
Colston Budd Rogers & Kafes Pty Ltd

as Trustee for C & B Unit Trust
ABN 27 623 918 759

Our Ref: JH/I2087/jh

5 October, 2023

Transport Planning
Traffic Studies
Parking Studies

Opal Healthcare
c/- CYRE Projects Pty Limited
Level 8, Suite 18
100 Walker Street
NORTH SYDNEY NSW 2060

Attention: Marlon Zunac

Email: marlon@cyreprojects.com.au

Dear Sir,

**RE: PROPOSED RESIDENTIAL AGED CARE FACILITY,
59-67 KARNE STREET, NARWEE**

1. As requested, we are writing regarding traffic matters raised in submissions in relation to the above development. We have previously prepared a report¹ which was submitted with the State Significant Development Application (SSD-45024776).
2. This addendum traffic document has been prepared to support the response to submissions report for the Narwee Parklands Care Community State Significant Development Application (SSD-45024776) located at 59-67 Karne Street North, Narwee. The NSW Department of Planning and Environment (DPE) placed the Environmental Impact Statement and the accompanying technical documentation on public exhibition from 14 February 2023 until 13 March 2023. During the exhibition, a total of 23 submissions were received in response to the public exhibition of the EIS. These included submissions made by state and local government agencies as well as the general public.
3. This document provides responses to matters relating to traffic and it should be read in conjunction with the EIS and all supporting documentation originally submitted with the SSDA. Table I below identifies the specific matters raised by the relevant agencies and where these matters are addressed.

¹ Transport and Accessibility Impact Assessment for Proposed Residential Care Facility, 59-67 Karne Street North, Narwee, January 2023.

Suite 1801/Tower A, Zenith Centre, 821 Pacific Highway, Chatswood NSW 2067

P.O. Box 5186 West Chatswood NSW 1515 Tel: (02) 9411 2411

Directors - Geoff Budd - Stan Kafes - Tim Rogers - Joshua Hollis ACN 002 334 296

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Table 1: Agency matters raised			
Agency	Agency reference	Comment from agency	Section reference for response
Canterbury-Bankstown Council	Letter of 13 March 2023	Truck sizes and waste collection	Paragraphs 4 to 5
		Bicycle parking	Paragraph 6
Department of Planning and Environment	Letter of 24 March 2023	Green travel plan	Paragraph 7
		Construction traffic	Paragraphs 8 to 10
		Ambulances	Paragraph 11
		Parking allocation	Paragraph 12

Council letter of 13 March 2023

- Additional information requested*

- Amend the plans to demonstrate compliance with AS2890.2 and provide swept paths for a Heavy Rigid Vehicle

Waste *The plans need to be amended to clarify the following:*

- The location of the bin collection point must allow for a Heavy Rigid Vehicle (HRV) to enter and exit in a forward direction. All movements must comply with the Australian Standard AS2890.2*
- Demonstrate a HRV can service the site without hindering traffic flow (i.e., the full length of the HRV must be contained within the loading bay while still allowing a 2-metre rear clearance and not be located within the driveway area).*
- Headroom allowances compliant with AS2890.2 for the entire travel path.*
- Swept paths need to demonstrate HRV movements in addition to the provided B85 vehicle.*

- As noted in our previous report, a loading area will be provided in the basement, suitable for rigid trucks ranging in size up to 10 metres long, for garbage collection and deliveries. 3.9 metres height clearance will be provided in all areas used by service vehicles (suitable for the largest service vehicle used by the operator, for garbage collection). Service vehicles will be able to enter and exit the site in a forward direction. Vehicle swept paths are provided in Appendix A of our previous report. The design provides for the truck described above to service the site in accordance with the Australian Standard for Parking Facilities (Part 2: Off-street commercial vehicle facilities), AS 2890.2:2018.
- The applicant uses contract waste collection and delivery vehicles which will be accommodated in the proposed loading bay. Larger vehicles, including 12.5 metre heavy rigid vehicles identified by the council, are not proposed for the development. There is therefore not a requirement to accommodate them.

Urban Design The proposed design is generally consistent with the Seniors Housing Design Guide (NSW SEPP November 2022). The residential Care Facility overall design delivers acceptable quality development outcomes that are responsive to the natural and built form context around the site.

