

Transport Engineering

REF: N168210

DATE: 18 December 2020

Han's Sydney Pty Ltd
c/- Touchstone Partners Pty Ltd
Suite 1, Level 8, 92 Pitt Street
SYDNEY NSW 2000

Attention: Tracy Hoven (Project Director)¹

Dear Tracy

RE: 338 PITT STREET, SYDNEY – RESPONSE TO STAKEHOLDER SUBMISSIONS

This letter has been prepared in response to stakeholder submissions seeking further information in relation to the proposed mixed-use development at 338 Pitt Street, Sydney.

Correspondence received includes the following:

- City of Sydney (CoS) letter to China Centre Development Pty Limited, dated 14 September 2020¹
- Transport for New South Wales (TfNSW) letter to David Zabell, CoS²
- Sydney Metro letter to CoS, dated 10 August 2020³

This letter should be read in conjunction with the 338 Pitt Street Transport Assessment (transport report) prepared by GTA Consultants dated 25 March 2020⁴.

As part of the response to submissions process, the project team has proactively responded to a range of queries of which transport is a key component. As a result, this response considers the revised architectural plans and information that will form part of the broader response to submissions. Overall, the following has been achieved:

- the quantum of service vehicle parking spaces has increased
- the quantum of residential accessible parking has increased
- the quantum of retail parking has decreased
- car share spaces have been reallocated to the lower ground level for ease of access by the general public.

The submitted Development Application (DA) and revised scheme that forms the response to submissions are summarised in Table 1.

¹ Request for amended plans and further information – SSD 10362 (D/2020/610) 338 Pitt Street, Sydney, 14 September 2020

² Development Application for 324-330 Pitt Street, Sydney NSW 2000 (D/2020/610)

³ State Environmental Planning Policy (Infrastructure) 2007 S4.55(2) Modification Application – D/2016/1509/A 338-348 Pitt Street, Sydney, Request for additional information, 10 August 2020

⁴ 338 Pitt Street, Transport Impact Assessment, GTA Consultants, 25 March 2020

Table 1: Overview of submissions

Description	DA submission	Revised architectural plans	Net change from DA submission
Service vehicle bays	11	21	+10 spaces
Retail parking spaces	39	20	-19 spaces
Residential accessible spaces	19	89	+70 spaces

The responses in this letter reflect updates to the parking analysis as they relate to the revised architectural plans. Queries in relation to the quantum of parking, loading demand, design requirements and the preparation of sustainable travel plans and management plans have also been addressed.

City of Sydney

15. The development proposes 470 car spaces on site, including the maximum number of residential spaces, 39 retail car spaces and 10 car spaces for the adjoining Telstra site. This is a significant increase in car parking compared to the existing provision on site and runs counter not only to the City's objectives for car parking in the CBD, but to the first recommendation of the Traffic Report at Section 8.3 to encourage sustainable forms of transport: limiting on-site parking provision. This quantum of parking is rarely used and is expensive in the CBD to build adding to the cost and time of construction. The City will not allow commercial carparking to be operated. A number of hotel and residential towers with parking in the past are looking for alternative uses of the under used space. We recommend that the parking be reduced by half to around 235 spaces.

While this comment is noted and the points made recognised, it is important to note that application of the maximum parking rates detailed in LEP 2012 is permissible as part of the proposed development. It is also recognised that the LEP 2012 parking rates are (suitably) low when compared with other metropolitan CBD locations in LGAs across metropolitan Sydney.

The proposal meets the LEP requirements for residential parking noting the proposal includes a total of 377 spaces for 592 apartments. This equates to around 36 per cent of apartments without a car space. This is appropriate for the type and quality of residential apartments the development will offer and in the CBD location. Naturally, sustainable travel (through an implemented green travel plan) will also encourage reduced daily travel by private car, though not necessarily strictly in-lieu of parking per se.

The applicant would naturally have completed detailed assessments, including cost-benefit and there is no intention to include commercial car parking as part of the development. Reducing residential parking to 235 spaces would result in about 60 per cent of apartments not having access to a parking space. This is considered a significant under provision for the target market and having regard to the points detailed above.

