

Our Ref: 16241

12 December 2025

Tiberius (Holroyd) Pty Ltd
30 Kings Park Road
WEST PERTH WA 6005

Attention: Rebecca Mayne

Dear Rebecca,

**RE: CRESCENT PARKLANDS
RESPONSE TO SUBMISSIONS – ADDITIONAL INFORMATION**

As requested, please find herein The Transport Planning Partnership (TPPP)'s response to the agency advice provided on 1st December 2025. This letter provides additional information to address the issues raised.

Background

Cumberland City Council has provided further Agency advice on the response to the submission. The advice was dated 1st December 2025. This letter addresses the key issues raised in terms of traffic and transport.

Responses

Responses to the specific submissions received are presented in Table 1 with a summary of the responses. Further information to address the issues raised is provided in the following letter.

Table 1: Summary of Responses

Item	Comments	Response
Parramatta City Council		
Parking & Traffic Congestion		
1	The applicant's response does not address the previous concerns raised by Council regarding the traffic impact to a road network that already is significantly congested other than noting the previous modelling works and the provision of a shuttle bus. Accordingly, Council maintains its concerns regarding the scale of the development in this area.	The scale of the development has been reduced through the rezoning process so as to address such matters such as traffic impact. This is why thresholds were imposed on the planning proposal. It is also noted that the site has been empty for a number of years but if it were redeveloped even as a commercial site, it would be at a far greater intensity than the former use. Previous work undertaken by TTPP confirmed that a residential use with linked retail/commercial would be a lower traffic generator as opposed to other potential uses (see attached letter) at the existing site.
Site Access		
2	It is reiterated that the eastern driveway is located close to the signalised intersection at Woodville Road and that outstanding safety concerns require further consideration. While the applicant has undertaken modelling demonstrating that the eastern driveway will perform adequately, design deficiencies and influence of driver behaviour has not been given sufficient consideration. In this regard, it is noted that the proposed right turn bay in Crescent Avenue is only 25m as per the SIDRA layout. This appears to be non-compliant with section 5.2 of Austroads Guide to Road Design Part 4A (2023) as it would require vehicles to slow down within the through lane prior to entering the right turn bay. This would result in a rear end collision risk. The bay should be revised such that the total length allows for deceleration to the back of queue.	We do not consider that 100m to be 'close' to the intersection. The right turn length was conservatively modelled as 25m based on the effective storage lane length shown in the design. The design plans show the right turn bay starting at chainage 50 and ending 85 total of 35m. This is consistent with a CHR(s) design which does not require the distances in Austroads Guide to Road Design section 5.2. In response, the Applicant has undertaken a detailed review of the Austroads Guide to Road Design Part 4A (2023) right-turn lane warrants, including revised traffic flow inputs and storage requirements. This further assessment confirms that a full auxiliary right-turn lane is warranted at the eastern driveway. Accordingly, the Crescent Street design has been refined to increase the total right-turn bay length from 25 metres to 52.5 metres, comprising: • 12.5 metres of storage length, sufficient to accommodate the calculated back-of-queue under design peak traffic conditions, and • 40 metres of deceleration (including 15m taper), consistent with Austroads 4A guidance for a 50 km/h operating environment. The Crescent Street corridor provides adequate longitudinal distance between the Woodville Road traffic control signals and the eastern driveway to accommodate this full auxiliary lane within the proposed road reserve, without affecting pedestrian paths, landscape zones or adjoining interfaces. The updated design:

		- meets or exceeds Section 5.2 of Austroads Guide to Road Design Part 4A (2023), - provides a compliant deceleration path ensuring that vehicles are removed from the through lane prior to slowing, - eliminates the rear-end collision risk referenced in the TfNSW comment, - provides sufficient queue storage to avoid spillback toward the Woodville Road intersection, and - materially improves the overall road safety performance of the eastern driveway. With this refinement, the design deficiency identified by TfNSW is now fully addressed, and the right-turn movement can be safely accommodated in accordance with Austroads criteria. (See additional information provided after this table)
3	With the sight line assessments provided in the updated TIA, it is unclear if this considered the proposed landscaping along the nature strip as indicated in the landscaping plans. Accordingly, the assessment should be updated to ensure that no vegetation is planted that may compromise driver sight lines.	A condition is proposed to ensure there is no potential impacts from vegetation that would compromise driver sightlines. Proposed Condition Sight lines from the driveway to Crescent Street must be maintained in accordance with the sight distance requirements shown on the Figure 5 prepared by TPP. No vegetation, including trees, shrubs or other landscaping elements, is to be planted or retained within the identified sight line areas that would compromise driver visibility. Should existing vegetation within these areas be retained, it must be pruned or managed to ensure compliance with the sight distance requirements.
4	It is noted that Council's view is unchanged in that the eastern driveway should be made left-in left-out through the provision of a median island and that the western driveway access and internal roads be updated to account for the re-assignment of traffic including heavy vehicles.	The concept of bringing most of the retail/commercial traffic and service vehicles around the residential site and around the park is a bad outcome for the amenity of the site and internal traffic flow. The separation of the commercial and residential traffic is a standard transport planning outcome.(See additional information provided after this table)
Active Transport		
5	It is noted that the applicant's response indicates active transport users can use the M4 underpass and Wigram Street cycleway to access Harris Park. However, this neglects the significant number of active transport users (especially pedestrians) that would be walking via Church Street to access Parramatta CBD, as well as key public transport routes and other employment generating activities along this corridor. Accordingly, Council maintains that the applicant has not given this critical route due consideration and that the upgrade of the Boundary Street and Church Street intersection to include the missing signalised pedestrian and cyclist phase should form part of this development.	The TIA confirms that active transport desire lines are strongest via the M4 underpass and Wigram Street cycleway, which provide a separated, legible and safer connection to Harris Park and Parramatta without requiring pedestrians to traverse the Boundary Street / Church Street intersection. On this basis, the development does not materially increase pedestrian demand at that intersection, nor does it create a safety issue that would warrant its upgrade. Given the location of the intersection in a neighbouring LGA, the absence of a demonstrated causal nexus, and the fact that the proposal already delivers substantial on-site active transport improvements and a new pedestrian bridge connection, it is not reasonable or proportionate for this development to fund or deliver a signalised pedestrian and cyclist phase at Boundary Street / Church Street.

		Accordingly, we maintain that no further works are required at this intersection as part of the SSDA.
Transport for NSW		
6	The other critical concern for TfNSW regarding the proposed development was the road safety impact of proposed eastern driveway in The Crescent. Whilst the RTS indicates that the impact of the right turning vehicles at the eastern driveway is unlikely to impact the existing traffic control signals (TCS) in terms of operational efficiency, TfNSW are of the view that the road safety issues have not adequately been addressed. In this regard, TfNSW reiterate our previous that eastern driveway should be restricted to left-in, left-out (LILO) movements only with right turn access being permitted from the western driveway only. To assist with the Applicant's staging concerns, TfNSW would be willing to accept an interim access arrangement condition that allows movements into and out of the site from the eastern driveway that would remain in place until the internal access road that links the eastern and western driveways is completed. Following the completion of the western driveway and internal access connection, the eastern driveway is to be restricted to LILO movements only.	TfNSW's comments regarding the road safety performance of right-turn movements at the eastern driveway are acknowledged. In response, the Applicant has undertaken a detailed reassessment of the auxiliary lane warrants and intersection geometry in accordance with <i>Austroads Guide to Road Design Part 4A</i>. This has resulted in a refinement to the Crescent Street design, with the right-turn bay extended to 52.5 metres (40 deceleration plus a 12.5 meters storage). The Crescent Street corridor provides sufficient width and longitudinal distance between the Woodville Road traffic control signals and the eastern driveway to accommodate the full-length auxiliary lane. This refinement significantly enhances deceleration, storage, and separation between through and turning vehicles, thereby resolving the road safety concern previously raised by TfNSW. With the updated design now: • providing a fully compliant Austroads auxiliary right-turn lane, • eliminating any risk of through-traffic conflict or queuing spillback, and • ensuring safe right-turn operation under both interim and ultimate traffic conditions, the Applicant's position is that permanent full-movements at the eastern driveway can be safely accommodated. We acknowledge TfNSW's preference for a LILO restriction in the long term; however, the updated analysis and geometric design demonstrate that the eastern driveway can continue to operate safely as a full-movement access point without adverse impact on the Woodville Road intersection or the broader network. (See additional information provided after this table)

