

31 July 2025

Enquiries: Sunny Hong
Project No: 301351270

Third.i
53 Hume Street
CROWS NEST NSW 2065

Attention: Anna Limnios

**RE: Crows Nest Over Station Development Site B (SSD-614000212)
Response to Submissions and Additional Information**

Dear Anna

Stantec was engaged to prepare a series of documents, including a Transport and Accessibility Impact Assessment (TAIA), Green Travel Plan (GTP), Preliminary Construction Traffic Management Plan (CTMP), Vehicular Servicing Management Plan (VSMP) and a Car Parking Strategy Management Plan (CPSMP), to support a State Significant Development Application (SSD-614000212) for the Crows Nest Over Station Development (OSD) Site B.

Subsequent to the lodgement of the application, the Department of Planning, Housing and Infrastructure (DPHI) issued their comments/ request for additional information in a letter dated 17 December 2024. This also included North Sydney Council's submissions, in a separate letter dated 12 December 2024.

This statement summarises Stantec's response to the submissions.

It is noted that the SSDA scheme has been modified since receiving the submissions. Whilst Stantec's responses included in this statement are a direct response to the submissions received on the original SSDA scheme, the modified scheme has considered and addressed the submissions raised. Refer to the following documents for the updated assessment of the modified scheme:

- Crows Nest Over Station Development Concept Approval Modification Traffic Statement, prepared by Stantec dated 26 May 2025
- Crows Nest OSD Site B SSDA Modification (SSD-614000212) Traffic Statement, prepared by Stantec dated 8 July 2025

DPHI Submissions and Stantec Response

- ***Submit an updated Traffic Impact Assessment with reference to the Guide to Transport Impact Assessment 2024 and consideration of traffic generation from any non-residential uses at the site.***

The Guide to Transport Impact Assessment 2024 (Guide 2024) specifically notes that "*This Guide applies to TIAs commenced and development applications lodged on or after 4 November 2024*". The final TAIA was issued on 5 September 2024 and its preparation pre-dates the release of the Guide 2024.

Notwithstanding, the TAIA has been updated to reference the Guide 2024 and consider the traffic generation from the non-residential uses at the site. Refer to Section 5.1 of the updated TAIA.

In accordance with the Guide 2024, when adopting the commercial (office) trip rates of 1.69 vehicle trips per 100m² GFA in the weekday morning peak and 1.20 vehicle trips per 100m² GFA in the weekday afternoon peak, the non-residential component of the development (approx. 360m² GFA) is estimated to generate approximately six vehicle trips in the morning peak hour and four vehicle trips in the afternoon peak hour.

However, considering the small floor area of the non-residential component, the intention for it to be ancillary to the development and support surrounding land-uses (i.e. not intended to be a key attractor to the area), location at a major public transport and all on-site parking spaces to be allocated to residents, the non-residential component of the development is expected to generate little to no vehicle traffic during the road network peak periods.

Design with **community** in mind

- **Provide bicycle and motorcycle spaces and end-of-trip facilities as required by Condition B21 of the Concept Approval**

The North Sydney DCP 2013 requires new residential developments to provide bicycle parking at a minimum rate of one space per dwelling for residents and one space per 10 dwellings for visitors. Based on a yield of 130 dwellings, the site is required to provide a minimum of 143 bicycle parking spaces for the residential component.

For the retail premises, a rate of one bicycle space per 150m² GFA for employees and one space per 400m² GFA for customers are required. Based on a yield of 360m² GFA, the site required to provide a minimum of four bicycle parking spaces for the non-residential component.

In total, the site is required to provide 147 bicycle parking spaces.

The updated architectural plans indicate a provision of 148 bicycle parking spaces across the car parking levels which meets the DCP requirements.

Section 4.3 of the TAIA has been amended.

