

Our Ref: 21101

25 January 2022

Department of Planning, Industry & Environment
Level 17, 4 Parramatta Square
Parramatta NSW 2150

Attention: Rowan McKay

Dear Rowan McKay,

**RE: REDEVELOPMENT OF PRESIDENT PRIVATE HOSPITAL (SSD-10320)
PEER REVIEW OF TRAFFIC & TRANSPORT ASSESSMENT**

On behalf of the Department of Planning, Industry & Environment (DPIE), The Transport Planning Partnership (TPPP) has undertaken a peer review of the traffic and transport assessment submitted with the State-Significant Development application (SSD-10320) for the proposed redevelopment of the President Private Hospital in Kirrawee.

Principally the peer review by TPPP provided herein considers the traffic and transport assessments prepared by ML Traffic Engineers in support of the proposed redevelopment.

Review Documentation

TPPP has prepared this peer review to advise DPIE of the appropriateness of the methodology and assumptions made by the applicant and their consultant team in the preparation of the amended traffic related assessments for the President Private Hospital Redevelopment.

In addition, TPPP has undertaken the peer review in the context of the following documents:

- Planning Secretary's Environmental Assessment Requirements (SEARs) for SSD-10320 dated 28/5/2019.
- Redevelopment of President Private Hospital Environmental Impact Statement (November 2020) prepared by Image Design Studios (note: includes various traffic related reports prepared by ML Traffic Engineers and appended to the EIS).
- "Exhibition of EIS (SSD-10320) Redevelopment of President Private Hospital", Transport for NSW, (letter) dated 28 January 2020.
- Department of Transport (TfNSW) Submission dated 28 January 2020

- Roads and Maritime Services (RMS) Submission dated 28 January 2020
- DPIE Request for Response to Submissions dated 12 February 2021
- Updated “Travel Plan of an Existing Private Hospital, 269-381 President Avenue in Kirrawee” ML Traffic Engineers, April 2021
- Updated “Traffic and Parking Assessment Impact Assessment of a Proposed Expansion of President Avenue Private Hospital, 269 -381 President Avenue in Kirrawee, prepared by ML Traffic Engineers, April 2021
- “Expansion of President Hospital – Assessment of requirement for a slip lane at President Avenue Entry to the Staff Carpark and Provision of Separate exit Driveway at President Avenue” letter prepared by Greys Australia Pty Ltd dated 29 March 2021.

Background

The subject site (the site) is located at 369- 381 President Avenue, Kirrawee, and is currently occupied by President Private Hospital. Surrounding land uses are predominately residential, with some educational and local centre use further afield to the east.

At present, vehicular access to the site is provided directly off President Avenue and Hotham Road. The location for the subject site and surrounding environment is shown in Figure 1.

Figure 1: Site Locality



Reference: Nearthmap, dated 02 November 2021

President Avenue is a Classified Regional Road under the NSW Schedule of Classified Roads. Access to classified roads are generally restricted where other frontages are available. Regional roads are described as:

"Regional Roads perform an intermediate function between the main arterial network of State Roads and council controlled Local Roads. Due to their network significance RMS provides financial assistance to councils for the management of their Regional Roads." Schedule of Classified Roads and Unclassified Regional Roads, Roads and Maritime (2017)

For this review President Avenue is considered an arterial road based on traffic volumes and function within the road hierarchy.

Proposal Description

The proposed redevelopment of the hospital site will include an additional 182 bed hospital, 168 space car park, loading bays, drop off and ambulance areas. Vehicular access to the car park will be from President Avenue and Hotham Road.

Secretary's Environmental Assessment Requirements (SEARs)

For state significant projects the Environmental Impact Statement is required to clearly address the SEARs for the project.

Based on TTPP's review of the traffic and accessibility assessment documentation, it is TTPP's opinion that the submitted documents do not adequately address each of the SEARs for the project.

For example, the reports have not adequately addressed the following SEARs:

- Fails to address and demonstrate how the proposed development aligns with relevant strategic transport planning objectives as specifically required in the SEARs ie:
 - A Metropolis of Three Cities – the Greater Sydney Region Plan – South District Plan
 - Future Transport Strategy 2056
- The adequacy of public transport within the vicinity of the site or future public transport infrastructure. The report lacks any assessment of frequency of services or how people would walk to and from these locations and the capacity of the services. No details of mode share have been provided.
- There is no explanation of how the traffic distribution was developed and there does not appear to be any clear methodology or process involved.
- Road Safety – There is no mention of road safety for vehicles and pedestrians or road safety measures. Noted that an assessment of the access location was provided however we do not believe it adequately address Council's safety concerns.
- Details of travel demand management measures, wayfinding strategies etc. The Green Travel Plan is very cursory and does not provide any clear targets or strategies. For

example, the Green Travel Plan suggests the introduction of car pooling but does not provide targets or mechanism to implement carpooling.

