

28 May 2026

Landcom
60 Station Street
Parramatta NSW 2150

Chatswood Dive Site - Build-to-Rent SSDA - Response to Agency Submissions: Traffic and Transport

Background

Landcom submitted a State Significant Development Application (SSDA) to seek consent for:

- The construction of a high density 23-storey mixed-use building for the delivery of 180 apartments, including a mixed-use podium and residential tower with a height of approximately 85m, and associated services, including the:
 - Ground floor, including 5 residential dwellings facing the future streetscape, residential lobby and internal services, commercial/retail tenancies, services, lift shaft and fire stairs.
 - Level 1 and 2 Podium, including 8 dwellings, 37 car spaces total, services, lift core and fire stairs.
 - Level 3 Podium, including the communal internal amenity area and communal outdoor space, services, lift core and fire stairs.
 - Level 4-13 Tower, including 8 dwellings, services, lift core and fire stairs.
 - Level 14-22 Tower, including 9 dwellings, services, lift core and fire stairs.
 - External landscaping, consisting of a mix of hard and green space, with a public art feature which integrates with the delivery of highly landscaped public open space that interfaces with Frank Channon Walk.

SCT Consulting prepared a Transport Impact Assessment (TIA) to support a SSDA (ref. SSD- SSD-100006957) for the proposed development known as 'Chatswood 'Dive Site' Built-to-Rent' SSD located at 339 Mowbray Road, Chatswood. The TIA concluded that the surrounding existing and planned transport network is forecast to be able to accommodate the increased demand from the proposal. A summary of the mitigation measures discussed in this report have been included in **Table 1**. The necessary mitigation measures for this proposed are largely embedded in the delivery of the proposal itself, with minimal changes to the surrounding road network or public transport required.

Table 1 Summary of mitigation measures

Mitigation measure	Explanation	Timing
Minimise parking provision	Adopts minimum Housing SEPP and Willoughby DCP parking rates.	Forms part of this proposal.
Provision for bicycle parking	Adopt Council's minimum rates for bicycle parking and end-of-trip facilities to encourage cycling.	Forms part of this proposal.
Construction Traffic Management Plan (CTMP)	Devise a CTMP for the construction activities to mitigate/manage any potential construction impacts.	Prior to construction.

The SSDA was on exhibition in April 2026. As part of the submission process, TfNSW and Willoughby City Council have reviewed the documentation and provided their submissions for the application. DPHI also prepared a letter dated 12 May 2026, highlighted the key issues for Landcom to consider and address.

This letter provides a summary of the proponent's responses to the agency submissions.

Responses to Agency Submissions

Table 2 Responses to Agency Submissions

#	Agency Submission	Landcom's response
TfNSW - TAB A– TfNSW suggested conditions of consent		
Construction Traffic Impacts		
TfNSW A1	An updated Construction Pedestrian Traffic Management Plan (CPTMP) detailing construction vehicle routes, number and type of vehicles, hours of operation, access arrangements and traffic control should be submitted to TfNSW for review and endorsement prior to the issue of a construction certificate.	Noted. Landcom will prepare an updated CPTMP in response to the conditions of consent.
TfNSW A2	A Road Occupancy Licence (ROL) shall be obtained from Transport Management Centre (TMC) for any works that may impact on traffic flows on Pacific Highway during construction activities.	Noted. If required, Landcom will obtain a ROL in response to the conditions of consent for any works that may impact on traffic flows on Pacific Highway during construction activities.
TfNSW - TAB B – Advisory comments		
TfNSW B1.1	The applicant's TIA has adopted TDT 2013/04a (Guide to Traffic Generating Developments Updated Traffic Surveys) for the calculation of vehicle trip generation. However, TDT 2013/04a has been superseded by the Guide to Transport Impact Assessment (GTIA) 2024 (TS 00085 Version 1.1), which came into effect on 4 November 2024. Accordingly, the TIA report should be updated (or addendum TIA provided) to provide the trip generation calculation based on the current guidelines. Vehicle trip generation for the residential, commercial, and retail components should be recalculated in accordance with the latest GTIA requirements.	We noted the Guide to Transport Impact Assessment (GTIA) 2024 (TS 00085 Version 1.1), which came into effect on 4 November 2024. The GTIA acknowledged different trip generation estimation methods depending on the context and resources of a proposed development. The Chatswood Dive Site BTR TIA adopted the “benchmarking method” where we have benchmarked the site’s travel characteristics with similar surveyed sites (high density developments in St Leonards and Chatswood) to determine an average rate. This approach to estimating trip generation rates are considered valid and acceptable in the Guide to Transport Impact Assessment (GTIA) 2024 (TS 00085 Version 1.1). Hence, no change is required to estimate vehicle trip generation for the residential, commercial, and retail components of the BTR proposal.
TfNSW B1.2	The TIA report presents modelling results for existing conditions only.	As stated in section 5.3.3 of the TIA, the BTR development is expected to generate up to 29 vehicle trips during any peak period, equivalent to one vehicle every two minutes. This level of traffic generation alone is relatively low and falls well below typical daily fluctuations experienced during peak periods. Hence, no traffic modelling is typically required to quantify the traffic impacts of this level of traffic increase on the surrounding road network.

