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Department of Planning, Housing and Infrastructure

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Dear Sir / Madam

This document provides responses to the traffic and transport related matters raised by the Department of Planning, Housing and Infrastructure (DPHI), Transport for NSW (TfNSW) and Sutherland Shire Council (Council) in their submissions to the site 29 Floria Street, Sylvania (SSD – 83258708).

The relevant comments and associated responses, are outlined in the following table.

Table 1: Responses to DPHI comments

DPHI Comment	JMT Consulting Response
Provide further justification to support the proposed number of market dwelling parking spaces which exceeds the minimum requirement (under section 19 of the Housing SEPP) by more than 300 spaces	The parking rates prescribed under Section 19(2)(e) and (f) of the Housing SEPP are a non-discretionary development standard – meaning it is not mandatory to comply with these parking rates. Instead the parking rates recommended in the Sutherland DCP are proposed to be utilised to reflect likely future demands from residents and to minimise any flow on parking impacts on nearby residential streets.
As the proposal seeks to rely on Council's waste collection services, the waste servicing arrangements outlined in Council's submission dated 22 January 2026, along with Council's concerns with the design and function of the proposed internal road, must be addressed	The proposal has been updated to respond to concerns from Council regarding waste collection, with collection points revised to provide for more efficient servicing of each of the respective buildings on the site.
An updated Traffic Impact Assessment, including SIDRA modelling, is to be prepared to address the recommendations outlined in Transport for NSW's (TfNSW) advice dated 16 January 2026	An updated TIA has been prepared and is provided in Appendix A of this document.

DPHI Comment	JMT Consulting Response
Due to the extent of uplift proposed and improve pedestrian accessibility to Southgate Shopping Centre and public transport, TfNSW are to be consulted to consider the provision of pedestrian infrastructure upgrades to facilitate improved connections between the site and Southgate Shopping Centre.	Following the lodgement of the proposal consultation was held with TfNSW in relation to future pedestrian infrastructure upgrades, as per DPHI's advice. TfNSW have advised that there are no current plans for upgraded pedestrian infrastructure in the vicinity of the site. See response to Council item 2 for further details in relation to this matter.

Table 2: Responses to TfNSW comments

TfNSW Comment	JMT Consulting Response
The expected traffic generation for the affordable housing component of the development has been assumed to be half of the market housing rate without any clear justification. Given the site has limited access to major public transport hubs (i.e. interchanges, train stations, rapid buses, etc.), the TfNSW Guide to Transport Impact Assessment (GTIA) rate for a High-Density Residential Dwellings with low public transport accessibility for sub-metropolitan sites is more appropriate and shall be utilised for both the affordable housing and market housing components	An updated TIA has been prepared which considers the advice from TfNSW. This updated TIA has utilised the traffic generation rates for high density dwellings with low public transport accessibility as recommended by TfNSW for the market dwellings. Consistent with the original submission a discount factor for the affordable housing dwellings has been applied which reflects the significantly reduced level of on-site parking provision – it is maintained that this is appropriate and reflective of future travel behaviours of residents within the social housing building.
The traffic generation of the existing developments and the net increase in traffic generation due to the proposed development need to be assessed in the TIA.	The existing traffic generation has been factored into the updated assessment within the revised TIA, as per TfNSW's advice.
The assumption that only 45% of the outbound trips (particularly in the morning peak) would be citybound is questionable and may be underestimating the traffic generation impact on the signalised intersections of Port Hacking Rd/Melrose Ave and Princes Hwy/Formosa St. Trip distribution assumptions need to be clearly justified in the TIA	Updated trip distribution assumptions are noted in the revised report on the basis of Journey to Work data for the Sylvania – Taren Point area. This analysis indicates approximately 48% of trips would be to the east which closely aligns with the original assumptions. Notwithstanding the traffic modelling has been revised to consider these updated trip distribution assumptions.

