

Our Reference: **PT21104**

Gurner Group Pty Ltd
3 Goldman Lane
Double Bay NSW 2028

19 October 2022

Att: Mr Christopher Gorton

Via email: cgorton@gurner.com.au

12 Hassall Street Parramatta
Responses to Matters Raised by Transport for NSW

Further to the letter received from Transport for NSW dated 5 October 2022 of which a copy is provided in **Appendix A** of this response report, please find below a response to each issue raised. For ease of reference each issue has been repeated below verbatim with a response following.

General Comments

On the matters of investigating the traffic impacts of the proposal, it is noted that the proposed yield of the site has been assessed in terms of traffic impacts via a number of area wide traffic modelling assessments within the Parramatta CBD and surrounds. Further, the yield of this development as proposed, and the associated traffic generation has been **approved** by Parramatta City Council, Department of Planning and Transport for NSW as part of the approval of the masterplan for the site.

The area wide traffic reports which are in possession of Transport for NSW for both the Parramatta Light Rail Project and Sydney Metro West have **both** fully accounted for the redevelopment of not only this site but all known development sites within the Parramatta CBD for existing and future year conditions combined.

As both major projects are now approved for construction, the associated traffic impacts of this small peak hour traffic generation site combined with all known development sites for future years 2036 have been fully accepted by key stakeholders including Transport for NSW. It is unclear how a single site which generates in the order of **30-44** peak hour trips and the undertaking of single intersection modelling analysis can materially have an impact on the approved findings / forecast traffic conditions of the Parramatta CBD which also include the traffic impacts of major infrastructure proposals including the Parramatta Light Rail / Sydney Metro West.

Of further reference the approved planning proposal for this particular development site which now includes a site specific DCP was fast tracked and approved on the basis that the *parking provision* of the development was reduced to new lower rates now adopted for the Parramatta CBD by Parramatta City Council. These lower parking rates as agreed with Parramatta City Council have been adopted in the proposal.

Item

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.*

Response

The traffic impacts of this development have been both approved in the past as part of the masterplan approval included in the Parramatta CBD planning proposal (now approved) along with its including in the area wide modelling assessments of major infrastructure projects including the Parramatta Light Rail and Sydney Metro West.

Further, the scope and scale of the traffic assessment for this project on local intersection conditions has been previously agreed with Transport for NSW and also mirrors the approach undertaken by the now complete Western Sydney University in Hassall Street.

It is our view the traffic impacts of the low peak hour traffic generator located within a large CBD within convenient walking distance to a significant number of public transport options and personal services are not significant and further intersection counts / modelling are not required for an informed decision to be undertaken for this project to approve a yield for the site already approved previously as part of the masterplan.

Item

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*

Response

The comment that there is a lack of detail in the modelling assumptions is contested.

The original traffic report clearly states the following:

- 2019 and 2022 intersection traffic volumes and modelling of existing conditions
- Traffic generation of the proposal for the AM and PM weekday peak periods
- Trip distribution of generated trips of the site
- Future intersection operating conditions at adjacent intersections as **agreed with Transport for NSW in March 2022**

Item

3. *TfNSW requests Sidra modelling files should be provided for review.*

Response

Electronic copies of the SIDRA intersection modelling files in accordance with the previous agreed modelling scope with Transport for NSW are attached to this response report.

Item

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*

Response

See comments below regarding parking provision and green travel plan components.

Item

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.

Response

As confirmed in the application, the proposal includes a Built for Rent development and not one where residents would purchase dwellings and as such turnover of occupiers within

individual dwellings would be greater than compared to those purchased privately. As such, the provision of a travel access guide to occupiers would have a short shelf life of relevance.

Whilst it is accepted in practice that preparation of a Travel Access Guide is necessary as part of a condition of consent for DA approval, in this instance provision of up to date holistic public transport information on a building basis would be preferred and remain more relevant into the future.

It is recommended that a travel access guide on a building basis form a condition of consent and that the building operator is charged with maintaining of this public transport guide ongoing.

Attachment 1

Item

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.

Response

The traffic impacts of this proposal combined with all known development to the year 2036 has been fully assessed in area wide modelling undertaken and approved for the Parramatta CBD. The local traffic impacts have been fully accounted for and modelled as part of the traffic impact assessment report. The environmental capacity of Hassall Street would not be exceeded with approval of the subject proposal.

Item

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.