Additional Details

Eastern Driveway Access Right Turns

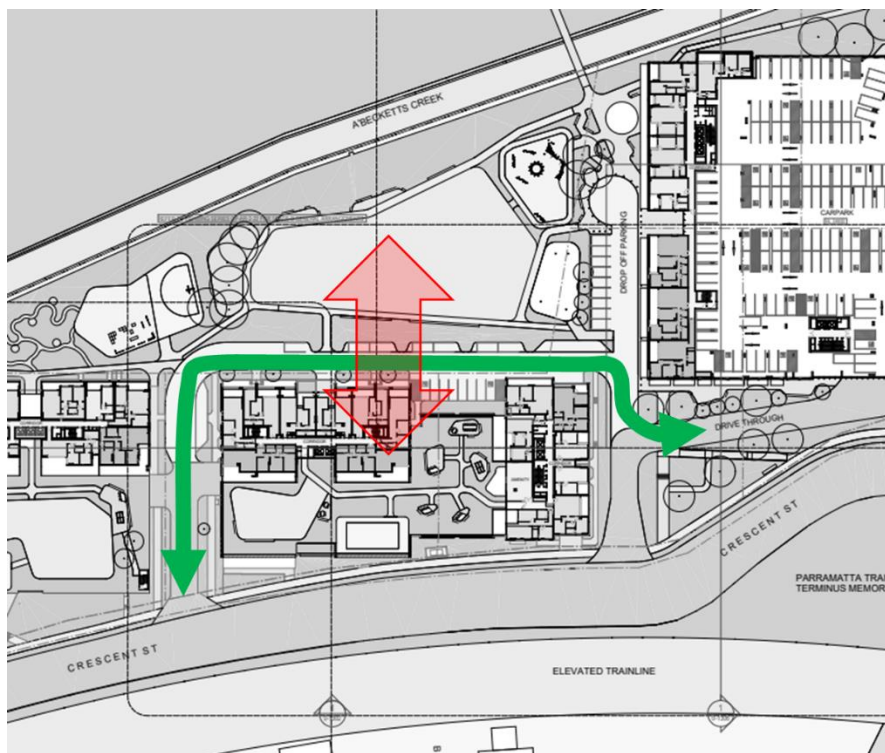
The revised scheme has maintained the right turn to the eastern access driveway for the following reasons:

- To separate commercial and retail traffic from the exclusively residential areas of the development
- Maintain a low-speed, low traffic internal road to improve the amenity of the park and connections to residential buildings in stage B and C.
- The design does not pose a significant road safety risk.

The eastern driveway provides primary access to the more intensive commercial and retail elements of the project. It is standard transport planning practice to separate these uses from the more residential areas of the development.

Preventing the right turns at the eastern access would result in the need to make the internal road two-way and be wide enough to accommodate a truck and car to pass safely. The result would be a wide roadway through the development carrying more vehicles on what was intended to be shared zone (see Figure 1)

Figure 1: Resulting Internal Road Route to Retail and Commercial



This would have an impact on the amenity of the residential stages B and C as well as the park and create more of a barrier between the residential buildings and the park lands. The current design allows for a quiet narrow one-way lane way that would support a share zone type environment.