In accordance with the Consolidated Conditions of Consent for SSD-9579, Site B is required to provide a maximum of two motorcycle spaces. The updated architectural plans indicate a provision of two motorcycle bays across the car parking levels which meets the Conditions of Consent requirements. Section 4.4 of the TAIA has been amended.

The updated architectural plans indicate two ambulant DDA bathrooms with showers, located within the commercial/retail tenancy on Level 1. An EOTF is not considered necessary for the residential component of the development as each dwelling will have bathroom/ shower and storage facilities. Section 4.3 of the TAIA has been amended.

- **Revise the design of the proposal to adopt the recommendations of the submitted Access Report. This must include provision of required shared parking zones and convenient lift access for any accessible car spaces.**

In accordance with the Consolidated Conditions of Consent for SSD-9579, Site B is required to provide a minimum of six accessible spaces. The development proposes six accessible spaces which satisfies this requirement.

In general, the accessible spaces have been designed in accordance with the requirements of AS2890.6:2022, however, there are some accessible spaces where there are columns located within areas of the shared bays not permitted by AS2890.6:2022. Specifically, these are Spaces 21 and 22 on Level 5 and Space 21 on Level 6.

Whilst these shared bays are not strictly compliant with AS2890.6:2022, the design of these shared bays are supported through a performance solution provided by the Access Consultant (refer to MGAC Performance Solution Report).

- **Address the recommendations of the Transport and Accessibility Impact Assessment Report including any design changes and measures to mitigate the risk of conflict between exiting vehicles and pedestrians**

The TAIA report included a recommendation to install flashing lights and associated warning signage at the Clarke Lane driveway due to the insufficient triangular pedestrian sight splay. The updated architectural plans include a note on the plans for the installation of flashing lights and warning signage. This can be further detailed post DA approval.

- **Submit a revised Car Parking Strategy and Management Plan to include operational details, maintenance schedule, procedures for car lift mechanical break-down and contingency for queuing of vehicles waiting to access the car lifts.**

The Car Parking Strategy and Management Plan has been revised to include further operational details and procedures for car lift mechanical break-down and contingency for queuing of vehicles waiting to access the car lifts. Refer to updated Car Parking Strategy and Management Plan.

Council Submissions and Stantec Response

- **In summary the following traffic and transport advice is provided:**
 - **Parking is compliant with Transport for NSW Guidelines.**
 - **Adequate accessible car and motorcycle parking and bicycle storage is proposed.**
 - **Waste collection arrangements are unacceptable and should allow for entering and leaving the site in a forward direction.**

- **Fire and Rescue NSW should be consulted regarding the ability of fire truck to make a three-point turn on streets adjacent to the site.**
- **Road safety measures are acceptable, except as discussed below.**
- **The Green Travel Plan submitted with the application lacks detailed initiatives, stakeholder engagement provision and does not allow for user-feedback, for continuous improvement.**

These points are all noted.

In regards to the waste collection arrangements, the over-station development will share the loading dock that has been delivered as part of the Crows Nest Metro Station works (i.e. no separate loading dock is proposed for the over-station development). As such, the over-station development will need to rely on the loading dock approved and constructed as part of the Crows Nest Metro Station works. As per the OSD Enabling Report (SMCSWSCN-SMC-SCN-EN-REP-000001, dated 29 June 2023), the loading dock has been designed to accommodate two Small Rigid Vehicles (SRV) and a Medium Rigid Vehicle (MRV) simultaneously. The design also allows a 9.6 metre long waste vehicle to pull over onto the loading access driveway without obstructing through traffic along Clarke Lane.

In regards to the fire truck access arrangement, the proposed over-station development will not be impacting existing fire truck access arrangements within the frontage roads.

A detailed Green Travel Plan will need to be prepared post-SSDA approval in conjunction with building management and other relevant stakeholders. This can be conditioned as part of the approval.

