
Sent: 24/03/2023 2:29:05 PM
Subject: St Augustines traffic issues & DA2021/2567
Attachments: St Augs Review.docx;

Hello,

There is currently a DA for St Augustine's (DA 2021/2567) to increase student numbers for which we submitted concerns about, but I would like to submit more information as the problems raised in the submission are ongoing, but now I am starting to document them more thoroughly as we are having more and more issues with traffic recently.

The St Augustine's Annual Report 2021 states the following student enrolment figures:

2018: 1295
2019: 1339
2020: 1413
2021: 1481

What is the penalty for breaching the limit of 1200 students? Why do we the residents have to pay for their breach of permit? Why have limits if you can just break them at will?

The DA is requesting an increase to 1600 students. We are already past breaking point, how does this align to the objectives set out by Northern beaches council in the DCP (2011)?
What is the penalty when the school ignores this 1600 student limit and decided to enrol 1700 or 1800 people? I went to a high school with 1800 students but it was about 3 times the physical size of St Augustine's, so how much is too much?

Northern Beaches Council DCP 2011 Objectives:

• **To ensure development responds to the characteristics of the site and the qualities of the surrounding neighbourhood**

The characteristics of the surrounding neighbourhood is not being responded to it is being ignored. This was a quiet neighbourhood which is now ruined every weekday around 8:30am and 3:30pm.

• **To ensure new development is a good neighbour, creates a unified landscape, contributes to the street, reinforces the importance of pedestrian areas and creates an attractive design outcome**

The building themselves aren't a problem to me, it's the volume of people and traffic which make for terrible neighbours. whatever rules are in place go out the window when it comes to school drop off and pickup, it makes everyone feral and brings our neighbourhood down.

• **To inspire design innovation for residential, commercial and industrial development**

Buildings yes, traffic no.

• **To provide a high level of access to and within development.**

Putting a large and dense school within tightly bound residential neighbourhood was always going to be a disaster. 900 student was workable, 1200 was noticeable, the current 1400+ is chaotic and so 1600+ s going to be a death sentence.

- **To protect environmentally sensitive areas from overdevelopment or visually intrusive development so that scenic qualities, as well as the biological and ecological values of those areas, are maintained**

Buildings yes, Traffic no. The area is simply not cut-out for high volumes of traffic

- **To achieve environmentally, economically and socially sustainable development for the community of Warringah**

We lost that 5 or 6 years ago when St Augustine's was allowed to increase from 800 to 1200, then ignored that and enrol nearly 1500 students now...

The GTA Traffic impact report finds that an increase will result in 134 more cars (30% increase) every day then concludes : "Clearly, such minor traffic volumes would have **no impact** on the operation of the surveyed intersections." which is clearly and utterly false to the point that they are either deliberately lying or being paid off. 134 extra cars all arriving in a 20-minute window

I live here and work from home every day and see it with my own eyes every time I'm stuck in my own driveway and can't leave, or am trying to come home and get caught in the gridlock. The modelling provided by this report is broken if it is clearly not matching what we can see with our own eyes. I have video evidence I can submit to support this.

In light of this I have done a review of the Traffic Impact Analysis to highlight all the flaws which I would like to submit (see attached)

Proposed Solutions

I was taught never to call out a problem unless you have a solution, so here some suggestions to ease the congestion:

