

11625
8 March 2012

Michael Woodland
Director - Metropolitan and Regional Projects South
NSW Department of Planning and Infrastructure
23-33 Bridge Street
SYDNEY NSW 2000

Attention: Thomas Fitzgerald

Dear Michael,

**SECTION 75W MODIFICATION TO COSTCO AUBURN (MP 09_0184) - HOURS OF OPERATION
17-21 PARRAMATTA ROAD, LIDCOMBE**

On behalf of Costco Wholesale Australia Pty Ltd we write to request the Minister (or his delegate) modify Project Approval MP 09_0184 under Section 75W of the *Environmental Planning and Assessment Act 1979* as described below.

This letter seeks to revise the original modification application submitted to the Department of Planning and Infrastructure (DPI) on 7 November 2011. This revised modification proposal seeks to amend the existing hours of operation of the retail warehouse, to allow for additional trading hours of 8:00am to 9:00pm Monday to Sunday (7 days) and respond to the request for additional information from the DPI on 18 November 2011.

The modification is accompanied by the following documents:

- Revised Traffic and Parking Report, prepared by Henson Consulting dated 5 March 2012 (**Attachment A**);
- Opening Period Traffic Plan and Management Plan (OPTPMP) prepared by Halcrow MWT, dated 30 June 2011 (**Attachment B**); and
- Request for Additional Information, email dated 18 November 2011 (**Attachment C**).

1.0 BACKGROUND

On 7 April 2010 the Minister for Planning approved a Concept Plan (MP09_0102) for the use of a Costco Wholesale Retail Warehouse building, Australian Regional Headquarters and associated works at 17-21 Parramatta Road, Auburn. The Planning Assessment Commission subsequently granted consent for a Project Application (MP09_0184) for the construction of the building on 23 April 2010.

A Section 75W modification was approved on 13 July 2011 to permit the occupation of the Costco Regional Headquarters Office portion of the development for a short period of time under an interim Occupation Certificate prior to the completion of the Costco Retail Warehouse and the subsequent issuing of a final Occupation Certificate for the development. On 21 July 2011 the Costco Wholesale Warehouse began operation.

This latest Section 75W amendment application was lodged at the DPI on 7 November 2011, and correspondence was subsequently received from the assessing Officer (Thomas Fitzgerald) on 11 and 18 November 2011 seeking additional information.

1.1 Description of Modification

The proposed modification seeks to amend Condition F3 – Hours of Operation to allow longer trading hours for Costco, which is likely to result in a greater spread of patrons over the hours of operation

1.2 Reason for Modification

The proposed amendment to operating hours is requested to allow the Costco store to operate earlier in the morning, in line with ‘standard hours’ for commercial and retail premises, and continue to operate later in the afternoon/evening to service the high demand from customers and members.

Costco seek to extend their trading hours based on a commercial decision and their higher than expected level of trading.

1.3 Modification to Condition F3

We seek the wording of Condition F3 to be deleted and reworded as follows:

F3 – Hours of Operation

The hours of operation for the retail component of the use shall be restricted to between 8:00am to 9:00pm Monday to Sunday. Deliveries and restacking of the premises are permitted to operate on a 24 hour a day, 7 days a week basis.

2.0 PLANNING ASSESSMENT

2.1 Traffic and Parking

Prior to opening, Costco was not able to fully understand or account for the trading patterns of the Sydney region and whilst a comparison of the Docklands Costco store (Melbourne) was considered as part of the Project Application, the Sydney store has seen greater turnover and volume, as well as a weighting of heavy trading during the evening hours, consistently since opening. These trading patterns and numbers have been consistently higher than could have been accounted for.

2.2 Revised Traffic and Parking Analysis

Following correspondence from the DPI, Halcrow MWT has undertaken additional traffic analysis to assess the impacts of the proposed extension of operating hours on the surrounding road network. This report is included at **Attachment A**.

Halcrow engaged in discussion NSW Roads & Maritime Services (RMS) and on 16 January 2012 a letter was issued to RMS that set out the preliminary findings of Halcrow’s traffic analysis of the amended opening times.

Following the submission of the letter, Halcrow discussed the results and findings with the RMS and it was agreed that Halcrow continue to prepare a Traffic Assessment Report for inclusion with this submission.

Accordingly the revised Traffic and Parking Report (**Attachment A**) considers the existing traffic conditions and travel patterns, and provides an assessment of the potential impacts of the proposed opening hours.

Halcrow note that as part of the original traffic assessment for the Part 3A application, Thursday evening and Saturday midday were assessed and identified as the peak traffic periods. From their

review of the proposed hours, they considered that the opening of the store at 8:00am would only require assessment as this effectively advances the hours of trading into the commuter peak hour of 8:00am – 9:00am, and the extension of hours to the evening was not necessary.

The traffic analysis included detailed traffic surveys of all intersections that were considered as part of the original Part 3A application as well as the eastbound left slip lane entry to the basement carpark and eastern loading dock exit. These surveys included full turning counts during the morning peak (7:00am to 10:00am). In addition, forecast traffic generation during the morning hours were calculated based on the existing Costco operational information and current survey data.