16. Insufficient information has been provided regarding the provision of parking for Telstra within the site. Please provide further information demonstrating how the provision of car parking for a neighbouring use not forming part of the application site meets the controls under Part 7, Division 1 of the Sydney LEP 2012.

Please refer to Appendix G Report on Easements submitted with the SSDA, and separate memo prepared by Touchstone Partners outlining the current easement arrangements and proposed arrangements for the proposed development.

17. The reduction in service parking is considered unjustified with respect to the failure to provide the required number of loading spaces. The development is required to provide between 18 and 21 loading spaces in accordance with Schedule 7 of the Sydney DCP 2012 (there are inconsistencies between the SEE and transport report regarding the gross floor area of certain uses). Consistent with the City's and RMS's objectives, the provision of on-site loading and servicing spaces is a higher priority than that of private car spaces. While the number of car spaces on site is recommended to be reduced, a number of spaces within the basement could be reallocated for loading and servicing.

As part of the response to submissions process, the basement plans have been refined to include an additional 10 service bays in the lower ground floor car park for use by smaller more regular deliveries by cars, vans and utes. The bays have been designed with a minimum width of 2.7 metres, allowing for additional space to load/ unload with convenient connections possible via lifts to the ground floor. This will limit the need for short-term loading to occur in the loading dock itself, while also significantly increasing the loading dock capacity and more exclusive use by larger service vehicles operating under a formal dock management system.

A loading dock management system is to be implemented to further enhance the efficiency and day to day use of the basement loading dock. This is common for such developments in CBD locations and ensures appropriate operations with minimal impacts. Any longer stay maintenance requirement etc. by cars, vans and utes will be required to use the service bays on the lower ground floor.

On-street loading is typically favoured by smaller faster turnaround deliveries, however the relative ease of accessing lower ground level bays and ease of connection to ground level will further encourage use of the on-site facilities. This further mitigates any such impact on on-street loading in the vicinity.

Loading Demand Assessment

The service vehicle parking requirements for different development types are set out in DCP 2012 and applied to the development in Table 1.

Table 2: DCP 2012 service vehicle parking requirements

Use	Size	DCP 2012 Parking Rate	Parking Requirement
Residential	592 apartments	1 space for the first 50 dwellings plus 0.5 spaces for every 50 dwellings or part thereafter	7
Retail	5,123m ²	1 space per 350 m ² GFA, or part thereof, up to 2,000m ² then 1 space per 800m ² GFA thereafter	10
Hotel - Bedrooms	158 rooms	Min. 1 space per 50 hotel rooms up to 100, then 1 space per 100 hotel rooms (>100)	3
Hotel – reception/ barista and lounge/ breakfast	321m ²	Min. 1 space per 400m ² of reception, lounge, bar, restaurant area GFA	1
Total			21 spaces

The transport assessment considered the mix of land uses, loading demands of these uses and time of day demands to arrive at an appropriate loading area to facilitate all proposed uses. The land uses

would naturally share the loading bays and a detailed dock management plan prepared prior to occupation. This is common in Sydney CBD and appropriate having regard to the proposed uses.

DCP 2012 also states *“for mixed use developments, the total number of service vehicle spaces is to be calculated on a pro rata basis of spaces required for the relative proportions of different uses within the building”*.

“The total requirement identified in [Table 1] above may be reduced for developments with GFAs in excess of 50,000sqm where it can be demonstrated to the satisfaction of the consent authority that: (a) the proposed uses are complementary in terms of servicing demand; and (b) at least one space per tenancy for business owners is provided.”

DCP 2012 has not been based on an empirical assessment of loading demands, having regard to the expected needs of the proposed uses and ability for a mix of land uses to share the same loading bays. A first principles assessment to appreciate the real or ‘practical’ loading demand of the proposal is set out in the following section.

Residential

The predominant form of ongoing deliveries to the residential apartments are likely to be in the form of supermarket and other e-commerce deliveries. It is noted that the site is very well located for provision of these services in local retail and supermarket offerings.