1. Reject the DA for an increase in student numbers and strictly enforce the 1200 student limit, then measure the impact. If 1200 eases the chaos, then make that a hard limit that cannot be breached. Not 1201, not 1300, not 1481. 1200 maximum.
2. Prevent buses from entering the hamlet of Alfred/Federal/Consul/Gulliver/Pine. There is no reason why the empty lane on Pittwater Rd outside the Oval couldn't be used as a school bus stop. It is literally only 50m away and would reduce the traffic considerably.
3. Make the school a high school only again. It has become increasingly normalised for young children to be chauffeured to school which is the primary reason why we have traffic issues here now. 100 x 15 year-olds walking/bussing to school is a thousand times better than 50 x 8-year-olds being driven to school by their parents. It's not just raw numbers, it's the age ranges that also have a big impact. This is yet another thing not covered in the Traffic Impact Report which is another reason it cannot be trusted.
4. Move the pick-up and drop-off spots to somewhere more compatible for high volume traffic. Alfred/Federal/Consul/Gulliver/Pine are simply not designed for this sort of capacity. It may mean the kids have to walk an extra 100m to Pittwater Rd but is that really such a bad thing? Bus to the Mall and use that for pick-up and drop-off makes a lot of sense to me.
5. There is currently a Brookvale Masterplan under review, why not include transport pickup and drop access and parking for both the school and the Oval in this plan to solve this ongoing issue? I recall for one game recently they blocked off Alfred St between Gulliver and Federal and it made the world of difference to flow of traffic.

Regards,
Scott Brown

Review of the Transport Impact Assessment

Initial report published By: GTA, now Stantec on behalf of Artazan Property Group 17 Dec 2021

This is a review summary of that report:

History:

2015 DA2013/1366 approved - increase from 800 to 1200, Major works undertaken to increase School building capacity

2015 onwards every year the school exceeds the approved limit of 1200 students causing increasing traffic congestion issues

2021 DA2021/2567 plans to cater for the beach of student numbers by increasing it even further (to 1600 which means 1800 based on past performance) AND converting residential houses into carparks ruining the feel of the neighbourhood.

Actual student numbers over time (according to St Augustine's Annual Report 2021)

2018: 1295

2019: 1339

2020: 1413

2021: 1481

2022: ?

Proposal Summary

- 24 parking spots at 60 Federal Parade - a residential house in a residential neighbourhood
- 30 parking spots Gulliver St - a former residential house in a residential neighbourhood
- increase approved student numbers from 1200 to 1600
- convert no stopping areas to allow more pick-up and drop-off
- 4 motorcycle parks
- other fluffy stuff

Report purpose: evaluate existing traffic and parking conditions, suitability of application

Comments on the Report

2.2.3 Surrounding Intersections

The analysis of 'surrounding intersections' does not include the three biggest bottlenecks, Consul/Gulliver, Gulliver/Alfred, and Alfred/Federal (adjacent to the proposed development). It appears to only include major intersections where high traffic numbers can be hidden among the already high traffic numbers on existing major arterial roads.

Any impact analysis should be done on the smaller intersections closer to the school where the impact is at its greatest.

eg Adding 50 cars to a road with 500 cars per hour won't have as much impact as adding 50 cars to a road that has 50 cars per hour. This is an important distinction which the report ignores.

2.3 Existing Travel Behaviour

Survey questionnaires were performed on the following dates:

Nov 2019 when enrolled student numbers were 1339 (they were 1481 in the most recent report). This is after HSC when no Y12 students would've been at the school (the largest cohort of student drivers).

Aug 2020 in the middle of the pandemic when there were no international students and most people were in or inbetween lockdown.

Neither of these should be used as a reliable indicator of normal operations.

2.4 Traffic Volumes

Movement counts were performed on the following dates:

Nov 2019 (again after HSC where most 17-year-old students, the one cohort with most of the student drivers are not at school)

July 2020 during Covid - data not reliable due to lockdowns.

"A comparison between the August 2020 traffic survey data and 2019 survey data was completed to understand any impact to typical traffic volumes due to COVID-19.

The comparison indicates that traffic volumes along Pittwater Road were relatively consistent between 2020 and 2019 and are considered suitable for transport modelling purposes."

The two datasets which are both not during normal school operation. This should be considered NOT SUITABLE for modelling purposes.

Pittwater Road is the largest highest traffic road in the council's area, so any anomalies generated by one school would be difficult to see among such high numbers. Traffic volumes need to be taken from local streets to gauge the full impact.