The two-way internal road would also impact on the staging of the development should stage A be constructed first, then access would need to be maintained through the worksite to the west. This may create delays or congestion in accessing stage A during construction activities.

However, it is noted that TfNSW advice is that they would support a temporary eastern access with right turns in the interim, which suggests that the right turn may not be safety issue.

Right Turning Bay Turning Bay Dimensions

The right turn bay will be designed in accordance with the relevant Austroads guidelines. The 25m bay modelled in Sidra was for modelling purposes to account for the effective length of the bay. The original design was for a 35m as a CHR(s) in accordance with Austroads; however, a review of the warrants for turn treatments has identified that a full right turn CHR would be more appropriate at this location.

Therefore, the right turn bay is proposed to be lengthened. The length has been determined using Austroads Guidelines, specifically the Guide to Traffic Management Part 6 and the Guide to Road Design Part 4A. Through assessing the warrant and the dimensions of the bay.

Right Turn Treatment Warrant

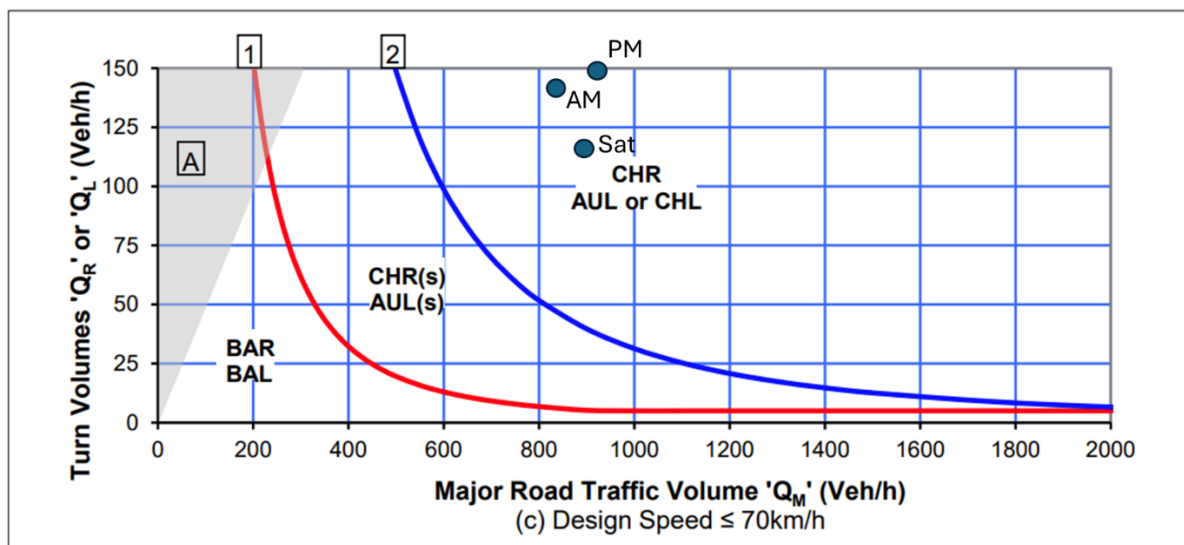
The warrant for the right turn treatment is based on Austroads Guide to Traffic Management Part 6. The warrants are based on the traffic volume travelling through and turning right.

The warrants for right turn treatments in Austroads Guide to Traffic Management Part 6 are shown in Figure 2 while the forecast volumes are presented in Table 2.