- **The site is proposed to be a mixed-use development above the Crows Nest Metro Station, which will comprise 130 units and retail/ commercial space. Pedestrian access to the site is proposed along the Hume Street frontage, whilst vehicular access to the Level 5 and 6 car parks will be off the Clarke Lane frontage. A breakdown of proposed yields (as identified in the Traffic and Transport Impact Assessment [the TA] prepared by Stantec dated 5 September 2024) is shown below.**
A review of the EIS and submitted architectural plans indicate a retail GFA that is closer to 360m² GFA, not 347m² GFA. Hence, the below parking and traffic calculations adopts 360m² GFA for the retail GFA component.
Additionally, the EIS indicates a unit breakdown outlined below, totalling 130 units. It is evident there is a slight discrepancy between the number of 2 beds and 3 beds compared to what has been indicated in the proposed yields identified in the TA. This memo has based the parking and traffic calculations on the below yields.

Noted. The TAIA has been amended to adopt yields consistent with the architectural plans.

- **Per the conditions of consent for the concept development application (SSD-9579 Mod 2) for and over station development, it is outlined that “future development application(s) must demonstrate compliance with the following maximum parking limits: a maximum of 55 spaces within Site B, including 6 accessible spaces”. The TA indicates a proposed provision of 55 car parking spaces across two levels. The TA notes that the car parking spaces will be allocated to the residential tenants of the building only. Hence, the provision of car parking complies with the conditions of SSD-9579 Mod 2.**

Noted, no response required.

- **Similar to the above SSD-9579 Mod 2 conditions, the development application should provide 6 accessible spaces in the maximum provision of 55 car parking spaces. The TA indicates a proposed provision of 6 accessible spaces, which is included in the total of 55 car parking spaces and therefore, complies with the conditions of SSD-9579 Mod 2.**

Noted, no response required.

- **Relevant DCP bicycle parking requirements are listed below:**
 - **Residential Accommodation:**
 - > **Occupants – 1/1 dwelling**
 - > **Visitor/ Customer – 1/10 dwellings**

- **Office Premises, Business Premises (Commercial)**
 - > **Occupants – 1/150m² GFA**
 - > **Visitor/ Customer – 1/400m² GFA**
- **Shop, Restaurant or Café (Retail)**
 - > **Occupants – 1/250m² GFA**
 - > **Visitor/ Customer – 2+ 1/100m² over 100m² GFA**

Application of the above rates assuming the retail/ commercial component is “Office Premises, Business Premises” results in 143 bicycle spaces for the residential component and 4 bicycle spaces for the retail/ commercial component, totaling 147 bicycle spaces.

The proposal only provides 100 bicycle spaces as indicated in the TA which does not comply with the DCP requirements. The TA identifies that the Site is constrained and justifies this shortfall by noting that residents will also be able to store their bicycles in their dwellings.

To strictly comply with the DCP (assuming the proposed non-residential component is entirely commercial), an additional 47 bicycle spaces should be provided so that the total number of bicycle spaces for development is 147. The applicant should also clarify whether the non-residential component is classified as commercial or retail.

The North Sydney DCP 2013 requires new residential developments to provide bicycle parking at a minimum rate of one space per dwelling for residents and one space per 10 dwellings for visitors. Based on a yield of 130 dwellings, the site is required to provide a minimum of 143 bicycle parking spaces for the residential component.

For the retail premises, a rate of one bicycle space per 150m² GFA for employees and one space per 400m² GFA for customers are required. Based on a yield of 360m² GFA, the site required to provide a minimum of four bicycle parking spaces for the non-residential component.

In total, the site is required to provide 147 bicycle parking spaces.

The updated architectural plans indicate a provision of 148 bicycle parking spaces across the car parking levels which meets the DCP requirements.

Section 4.3 of the TAIA has been amended.

- **Per Clause P11 Section 10.5 of the DCP, relevant rates are shown below. This applies to non-residential uses only.**

The proposal shall ensure that 1 personal locker is provided for each (non-residential) bike parking space. Assuming at least 4 bicycle spaces can be provided for the non-residential component, it would then be required that at least 1 shower and change cubicle is provided.