The methodology does not include an actual impact analysis, ie the level of traffic on non-school days to school days to show the impact that the school traffic has on the surrounding neighbourhood.

2.5 Intersection Operations

Table 2.4 contains a lot of D, E and F results, yet the report conclusion ignores these results.

There is also some deceptive 'smoothing out' occurring on this table where good results are bundle with some bad ones and then averaged in order improve the overall grade. ie If two traffic flow directions are 'A' and one is an 'E' then the overall result is not an A, yet the report does this very thing.

As an example: If I am travelling South bound and stuck in a lengthy traffic delay, it makes no difference to me if the North bound lane is flowing freely. That doesn't make my trip better.

This is not acceptable practice to hide poorly performing directional traffic with well performing traffic to average it out. Individual Level of Service (LOS) grades should be maintained for each individual direction, not smoothed-out to hide the bad results.

2.6 Car Parking

Table 2.5 indicates 358 on-street parking spaces then shows the demand at 295 as at July 2020, in the middle of Covid which is not indicative.

The school currently has 106 spaces, wants to add 54 making a total of 160. This represents an increase of 51% but is somehow considered 'minor' by the report.

2.7 Set-down/Pick Arrangements

"The on-site set-down/ pick-up area with access via Gulliver Street can facilitate seven vehicles at any one time. It is managed and operates well"

Define 'operates well'? By what metric? As a resident on the corner of Consul and Gulliver I can tell you that my opinion of this area is less than well, I would describe as a cluster-fuck. To say to that is operates well is sounds like a US military briefing from the Vietnam war.

“Once school ends, the queues quickly dissipate (typically within five minutes)”

‘Typically’? Again, as someone who works from home so is here EVERY DAY to see the reality, rather than someone who did one survey once, 2 years ago, during the middle of lockdown, I strongly contest this opinion of ‘typically’. Some days are ok, but some are complete chaos. I’ve been stuck in gridlock for over 15 minutes some days which is totally unacceptable. This chaos is not represented anywhere in this impact analysis.

4.1 Car Parking Requirements

DCP 2011 requires schools to have 1 allocated car park per staff member. The school has 106 parks and 150 staff so is the school allowed to just ignore this?

The school has approval for 1200 students, but they had 1481 in 2021. Why do we have Development Approvals if they can just be ignored?

How is the solution to the problem of too many students to allow more students, staff and parking? Should it not be to enforce the current approval limitations to minimise the problem?

“Overall, the proposal represents a definitive improvement over the approved operational conditions.”

Improved for whom? Based on what? I’m sure the school’s bank balance will improve but for residents it is the opposite. This analysis seems extremely biased towards the school and ignores ALL of the residents' concerns about traffic, parking, and deterioration of our neighbourhood where we have to live and raise our families.

“While it is acknowledged that some students are licensed and have the ability to drive, students will be encouraged and managed by the College to utilise other means of transport when travelling to/ from the school.”

Encouragement is not a sound plan; it is wishful thinking. What young man with a new licence and car is not going to want to drive to school? As a control measure, this is laughable.

“That said, if students do drive and park, there is adequate capacity along the frontage streets to accommodate the minor demand.”

Section 2.5, table 2.4 of this report lists a whole bunch of D, E, and F grades for traffic delays. How is adding to this already severe loss of service considered 'minor demand'?

“Other than local residents, many of which park in their own garages and driveways,”

Rezoning in recent years has seen resident numbers increase significantly as more and more apartments are developed. Every street parking space that the school is assuming for their own use is one less for residents and their visitors. Something has to give here.

“Removing the ability for caravans and boats to be stored in the area would also be of benefit to all.”

This is an initiative I fully support. Street parking should not be used for storage of trailers (caravans, boats etc), and this creates a blight everywhere you go, rusty old trailers and crappy old boats and caravans covered in leaves ruin streetscapes. I fully support the council creating new laws that restrict street parking to only vehicles that move under their own power, and those that are moved on a regular basis. A default 36-hour parking restriction on all streets should solve most of these issues.