From the traffic surveys, as well as the forecast traffic volumes anticipated for patrons and staff, the data indicates that the future morning network peak will be during 8:00am and 9:00am, at which time the total traffic generation would be 630 vehicles, consisting of:

- 91 primarily Costco Regional Office staff trips
- 539 customer/some Costco Warehouse Staff

In light of the above figures, Halcrow undertook a SIDRA analysis of the surrounding intersections at the morning peak (8:00am). **Table 1** below identifies the level of service and average delays for the surveyed intersection for the existing and the future traffic flows.

Table 1 - Existing and Future SIDRA Results at 8:00am

Existing and Future SIDRA Results at 8:00am				
Parramatta Road Intersection with:	EXISTING		PROPOSED	
	Ave. Delay (sec/veh)	Level of Service (LoS)	Ave. Delay (sec/veh)	Level of Service (LoS)
Silverwater Rd-St Hilliers Rd	39	C	47	D
Alban Street	3	A	3	A
Day Street	4	A	4	A
Costco Access - (w Nyrang St)	12	A	15	B
John Street	29	C	31	C
Hill Rd – Bombay Street	48	D	47	D

As shown in the **Table 1** above, the intersections of Parramatta Road with Alban Street, Day Street, John Street, and Nyrang Street operate at a good level of service. However, the Parramatta Road intersection with Silverwater Rd-St Hilliers Rd result in a marginal increase in average delay and a reduction in level of service from C to D, however the Parramatta Rd intersection with Hill Rd – Bombay St reduces the average delay by 1 second but does not alter the level of service (i.e no impact). The results above ultimately result in a marginal increase in average delays and in some cases, corresponding levels of service (i.e no impact).

Overall it is considered that against the existing conditions:

- the proposal would generate an additional 539 trips during the 8-9am morning peak hour, taking the site's total traffic generation to 630 trips during this period;
- SIDRA analysis of the surrounding road network indicates that all intersections within the study network would continue to operate satisfactorily with Levels of Service of D or better; and
- the detailed SIDRA results for the Costco Access intersection indicate that all forecasted 95th percentile queues would be accommodated within the available existing queuing space; and

For these reasons the proposed extension to the operating hours do not create additional adverse impacts on the road network.

2.3 Ongoing management

In order to further manage traffic during busy trading periods (such as Christmas) the Opening Period Traffic Plan and Management Plan (OPTPMP) has been reviewed by Halcrow and is considered to be appropriate for the ongoing operation and following implementation of extended trading hours. The OPTPMP is included at **Attachment B**.

2.4 Response to additional information request

The further information requested by the DPI (**Attachment C**) is set out in **Table 1** and our response to each request is set out accordingly.

Additional Information Request (DPI)		Response
1	<ul style="list-style-type: none"> Provide an updated traffic assessment that details the current issue. 	<ul style="list-style-type: none"> A Traffic and Parking Report has been prepared by Halcrow MWT (Attachment A) that describes the current situation.
	<ul style="list-style-type: none"> Provide an assessment of alternative options to alleviate the problem (including investigating an adjustment to the operation of the carpark - without altering the store hours - to allow vehicles in prior to the store opening), and projects traffic impacts based on a recommended solution. 	<ul style="list-style-type: none"> Alternative options were not considered as the hours of operation were not being amended as a means to alleviate traffic impacts.
	<ul style="list-style-type: none"> Prepare the traffic assessment in consultation with the RTA as they have previously expressed concern over the ingress/egress arrangements for the site. Provide evidence of this consultation must also be provided. 	<ul style="list-style-type: none"> The Traffic and Parking Report was prepared by Halcrow in consultation with the RMS (previously known as the RTA). Correspondence is described within their report (Attachment A).
2	A copy of the OPTPMP to be provided and an analysis of projected traffic volumes, operational details.	<ul style="list-style-type: none"> A copy of the OPTPMP is attached at Attachment B. A review of this Report by Halcrow considers that the measures will adequately cater for the site following implementation of the extended trading hours. The measures set out will be implemented during all busy trading periods.
3	Provide evidence of compliance with condition E2 (e.g. certified copies of the civil design plans) and any other relevant conditions of approval relating to operational traffic management on-site.	<ul style="list-style-type: none"> These plans were required for the issuing of an Occupation Certificate prior to Costco commencing operation. They are not considered to be a relevant matter for consideration in determining this application.
4	Provide a detailed justification for the changes proposed.	<ul style="list-style-type: none"> Justification for the proposed extension of operating hours is included in Section 1.1.
5	Describe any other flow-on impacts that could result from an extension of the operating hours of the site.	<ul style="list-style-type: none"> A Traffic and Parking Report has been prepared by Halcrow MWT (Attachment B) that considers the impacts. See Section 2.2.
6	Provide other relevant approvals e.g. liquor licence that specifies trading hours, relevant <i>Roads Act 1993</i> approval.	<ul style="list-style-type: none"> These details are not considered relevant to this application.

3.0 CONCLUSION

The Project as proposed to be amended by this modification application will be the same as the approved Project, amending only the hours of operation of the Retail Warehouse component. The proposed modifications have no environmental impact beyond those issues considered and are deemed acceptable under the original project approval (MP09_0184).

Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or at sgouge@jbaplanning.com.au.

Yours faithfully

A handwritten signature in blue ink that reads "Stephen Gouge". The signature is written in a cursive, flowing style.

Stephen Gouge
Urban Planner