GTA research on the frequency of supermarket deliveries for residential apartments in CBD locations revealed no credible data sources. However, with the site located close to a number of nearby supermarkets (including Woolworths Town Hall 420 metres to the north), it is expected that on-line supermarket deliveries will be relatively infrequent, with traditional in-store and ‘click and collect’ purchases likely to be more convenient and thus common.

Notwithstanding, for the purposes of this assessment, GTA has assumed that 10 per cent of residents purchase groceries via a home delivery service each week. For 592 apartments, this equates to approximately 60 apartments generating one home delivery per week; representing eight to nine home delivery services per day (on average). Assuming half of these home deliveries are either consolidated for the apartments within the site and/or other deliveries for nearby apartments, it follows that about five additional home delivery vehicles may be generated by the residential apartments per day. For e-commerce deliveries, GTA has further assumed that six additional vehicles movements per day are generated (this represents an arbitrary and highly conservative assumption).

In addition, the average residential apartment turnover rate is approximately 0.2 per cent of all apartments in any given week. Conservatively assuming a rate of 0.5 per cent to account for seasonal variations and given the proposed 592 apartments, there would be an average of three apartments moving in or out in any given week.

Overall, this assessment suggests that around 11 loading events per day could be generated by the residential component. Removalist trucks would be limited to 8.8m long MRVs.

Retail

GTA’s database of loading demand indicates that speciality retail stores typically receive an average of 0.5 deliveries per day per tenant. The development proposes up to 27 tenants and hence would likely result in 13 deliveries per day. Applying a 25 per cent contingency results in up to 15 deliveries per day. These would mostly be by small trucks and vans/ utes etc.

Hotel

Loading activity for the hotel would mostly be limited to general hotel deliveries (e.g. deliveries of stock/ guest consumables/ marketing collateral etc.), as well as linen service and boutique laundry services (dry cleaning etc.). With this in mind, GTA has assumed that the hotel would generate a demand of up to five deliveries per day.

Maintenance and waste

Occasional maintenance vehicles will also need to service the site with an assumed demand of one maintenance vehicle per day.

Up to two waste collection vehicles are likely to service the site per day, noting again that this is highly conservative.

Summary

Based on the analysis above, the development could be expected to generate up to 34 loading events per day.

In this regard, the provision of eight loading bays in the basement one loading dock (excluding provision of three spaces for Telstra), which are to be shared by the residential, retail and hotel land uses is considered appropriate for the development. This requires each bay to accommodate four to five deliveries per day. Assuming the dock is operational for 10 to 12 hour per day, this requires each bay to service no more than two to three deliveries per hour. This would clearly be able to be easily managed.

Furthermore, the development will not be reliant on any on-street loading, which may not be available in the future. Such activities represent a convenience only while the on-street zones remain available.

The revised architectural plans realise a significant increase in on-site loading capacity, with smaller vehicle loading demand readily able to occur in the lower ground floor car park and not within the basement loading dock. Notwithstanding, it is expected that the loading dock itself would be sufficient to accommodate all loading demands generated by the development.

18. As previously discussed, this large site has the potential to provide a super dock serving surrounding buildings which do not have off street loading and servicing, such as heritage buildings. This should be developed with some thought to an appropriate management plan. A statement and accompanying sections are to be provided demonstrating that the City's waste trucks can access the loading area.

The proposed loading dock for the development includes servicing requirements for all uses on the site. The development also accommodates 11 dedicated service vehicle bays available for the use of the commercial building to the north at 320 Pitt Street. In addition to the loading dock for this user are waste handling and storage facilities with direct undercover access to their foyer and lifts. Safe separated access to the end of trip facility for the occupants of 320 Pitt Street is also provided.

Overall, a minimum 31 service vehicle bays are provided to serve almost all the southern portion of the block.

During design development, discussions were held and exhausted with the owners of 255 Castlereagh Street to incorporate immediate or future access to their basement. This solution would have removed vehicles from Dungate Lane. Unfortunately, discussions were terminated by the neighbour. However, access could be re-investigated during detail design, if appropriate.