- Impacts on on-street parking has not been considered, or the existing on-street parking conditions.

It is recommended that the transport assessment clearly summarise how each of the SEARs has been addressed and reference where the SEARs are addressed in detail. This would greatly assist the reviewers to determine if the assessment is adequate.

Peer Review Assessment of Traffic Report

TTPP's peer review findings of ML Traffic Engineers Traffic and Parking Impact Assessment report (transport assessment) are show as follows:

On-Site Parking (Section 2.7)

ML Traffic Engineers assesses that the car park fronting President Avenue has an existing supply of 20 spaces for patients. From site observations, the car park has no line marking and hence it cannot be formally understood to have a supply of 20 spaces. In addition, the parking survey undertaken by the proponent shows that the car park is occupied with 15 – 16 spaces through a typical weekday (9:00am – 3:00pm). Although there may be a theoretical maximum of 20 car parking spaces, this may be contingent on patient/ visitor parking behaviour and not formally recognised without line marking for guidance.

On-Site Parking (Section 2.7, Table 3)

The table should differentiate between hospital staff and visitor parking spaces to better understand demand profiles and which spaces are more frequently occupied. Specifically, it is expressed that the southern car park fronting Hotham Road has 25 car parking spaces for both staff and visitors, with five spaces marked for doctors and surgeons.

Forecast Traffic Volumes (Section 5.2, Figures 10 and 11)

The rationale and logic behind the chosen traffic distributions shown in Figures 10 and 11 are not determinable by reading the report. Further information would be helpful to explain the reasoning for allocation and distribution decisions.

Appendix B (Table B2)

Table B2 of the SIDRA outputs for the Existing Traffic with Additional Hospital Traffic" show a reduction of some 80 vehicles in the through movement at the President Avenue west approach. TTPP suggests further clarification of this reduction as there is no determinable mention of this reduction of background traffic.

Appendix A and B

The SIDRA traffic modelling analysis does not assess a 10-year future scenario of the President Avenue – Hotham Road – NW Arm Road intersection. Given that the proposed development would require significant construction activities (excavation for four basement-level car parks) within the site and the general timeline of hospital developments, it is unlikely to envisage the proposed development operating under existing traffic conditions, and instead the development would likely be operational under the upgrade nearer the 10-year horizon than the existing conditions.

As such, the following SIDRA traffic modelling scenarios should be considered at the subject intersection:

- 10-year future scenario, and
- 10-year future scenario with development traffic.

Model Calibration and Validation

There has been no evidence to explain the modelling methodology and that the models are calibrated and accurately represent the existing conditions.

Modellings should be undertaken with reference to the TfNSW modelling guidelines and reporting requirements. For example, sources of signal timing and queue length validation should be referenced.

References:

- Traffic Modelling Guidelines – Transport for NSW (Roads and Maritime) version 1.0 February 2013.
- Operational Modelling Report Structure, Technical Direction TTD 2017 / 001 – Transport for NSW (Roads and Maritime), May 2017

General Comments

The reports do not adequately address issues of access to public transport or strategies to reduce dependence on private vehicles and focuses on private vehicle access. The assessment also does not consider future traffic conditions and cumulative impacts of development in the area or future transport infrastructure.

Response to Stakeholder Submissions

Sutherland Shire Council (Council) and Transport for NSW have raised key items of concern in relation to the EIS.

Some of these items have been discussed in the review of the traffic and transport assessment and noted, but the following issues are still considered outstanding or have not adequately been addressed.

Vehicle Access Arrangements

As requested in Council's submission for the SEARs, for safety reasons Council requested that the EIS traffic assess consider the provision of a slip lane at the President Avenue entry to the carpark with a separate exit to President Avenue for the proposed site. Consideration of this option should be investigated, and the outcome of the investigation provided.

A review of the access arrangement is provided in the Greys Australia Pty Ltd letter dated 28 March 2021, but does not in TTPP's opinion address Council's safety concerns.