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TfNSW B1.3	It is noted that the subject SSDA seeks consent for the site preparation and development of a 23-storey mixed use development, consisting of commercial premises and a residential flat building with 180 build-to-rent dwellings. While the traffic impact of the subject SSDA on the classified road network (considered in isolation) is unlikely to be significant and modelling of the classified road network impacts may not be warranted, it is understood that the applicant will ultimately seek approval under a Concept Master Plan (SSD-100360960) for development of the Chatswood 'Dive Site' more broadly to accommodate four towers consisting of a commercial/retail podium and approximately 1,500 dwellings and associated uses. The applicant should consider the subject SSDA impact in the context of any surrounding approved developments, and the development planned for the remainder of the Chatswood 'Dive Site' (SSD-100360960) more broadly and consider including details of the cumulative impact in the TIA.	The cumulative impacts of the BTR and the Concept Master Plan (SSD-100360960) have been considered in the TMAP prepared as part of the SSD-100360960. This will be submitted separately for TfNSW's consideration.
TfNSW B1.4	It is requested that the applicant confirm whether any of the internal roads with proposed 'shared zones' will be constructed as part of this stage. Further, the applicant is also requested to confirm if the Bryson Street access from Pacific Highway is proposed to be retained or closed as part of this SSDA. It should be noted that all vehicular access to the future development (for SSD-100006957 and SSD-100360960) is to be obtained via the local road network as vehicular access to the Pacific Highway will not be supported.	The vehicular access to the BTR development is proposed directly via Nelson Street. Hence none of the internal roads with proposed 'shared zones' will be constructed as part of the BTR development. Bryson Street access from Pacific Highway is proposed to be closed as part of this SSDA and the Concept Master Plan (SSD-100360960).
TfNSW B1.5	It is noted that vehicle movements will be controlled by internal traffic signals at each end of the ramp. Traffic control within the site should not result in queues extending to the Pacific Highway and the internal traffic signals should not be positioned so that they are visible to traffic external to the development.	Noted, as discussed in section 4.2.1 of the TIA, the proposed internal traffic signals are considered appropriate according to Clause 3.2.2 of AS2890.1 2004. The car park is expected to generate a maximum of 29 vehicle trips during a peak period and would generate relatively low traffic volumes with limited potential for two-way conflicts.
TfNSW B1.6	It is noted that vehicular access to the development is proposed via the cul-de-sac at the end of Nelson Street, where sight distance for drivers is limited. Appropriate mitigation measures need to be provided to ensure safety at the proposed access point, or the access should be relocated to a location that provides adequate sight distance along Nelson Street.	A cul-de-sac by nature accommodates low traffic volumes and primarily serves local residents. Note 2 to Figure 3.2 of AS2890.1 (Clause 3.2.4) states that <i>"a check to the left is not required at a divided road where the median is wide enough to shelter a vehicle leaving the driveway."</i> This establishes that left-side sight distance is primarily relevant where a right-turn movement is reasonably expected. In the case of a cul-de-sac, vehicles exiting the site would not turn right into the dead end and would only turn left to exit the street. Accordingly, sight-distance requirements for this development are limited to vehicles approaching from the right, from the neighbouring lot to the north. Vehicles travelling between the subject site and the adjoining northern lot have clear intervisibility within the cul-de-sac and are therefore able to

