



Consulting Engineers, Transportation, Environmental Planners & Architects
ABN 84 095 235 957

Our Ref: 1160-8-25

Your Ref: Stage 3 (SSD 57703458)

06 February 2026

Attn: Paulina Wythes

Director
Social and Diverse Housing Assessments
(as a delegate for the Planning Secretary)
Department of Planning, Housing and Infrastructure
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2124

Dear Paulina,

**Re: Regents Park In-fill Affordable Housing – Stage 3 (SSD 57703458)
Response to submissions – Traffic.**

I am writing in response to your letter of 24 December 2025 providing advice as to the responses received relating to the stage 3 development application at 30 – 34 Auburn Road Regents Park. I have addressed several issues received from different respondents here. For clarity I have included the respective comment along with the response.

**DPHI submission; Item 4a - Heavy Rigid Vehicle (HRV) travel paths
Query**

The Transport Impact Assessment and Waste Management Plan (WMP) does not provide swept paths for on-site collection by a Heavy Rigid Vehicle (HRV) or identify the travel paths from the basement waste storage to the waste collection point. The WMP advises that cleaners will be responsible for transporting waste to the collection points. Please provide:

- swept paths for waste collection vehicles
- travel path diagrams from basement waste storage to the collection point
- a designated staff room
- cleaning storage facilities.

Response

The Transport Impact Assessment and Waste Management Plans have both been updated to include swept paths for onsite collection of waste by HRVs.

**NSW Department of Education submission; dot points 1 and 2
Congestion****Query**

Traffic generated by the development should not result in significant congestion on local roads and appropriate works be undertaken where required to ensure satisfactory intersection performance, particularly on travel routes to the schools' pick-up and drop-off areas.

Response

The development will have minimal impact on congestion on local roads. Please refer to the Traffic Impact assessment prepared by Lyle Marshall and Partners Pty Ltd and submitted with the development application for this development Report No 23/24 Revision C. Refer to section 4.3 Road network impacts; this item details the expected impact from the development on the surrounding street network.

The SIDRA modelling undertaken for the 2033 existing plus background traffic scenario (Table 4.3) indicates that future intersection performance in the vicinity of the site is largely driven by background traffic growth. When the proposed Stage 3 Building C development traffic is added to this scenario, the comparative SIDRA results demonstrate that the resulting changes to intersection performance are minimal, with Levels of Service, degrees of saturation, average delays and 95th percentile queue lengths remaining generally consistent with the 2033 background case. Any variations in performance are minor and do not materially alter overall intersection operation or network efficiency.

Sustainable travel**Query**

Measures should be incorporated to encourage sustainable and active travel as part of the development to minimise impacts on the road network and air quality in proximity to the schools.

Response

The development will support and encourage sustainable and active travel. Please refer to the green travel plan prepared by Lyle Marshall and Partners Pty Ltd and submitted with the development application for this development. This report is included in the TIA report in **Appendix J**.

Name withheld – Birrong NSW

Too busy

The suburb has gotten much much too busy over the last 20 years and this developments (sic) would make things so much worse for the residents.

Just take a look at traffic down auburn road to regents park station at peak hour, it's already ridiculous.

Do not make things worse.

I strongly object and so do all the neighbours and residents.

You don't want this fight.

Response - traffic

The development will have minimal impact on congestion on local roads. Please refer to the Section 4.3 Road Network Impacts from the Traffic Impact Assessment prepared by Lyle Marshall and Partners Pty Ltd and submitted with the development application for this development. The Traffic Impact Assessment (Report No. 23/24 Rev C) concludes that the proposed Stage 3 Building C development will result in minimal impacts on road congestion. As outlined in Section 4.3, the development generates a relatively low level of additional traffic, with approximately 69 vehicles in the AM peak hour and 59 vehicles in the PM peak hour.

