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Department of Planning, Housing and Infrastructure
4 Parramatta Square
Parramatta NSW 2124

18 December 2025

Dear Sir / Madam

This Response to Submission Statement relates to the transport impact assessment report. It is submitted to the Department of Planning, Housing and Infrastructure (DPHI) in support of the Response to Submissions (RTS) to the State Significant Development Application (SSDA) (SSD-82548708) for a residential flat building with infill affordable housing at 24, 26 and 28 Middle Harbour Road, Lindfield.

The Proponent has received feedback from the Department of Planning, Housing and Infrastructure (**DPHI**), Transport for NSW (**TfNSW**) and Ku-Ring-Gai Council (**Council**), following the submission of the transport impact assessment report as part of the EIS submission. The responses are identified and references are provided to show where they are addressed in this document.

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

Regards



Josh Milston

Director | JMT Consulting

MIEAust CPEng

Agency	Agency Comment	JMT Consulting Response
DPHI	As the site is located within walking distance of Lindfield Station, the number of residential car parking spaces should not exceed the Housing SEPP minimum car parking rates. Amend the proposal to reduce car parking provision accordingly and in conjunction with the other amendments requested in relation to the amendment of basement setbacks.	The updated development proposal includes 168 car parking spaces, a reduction when compared to the 190 contemplated at the time of the EIS submission. The proposed car parking provision sits between the minimum (129) and maximum (172) car parking requirements outlined in the Ku-Ring-Gai DCP. Further the parking provision is consistent with the <u>minimum</u> requirements noted in the Housing SEPP 2021 which apply to the site. The minimum car parking requirement is prescribed as a non-discretionary development standard under Section 19(2)(e) and (f) of the Housing SEPP, which if complied with, prevents the consent authority from requiring more onerous standards. Providing suitable levels of on-site car parking for residents will ensure demands can be met wholly on the site and therefore limit any overflow parking impacts on surrounding streets. Adequate car parking provision is also required to cater to the travel needs of downsizers, aging owner-occupiers and young families as public transport does not meet all the travel needs of these residents, especially for destinations not well-served by public transport. In this context the proposed level of on-site car parking is considered appropriate.
DPHI	The proposed development states it seeks approval for 32 Build to Rent (BtR) apartments. However, as less than 50 BtR apartments are proposed the provisions of Chapter 3, Part 4 of the Housing SEPP are not invoked. Therefore, the BtR car parking rates at section 74(2)(d) do not apply. Amend the car parking calculation so that the car parking rates for all BtR apartments are calculated in accordance with section 19(2)(f) of the Housing SEPP.	The amended proposal involves a reduction in the number of car parking spaces down to 168 spaces, which sits between the minimum (129) and maximum (172) car parking requirements outlined in the Ku-Ring-Gai DCP. Section 19(2)(f) of the Housing SEPP provides for (non-discretionary) <u>minimum</u> car parking rates. The proposed level of car parking for the proposal exceeds the minimum requirements when adopting the parking rates under Section 19(2)(f) of the Housing SEPP and therefore the proposal complies with this section of the Housing SEPP.
DPHI	Consider the provision of motorcycle parking to support alternative modes of transport.	Although the Ku-Ring-Gai DCP has no strict requirement for motorcycle parking, the updated development proposal includes 15 motorcycle parking spaces within the basement of the building to support this mode of transport. It is also noted that the Housing SEPP has no requirement for motorcycle parking.

DPHI

The swept path analysis indicates that Medium Rigid Vehicle (MRV) movements are likely to result in conflicts / overlap to the two-way movement of vehicles within the basement entrance ramp. Redesign the basement layout / access to address this issue or justify how these conflicts and potential safety implications can be ameliorated.

The amended basement design provides for simultaneous passing of a B99 vehicle and a B85 vehicle at all times as required under AS2980.1. This is shown in Figure 1 below.