The TA does not provide an assessment on the end of trip facilities. The architectural plans do not seem to have end of trip facilities annotated. The applicant shall provide an end of trip facilities assessment and clarify proposed provisions of lockers, shower and change cubicle with reference to DCP requirements.

The updated architectural plans indicate two ambulant DDA bathrooms with showers, located within the commercial tenancy on Level 1. Four lockers are also provided between the two ambulant DDA bathrooms. This satisfies the DCP requirements.

An EOTF is not considered necessary for the residential component of the development as each dwelling will have bathroom/ shower and storage facilities. Section 4.3 of the TAIA has been amended.

- **Per Provision P15 of Section 2.5.10 of the DCP, it is required that mixed use developments where there are more than 4 dwellings within the development shall incorporate car wash bays. The TA does not provide indication of the provision of car wash bays. The architectural plans does not seem to show any car wash bays. Hence, the proposal does not comply with the DCP’s car wash bay requirements.**

The applicant shall incorporate car wash bays to comply with Clause P15 Section 2.5.10 of the DCP.

The Consolidated Conditions of Consent for SSD-9579 do not specify a requirement to provide car wash bays. As such, no car wash bays have been provided as part of the development.

- **Per Provision P3, Section 10.4 of the DCP, it outlines that “developments containing more than 60 dwellings must provide at least 1 service delivery space, capable of accommodating at least (a) 1 HRV or (b) 2 MRVs”. Application of the above requirement on the proposed yield of 130 dwellings results in a requirement of 1 HRV loading bay or 2 MRV loading bays.**

The TA outlines that the Site will be sharing the dedicated loading dock on ground level which can be accessed off Clarke Lane which will be delivered as part of the Crows Nest Metro Station works. It states that the loading dock has been designed to accommodate 2 SRVs and 1 MRV simultaneously. The TA states that the proposed loading dock is considered to be sufficient for the servicing requirement of Site B.

The proposal does not strictly comply with the requirements of the DCP. However, noting the TA states that the proposed shared loading dock would be sufficient for waste, removalist and maintenance activities, Council’s Traffic Engineers raise no objection.

Noted, no response required.

- **The TA adopts a vehicle trip rate that is based on parking space as opposed to the number of dwellings and is justified by consideration that the parking provision is based on reduced rates (to reduce private car ownership). As such, the TA adopts vehicle trip rates for St Leonards as outlined in the TDT 2013/04a. High Density Residential 0.10 vehicle trips per car parking space in the AM peak 0.05 vehicle trips per car parking space in the PM peak. The TA’s application of the above results in approximately 6 vehicle trips in the AM peak and 3 vehicle trips in the PM peak.**

The TA identifies the traffic impact (up to 6 vehicle trips in the AM) would have negligible impact on the surrounding road network and therefore, no further traffic analysis is warranted.

The TA’s traffic generation assessment does not seem to address the traffic generated from the retail/commercial component of the development. This should be clarified.

The applicant is to follow the Guide to Transport Impact Assessment 2024 which states in Appendix E that a Transport Impact Assessment are to provide the number of trips generated to/ from the development by mode. The current Transport Impact Assessment only provides for private vehicle trips. The applicant should explore other modes of transportation including active transport and public transport trip generation.

The applicant is to provide a multimodal network impact assessment. This means not just private vehicle trips, but also public and active transport impact assessments. The applicant should refer to Chapter 6 of the Guide to Transport Impact Assessment 2024 for further details.

As previously noted, the TAIA was prepared prior to the release of the Guide 2024. The TAIA has been updated to reference the Guide 2024 and consider the traffic generation from the non-residential uses at the site. Refer to Section 5.1 of the updated TAIA.