Table 2: Forecast Traffic Volumes

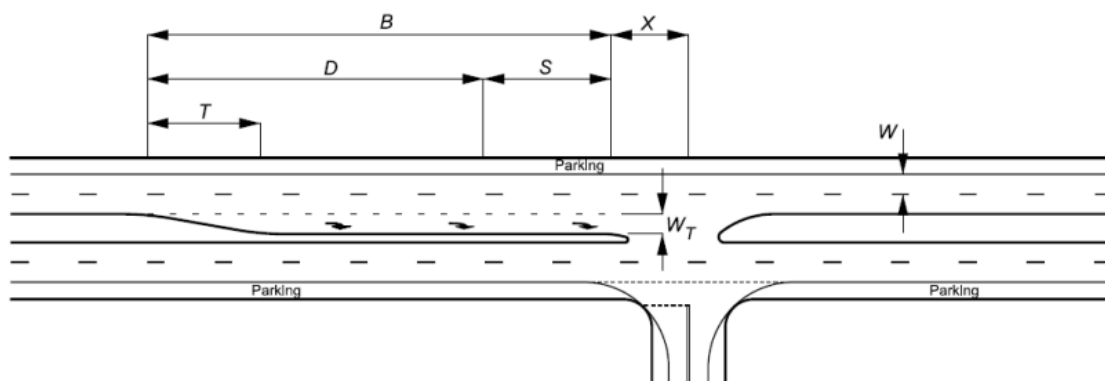
Peak Hour	Turn Volume	Major Road (Q _m)
Morning Peak	128	814
Evening Peak	150	972
Saturday Peak	115	940

Figure 2: Austroads Turn Treatment Warrants



The resulting turn treatment is a channelised right turn or CHR which is the full version of this type of turn treatment. The typical full right turn treatment is shown in Figure 3.

Figure 3: CHR Right Turn Treatment (Austroads)



The design speed for Crescent Street is based on the posted speed limit of 50km/h.

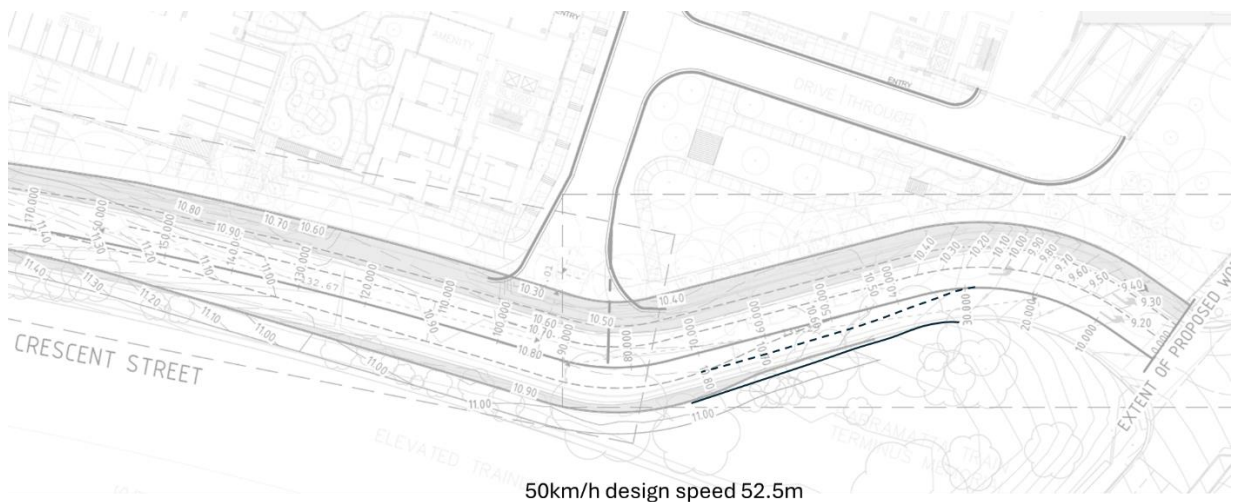
The deceleration length D is adopted from Austroads Guide Part 4A table 5.2 and for comfortable deceleration is a distance of 40m.

