

05 October 2022

TfNSW Reference: SYD22/01053/01

Client Reference: SSD-35609161

Director
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Suzannah Byers

**EXHIBITION OF EIS FOR MIXED USE DEVELOPMENT IDENTIFIED AS GQ
PARRAMATTA – 12 HASSALL STREET, PARRAMATTA**

Dear Suzannah Byers,

Reference is made to the Department's correspondence dated 01 August 2022, requesting Transport for NSW (TfNSW) to provide comment in response to the notification of the Environmental Impact Statement (EIS) regarding the abovementioned development.

TfNSW has reviewed the information provided and requests the following matters be addressed prior to the Response to Submissions:

1. Additional details are required to be provided within the Traffic Impact Assessment Statement including modelling for future year scenario, and a reassessment of the submitted swept path analysis which required to be returned to TfNSW as part of the response to submissions.
2. It is advised that there are several construction projects, including Parramatta Light Rail and Sydney Metro West, that are likely to occur at the same time as the proposed development within the precinct, contributing to cumulative baseline traffic and future traffic. As such, it is requested that the Traffic Impact Assessment be updated to incorporate:
 - Modelling for base and future year scenarios
 - SIDRA network modelling for key intersections
 - There is a lack of detail regarding the modelling assumptions. Given the size and location of the proposal TfNSW recommends that appropriate data, assumptions and SIDRA modelling be undertaken and the EIS updated accordingly. Any modelling will be required to demonstrate that the existing road network and the Parramatta Light Rail (PLR) will not be adversely impacted by the development and must reference future year sceneries and background traffic growth
 - identification of suitable mitigation measures and/or infrastructure required to ameliorate any traffic impacts and safety impacts associated with the development

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3. TfNSW requests Sidra modelling files should be provided for review.
4. The Green Travel Plan is required to be updated to align with the submitted Traffic Impact Assessment and the matters discussed below with Attachment 1; and
5. TfNSW requests that a Travel Access Guide (TAG) be prepared as part of the GTP and included as a separate appendices (with an actual proposed TAG) that is updated in Appendix 21 – Green Travel Plan. The TAG should include the following:
 - Provide information about cycling, walking and public transport initiatives to encourage the use of sustainable transport journeys by residents and workers using the site.
 - Provide promotion of end of trip (EoT) facilities, including any new cycling infrastructure available, and update number and location of bicycle parking and EoT facilities.
 - Provide information on car share, car-pooling and priority parking for people that car pool or car-share particularly for regional workers.

TfNSW provides further comments at Attachment 1 to be addressed by the proponent prior to the Response to Submissions.

Should you have any questions, please do not hesitate to contact Mr. James Douglas at email development.sydney@transport.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Zhaleh Alamouti".

Zhaleh Alamouti
Senior Land Use Planner

Attachment 1 – Additional Commentary

a. Environmental Impacts

Should any works be required as a result of the proposed development within the road reserve areas the environmental assessment for the project will need to consider their environmental impacts of these works. This is to allow the consent authority to consider the environmental impacts of these works, including traffic and road safety impacts as well as other impacts such as noise, heritage, impact to the community, etc. It will be a matter for consent authority to determine if any further consultation is required for any specific matter or impact.

b. Internal Manoeuvring and Swept Path Analysis

The vehicle swept path analysis in the Traffic and Parking Assessment report prepared to support the proposed development application shows swept path conflicts between a garbage truck and B85 vehicle during simultaneous travel within the ramp between Ground Level and Basement Level 1. A swept path analysis has not been provided at the development site access on Hassall Street, making it unclear if this issue also exists at the location of the site access.

Further, the vehicle class of the garbage truck used in the swept path analysis is unclear. It is also unclear if B85 vehicles are able to enter and exit the development site simultaneously at the location of the site access as no swept path analysis has been provided for B85 vehicles at the site access.