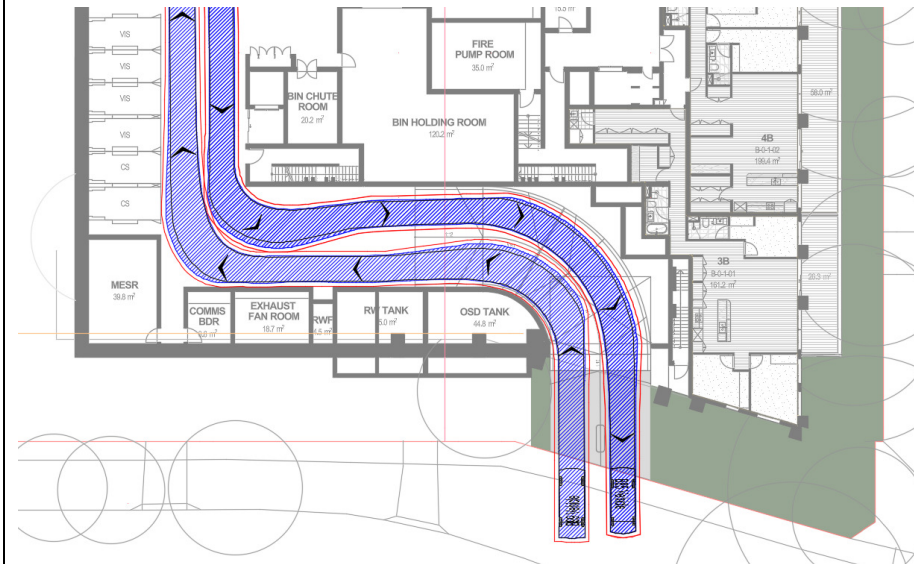
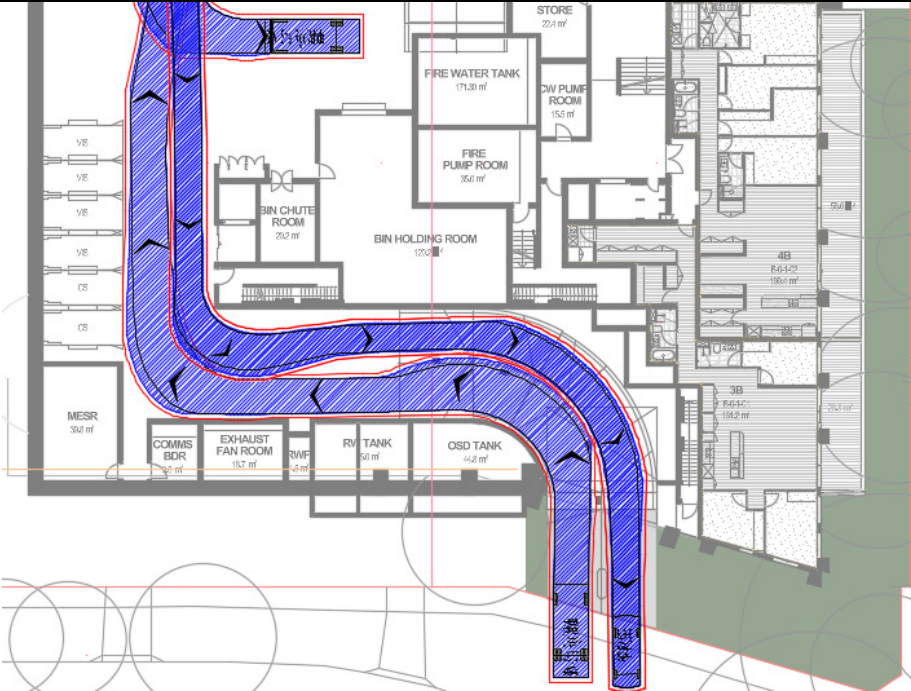
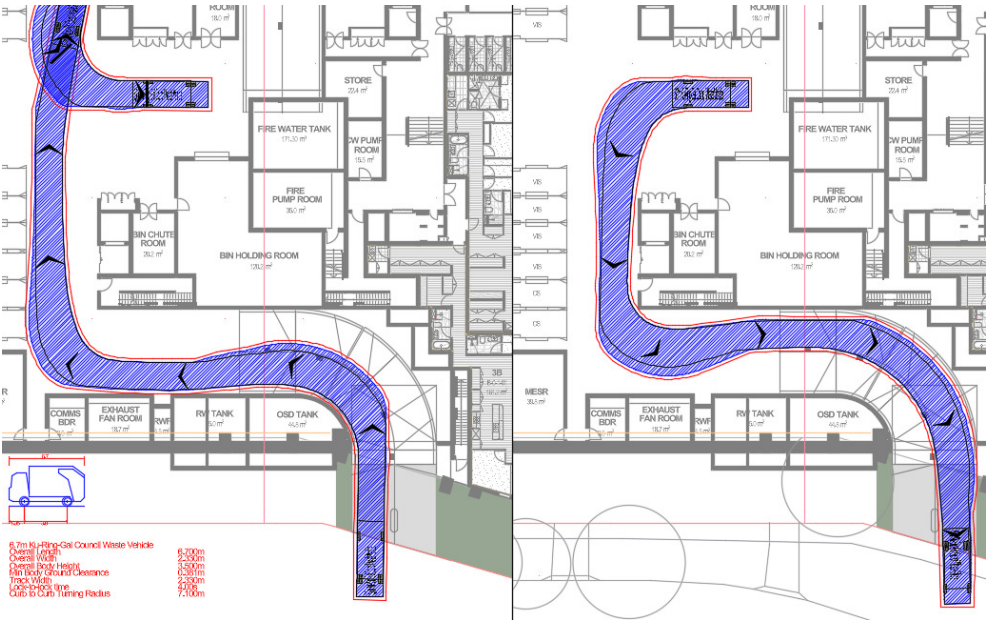