Whilst Council has provided little detail as to what they envision in a super dock, in considering the possibilities we note the following:

- Delivery drivers/ courier using the basement of 338 Pitt Street would be required to cross public roads carrying/ wheeling goods to service the surrounding buildings.
- Delivery drivers/ courier would need to traverse the publicly accessible ground floor areas of 338 Pitt Street and footpaths surrounding the site. This is not an ideal solution from a safety perspective or in keeping with the quality of development intended by the proponent.
- There are a number of new developments proposed on the blocks surrounding 338 Pitt Street. From a safety and equity view, we consider that parking for service and delivery vehicles is best accommodated on the block that they are serving.
- There is also no statutory requirement for the development to consider adoption of a super dock.

The site access ramp and basement loading dock has been designed in accordance with relevant standards. Council's 9.25 metre long garbage truck has been accommodated and is the largest design vehicle.

19. Providing car parking spaces for people with disability in accordance with the City's controls is a high priority. It is recommended that the development is amended to provide 89 accessible car spaces for residents (one car space for every adaptable unit) and accessible visitor spaces in accordance with Schedule 7.8.5 of the Sydney DCP 2012.

As part of the response to submissions process, the basement plans have been refined to include one accessible car space for every adaptable apartment (a total of 89 residential accessible spaces). The site is in Category A area and as per Clause 7.5 (2) of the Sydney Local Environmental Plan 2012, visitor parking is not required. As such no visitor parking, either standard or accessible, is included in the proposed development.

20. There is also a concern with the high provision of retail parking on site when considered against Schedule 7.5.1 of the Sydney DCP 2012. The site is highly accessible from alternative, sustainable transport modes, and should actively encourage visitors to use these options, regardless of whether they are 'high-end' customers.

As part of the response to submissions process, the basement plans have been refined to reduce the quantum of retail parking by 19 spaces, from 39 to 20 spaces. While it is not common for developments in Sydney CBD to include on-site retail parking, the proposal strikes a positive balance given the intended high end retail offering. The provision of 20 retail spaces for around 10 to 15 such retailers equates to between one to two spaces per tenant.

Each space would be operated on a booking system hence the retail spaces would not function as a typical publicly accessible car park. It is also intended for a boom gate to be provided between the retail car park and porte cochere to ensure access to the car park is restricted and easily managed. No general public access will be permitted to the basement car parks.

21. The driveway crossover should be reduced in width – its current width will adversely impact the safe and efficient passage of pedestrians on Pitt Street. The crossover is to be reduced in size having regard to Section 3.11.11 of the Sydney DCP 2012.

The development proposes to consolidate all vehicular access into the basement via a single access driveway on Pitt Street in the north-west corner of the site. This would realise the removal of five existing driveways from the site frontages and construction of one. Provision of a single driveway crossover to accommodate all site generated traffic would represent a significant improvement over existing conditions and certainly better than a proposal that may include more than one crossover. This improves the public domain and pedestrian amenity generally.

Given Pitt Street is also one-way northbound, all vehicles would turn right on entry and right on exit. This results in the crossover of vehicles when entering and exiting. While this is not ideal, it is also not uncommon in CBD locations where there are a greater proportion of one-way streets. Such access arrangements result in the need to facilitate trucks and cars in the same access, with sufficient width to allow the passing of entering and exiting vehicles at the access point.

GTA prepared vehicle swept paths as part of the submission. This included 8.8-metre long MRVs, with updated swept paths included in Attachment 1. As shown, the driveway currently provides for two vehicles to appropriately pass however is not recommended to reduce the driveway crossover width any further than that documented.

Transport for NSW

It is requested that the applicant be conditioned to prepare a Transport Access Guide, in consultation with the Sydney Coordination Office within TfNSW, for staff, clients and guests prior to the issue of the Occupation Certificate.

It is recommended that the applicant be conditioned to prepare a detailed GTP in consultation with the Sydney Coordination Office within TfNSW prior to the issue of the Occupation Certificate. The GTP needs to include target mode shares for both staff, residents and guests with the objective to reduce the reliance on private vehicles, as part of the ongoing operation of the development.

The GTP must be implemented accordingly and updated annually to ensure sustainable transport outcomes and achieve the overall strategic planning objectives in the Future Transport 2056.