In accordance with the Guide 2024, when adopting the commercial (office) trip rates of 1.69 vehicle trips per 100m² GFA in the weekday morning peak and 1.20 vehicle trips per 100m² GFA in the weekday afternoon peak, the non-residential component of the development (approx. 360m² GFA) is estimated to generate approximately six vehicle trips in the morning peak hour and four vehicle trips in the afternoon peak hour.

However, considering the small GFA of the non-residential component, the intention for it to be ancillary to the development and support surrounding land-uses (i.e. not intended to be a key attractor to the area), location at a major public transport node, and all on-site parking spaces to be allocated to residents, the non-residential component of the development is expected to generate little to no vehicle traffic during the road network peak periods.

A multimodal assessment has been included in the updated TAIA. Refer to Section 5.1 of the updated TAIA.

- **The TA identifies that the total time for the car lift system to complete 1 cycle is 264 seconds which translates to a capacity of 13 vehicles per hour for single car lift system. There are 2 car lift systems proposed. It also notes that the cycle time is conservative as it is based on the longest travel distance between the street level and Level 3 car park. For the critical afternoon peak hour period, a 20:80 split on a PM traffic generation of 3 vehicle trips would mean up to 2 vehicles could enter the site during the peak hour.**

The TA references the Guide to Traffic Management Part 2: Traffic Theory (Austroads 2020) which concludes that the 95th percentile queue for vehicles entering the Site in the afternoon peak is expected to be 1 vehicle at any given time (the 93rd percentile queue is no vehicles).

The applicant shall confirm whether the design of the access complies with Clause 3.5 of AS2890.1:2004 which highlights that the storage area shall be designed to accommodate the 98th percentile queue. Per this standard, the proposal must provide sufficient vehicle storage to ensure that queues of vehicles awaiting service by the car lifts do not extend beyond the property boundary under normally foreseeable conditions. E.g. The on-street area highlighted in yellow should not be used for queue storage to comply with AS2890.1:2004.

The applicant needs to provide more details on how they would plan to manage a situation where the leftmost car lift has a car coming out at the same time a car is driving into the driveway which would result in cars blocking each other.