SIDRA intersection modelling demonstrates that surrounding intersections continue to operate at acceptable Levels of Service, with no material increases in delay or queue lengths. The existing road network has sufficient capacity to accommodate the additional traffic, with vehicle movements dispersed across the wider network, and the reduced parking provision and proximity to public transport further limiting private vehicle demand.

Canterbury Bankstown submission**Traffic issues****Query**

Council is not satisfied with the trip generation calculation and assumptions made to determine trip rates and reduction factors. Council is also concerned about congestion and delays at the two mini roundabouts at Carlingford Street and Amy Street intersections. The Applicant must consider some capacity improvement measures. Detailed comments below:

Response

Responses below.

With respect to congestion and delays at the Carlingford Street / Park Road and Auburn Road / Amy Street mini-roundabouts, SIDRA modelling has been undertaken for existing (2023), future background (2033), and future plus development scenarios. The modelling demonstrates that future intersection performance is primarily driven by background traffic growth, rather than by traffic generated by the proposal. Importantly, a comparison of the 2033 background and 2033 background plus development scenarios confirms that the additional traffic generated by Stage 3 results in only minimal changes to degrees of saturation, delays and queue lengths, with no material change to overall Levels of Service at either intersection.

Council cannot accept assumptions**Query**

Traffic generation and congestion

Council cannot accept assumptions such as the following statement by the Applicant:

“Consideration of a reduction of 15% (10% for local trips and 5% for active travel trips would see an overall reduction in trips of 24 trips in the AM Peak Hour and 20 trips in the PM Peak Hour.”

Similarly the Applicant has considered a reduction in the child care centre traffic – “The traffic generation that has been calculated does not take into consideration the off set to active travel 5% with improvements to pedestrian footpaths and cycle paths and local trips 10%. Consideration of a possible 15% reduction in vehicular traffic would mean a reduction of 24 trips in the AM peak hour and 20 trips in the PM peak hour.”

The Applicant must substantiate this claim by providing survey data from comparable developments that demonstrates the trip reductions quoted.

Response

The Traffic Impact Assessment notes that no reductions for active transport or local trips have been applied to the childcare or residential traffic generation calculations for Stage 3. All trip generation and SIDRA modelling are based on survey-derived and unreduced traffic volumes, as set out in Table 4.4.1a.

The Traffic Impact Assessment states; *“The traffic generation that has been calculated does not take into consideration an off set for active travel of 5% due to improvements to pedestrian footpaths and cycle paths, nor a reduction for local trips of 10%.”*

The reference to a potential 5% active transport offset and 10% local trip reduction is provided as contextual commentary only, reflecting observations from the broader masterplan and Green Travel Plan investigations, which identify future pedestrian, cycling and public domain improvements that may influence travel behaviour over time. These potential influences are not incorporated into the traffic generation or SIDRA modelling, and have no bearing on the traffic volumes or conclusions presented in the Stage 3 assessment.

*“Consideration of a **possible** 15% reduction in vehicular traffic would mean a reduction of 24 trips in the AM peak hour and 20 trips in the PM peak hour.”*

To clarify, the report is **NOT** modelling this reduction, rather it states that if certain local infrastructure were to be upgraded then reduced could be expected. It makes no hard claims, just offers an acknowledged opinion provided by an expert. The opinion does not change the traffic generation calculation that forms the basis of the report.

Roundabouts, Staging, Childcare trips and SIDRA modelling

Query

Furthermore, Council has received several community concerns regarding congestion at the two small roundabouts at the intersections of Carlingford Street and Park Road, and Amy Street and Auburn Road. As these roads are shared between two Councils, it is difficult for Council to investigate and address these concerns in isolation. Residents have expressed frustration at being directed to approach the neighbouring Council with their concerns.

In addition, even if parking and traffic generation associated with the proposed development are staged—where Stage 1 comprises excavation and road construction, and Stage 2 includes the operational phase—these issues must be properly addressed prior to the approval of the SSDA.

Response

The Traffic Impact Assessment has therefore assessed these intersections using network-wide SIDRA modelling, rather than in isolation, to ensure cumulative impacts are appropriately considered.