It is requested that the applicant be conditioned to prepare a Loading and Servicing Management Plan for the review and endorsement of the Coordinator General, Transport Coordination within TfNSW, prior to the issue of any Construction Certificate.

It is requested that the applicant be conditioned to prepare a Passenger Pick-Up and Set-Down Management Plan, in consultation with the Sydney Coordination Office within TfNSW, prior to the commencement of any work on site.

It is requested that:

- *Any changes to design of Dungate Lane and new pedestrian paths should take into consideration the future use of Castlereagh Street; and*
- *The applicant locates bicycle facilities in secure, convenient, accessible areas close to the main entries incorporating adequate lighting and passive surveillance and in accordance with Austroads guidelines.*

It is requested that the applicant be conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with the Sydney Coordination Office within TfNSW, prior to

the issue of any Construction Certificate or any preparatory, demolition or excavation works, whichever is the earlier.

These comments are noted and agreed.

Sydney Metro

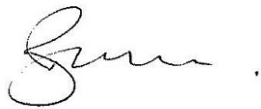
It is noted that there was an inconsistency between the basement level information within the proposal package for the concurrent SSD Detailed Design Development Application (D/2020/610) submitted. A number of technical documents provided for D/2020/610 referenced 4-level basements while other documents indicated 5-level basements. However, the Modification Report (dated 18 June 2020) prepared by Ethos Urban Pty Ltd does not include basement information nor does it explicitly seek to propose an additional basement level within the proposed scope of works. As such, clarification is required.

GTA has documented four levels of basement parking, one basement level loading dock, and one basement level porte cochere for drop off/ pick up activities.

I trust this provides the information you require. Naturally, should you have any questions or require any further information, please do not hesitate to contact me on (02) 8448 1800.

Yours sincerely

GTA CONSULTANTS



Rhys Hazell
Director

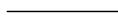
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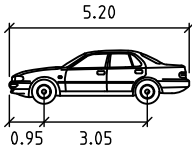
Attachment 1: Vehicle swept paths