Figure 1 Swept paths – B85 passing B99

There is no Australian Standard requirement that ramps in residential developments, where the instances of heavy vehicle movements are very low, must accommodate simultaneous passing of heavy and light vehicles at all times.

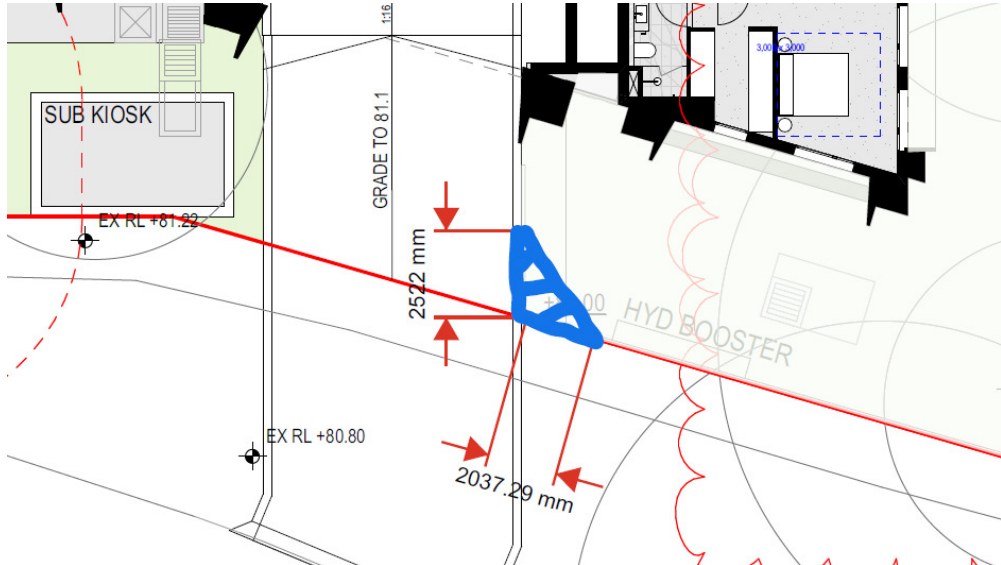
As shown in Figure 2 passing of a passenger vehicle and a Council waste collection truck is possible along the vast majority of the path of travel, with just a small section of overlap – refer to Figure 2. Importantly these vehicles can pass each other at the top of the ramp at street level.