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		negotiate movements prior to entering the road network. As such, no sight-distance issues are anticipated. Additionally, the adjoining lot to the north will have its access relocated to Gordon Street as per Council's site-specific DCP controls for that site. Once this occurs, the cul-de-sac will exclusively serve the subject development, further reducing traffic interaction and potential conflict at the access location.
TfNSW B1.7	Given the site's proximity to key pedestrian and cycling infrastructure, including Frank Channon Walk and shared paths along Pacific Highway, and noting the estimated active transport demand, the TIA should further consider the provision of appropriate end-of-trip facilities. This should include details of bicycle parking, showers, lockers, and associated amenities to support and encourage cycling as a viable mode of transport. The adequacy of these facilities should be demonstrated in accordance with relevant guidelines and in the context of the estimated active transport trips.	Bicycle parking will be provided to support and encourage cycling as a viable mode of transport. No end-of-trip facilities are warranted as a result of the small scale ancillary non-residential uses.
TfNSW B1.8	The report should also demonstrate safe and convenient connectivity between the development and the surrounding walking and cycling network.	Multiple accesses are provided at the BTR development to connect with existing walking and cycling facilities surrounding the development including those along Nelson Street, Mowbray Road, Pacific Highway and Frank Channon Walk.
TfNSW B2	Car parking: While the Willoughby Development Control Plan (DCP) does not provide the parking rate for built-to-rent developments, it requires parking for affordable housing to be compliant with the parking rate provided in the State Environmental Planning Policy (Housing) 2021 (SEPP) guideline. However, the proposed 23-storey building is expected to be taller than the maximum building height permitted under Chapter 5 & 6 of the SEPP, and therefore the adopted 0.2 space/dwelling rate may not be appropriate for this development. As the SSDA proposes a mixed-use building, which Willoughby DCP provides a minimum and maximum parking rate, it is recommended that consideration is given to adjusting the parking provision with consideration also to the DCP.	Parking provision complies with the Housing SEPP and Willoughby Council DCP. The priority of the provision is to meet parking demand needs, while discouraging car ownership. This ensures that the proposal aligns with the principles and visions of the various state and local transport plans. The Housing SEPP requirements of a rate of 0.2 space/dwelling is still valid for the overall BTR development proposal, and a provision of 36 spaces for the 180 BTR unit is compliant. There is a shortfall of one car parking spaces in relation to the retail component of the proposal. This is justified as the small-scaled ground floor retail may only generate parking demand for staff which in this case the staff is expected to travel to work using public transport given the site's proximity to Chatswood and Artarmon stations.
TfNSW B3	Environmental Impact Statement, prepared by Gyde dated 6 March 2026: Section 5.4.1, page 57 – The section states that “The proposed works include the provision of a driveway and the roll kerb for vehicles being work in a public road, being Nelson Street. Concurrence from TfNSW regarding the proposed works will be defined as a mitigation measure under Appendix 3 and is recommended to be included as a condition of consent to be achieved prior to the issue of a Construction Certificate”. A similar	Noted.