It remains unclear if vehicles of other vehicle classes would be able to enter and exit the development site simultaneously and travel within the ramp between Ground Level and Basement Level 1 also simultaneously, without swept path conflicts, including B99, Small Rigid Vehicle (SRV) and Medium Rigid Vehicle (MRV) as no vehicle swept path analysis has been provided for such vehicles classes.

A vehicle swept path analysis has also not been provided for vehicles entering and exiting the “drop off” area for the valet parking simultaneously on Basement Level 1M, as well as entering and exiting the valet parking spaces.

It is advised that Hassall Street is heavily used by bus services accessing the Parramatta interchange on Argyle Street from the Charles Street bus layover and that vehicle swept path conflicts within the development site have the potential to cause vehicle queueing on Hassall Street and impacts to bus services.

The design should ensure that vehicles of vehicle classes B85, B99, SRV, MRV and “garbage truck” are able to enter and exit the site simultaneously, including vehicles of the same vehicle class (e.g. B99 entering and exiting the site simultaneously) and different vehicle class (e.g. B99 entering the site and MRV exiting the site simultaneously). The design should also ensure that the five (5) aforementioned vehicle classes are able to travel within the ramp between Ground Level and Basement Level 1 simultaneously, including vehicles of the same vehicle class and different vehicle class;

The vehicle swept path analysis must be updated to demonstrate nil swept path conflicts for all onsite vehicle manoeuvres. The swept path analysis should also demonstrate that vehicles are able to enter and exit the “drop off” area simultaneously and within the valet parking area without any swept path conflicts. It is also requested that the applicant clarify the vehicle class of the garbage truck used in the swept path analysis.

c. Proposed loading and service vehicle parking

The Traffic and Parking Assessment report states that the development would include one (1) loading dock vehicle space to accommodate a full sized garbage truck and two (2) light vehicle service/delivery parking bays.

It is advised that:

The applicant has not adequately demonstrated that the proposed loading dock (including the service/delivery vehicle parking bays) has capacity to adequately accommodate the loading/service vehicle demand of all land uses of the development (including long dwell time vehicles) through consideration of the development’s freight and servicing profile, including the forecast loading/service vehicle traffic volumes by vehicle size, frequency, time of day and duration of stay;

TfNSW’s forecast of the proposed development’s freight and servicing activity identifies that the provision of (1) loading dock vehicle space to accommodate a full sized garbage truck and two (2) light vehicle service/delivery parking bays would not adequately accommodate the loading/service vehicle demand of the development and that loading/service vehicles of various vehicle classes are forecast to support the development, including B99, SRV and MRV vehicles;

Provision of on-street parking zones for loading/service vehicles within the vicinity of the site is minimal. These parking zones cannot be guaranteed as there are many competing demands for kerbside space with kerbside restrictions set to suit the wider community needs and transport network requirements and are subject to change;

Insufficient loading and service vehicle parking within the loading dock would have the potential to impact bus operations, as well as contributing to traffic congestion within the Parramatta CBD from loading/service vehicles circulating through the CBD to find parking locations;

It is requested that the applicant undertake the following as part of the Response to Submissions:

- Provide details of the development’s freight and servicing profile, including the forecast freight and servicing traffic volumes by vehicle size, frequency, time of day and duration of stay for all land uses of the development;
- Provide loading and service vehicle parking within the subject site that adequately accommodates the forecast demand of all land uses of the development (including long dwell time vehicles) so as to not rely on the kerbside restrictions to conduct the development’s business, including parking bays capable of accommodating B99, SRV and MRV vehicles;
- Demonstrate that the swept path of the garbage truck does not conflict with the internal walls and supports of the development; and

- Provide light vehicle service/delivery parking bays within the development that are of a minimum B99 vehicle class.

d. Proposed drop off area and valet parking spaces

The Traffic and Parking Assessment report and architectural drawings identify that a “drop off” area and two valet parking spaces are proposed on Basement Level 1M. TfNSW advises the following:

- It is considered that the location of the “drop off” area located off the vehicle ramp between the development site entry on Hassall Street and Basement Level 1 and adjacent to the curvature of the vehicle ramp may lead to vehicle collisions within the site due to poor sightlines for vehicles turning into and out of the “drop off” area;
- It is not clear how the “drop off” area and valet parking spaces would operate;
- It is not clear how the “drop off” area and valet parking spaces would be managed to minimise queuing into the vehicle ramp and development site access;
- The requirement for a “drop off” area and valet parking spaces within a predominantly residential development is not clear; and
- Any queuing on Hassall Street from the operation of the “drop off” area and valet parking and/or vehicle incidents at the entrance to the “drop off” area, has the potential to impact bus services on Hassall Street.