Notwithstanding, there are outstanding issues that should be addressed prior to the Department granting development consent to the SSD Application:

- Traffic and Transport – it is recommended that the proposal provides for adequate bicycle parking spaces to promote sustainable travel choices for employees and visitors.*

6. As noted in our previous report, the proposed development is not expected to generate significant demand for travel by bicycles, as the development is a nursing home and residents will not be travelling by bicycle. Five bicycle spaces for employees and visitors are proposed on the ground level. Change rooms, lockers and shower facilities for employees are proposed in the basement level.

DPE letter of 24 March 2023

- (a) *The submitted Green Travel Plan insufficiently addresses the SEARs requirement for a green travel plan. A revised Green Travel Plan is to be submitted that adequately addresses requirements of the SEARs.*
7. The revised green travel plan is provided as Attachment A.
- (b) *The submitted Construction Traffic Management plan does not adequately consider worker parking arrangements, other construction within the area and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated. A detailed Construction Traffic Management Plan is required to be submitted meeting the requirements of the SEARs. Specifically, a focus is to be put on internal site parking in order to not impact public street parking for use of the nearby local parks.*
8. Chapter 7 of our previous report is the construction traffic management plan for the site. As noted in that chapter, construction employees will be able to park on the site and in Karne Street North, adjacent to the site. Parking in Karne Street north is unrestricted and is able to be legally used by people in the area, including construction employees. The relatively small number of employees on the site over the construction period (some 10 to 30) are not expected to have significant effects on parking in Karne Street North. As parking near Bennett Park and Wise Reserve is some distance away from the site, it is not expected to be heavily used by construction employees.

9. Aerial photographs of the area through 2022 and 2023 indicate generally low to modest use of on-street parking in Karne Street North and Arilla Avenue (in the vicinity of the parks) through the week, with substantial parking available. Construction employee parking would therefore not cause unusual issues.
10. We are not aware of other construction occurring in the area which would cause unusual issues for the subject development, or for which this development would cause unusual issues.
 - (d) *Further consideration is to be given towards the ambulance turning circle in accordance with the relevant standards in Vehicle Access Specifications – NSW Ambulance, noting the sensitive use and increased potential for ambulance attendance to the site.*
11. The ambulance swept paths in our previous report (Figure A3) are for a 7.3 metre long ambulance, the longest vehicle used by NSW Ambulance.
 - (e) *The architectural plans must be amended to accurately identify the parking spaces breakdown including allocating for visitors and staff.*
12. The amended architectural plans include these details.
13. We trust the above provides the information you require. Finally, if you should have any queries, please do not hesitate to contact us.

Yours faithfully,

COLSTON BUDD ROGERS & KAFES PTY LTD



J Hollis
Director

ATTACHMENT A
GREEN TRAVEL PLAN

Green Travel Plan

A framework for a green travel plan has been developed to identify measures to promote sustainable transport options and to encourage travel modes away from single occupant private vehicles. It adopts a transport management approach and provides a site-specific management strategy for delivering long term behavioural change and sustainable travel patterns. It outlines a range of actions and initiatives to increase travel modes such as walking, cycling, public transport, car sharing and car pooling, as well as influencing behaviours that lead to better organisational outcomes, improving environmental impacts, improving viability of public transport services and creating healthier lifestyles, while reducing adverse transport impacts on the surrounding road network. The framework ensures that employees and visitors feel safe, secure and well informed about travel to and from the site.

This framework will be used to develop and prepare the green travel plan which will be used by employers, employees and visitors travelling to and from the site. Government authorities and planning guidelines are placing increasing emphasis on the need to reduce the number vehicle trips and travel distances by car, while encouraging greater use of alternative means of non car-based travel, resulting in reduced environmental impact.

