

Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy St
Parramatta NSW 2150

4 December 2025

Dear Sir/Madam

**Re: Forest Lodge Integrated Seniors Living (SSD-75493483)
– Response to Submissions**

Introduction

This document has been prepared by JMT Consulting to support the Response to Submissions (RTS) for the Forest Lodge Integrated Seniors Living (SSD-75493483) project. The document provides responses to the traffic related comments provided in the key issues letter provided by the Department of Planning, Housing and Infrastructure (DPHI) dated 4 November 2025. Additionally responses are provided to traffic comments raised by City of Sydney Council.

This document should be read in conjunction with the transport impact assessment report dated 26 June 2025 prepared by JMT Consulting in support of the project application.

Context

In considering the traffic comments raised in DPHI's key issues letter it is important to recognise the existing site conditions of the subject site. The existing site comprises a three storey commercial building containing approximately 100 car parking spaces. Traffic surveys undertaken in March 2025 indicated during peak hours the site generates over 50 vehicles per hour.

The site is currently operated as a busy commercial office operating from 7am to 6pm 5 days per week. There are approximately 170 staff who attend the office every day as their main place of work. Staff members frequently leave the site throughout the day via car and taxi service to attend meetings in the Sydney CBD and throughout the Sydney metropolitan area. In addition external business associates attend the site for meetings throughout the day in addition to delivery drivers.

The proposal to convert the site to a seniors living development involves a reduction in the number of car parking spaces from approximately 100 to 78 spaces – a 22% reduction. Further, given the nature of the site use, expected traffic movements during peak hours are expected to fall by over 70% compared to current conditions. The reason for the reduction in traffic generation is as follows:

- The proposal results in more than a 20% reduction in physical car parking spaces on the site. Fewer car parking spaces equates to reduced levels of traffic movements.
- Workers travelling to a commercial building (i.e. current site use) do so in a very concentrated period of time and in the busiest periods of the road network – i.e. 7am-9am and 4pm-6pm.
- In contrast Seniors Living uses mostly generate traffic outside of the commuter peak hours, typically between 10am – 4pm. Traffic movements by residents of Seniors Living developments are generally infrequent, with most residents undertaking trips on a discretionary basis outside of the busy road network period.

Therefore the proposed development will reduce traffic movements on surrounding streets and contribute to an improved traffic environment for the area. Overall the nature of a commercial office will provide for a much greater intensity of use of the site than a seniors housing development, and this is supported by the traffic analysis assessment.

It is also important to note that both City of Sydney Council and Transport for NSW reviewed the application and raised no concerns in relation to traffic movements and impacts.

Response to Submissions

DPHI Comment	Response
<p>Noting the number of submissions raising traffic and parking impacts, please provide further consideration and justification for any potential impacts on traffic and parking provision on Junction Street, including further consideration of:</p>	<p>See responses below</p>
<p>a. the narrow streets, some of which function as a single lane due to on-street parking on both sides of the road</p>	<p>Traffic surveys demonstrate that Junction Street carries relatively low traffic flows which is commensurate with the adjacent road environment. The development will reduce the number of vehicles travelling along local streets which will relieve traffic pressures on surrounding streets</p>
<p>b. restrictions preventing traffic from exiting Junction Street onto Bridge Street, effectively creating a dead-end for northbound traffic</p>	<p>Current turning restrictions are noted with no changes to existing conditions proposed. Traffic modelling confirms this intersection operates at a very good level of service. Vehicles may access the site from other routes if required including St Johns Road and Ross Street. Given the constraints of Junction Street, the design has placed the loading dock on Larkin Street which is better suited to accommodate Council's large waste truck and other large delivery vehicles.</p>
<p>c. potential impacts during peak times for vehicles accessing and exiting the site</p>	<p>Traffic impacts have been assessed and deemed to be acceptable. It is noted the development would result in a reduction in peak hour traffic generation when compared to existing conditions of 85% in the morning peak hour and 71% in the afternoon peak hour – thereby providing for an improved road network outcome</p>
<p>d. potential for residents or visitors to use on-street parking, which is already constrained.</p>	<p>Limited reliance for on-street car parking is anticipated. 78 car parking spaces are proposed which are considered adequate to accommodate expected demands within the site. City of Sydney Council have recommended the parking provision should be further reduced, confirming that Council have no concerns with any flow on impacts to street parking.</p>

City of Sydney Council Comment	Response
<p>Given the location of the site and the availability of alternative transport options, the provision of car parking should be reconsidered and further reduced. The car parking rates for residential flat buildings under clause 7.5 of Sydney LEP 2012 should be adopted, including the provision for visitor parking spaces.</p>	<p>The proposal includes 78 car parking spaces which is six less relative to the non-discretionary parking rates noted in the Housing SEPP 2021. The proposed level of car parking is considered suitable to accommodate the needs of future residents and guests. The parking rates under Clause 7.5 of the Sydney LEP are related to private residential accommodation and are not applicable to this development. Regardless, even if these rates were applied, a maximum of 74 parking spaces could be provided which closely aligns with the 78 spaces proposed for the site.</p>
<p>Car share parking spaces should also be provided as suggested by the submitted Traffic Impact Assessment to provide alternatives to private vehicle ownership.</p>	<p>A car share space is included as part of the updated design package.</p> <p>There are also numerous public car share spaces surrounding the site on nearby streets. The availability of these spaces would be communicated to residents and staff.</p>
<p>The parking rates for aged care staff indicated by the Housing SEPP is appropriate and should be maintained.</p>	<p>Noted</p>
<p>The different types of parking spaces must be clearly identified on the architectural drawings. The applicant is also encouraged to review the car park layout to ensure compliance with AS2890.</p>	<p>The car parking layout has been configured to achieve compliance with AS2890. It is anticipated there will be a consent condition requiring the preparation of a traffic certificate confirming compliance with the relevant AS2890 suite of standards prior to the issue of a construction certificate for the site. The updated design package also includes notation of the different types of parking spaces.</p>
<p>The location of the ambulance parking should be reconsidered. The proposed location is disconnected from the residential care units and does not appear to be easily accessible in an emergency.</p>	<p>This item is addressed separately as part of the overall design response. The ambulance bay as nominated is capable of being accessed suitably, with updated vehicle swept path analysis provided in the revised transport impact assessment report. The design of the ambulance bay complies with relevant requirements including width and clearance height. If required ambulances will also be able to utilise the on-site loading dock.</p>

Please contact the undersigned should you have any questions in relation to this advice.

Regards



Josh Milston

Director | JMT Consulting

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