach to student and staff transport, traffic and congestion will increase in line with the growth in student and staff numbers.

The Transport Accessibility Impact Statement estimates that there will 309 additional peak hour vehicle trips after Stage 3, and that this will degrade the Level of Service (LoS) at two intersections:

- Edward St-Mount St will go from LoS A to LoS B (PM).
- Blue St-Miller St will go from LoS B to LoS C (AM).

The proponent claims that “the additional traffic generation of Stage 3 options can be adequately accommodated within the existing road network capacity without significant adverse impacts to ‘Level of Service’ or average vehicle delays”.

In my opinion the estimated impacts on LoS and vehicle delays are significant, and at odds with state and local strategies to contain traffic growth. The combined impact of current and additional traffic generation will certainly be significant. Moreover *the cumulative impact of this project and others nearby, both present and future, must also be taken into account.*

Consistency with the proponent’s sustainable transport objectives

The Concept Plan is at odds with the proponent’s own objectives for sustainable travel (detailed in section 3.3.1 of the Transport and Accessibility Impact Assessment).

Proponent’s objective	Comment
Reduce the rate of growth of car based trips.	The project will result in an <i>increase</i> in the overall number of car based trips by both staff and students. Also, because of the increase in parking spaces per staff member from 0.63 to 0.68, a greater percentage of staff will be encouraged to drive to work.
Support and improve sustainable transport facilities for existing users of public transport, walking and cycling to the site.	The proposal includes no initiatives for improvements to sustainable transport facilities, except for the provision of an unspecified number of bicycle parking spaces.
At the same time ensure that appropriate provisions are made for car parking and for traffic travelling to and from the centre to minimise the impacts to surrounding residents.	The best way to minimise traffic impact on surrounding residents is to discourage car use. Providing additional parking can only encourage additional car use.

Consistency with state and local strategies, policies and plans

The Environmental Assessment states that the Concept Plan “is generally consistent with relevant strategic and statutory plans and policies” and that “variations proposed to North Sydney Council’s controls/standards (for example height and parking) are reasonable and do not result in any adverse environmental effects.”]

In my opinion the Concept Plan is at odds with a number of state and local strategies, policies and plans, as detailed below.

Strategy or Plan	Goal or Objective	Comment
NSW State Plan	Improved urban environments	The additional traffic generated by the project will degrade the local environment through additional vehicle noise, exhaust emissions and contaminated road runoff.
	Support students to reach their full potential at school; Improve child wellbeing, health and safety	The proposal does not include any initiatives for reducing the proportion of students who are driven to school. These children are likely to lag their peers in developing independence and responsibility, and also miss out on physical exercise during the journey to and from school.
	Promote healthy lifestyles	The proposal contains no initiatives for increasing the proportion of staff and students using active travel modes.
	Increase walking and cycling	The proposal contains no initiatives for increasing the mode share for walking and cycling, except for the provision of an unspecified number of bicycle parking spaces.

	Increasing share of peak hour journeys on a safe and reliable public transport system	Because of the increase in parking spaces per staff member from 0.63 to 0.68, a greater percentage of staff will be encouraged to drive to work.
	Improve road safety	The additional traffic generated by the project will increase accident risk.
	Improve air quality	The additional traffic generated by the project will increase emissions of air toxins, including oxides of nitrogen, sulphur dioxide, ozone, particulates, carbon monoxide, and the carcinogens benzene and benzo[a]pyrene.
	Tackle climate change	The additional traffic generated by the project will increase emissions of greenhouse gases.
	Improve the efficiency of the road network	The additional traffic generated by the project will decrease the efficiency of the road network for those who need to drive.
North Sydney DCP	Existing levels of traffic generation are contained and reduced	The project will result in an increase in the overall number of car trips by both staff and students. Also, because of the increase in parking spaces per staff member from 0.63 to 0.68, a greater percentage of staff will be encouraged to drive to work.
	Public transport, including walking and cycling, is the main form of access	On completion of the project, the private car will remain the most common mode of transport for staff and students.

	Parking is adequate and managed in a way that maintains pedestrian safety and the quality of the public domain and minimises traffic generation	The addition of 48 parking spaces will induce additional traffic generation.
	Parking is limited to minimise impacts on surrounding areas	Both the total number of parking spaces and the number of parking spaces per staff member will increase, which will increase congestion, noise and air pollution in surrounding areas.