Roundabouts

The report identifies and models these intersections it also states; *“When assigned to the road network, we predict this will not change the Level of Service (LoS) at key intersections.”*

Staging

It is unclear why staging is raised as an issue here.

Query

Childcare trips have been halved both during AM and PM (0.8/2 and 0.7/2). The Applicant is to provide reasoning behind halving the trips.

The Applicant has not provided SIDRA outputs for all scenarios. Existing scenario AM and PM peak are provided and design horizon year 2033 base case AM and PM are provided. However, existing plus development traffic in the opening year and existing plus development traffic in the design horizon year SIDRA outputs have not been provided.

Council notes that the peak hour dev traffic is 29 during AM and 27 during PM is insignificant when distributed to the traffic on Auburn Road and other roads.

Response

The Applicant clarifies that the childcare centre trip generation has not been reduced or discounted, but has been calculated using a two-way trip methodology over the defined peak hour, consistent with accepted traffic engineering practice. Each childcare place generates a two-way vehicle movement, with arrivals and departures distributed across the peak period, rather than occurring simultaneously.

The adopted trip rates are derived from empirical TfNSW survey data collected from ten comparable childcare centres, and have been pro-rated to the proposed 106 childcare places. As detailed in Table 4.4.1a, the survey data identifies average peak hour arrivals and departures, which are then adjusted using the observed parent car-driver mode share (47.4%) to determine peak hour vehicle trips.

SIDRA Modelling

All SIDRA data is included in appendix F of the TIA.

Access Arrangement**Query**

It is acceptable that the driveway width need not strictly comply with AS 2890.2. However, the Applicant must provide more legible and accurate turning path diagrams.

The submitted swept paths currently show significant overlap. The Applicant must demonstrate simultaneous entry and exit movements for a 12.5m HRV together with either a B85 or B99 vehicle for each driveway.

In addition, when a vehicle is waiting to turn right into the proposed site, the Applicant must clearly demonstrate that there is sufficient safe clearance for southbound vehicles to continue through without obstruction. The two internal roads must be wide enough to cater for footpath and services and in line with Council's standard. To be referred to Infrastructure Service.

It is noted that the on-street parking along the frontage of the site is being used for vehicles entering and exiting the property — effectively serving as merging and deceleration lanes.

Moreover, the deceleration area is shown within the existing Bus Zone, which is not acceptable. All turning paths must be designed and assessed so as not to intrude the Bus Zone (assuming a bus is stopped within the Bus Zone).

Turning paths needs to be reassessed and may require considering a wider driveway to improve safety at this location and predominantly avoid congestion and delays on Auburn Road.

Response

Updated swept paths have been provided with the updated TIA included with the response to submissions.

The public domain design and articulation will form part of the scope of the Voluntary Planning Agreement (VPA) currently under discussion with Council. It is expected that the final road layout will be resolved consistent Council's expectations as part of this process.

Proposed traffic calming treatment

Query

The Applicant is proposing a protected right turn for vehicles accessing the site from south. The Applicant must superimpose aerial image to demonstrate that the existing carriageway is sufficient to cater for the development traffic and these new treatments. The protected right turn treatment is satisfactory.

Response

The public domain design and articulation will form part of the scope of the Voluntary Planning agreement currently under discussion with Council. It is expected that the final road layout will be resolved consistent Council's expectations as part of this process.

Internal Parking

Query

The use of convex mirrors to enhance driver visibility at intersections between parking aisles and basement ramps throughout the entire parking arrangement. Although the ramps and aisle widths have been designed at or greater than the minimum

requirements as per AS2890 parking series, convex mirrors will cover any blind spot areas as a safety measure where vehicular intervisibility cannot be achieved.

Response

Council's advice is noted and will be considered in the detailed design of the parking levels.

Yours faithfully,



Erica Marshall-Evans
LYLE MARSHALL & PARTNERS PTY LTD