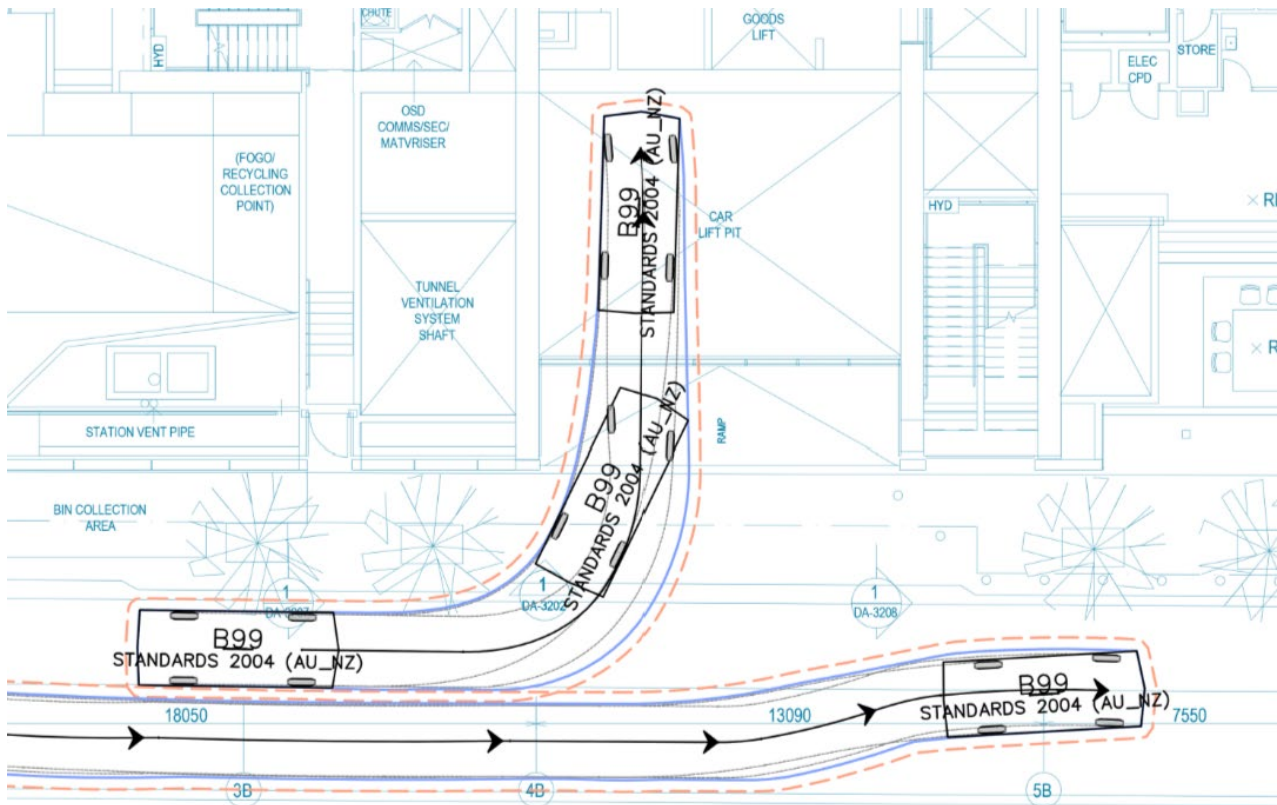
As shown in Drawing DA-2210 revision A, prepared by Woods Bagot and included in Appendix A, the car lift pit has been constructed as part of the Crows Nest Metro Station works. The entrance to the car lift pit is setback from the property boundary by approximately 4.0 metres, which is insufficient to store a B99 design vehicle wholly within the site. As shown in Figure 1, if a B99 design vehicle were to wait in front of the car lift, almost the entire width between the car lift entry and Clarke Lane will be required, providing no opportunity for a car exiting the southern car lift to pass the waiting vehicle.

As such, to avoid conflict at the car lift entry and obstruct pedestrian flow along the Clarke Lane frontage, cars will need to wait along Clarke Lane and give way to exiting vehicles. As per the queuing analysis included in Section 4.7 of the TAIA (which has been amended to reflect the updated traffic generation numbers), the 98th percentile queue length during the afternoon peak will be two vehicles, whilst the 93rd percentile queue length will be one vehicle. As this queue length also includes the vehicles in the system, this means that the likelihood of vehicles queuing to enter the site will be very low, if both car lifts are operational. However, as per the Car Parking Strategy and Management Plan, if only one car lift is available, the 98th percentile queue will increase to four vehicles, which means that there will be two vehicles queuing to use the car lifts. In the event that a vehicle is required to wait and give-way to an exiting vehicle, it is noted that the kerbside restriction along the eastern side of Clarke Lane, directly adjacent to the driveway into the car lift, is "No Parking". Vehicles are permitted to stop in "No Parking" zones for up to two minutes.

The swept path assessment included in Figure 1 shows that a B99 design vehicle will be able to travel around another B99 design vehicle stopped kerbside, waiting to enter the car lift.

To manage the conflict, flashing lights and appropriate signage can be installed within the property boundary to alert approaching vehicles along Clarke Lane that there is a vehicle exiting the car lift. This can be detailed during future submissions post SSDA approval.

Figure 1: B99 design vehicle waiting to enter car lift



- **The applicant should confirm no on-street spaces will be lost as a result of the proposal. Alternatively, clarify any loss of on-street parking spaces.**

Stantec confirms that there will be no loss of existing on-street spaces as a result of the proposal.