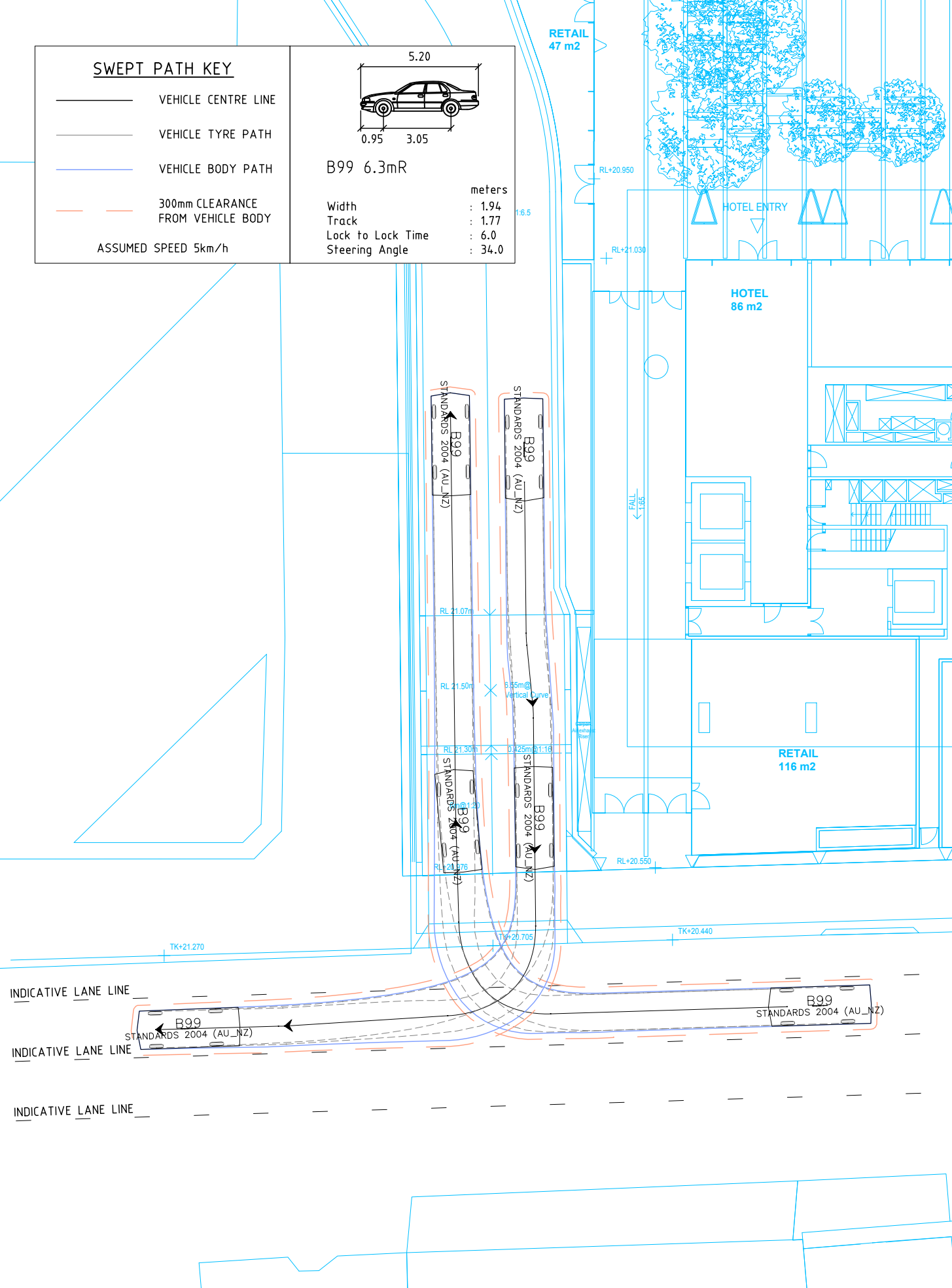
ATTACHMENT 1

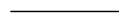
Vehicle swept paths

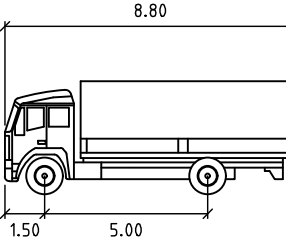
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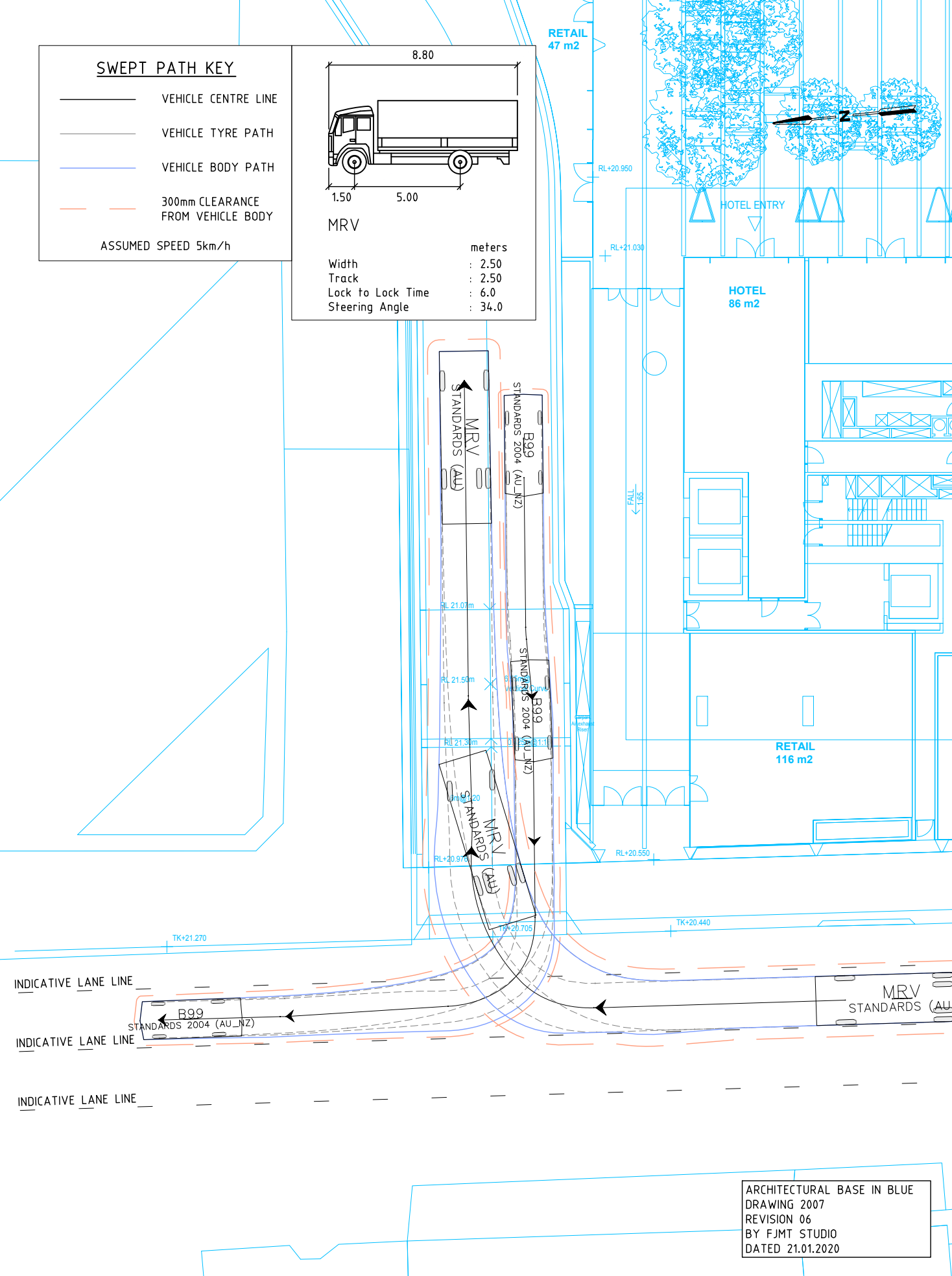
SWEPT PATH KEY	
	VEHICLE CENTRE LINE
	VEHICLE TYRE PATH
	VEHICLE BODY PATH
	300mm CLEARANCE FROM VEHICLE BODY
ASSUMED SPEED 5km/h	