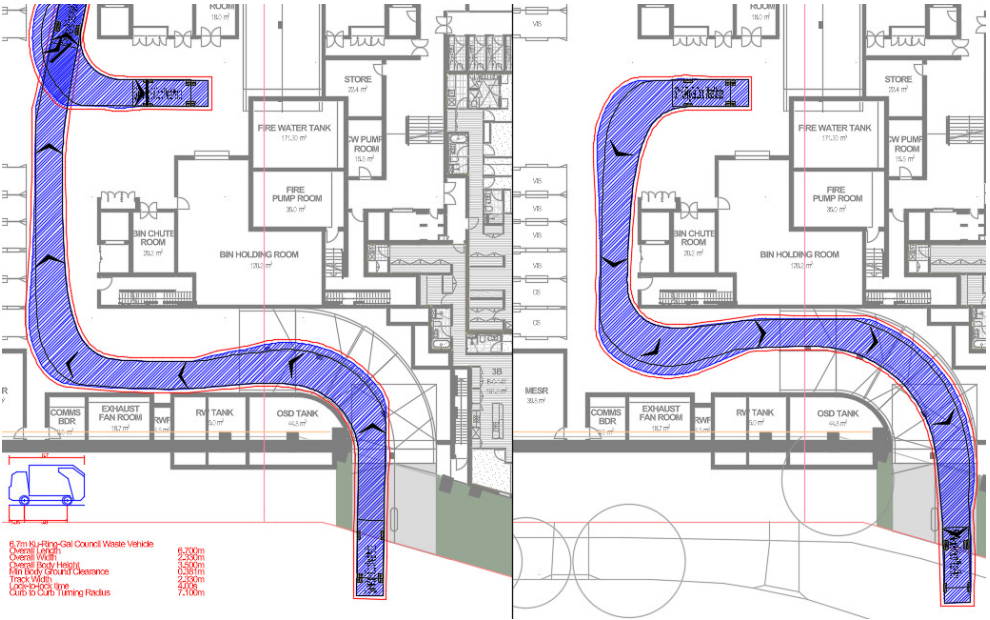
Agency	Agency Comment	JMT Consulting Response
		 <i>Figure 2 Swept paths – car passing waste collection vehicle</i> Typically situations such as these are addressed through signage and the provision of mirrors so vehicles can sight one another as they are travelling through the car park at all times. Although heavy vehicle movements will be very low, to address the submission stop lines and mirrors can be introduced at the corner of the south-western area of the basement to mitigate any concerns around vehicle conflicts. Signage would also be introduced to make drivers aware of potential oncoming traffic movements.

Agency	Agency Comment	JMT Consulting Response
DPHI	Update the basement layout plans to annotate the location of visitor, accessible and car-share parking spaces	Basement plans have been updated as requested by DPHI
DPHI	Amend the design and layout of the basement vehicle driveway, access ramp and loading dock to accommodate a minimum 6.7m long service vehicle.	The design has been amended to accommodate Council's 6.7m long waste truck, refer to swept paths in Figure 3 below  Figure 3 Swept paths – 6.7m Council waste truck
DPHI	The EIS repeatedly refers to the provision of 'ambulance and mini-bus' parking at basement level (e.g. EIS p58 and p116). Confirm whether this is proposed	This was an error in the EIS, no ambulance or minibus parking is proposed as part of the development

Agency	Agency Comment	JMT Consulting Response
DPHI	Clarify why the Traffic Report did not consider the impact on the Pacific Highway / Strickland Avenue intersection.	This intersection is located over 400m from the subject site. By the time vehicle movements to/from the site are dispersed across multiple traffic routes the extent of additional traffic movements through the Pacific Highway / Strickland Avenue intersection arising from the development would amount to less than 5 vehicles per hour. This extent of traffic movements would have a negligible impact on the operation of this intersection. No concern was raised by either Council or Transport for NSW in relation to the operation of this intersection as part of their respective submissions to the EIS.
Council	Clarification needs to be provided as to the location of the visitor car parking spaces	This is now indicated on the updated architectural plans
Council	Clarification needs to be provided as to the location of the accessible visitor car parking space	This is now indicated on the updated architectural plans
Council	It is unclear if there is practical access for residents to the on-site Loading Area to collect larger parcels or groceries from, or if there is any communication or access between the Loading Bay and residents. A Loading Area and Deliveries Management Plan would be required so that there is coordination between the loading dock and home deliveries/groceries etc.	The loading area has been redesigned / replanned to allow for more efficient access for residents to access any parcels or groceries, available from a nearby goods lifts. All residents will be provided with information from the building manager when they move into the premises as to the correct procedures and paths of travel to access the loading dock. A more detailed loading plan can be prepared closer to the time of initial occupancy which will incorporate measures investigated during the detailed design period of the project.