- **It is understood that the loading dock does not strictly comply with the requirements of Clause P3 Section 10.4 of the DCP. Instead, it is noted that the loading dock would be capable of accommodating 2 SRVs and 1 MRV simultaneously. Swept paths for these vehicles associated with the loading dock should be contained in the TA.**
- **Per the Vehicular Servicing Management Plan prepared by Stantec dated 9 September 2024, it states that the vertical clearance of the loading dock is 4.2m which does not comply with AS2890.2:2018 which requires a minimum 4.5m headroom for an MRV. This shall be reviewed by the applicant.**

As aforementioned, the loading dock was designed and delivered as part of the Crows Nest Metro Station works. The over-station development will share this loading dock but is not responsible for the design of this space. The assessment of the loading dock is included in the OSD Enabling Report (SMCSWSCN-SMC-SCN-EN-REP-000001, dated 29 June 2023).

- **The following comments are made on the Preliminary Construction Traffic Management Plan dated 5 September 2024:**
 - **Cumulative construction impacts should be considered in the preliminary Construction Traffic Management Plan if there are surrounding properties also being developed per SEARs requirements.**
 - **Hours of construction should align with North Sydney’s standard construction hours which can be found on North Sydney Council’s website and shown below.**
 - **North Sydney Council does not support the utilization of vehicles greater than 12.5m Heavy Rigid Vehicle due to public safety. Hence, a 19m articulated vehicle for construction is not supportable.**
 - **Construction vehicles shall not utilize North Sydney LGA’s local roads located within school zones during school zone hours for safety.**

- ***The applicant shall ensure swept paths and Traffic Guidance Schemes are prepared with the detailed Construction Management Plan as part of a future submission.***
- ***Consideration should be given to installing the works zone on roads with lower traffic volumes as opposed to Pacific Highway. A works zone on Pacific Highway should be restricted to short term works only and outside of peak hour to minimise impacts. Traffic Guidance Schemes are to be prepared accordingly as part of the detailed Construction Traffic Management Plan.***

Noted and to be reviewed as part of the detailed Construction Traffic Management Plan to be prepared by the appointed contractor.

- ***As a result of the above issued, Council's Traffic Engineers do not support the proposal in its current form. However, should this matter be approved, the following requirements are requested:***
 - ***That a Construction Management Plan be prepared and submitted to Council for approval by the North Sydney Traffic team prior to the issue of the Construction Certificate. Any use of Council property shall require appropriate separate permits/ approvals.***
 - ***All parking provisions must comply with the latest versions of the Australian Standards: AS2890.1 for off-street car parking, AS2890.6 for off-street parking for people with disabilities, AS2890.3 for bicycle parking, and AS2890.2 for off-street commercial vehicle parking. The car park and loading dock design (including any modifications to the original design) must be reviewed and approved by a suitably qualified person and submitted for approval to the satisfaction of the Certifying Authority.***
 - ***That a condition be imposed on the determination stating that Council will not consider any future requests for 'No Parking' restriction benefitting this development.***

Noted.

We trust this letter provides a suitable response to the matters identified by DPHI and Council and further assists in determining the application.

Should you require any further information or would like to discuss any issues, please do hesitate to contact the undersigned.