Benefits of the Green Travel Plan

The provision of a green travel plan creates a number of social, economic, environmental and health benefits for employers and employees at the site. These include:

- promoting the use of sustainable transport modes by increasing awareness of public transport routes and facilities;
- the provision of car parking reflects the site's proximity to public transport and the ability to provide alternative travel modes for employees and visitors by encouraging non car based travel;
- reducing the growth in greenhouse gas emissions will result in significant benefits for the environment as a result of reducing car based travel. The reduction in greenhouse gases will also result in improved health benefits;
- encourage healthier travel options for employees, such as walking and cycling;
- promoting the use of sustainable transport modes can provide a more affordable means of transport and provide travel cost savings;

- reducing travel time and travel costs;
- convenient transport access and high quality employment facilities creates an attractive workplace for employers and employees, resulting in greater productivity, improved health and wellbeing; and
- the implementation of a green travel plan can reduce traffic impacts and traffic congestion on the surrounding road network by reducing the number of vehicles travelling to and from the site, resulting in improved intersection operation.

Objectives of the Green Travel Plan

The green travel plan will comprise a package of measures designed to address the specific travel needs of the site. The main objectives of the plan include:

- reducing dependence on private vehicles and encourage the use of more sustainable travel modes;
- reducing the number of car trips to and from the site;
- providing facilities for employees and visitors to commute by sustainable transport modes, including walking and cycling;
- promoting public transport and car sharing;
- advising new employees of the available public transport options at the site and within the surrounding area;
- reduce the environmental footprint of the development;
- reducing congestion in the local area; and
- promoting the health benefits of active transport and create a more active social culture.

Framework Green Travel Plan

The plan will be refined in consultation with council, TfNSW, public transport operators and other stakeholders. It will include the following action strategies:

- travel planning and demand management;
- encouraging the use of public transport;
- encouraging active transport (cycling and walking);

- controlling parking provision; and
- influencing travel behavior.

Measures and action strategies to achieve the objectives of the plan include:

- Travel Planning and Demand Management
 - develop a Workplace Travel Plan. The travel plan will provide public transport information, maps, car share vehicle locations and public transport timetable;
 - management and promotion of travel plan by rewarding and encouraging those who travel actively to help develop a healthy, active culture and meet travel mode targets;
 - allow employees the flexibility to commute outside of peak periods to reduce traffic impacts and travel time, by developing flexible working hours where possible;
 - provide the option for employees to work remotely (work-from-home policies), where possible, to reduce the number of vehicles on the road and encourage teleconferencing rather than travelling to and from meetings;
- Encourage the Use of Public Transport
 - encourage the use of public transport by providing information and resources, through the development of a Workplace Travel Plan;
 - work with public transport providers to improve services;
 - promote the provision of travel passes and car share discounts to employees;
 - tenants to promote public transport as the first preference for business travel. This should be supported by employees having access to travel passes, such as Opal Cards;
- Encouraging Active Transport (Cycling and Walking)
 - implement a range of initiatives to reward and encourage employees to walk and cycle to work and to develop a healthy, active culture and meet travel targets;

- promote active transport by undertaking a Green Travel Plan event each year, such as group cycling events, NSW bicycle week and walking groups;
 - provide convenient bicycle parking and appropriate end of trip facilities for employees and visitors who walk or cycle to work. As noted above, bicycle parking spaces and end of trip facilities are proposed to be provided;
 - provision of sufficient end of trip facilities such as showers, change rooms and lockers to maximise pedestrian activity;
- Controlling Parking Provision
 - promote the use of car share facilities, such as GoGet, for employees and visitors;
 - introduce an employee car pool register to inform employees of the travel characteristics of other employees with similar travel destinations.
 - Influencing Travel Behavior
 - provision of sustainable travel packs to employees. This introduces employees to the travel plan and provides information on walking and cycling routes, and travel by bus. Contacts of the travel plan coordinator for the travel plan will also be provided. This will include the provision of a Workplace Travel Plan/Travel Access Guide.

The green travel plan will assist in delivering sustainable transport objectives by considering the means available for reducing dependence solely on cars for travel purposes, encouraging the use of public transport and supporting the efficient and viable operation of public transport services.

Monitoring and Reviewing the Framework Travel Plan

The green travel plan will be monitored to ensure that it is meeting its objectives and having the intended impact on car use and transport choices for employees and visitors. The plan will be reviewed annually through travel mode surveys (employee questionnaire surveys) and traffic and parking surveys. The plan will be updated to reflect changing circumstances and to identify which initiatives are having an impact or need to be modified to ensure appropriate travel behaviour.