TfNSW Comment	JMT Consulting Response
The intersection of Port Hacking Rd and Melrose Ave needs to be assessed with SIDRA in a network model. It is particularly important that the applicant assesses the impact of additional traffic turning left from Pembroke St onto Port Hacking Rd towards the right turn bay at the signalised intersection of Port Hacking Rd/Melrose Ave, given the short distance available to cross multiple high-speed lanes, existing queues on Port Hacking Rd and reported crash history at the intersection of Pembroke St and Port Hacking Rd (e.g. capacity of the existing right turn lane, etc).	The updated TIA considers the future operation of the Port Hacking Road and Melrose Avenue intersection as requested by TfNSW
The traffic demand flows shown in the Appendix A SIDRA Movement Summary are inconsistent with the surveyed traffic counts. Modelling for the base model should be based on the traffic counts surveyed at the intersections	This inconsistency in the SIDRA outputs is the result of the 'peak flow factor' typically applied as per TfNSW modelling guidelines. The input volumes within the SIDRA model reflect the surveyed traffic volumes.
The cycle time of 150 seconds is adopted for the signalised intersection of Princes Hwy and Port Hacking Rd in the SIDRA modelling provided in the TIA. Cycle times adopted for the signalised intersections should be justified in the TIA. The modelling provided also needs to reflect existing cycle times and phasing for the signalised intersections being modelled.	The adopted cycle time and signal phasing were developed on the basis of video footage taken on the date of the traffic survey. This video footage was reviewed to ensure adopted cycle times and phasing reflected the actual signal operations.
Electronic copies of all SIDRA files need to be submitted for review. Modelling undertaken must include, but not be limited to, the current traffic counts and the base model calibration with on-site observations (e.g. queue lengths, delays). Details on the model calibration, as well as justifications for any adjustments to the default settings needs to be documented in the TIA.	The SIDRA traffic model was calibrated via the use of video footage of the intersections. The video footage was used to calibrate the model in the following ways: • Traffic light phasing arrangements • Typical phase and cycle times of the traffic lights (including actuation of pedestrian signals) • Queue lengths and typical delays for vehicles on local streets

TfNSW Comment	JMT Consulting Response
Whilst it is acknowledged that the Construction Traffic Management Plan (CTMP) provided in the TIA is at a preliminary stage, the outbound construction routes are not shown in Figure 19. Outbound routes are critical, as heavy vehicles require significantly greater reaction time, queueing length, and safe crossing gaps compared to passenger vehicles. Consequently, all the issues identified above are exacerbated for heavy vehicles attempting to access the right-turn bay on Port Hacking Road at the intersection of Port Hacking Rd and Melrose Ave. It is Transport's preference that, during construction stages, citybound heavy vehicles instead turn right at the Evelyn St and Port Hacking Rd intersection	As requested by TfNSW outbound construction vehicle routes have been included in the updated TIA, with citybound vehicles utilising the Evelyn Street / Port Hacking Road intersection. Construction vehicle routes will be further developed as the project progresses and outlined within the detailed CTMP to be prepared prior to the commencement of works.

Table 3: Responses to Council comments

Council Comment	JMT Consulting Response
The number of parking spaces allocated to the market dwellings exceeds the minimum requirement by 204 spaces. However, the parking spaces allocated to the Social housing building is deficient by 7 parking spaces. The allocation of parking between the market and social housing dwellings is not considered equitable to future occupants and compliance is required.	Under the Housing SEPP a minimum of 83 parking spaces are required for the 159 social housing units. The proposal provides for 92 parking spaces for the social housing building and therefore exceeds the minimum requirements of the SEPP.
Parking bays associated with liveable and adaptable dwellings should conform with the silver standard and Adaptable Housing AS4299-1995. An alternative arrangement to the before mentioned standards can be considered by providing the required parking in accordance with AS2890.6.	Noted, the design makes suitable provision for parking spaces for adaptable units which comply with the requirements of AS2890.6

Council Comment	JMT Consulting Response
The proposed internal shared road is not supported as it creates conflicts and safety concerns for heavy vehicles. A traditional roadway pavement and separate foot path pavement should be provided. The road pavement width must comply with SSDCP2015 Chapter 36 for the size and scale of the development	The internal road will be a private roadway that provides local access to the respective buildings on the site, with little to no 'through' traffic movements expected. A shared zone is considered appropriate to accommodate these localised traffic movements and promote a safer environment for all road users. The advent of a shared zone on this internal roadway will support improved pedestrian movements and complies with the relevant TfNSW requirements for a shared zone given the low traffic flows and minimal number of service vehicle movements.
The kerb and gutter within the internal private road must be designed as integral kerb 150mm high with traditional kerb inlet pits with minimum lintel opening of 1.8m	An example of a successful shared zone on an internal road supporting a high density residential precinct is shown below, that being Yarraman Avenue in Randwick adjacent to the Newmarket development. The implementation of appropriate signage and pavement treatments supports a low speed environment – similar to that proposed for the subject site. 

Please do not hesitate to contact the undersigned should you have any questions in relation to this advice.

Regards



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Director | JMT Consulting

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