5 Traffic Generation

“the anticipated change in traffic generation as a result of the increase in enrolments from the current 1,422 students to 1,600 students.”

This is misleading as the approved numbers are 1200. The difference between the approved 1200 and the requested 1600 is glossed over in the report. If it were given more attention, it would show much more drastic impacts. As a resident it has been obvious that the increases over the last 7 or 8 years have crossed a threshold of being a minor inconvenience to being adversely impacted. Not being able to leave or arrive at your own house twice a day is an impact which will only get worse if numbers are allowed to increase.

Chart figures of number of car journeys between existing approval of 1200 students and proposed 1600 students:

Staff: +26 (+23%)

Students: +108 (+33%)

+23% and +33% do not sound minor to me. The report continuously tries to pass off these increases as ‘minor’ when they aren’t.

Also, worth noting that the figures in this chart are grossly inaccurate. It states that there are currently only 14 students who drive (and 0 motorcycles) to school each day. I can easily count more than this just on my street every morning when I walk my dog down at the park. That are obviously wrong and cast doubt on the process used in the entire report.

The report concludes that 56 extra car trips each morning is “clearly a minor quantum,”. 56 extra cars every morning is NOT 'clearly minor'. What is the method used to determine this?

Using the SIDRA modelling data provided in section 2.5 table 2.4, adding 56 extra cars to any one of those intersections would result in a MAJOR impact.

This number of inaccuracies and misleading statements in this report should deem it inadmissible part of the application. A new analysis should be performed using real data with a review from residents to validate the numbers presented.

6 Conclusion

“the College seeks to improve existing parking and traffic conditions both internal to the College and on the surrounding streets.

This can be achieved through the following measures:”

The most obvious way to improve traffic and parking would be to enforce the 1200 student limit that was a condition of the DA in 2015 and reject any increase. Why is this not a consideration?

11. “with SIDRA modelling results indicating negligible differences to intersection operation from current conditions.”

This is false since the intersections analysis has smoothed out any figures that are an issue. It also fails to analyse smaller intersections where traffic increases would show a much larger impact.

Not addressed in the report:

- Consul Road south of Gulliver, and Federal Parade north of the Oval are restricted to one way due to existing parking issues. Traffic analysis seems to focus only on intersections away from these locations which is deceptive.
- The limited street access issues above are exacerbated by large buses entering the area. Bus access into tight residential neighbourhoods is not addressed.
- Some buses are often caught rat running out of Consul Road which is illegal since Beacon Hill Rd is restricted to only vehicles 3T and under. The report assumes that everyone will do the right thing when clearly that is not the case now, so why would it be assumed in future?
- High volume pedestrian activity across is not always controlled.
- Entry into school pickup/drop-off location on Gulliver result in street blockages daily. This was documented with video evidence recently on A Current Affair.
- Surveys and metrics were all gathered outside of normal operating days (ie after HSC and during Covid lockdown)

Other considerations: The Australian and Federal Government have both pledged a rapid transition to electric transport. This proposal is specifically targeted at cars and parking yet does not mention any form of capacity for charging facilities.

Summary

More people and more parking spaces means more cars and more traffic. No amount of whitewashing data changes this fact.

The neighbourhood around St Augustine's is considered by residents to be quiet and intimate, and already exceeds capacity during school rush hours. But this seems to be ignored in favour of an over-sized school jammed into the area with no capacity to handle the traffic it generates. And now the school wants to get even bigger.

There must be a theoretical maximum for how many people and cars this area can cater for. And based on living here and walking the streets every day I believe that we've already reached that limit.

When it was 800 students it was ideal. When it increased to 1200 it became a minor inconvenience. Now it's at 1400+ and it's causing problems, so 1600 is going to ruin the neighbourhood forever. And we all know that 1600 will turn into 1800 very quickly since the school has form in this regard. Enough is enough.