Response

The above comment fails to acknowledge the provisions of the Australian Standard for Commercial Parking Facilities AS2890.2 – 2018 which specifically allows for 'occasional service' vehicles to access the site utilising the full width of driveway accesses. An 'occasional service' vehicle is defined in the Australian Standard as follows:

1.4.16

Occasional service – service nominated design vehicle less than once per day

Clause 3.2.2 – Occasional Service

Requirements for providing occasional service shall be as follows:

- (a) The vehicle shall be able to stand wholly within the site*
- (b) Reverse manoeuvres at the property boundary, if permitted by the relevant authority shall be limited to one only, either on entering or departing, and be subject to determination of both safety and obstruction to other on-street traffic. Note: The AV vehicle is the largest vehicle to be considered for reverse manoeuvres.*
- (c) The swept path plus clearances shall be accommodated within the access driveway or circulation roadway. Note: The full width of the access driveway may be used for both entering and leaving the site.*

We do not support the requirements for a ramp arrangement for a relatively small footprint site fully accommodating a large 10.7m garbage truck (as stipulated in consultation with Parramatta City Council's Waste Management Officer) and a light vehicle passing. The access by a garbage truck would occur periodically and would fall under the definition of an occasional service vehicle.

The provision for and access arrangements of the 10.7m garbage truck were developed in close consultation with representatives of Parramatta City Council. Further, the above requirement would result in a much wider (in the order of 12.5m wide) and less safe driveway width at the boundary which is not best practice provision within a high pedestrian activity area as is the case for the Parramatta CBD and noting the new Western Sydney University has now been constructed immediately adjacent.

Overall, the access arrangements for waste vehicles has been specifically designed as per the requirements of Parramatta City Council's Waste Manager and provide a balance between suitable / safe access and minimising the driveway width pedestrians are required to cross.

Appropriate internal flashing lights when garbage trucks are entering / leaving the loading dock as are commonplace in basement accessed developments within a CBD can form a condition of consent.

Item

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.

Response

The only large vehicle over and above a light vehicle / van which would access the site would include the Parramatta City Council standard 10.7m long garbage truck. Separate parking provision has been made for light vehicle / vans which may service the site and are considered the approach 'design vehicle' for a development which includes a relatively small area of commercial floorspace (gymnasium) and mainly residential dwellings.

Further, the loading dock which has been designed for Council's waste vehicle can accommodate a vehicle larger than a light vehicle if necessary.

As stated above, the width of the ramp / driveway access has adequately accommodated the largest vehicle which would access the site in accordance with the requirements of AS2890.2 with the design of the ramp ensuring clear two way access at all times for light vehicles.

As stated in the original traffic report the driveway width at the boundary fully complies with the requirements of the Australian Standard for Off Street Car Parking Facilities – AS2890.1 in terms of its width.

Turn paths of light vehicle passing at the Australian Standard compliant width driveway entry are provided in [Appendix B](#) of this report and confirm the design is satisfactory.

Item

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.

Response

The Australian Standard for Off Street Car Parking Facilities – AS2890.1 defines the minimum requirements for two way access to parking areas as follows:

3.2.2 Width requirements at low volume (Category 1) access driveways and connecting roadways

*Where the circulation roadway leading from a Category 1 access driveway is 30 m or longer, or sight distance from one end to the other is restricted, and the frontage road is an arterial or sub-arterial road, both the access driveway and the circulation roadway for at least the first 6 m from the property boundary shall be a minimum of 5.5 m wide. In other cases subject to consideration of traffic volumes on a case-by-case basis, lesser widths, down to a minimum of 3.0 m at a domestic property, may be provided. **As a guide, 30 or more movements in a peak hour (in and out combined) would usually require provision for two vehicles to pass on the driveway, i.e. a minimum width of 5.5 m. On long driveways, passing opportunities should be provided at least every 30 m.***

Reversing movements to public roads shall be prohibited wherever possible.

Clause 3.2.2 recommends two-way unimpeded access driveways should be provided where peak hour movements generated from the parking spaces served exceed 30 vehicle movements per hour. The small area in question only serves **2 spaces** for either taxi's or car share companies and would generate significantly less than 30 vehicle movements per hour. The access arrangements to these two parking spaces comply with the requirements of the Australian Standard which permits two-way traffic on narrow driveways and is considered satisfactory.

Item

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.

Response

We do not agree with the above inference that bus operations would be impacted by traffic entering the subject development.

The development does not include any boom gate control facilities to access the site and entering vehicles would be free flowing unless waiting for crossing pedestrians which would be the case for any development on any scale at the subject site.

The traffic generation of the development of up to 44 vehicles in a peak hour represents on average **1 vehicle every 1.5 minutes**. The appropriately designed compliant driveway width at the boundary

Item

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.