The storage S is based on the traffic modelling and would require storage for at least one vehicle. In this case, it would be equal to the design vehicle, a 12.5m heavy rigid truck.

The resulting turn bay would be 52.5m long. The length of the taper adopted is 15m taken from Table 5.1 of Austroads Guide to Road Design, Part 4A.

The resulting extended right turn bay is shown in Figure 4.

Figure 4: Extended Right Turn



Sight Distance

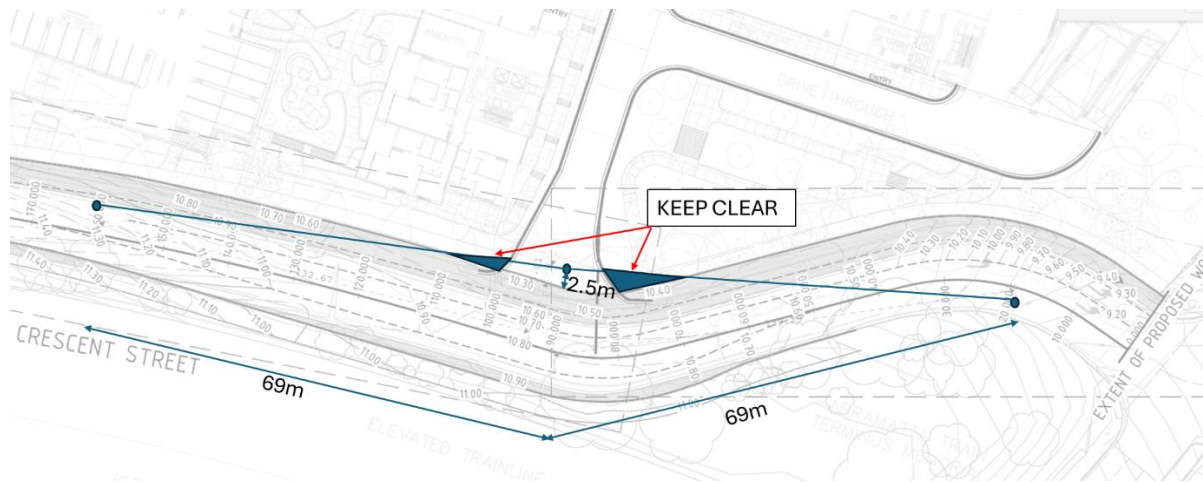
It is agreed that sight distance will be maintained in the locations identified in Figure 5, and these areas will be kept clear of any vegetation or built elements that could obstruct driver visibility. A condition is proposed to ensure ongoing protection of the required sight lines.

Proposed Condition

Sight lines from the driveway to Crescent Street must be maintained in accordance with the sight distance requirements shown on Figure 5 prepared by TPP, dated 12 December 2025.

No vegetation, including trees, shrubs or other landscaping elements, is to be planted or retained within the identified sight line areas if it would compromise driver visibility.

Figure 5: Sight distance Splays



We trust the above is to your satisfaction. Should you have any queries regarding the above or require further information, please do not hesitate to contact the undersigned on 8437 7800.

Yours sincerely,

S. Read.

Stephen Read
Associate

Attachment One

TTPP Planning Proposal Advice

Our Ref: 16241

5 December 2016

Tiberius (Holroyd) Pty Ltd
Suite 8.01, Level,
1 Castlereagh Street,
SYDNEY NSW 2000

Attention: Mr Kurt Robinson

Dear Kurt,

RE: 1 CRESCENT STREET, HOLROYD – PLANNING PROPOSAL

We are writing to you regarding your recent request that the Transport Planning Partnership (TPPP) undertake a preliminary assessment of the traffic likely to be generated by the UrbanGrowth recommendations for the above site in the context of the Parramatta Road Urban Transformation Strategy 2016 (PRUTS).

Architectus has provided TPPP with the following analysis of the likely development outcome proposed for the UrbanGrowth site and they have assumed the site is developed for the highest and best use.