As part of the Response to Submissions, it is requested that the applicant undertake a road safety audit for the design and operation of the “drop off” area and valet parking spaces and that any necessary design and operational changes to the “drop off” area and valet parking spaces be made to mitigate any identified road safety impacts.

It is also requested that the applicant provide details on the requirement for the “drop off” area and valet parking spaces, how they are proposed to be operated, and how they would be managed to minimise queuing into the vehicle ramp and development site access.

e. Indented on-street parking bay

The architectural drawings prepared to support the development application retain the existing indented on-street parking bay along the development site’s Hassall Street frontage. It is advised that retaining the indented parking bay does not produce a good pedestrian outcome, with pedestrians needing to weave in and out due to the changing alignment of the footpath on both sides of the development site.

Further, it is advised that this area should have a high place function prioritising the movement of pedestrians due to its location at the junction of the Parramatta CBD Commercial Core, Parramatta Interchange, adjacent Western Sydney University Engineering Innovation Hub, expanding high density mixed-use development (including the subject development) and green space at Robin Thomas Reserve which is increasingly being used by CBD workers. Widening the pedestrian footway in the location of the indented parking bay would provide greater capacity for pedestrian activity.

It is requested that the applicant remove the existing indented on-street parking bay along the development site's Hassall Street frontage and widen the pedestrian footway in its place as part of the proposed development.

f. Green Travel Path

Car Parking: TfNSW recommend further reducing the amount of carparking from 175 car park spaces in Appendix 22 Traffic Impact Assessment (May 2022) proposed as this will further encourage car driving as a preference, and reduce any incentive to harness other more sustainable modes, consistent with [Future Transport \(nsw.gov.au\)](https://www.nsw.gov.au/future-transport) in which Travel Demand Management (TDM) is one of TfNSW top priorities. This is particularly the case given the site's proximity the Parramatta Rail Station, plethora of bus services, and future light rail stops and Sydney Metro train services in the vicinity of the site. These reduced car parking spaces should be updated in the GTP done in February 2022.

Bicycle Parking and End of Trip (EoT): In the Revised Traffic and Parking Reassessment Report dated May 2022, TfNSW appreciates that increased bicycle parking is to be provided for residents (214 bike parking spaces) and asks that this be updated in the GTP (Appendix 21) TfNSW also asks that the bike parking and EoT facilities advised here also be updated in the Green Travel Plan. TfNSW also recommend that End of Trip facilities (EoT) are provided for the commercial uses. A good supply of quality EoT and bicycle parking is considered to further encourage walking and cycling mode shares. TfNSW recommend that this bicycle parking and any EoT should be monitored over time to ensure sufficient supply to encourage active transport both to/from the site, for employees, residents as well as visitors. The bicycle parking should be located at the development site at convenient locations, be safe, secured and under cover. Some further guidance on bicycle parking and end of trip facilities can be found in the [cycleway design toolkit](#).

Travel Survey: TfNSW recommends that resident and visitor travel surveys each year for the lifecycle of the development. The proposed baseline survey that will be asked 3 months post occupancy should be included as a separate appendices in the updated Green Travel Plan. The surveys should include questions to ask obtain workforce resident data analysis (including resident, employee and visitor residential postcodes) to identify the actual resident and visitor travel origin and destination patterns, to inform strategies that help to reduce car parking demand for resident, employee and visitors to get to and from the site. The Travel Survey should also be promoting any initiatives or strategies that encourage sustainable transport routes.