Response

Further to the responses above on a number of common matters, the above requirement would result in a significantly wider driveway entry (up to 12.5m wide) within a high pedestrian area of the Parramatta CBD and should not be supported on safety grounds.

The access arrangements of the site have been prepared in close consultation with representatives of Parramatta City Council and achieve a relatively narrow driveway entry width whilst fully and appropriately catering for occasional service vehicles at the site.

The design of the access / ramp arrangements are considered satisfactory and would allow for two way unimpeded access for the design vehicle (light vehicles / vans) at all times.

Item

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.*

Response

As the elements of the forecasting service vehicle demands prepared by TfNSW have not been included in the response, it is not possible to provide formal comment on these forecasts. However, we do not agree with the statement that the service vehicle parking provision of this mainly build to rent residential building is inadequate. Further, the parking provision for waste vehicles has been prepared in consultation with Parramatta City Council's Waste Management Officer of which they supported one (1) loading bay to accommodate a 10.7m waste vehicle to serve the development as a whole.

The loading dock provision and service vehicle parking of this development **exceeds the service vehicle parking approved for the adjacent Western Sydney University** which was approved with provision of only two (2) Small Rigid Truck loading bays.

As with the University of Western Sydney development adjacent, it is expected as a condition of consent the preparation of a Loading Dock Management Plan would detail the freight and servicing demands of the development, (including a booking system to manage the access of servicing vehicles). Further, to reduce vehicle congestion at the access point and vehicle waiting times it is intended that commercial deliveries will have an established time allocation to restrict the use of the loading bay.

Item

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.*

Response

To limit the impact on public parking availability in Hassall Street the development includes two (2) parking spaces for use by taxi's and car share vehicles. No vehicle valet service would be offered in this location.

As a condition of consent it is recommended that a flashing light system at the base of the ramp is installed to advise oncoming motorists that a vehicle is entering / exiting the small parking area. Such arrangements are commonplace for developments within a CBD environment.

As a further condition of consent appropriate convex mirrors can be installed at the access location to manufacturer requirements providing a further forewarning device to approaching motorists of a vehicle which may be entering / exiting the small parking area.

Item

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.

Response

The design of the car parking / access / service vehicle areas have been prepared under my guidance. I possess 29 years of experience as a traffic engineer and hold a Level 3 (Lead Auditor) accreditation for the preparation of Road Safety Audit reports with NSW Centre for Road Safety's Register of Road Safety Auditors.

It is my view that the preparation of a Road Safety Audit report for a parking area which serves only two (2) parking spaces for use occasionally by taxis / car share companies is unwarranted.

The Transport for NSW Guidelines for Road Safety Audit Practices defines the preparation of a Road Safety Audit report as follows:

A road safety audit is a formal examination of proposed or existing roads and road related areas from the perspective of all road users with the intention of identifying road safety deficiencies and areas of risk that could lead to road crashes. It does not consider crash history. It is conducted by an independent, qualified team of professionals.

The location includes a small two (2) space car park within a private development. The recommendations presented above for forewarning facilities would in my view be more than adequate to ensure safe movement of vehicles at the location.

Item

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.

Response

The removal of public on street parking within a local road environment under the care and control of Parramatta City Council is a matter for discussion between Council and Transport for NSW, not a private developer who has no carriage or control over such outcomes.

No further action is deemed necessary on this item.

Item

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) 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.

Response

As stated above, the yield / scale of the development has been previously approved by all authorities as part of the masterplan approval for the site. This approval included a reduction in applicable parking rates for the development prior to the now gazetted parking rates of the Parramatta CBD.

The parking provision complies with the requirements of the Parramatta Council DCP. The bicycle parking provision also complies with the requirements of Parramatta City Council.

The development includes high quality End of Trip facilities for occupiers of commercial areas

Item

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.

Response

As stated above the development includes a Build for Rent proposal where the building ownership remains under the control of Gurner which allows greater control of information sharing within the development to both commercial occupiers and residents.

The above could form a condition of consent for the project.

Please do not hesitate to contact myself on 0414 462247 should you require any additional information.

Yours sincerely



DEAN BRODIE

Managing Director

B.Eng (Civil) MIEAust NER

RMS Accredited Level 3 (Lead) Road Safety Auditor

RPEQ 27423

Expert Traffic Engineering & Road Safety Witness at NSW Land & Environment & NSW Supreme Court

APPENDIX A – TfNSW LETTER DATED 5 OCTOBER 2022

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

OFFICIAL

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.

APPENDIX B- LIGHT VEHICLE DRIVEWAY TURNING PATH ASSESSMENT