- Bulky goods - 39,000sqm GFA
- Mixed use:
 - o 5200sqm GFA retail
 - o 29500sqm GFA residential (approx. 343 apartments)

(N.B. Assumptions used are that the mixed use is divided into 0.3:1 retail and 1.7:1 residential and that there would be 86sqm GFA / apartment (this was the number used for the planning proposal and equates to approx. 73.25sqm NSA per apartment)

Based upon the above yields I have calculated the “UrbanGrowth” proposal could have generated up to 1958 trips in the PM peak hour

		Weekday PM peak Traffic Generation Rate	Weekday PM Peak hour traffic generation
Bulky Goods	39000	2.7 2.7 Traffic movements per 100m2 Allow for 25% multivisiting	790
Retail	5200	15.5 Traffic movements 15.5 per 10m2	806
Residential	343	0.29 0.29 trips per peak	99
		TOTAL	1695

My assessment has been based upon the following

Bulky Goods (taken from RMS Guidelines to Traffic Generating Developments – Updated Traffic Surveys technical direction 2013)	Bulky goods retail stores Six surveys were conducted in 2009. Two of the surveys were conducted within the Sydney urban area (one electrical goods and one furniture) and four within regional New South Wales (two electrical goods and two furniture). Summary vehicle trip rates are as follows: Weekday daily vehicle trips = 17 (including 1 heavy) vehicles per 100 m² of gross floor area Weekday peak hour vehicle trips = 2.7 vehicles per 100 m² of gross floor area. (note that the morning site peak hour during weekdays does not generally coincide with the network peak hour.) Weekend day daily vehicle trips = 19 vehicles per 100 m² of gross floor area (minimal heavy vehicles) Weekend day peak hour vehicle trips = 3.9 vehicles per 100 m² of gross floor area. It is also noted that bulky goods sites generally have an area of 2000m² to 6000m² so a site with a size of 39,000m² would need to be comprised of up to 10 individual stores. Consequently, there would be likely to be an element of multi-visiting of around 25%.
Mixed Use (taken from GTA traffic report for Crescent Parklands)	Traffic generation estimates for the proposed mixed use development have been sourced from the <i>Guide to Traffic Generating Developments</i> (RMS 2002) & its supplementary technical direction (TDT 2013/04a). The following peak hour traffic generation rates have been used: ○ High density residential flat buildings – 0.29 trips per unit for AM/PM (N.B. Whilst TDT 13/04a has suggested that traffic generation could be as low as 0.16 peak hours trips when close to a railway line, the trip generation at this site is likely to be higher) ○ Retail (supermarket) – 155 trips per 1,000m² for PM using the multiple regression equation for different trade categories

The traffic report for the Tiberius Planning Proposal estimated the traffic generation for the planning proposal as outlined below.

Development Generated Traffic	Peak Hour Traffic (vehicles per hour)	
	AM Peak Hour	PM Peak Hour
Residential	544	544
Retail	217	434
Showroom	7	14
Childcare centre	49	43
Gym	54	54
Office/Medical	15	29
Total	+ 886	+ 1118
Current Industrial Site Traffic	- 35	- 34
Resultant Increase	+ 851	+ 1084

It can therefore be concluded that based upon the preliminary analysis of the PRUTS recommendations, if developed to its highest and best use, the site would result in traffic impacts some 50% greater than the Planning Proposal. (1695 for the UrbanGrowth proposal as opposed to 1118 for the Tiberius Planning proposal).

There is no certainty that RMS or Transport for NSW will support this level of additional traffic impact.

It has been demonstrated that the Planning Proposal can provide a traffic outcome (predicated upon the balance of employment and residential development) with manageable traffic impacts supported by well-considered transport solutions.

I trust the above is clear but should you require any else, do not hesitate to call.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K. Hollyoak', with a large, stylized loop at the end.

Ken Hollyoak
Executive Director