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	statement is included in Section 7.1.5.4 (page 108). Nelson Street is a local road under the care and control of Willoughby City Council and therefore a Section 138 consent under the Roads Act 1993 should be sought from Council without the need for concurrence from TfNSW.	
TfNSW B4	Mitigation Measures Table – Appendix 3 of EIS, prepared by Gyde: Table 1, SEAR 9 Transport, page 3 – TfNSW requests that the proposed condition of consent requiring concurrence from TfNSW under Section 138 of the Roads Act 1993 be deleted. Instead, include a new condition requiring a Section 138 consent from Willoughby City Council for any works proposed on the Nelson Street road reserve. Table 1, SEAR 9 Transport, page 3 – TfNSW notes the proposed condition of consent requiring the development, including landscaping, within the easements identified within Appendix 8 to be provided prior to the provision of an Occupation Certificate. This condition has been proposed under the 'prior to construction' column, however it appears that it should be proposed under the 'ongoing operation' column.	Noted.
Willoughby City Council		
WCC 7	7. Vehicle Access and Parking While the one lane, two-way ramp arrangement is proposed as a performance-based solution under AS 2890.1, the safe operation of the ramp is dependent on continuous operation of the traffic signal system. The submitted documentation does not currently demonstrate how safe ramp operation would be maintained in the event of a power outage or system failure. Additional details are required confirming backup power provision or fail-safe signal operation to ensure that conflicting vehicle movements cannot occur under blackout conditions. Swept path diagrams are to be provided showing how the one lane and 2-way ramp would work to confirm compliance with AS2890.1. Additional details are required confirming backup power provision or fail-safe signal operation to ensure that conflicting vehicle movements cannot occur under blackout conditions. Swept path diagrams are to be provided showing how the one lane and 2-way ramp would work to confirm compliance with AS2890.1.	Noted, as discussed in section 4.2.1 of the TIA, the proposed internal traffic signals are considered appropriate according to Clause 3.2.2 of AS2890.1 2004. The car park is expected to generate a maximum of 29 vehicle trips during a peak period and would generate relatively low traffic volumes with limited potential for two-way conflicts. As part of the detailed design for the Construction Certificate, a car parking operational management plan will be developed to confirm the operation of the car park and how conflicting vehicle movements can be managed under blackout conditions.
WCC 8	8. Parking Infrastructure The following recommendations are made to ensure parking infrastructure is adequate and responsive to contemporary transport needs: – A condition of consent should be imposed requiring the car parking space be EV-ready as per the Willoughby Development Control Plan (WDCP). – A condition of consent be included requiring completion of a detailed Loading Dock Management Plan (LDMP), including:	Noted.

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	• Delivery and waste booking systems. • Scheduling outside peak pedestrian periods. • On-site management and supervision. – Inclusion of at least one carshare parking space within the on-site car park, subject to feasibility investigation with a carshare operator. – E-bike charging facilities for the bicycle parking. – Finalisation and implementation of a site-specific Green Travel Plan (GTP). The above listed requirements are to be required by a condition of consent to ensure adequate parking infrastructure is provided to meet contemporary transport needs.	
WCC 10	10. Construction Phase Management and Liability A detailed and enforceable Construction Traffic and Parking Management Plan (CTPMP) is required as a condition of consent, prior to the commencement of any works, and meet the requirements listed above to ensure construction vehicles park on-site, and to minimise impacts on the surrounding road network, public domain and nearby residents.	Noted. Landcom will prepare an updated CPTMP in response to the conditions of consent.
WCC 12.1	12. Traffic Impact Assessment Traffic Surveys and Data Collection The traffic surveys within the Traffic Impact Assessment were undertaken on a single weekday only (Wednesday 30 July 2025). Council considers that: – Traffic data based on a single weekday is not representative of typical or peak conditions in a dense, mixed-use centre such as Chatswood. – No weekend traffic or parking surveys have been undertaken. – In the absence of weekend data, the assessment cannot be considered conservative or robust under Austroads guidance. Additional traffic surveys taking into account the above points are required to demonstrate that the adopted traffic inputs are representative of site-specific operating conditions.	It is industry standard that traffic modelling and impact assessment are prepared based on one typical weekday of traffic surveys. Other SSDAs in Chatswood CBD area have also been approved based on one typical weekday of traffic surveys. This approach of traffic modelling and impact assessment has also been agreed with Transport for NSW. We do not propose the need for any additional traffic data collection for this TIA.
WCC 12.2	12. Traffic Impact Assessment Peak Period Selection and Modelling Methodology While Council acknowledges that Austroads allows modelling of development-generated peak hours where they differ from wider network peaks, this approach requires clear justification that the selected period represents an equivalent or worst-case scenario. In this case:	It is industry standard that traffic modelling and impact assessment are undertaken for the development-generated peak hours, especially for a development that has a majority of residential use with ancillary retail/office uses. Other similar SSDAs in Chatswood CBD area have also been approved based on modelling of development-generated peak hours.