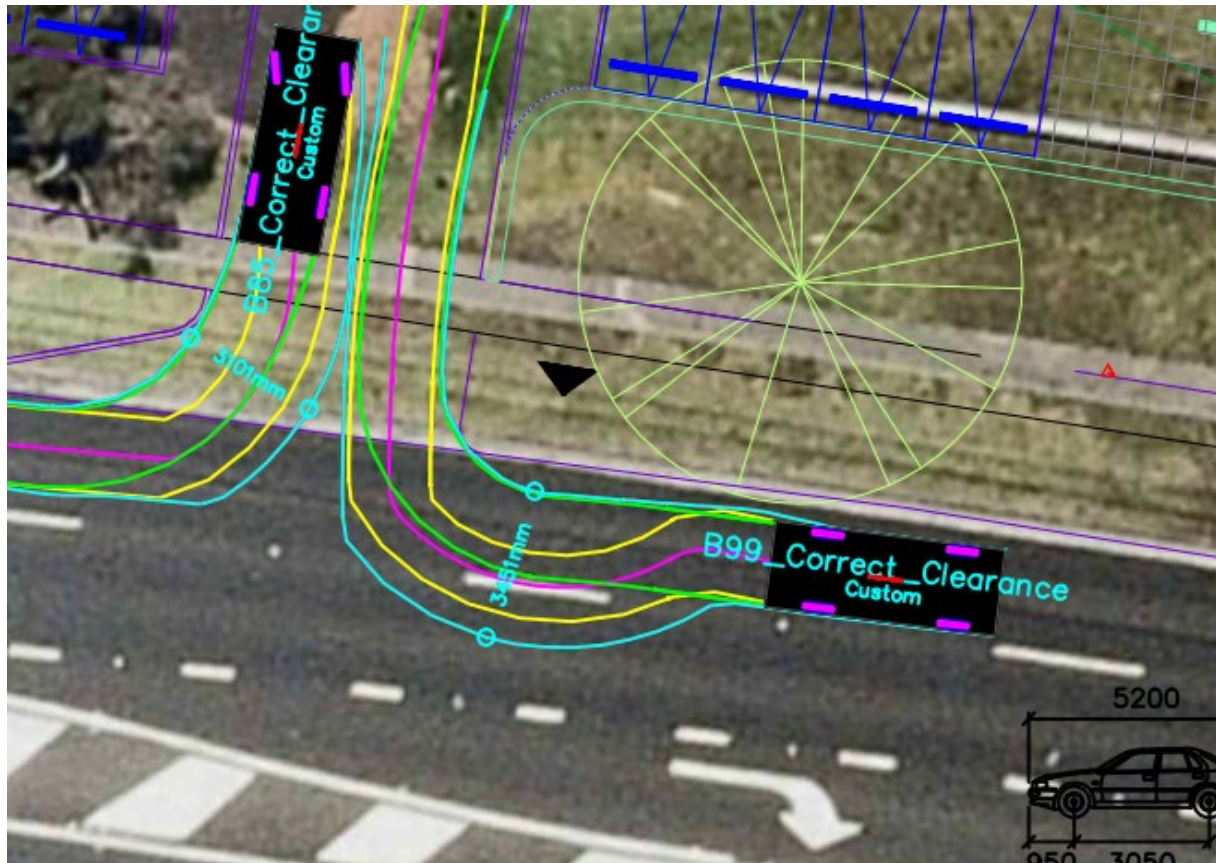
The swept paths provided in the letter show that a vehicle leaving the site at the President Avenue driveway would turn into the adjacent lane (see Figure 2).

Given President Avenue functions as an arterial road this should be unacceptable. It is reasonable for Council to request a 'slip' lane access to a major car park from an arterial road.

Further the following issues have not been addressed:

- The Australian Standards AS2890.1 stipulates driveways should not be provided within the queuing area of traffic signals. There has been no assessment on observed queuing extents.
- The RTA *Guide to Traffic Generating Developments* clearly states that access should be avoided on major roads where access is available from a minor road.
- Review of Austroad Warrants for intersection auxiliary lane requirements.

Figure 2: President Avenue / Site Access Driveway - Swept Paths Provided by Applicant



References:

- RTA Guide to Traffic Generating Developments – RTA 2002, section 1.3.2 “Direct access to major roads should provide: acceleration lanes; deceleration lanes; and, right turn bays”.
- Australian Standards AS2890.1 – Cl 3.2.3 “locate access driveway beyond the influence of queues.”, “Traffic management means to ensure safe and efficient operation of driveway” and for class 3 – “Shall not be located on arterial roads unless entrances and exits are designed and constructed as intersections...”
- Austroads Guide to Road Design – Part 4 Intersections, Austroads (2021)
- Austroads Guide to Traffic Management – Part 5 Link Management, Austroads (2020)

Parking Provision

A parking survey should be undertaken having regard to similar-sized private hospital developments with more than 180 beds and 100 staff in order to determine if the proposed parking rates to support the parking demand is satisfactory for the proposal and sufficient parking is proposed.