	
B99 6.3mR	
Width	: 1.94 meters
Track	: 1.77
Lock to Lock Time	: 6.0
Steering Angle	: 34.0



SWEPT PATH KEY	
	VEHICLE CENTRE LINE
	VEHICLE TYRE PATH
	VEHICLE BODY PATH
	300mm CLEARANCE FROM VEHICLE BODY
ASSUMED SPEED 5km/h	

	
MRV	
Width	: 2.50 meters
Track	: 2.50
Lock to Lock Time	: 6.0
Steering Angle	: 34.0



ARCHITECTURAL BASE IN BLUE
DRAWING 2007
REVISION 06
BY FJMT STUDIO
DATED 21.01.2020



Melbourne 03 9851 9600
Sydney 02 8448 1800
Brisbane 07 3113 5000
Adelaide 08 8334 3600
Perth 08 6169 1000

PRELIMINARY PLAN
FOR DISCUSSION PURPOSES ONLY
SUBJECT TO CHANGE WITHOUT
NOTIFICATION

WARNING
BEWARE OF UNDERGROUND SERVICES
THE LOCATIONS OF UNDERGROUND SERVICES ARE
APPROXIMATE ONLY AND THEIR EXACT POSITION
SHOULD BE PROVEN ON SITE. NO GUARANTEE IS
GIVEN THAT ALL EXISTING SERVICES ARE SHOWN.

DESIGNED
R.ZHANG

DESIGN CHECK
R.HAZELL

APPROVED BY
R.HAZELL

DATE ISSUED
2 OCTOBER 2020

SCALE
A3 0 1.25 2.5 5 1:250

CAD FILE NO.
N168211-01-P1.DWG

388 PITT STREET, SYDNEY

GROUND FLOOR
VEHICLE SWEEP PATH ASSESSMENT

DRAWING NO. N168211-01-01

SHEET 01 OF 01

ISSUE P1