Agency	Agency Comment	JMT Consulting Response
Council	- At least 2 car parking spaces on Basement Level 1 are to be reserved for car share operation, with no charge to the car share operator to use the space/s. - The spaces must be available/accessible to verified members of the car share scheme (including members who are not residents of the development) and should be well-lit with safe pedestrian access. - These spaces must be contracted to an operator (a Car Share Provider that has been approved by the Responsible Authority) with evidence of agreement submitted to Council prior to issuing of the Occupation Certificate. - Car share vehicles must be operational within 4 weeks of issue of the Occupation Certificate - The agreement must ensure appropriate insurance and vehicle maintenance is in place, including public liability. - Since car share spaces are located in the basement, sufficient cellular communications connectivity must be available at the location of the carshare spaces to ensure proper car share management/operation. - The map in the Green Travel Plan showing car share spaces in the area should also include reference to car share vehicles on-site.	Although the Ku-Ring-Gai DCP has no strict requirement for car share, the updated development proposal includes 2 car share spaces within the basement of the building on lower ground level. These spaces will be available/accessible to verified members of the car share scheme (including members who are not residents of the development) and are to be well lit with suitable pedestrian access. Further details around the car share scheme including the appointed operator will be provided to Council prior to the initial occupation of the development.
Council	EV readiness is to be provided for all car parking spaces within the development	Enabling infrastructure for electric vehicles (100% of all parking space) are to be provided in accordance with the relevant requirements of the NCC

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Council	The 2m x 2.5m sight triangle at the access point as per AS2890.1 is to be provided	The design makes provision for the driver sight triangle as required under AS2890.1, refer to markup below 

Agency	Agency Comment	JMT Consulting Response
Council	Provision is to be made for an on-site loading area (a separate hardstand area is not permitted). The position of the loading area must not prevent access to and from the basement level car park, with at least one travel lane to be maintained at all times while loading/unloading takes place on the driveway. At least one on-site loading space is to be provided to cater for a minimum 6.7 m long service vehicle. The loading space/s should be line marked and/or signposted as a designated loading area. This may require the entry driveway to be redesigned to accommodate the on-site loading area.	The design has been amended to accommodate an on-site loading area capable of accommodating Council's 6.7m long waste truck, refer to swept paths in Figure 4 below. The loading space will be line-marked and signposted to ensure it is used by authorised vehicles only.  Figure 4 Swept paths – 6.7m Council waste truck
Council	'No Parking' restrictions for 6 metres on either side of the driveway are to be implemented prior to occupation. The proponent is to make an application to the Ku-ring-gai Traffic Committee for approval of the parking restrictions. Council's fees and charges for referral to the Ku-ring-gai Traffic Committee and installation of signs are to be paid by the proponent.	Noted

Agency	Agency Comment	JMT Consulting Response
Council	The lifts and lobbies are to be of a suitable size such that residents can transport their bicycles between their storage area and ground/street level, without using the internal car park ramps	Noted, these are currently shown as 2.5m wide which is sufficient to allow for residents to wheel their bicycles.
Council	The visitor bicycle parking facilities are to be relocated to somewhere near the pedestrian entry area shown on the Ground level plan	Visitor bicycle parking has been relocated to the ground floor in a visible location to respond to Council's feedback.
Council	The ramp from street level to the entry forecourt/entry lobby should be of a suitable size such that visitors can transport their bicycles between street level and the entry area where visitor bicycle parking facilities are to be located	The ramp is approximately 1200mm wide which is sufficient for visitors to wheel their bikes to the allocated bicycle parking.
Council	An indicative construction traffic management plan is to be submitted (required under Council's DA Guide). Plan to show the largest vehicle to be used entering and exiting the site for the demolition, excavation and construction stages, stockpiles and all necessary tree protection fencing. Consultation with the project arborist is recommended. Traffic engineer can include a discussion within the traffic report.	A preliminary construction traffic management plan (CTMP) was included within the transport impact assessment submitted as part of the original application. This preliminary assessment included details of the largest vehicle expected to access the site, site access routes and paths of travel on the broader road network. A more detailed CTMP will be prepared prior to the commencement of construction when more details are known and following the appointment of a contractor. This detailed CTMP will be prepared in consultation with Ku-Ring-Gai Council.
TfNSW	TfNSW has reviewed the EIS and has no requirements as the proposed development is unlikely to have a significant impact on the classified road network	Noted