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	– The PM network peak occurs earlier than the modelled 5:00–6:00 pm period. – The assertion of a 2% network-wide volume difference does not demonstrate that critical turning movements or intersection performance would not be worse during the network PM peak. – No modelling of the network PM peak, or movement-level comparison, has been provided. Additional modelling or comparative analysis taking into consideration the above points is required to demonstrate that the adopted peak period is conservative.	This approach of traffic modelling and impact assessment has also been agreed with Transport for NSW. We do not propose the need for any additional traffic modelling for this TIA.
WCC 12.3	12. Traffic Impact Assessment Traffic Capacity, Queue Propagation and Network Performance The Traffic Impact Assessment identifies that elements of the surrounding road network—particularly the Pacific Highway / Mowbray Road intersection—are operating at or near capacity, with degrees of saturation of up to 0.97 and significant delays during peak periods. The assessment also acknowledges queue propagation along Mowbray Road, Hampden Road and Pacific Highway. Notwithstanding this, the assessment concludes that overall network performance remains satisfactory based primarily on level of service and degree of saturation metrics. Council notes that reliance on these metrics alone does not adequately characterise performance in a constrained urban network where queue spillback and access obstruction materially affect safety and functionality. Council is not satisfied that: – The additional development traffic can be accommodated without worsening existing queue spillback and access constraints. – The interaction between propagated queues and site access via Nelson Street has been adequately assessed. – The cumulative effect of additional traffic on an already constrained corridor has been demonstrated. No specific mitigation measures, operational improvements or network management strategies are proposed. Further assessment and, where necessary, mitigation measures are required to demonstrate acceptable network performance.	As stated in section 5.3.3 of the TIA, the BTR development is expected to generate a maximum of 29 vehicle trips during any peak period, which is equivalent to one vehicle every two minutes. This level of traffic generation alone is relatively low and falls well below typical daily fluctuations experienced during peak periods. Hence, no traffic modelling is required typically to quantify the traffic impacts of this level of traffic increase onto the surrounding road network. TfNSW has not raised any concerns or any specific mitigation measures on the operation of the intersection of Pacific Highway Nelson Street as a result of the BTR development.
WCC 14	14. Pedestrian Capacity Assessment The Applicant should provide a pedestrian capacity and footpath width assessment for Nelson Street and Frank Channon Walk, to demonstrate that these pedestrian links are capable of accommodating the future demand generated by the development.	Walking and cycling trips were estimated to be a maximum of 109 trips (including public transport trips). This level of trip generation is relatively low for active transport trips and can be accommodated by the existing and planned network. No pedestrian capacity assessment is required.

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	Submit a pedestrian capacity and footpath width assessment for Nelson Street and Frank Channon Walk, confirming these links can accommodate future pedestrian demand generated by the development.	
Department of Planning, Housing and Infrastructure (DPHI)		
DPHI 12	12. Provide an updated Transport Impact Assessment (TIA) in response to issues raised by Council and Transport for NSW addressing:	It is noted that the key issues highlighted by DPHI have also been raised by TfNSW and Council. Hence we have responded by referring to responses provided to TfNSW and Council already included in this table above.
	a) trip generation based on the Guide to Transport Impact Assessment (GTIA) 2024	Refer TfNSW B1.1 response.
	b) additional traffic and parking surveys on a weekend	Refer to WCC 12.1 response.
	c) traffic modelling of the network PM peak period	Refer to WCC 12.2 response.
	d) potential traffic queuing from vehicles entering and exiting Nelson Street	Refer to WCC 12.3 response.
	e) the operation of the signal-controlled ramp system during power failure conditions and vehicle swept path analysis	Refer to WCC 7 response.
	f) sight distance from the vehicular access point along Nelson Street	Refer TfNSW B1.6 response.
	g) the provision of appropriate end-of-trip facilities including details of bicycle parking, showers, lockers, and associated amenities to support and encourage cycling as a viable mode of transport	Refer TfNSW B1.7 response.
	h) connectivity between the development and the surrounding walking and cycling network.	Refer TfNSW B1.8 response.

Yours sincerely



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