The transport assessment did not include a parking survey of the site. The assessment was based on TfNSW's Guide to Traffic Generating Developments (2002) and other sites. Considering the locality and scale of the proposed, it would be prudent to back up the parking demand estimate with empirical data from the site.

Cycling Requirements

The Traffic and Parking Impact Assessment (TPIA) provided as part of the proposed development does not address TfNSW policies for integrating transport with land use, or the requirement of the Sutherland Shire Development Control Plan (DCP) 2015 regarding off-street bicycle parking and end-of-trip facilities. The application is to be amended including the TPIA to satisfy the minimum requirement of the Sutherland Shire DCP 2015 in regard to provision of adequate and suitably located secure end-of-trip facilities and off-street bicycle parking in accordance with Australian Standards AS2890.3.

Developments just provide one bicycle space per 10 car parking spaces for the first 200 car spaces. For the proposed 158 car parking spaces, allocation must be provided for 16 bicycle parking spaces. Additionally, one unisex shower must be provided per 10 employees as part of end-of-trip facilities. For the weekday day shift (the peak for rostered hospital staff), 102 staff members would be on-site. Hence, 10 unisex showers would be required.

Bicycle parking for employees should be designed according to Class 1 or 2 of the AS2890.3 and bicycle parking for visitors should be designed according to Class 3. These classes relate to the accessibility and security of bicycle parking racks/ cages.

References:

- Sutherland Shire Council DCP (2015), Chapter 36
- Australian Standard AS2890.3.

Green Travel Plan

The SEARs requests the following:

"Submit an updated preliminary Green Travel Plan that responds to the mode split assumptions contained in the updated TPIA and also responds to the specific documents relating to hospital green travel plans."

ML Engineers have not allocated any mode split assumptions nor targets in the Green Travel Plan, and actions/ initiatives are vague. TTPP suggests further consideration of travel plan indicators, intentions, and initiatives, as well as a possible draft Travel Access Guide to assist hospital staff with distribution of information.

It is critical to consider the unique travel behaviours associated with occupations when discussing public transport uptake. Generally, in occupations where staffing hours are generally outside the typical 9am to 5pm, driving is more common as public transport may operate outside staff changeover/ site peaks.

Employee surveys of the existing President Private Hospital, or of comparative small private hospitals in sub-regional areas, would be required to adequately assess the existing modal split. The use of ABS data is unlikely to be representative of the site considering its use.

To encourage carpooling, assisting with understanding costs associated with individual travel, and intra-team rosters, may assist with carpooling uptake.

The Green Travel Plan lacks any detail of the existing mode share, and targets and actions to achieve those targets.

References:

- City of Sydney, Draft Travel Planning Guidelines (2020), this document provides some excellent guidelines and examples of how to prepare a green travel plan.
- Example for a hospital :
<https://randwickcampusredevelopment.health.nsw.gov.au/getattachment/Transport/Transport-and-Access/2019-08-Green-Travel-Plan.pdf.aspx?lang=en-AU>

Summary and Conclusion

TTPP has undertaken a peer review of the TPIA and GTP documentation submitted with the SSD application for the redevelopment of the President Private Hospital.

Generally, based on the review it is recommended that further clarification is required as outlined by Transport for NSW and Council.

TTPP's assessment is that the traffic and transport related reports have not adequately addressed the SEARs or responded to the submissions by Sutherland Shire Council and Transport for NSW.

In particular TTPP's review is concerned that:

- Vehicle access from an arterial road has not been fully considered and has not addressed Council's safety concerns.
- The Green Travel Plan does not have measurable targets or adequate strategies. No details are provided of existing employee / visitor travel demand behaviour. Surveys of or details pertaining to existing travel behaviour would provide bench marks from which to enable the establishment of mode shift targets for appropriate travel demand measures.
- Access to public transport and suitability of public transport has not been adequately addressed.
- Cumulative impacts of the development have not been considered or future traffic conditions.
- The SEARs have not been clearly and adequately addressed.

We trust the above is to your satisfaction. Should you have any queries regarding the above or require further information, please do not hesitate to contact the undersigned on 8437 7800.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jason Rudd'.

Jason Rudd
Director