Yours sincerely

Stantec Australia Pty Ltd

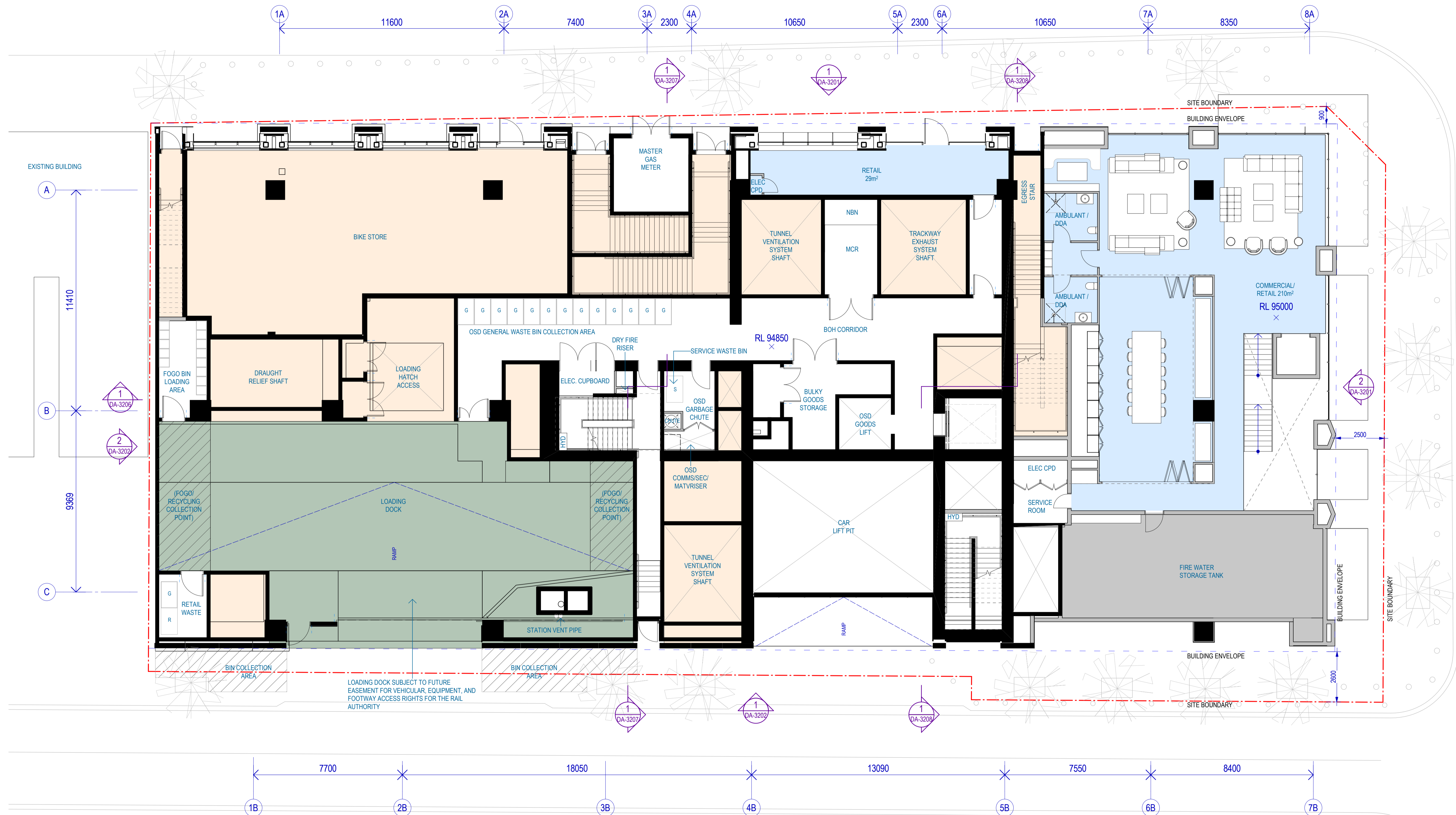
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Appendix A. Level 1 Plans



LEGEND

	BOUNDARY LINE		EXISTING
	BUILDING SEPERATION		PROPOSED
	BUILDING ENVELOPE		NOT IN SSSA SCOPE (CSSI APPROVED SCOPE)
			SHARED LOADING DOCK EASEMENT FOR RAIL AUTHORITY

Recent revision history

#	Status	Description	Date
A		FOR SSSA	14/06/24

Notes
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 Contractor must verify all dimensions on site before commencing work or preparing shop drawings.
 Do not scale drawings.

NOTE:
 Minor changes to form and configuration may be required when drawings are subsequently prepared for construction purposes after the grant of development consent

Project
Crows Nest OSD - Site B
 Client
Third.i

Issuer
W-B
WOODS BAGOT
 Project number
121809
 Checked Approved
 Checker Approver

Size check
 25mm
 Sheet size
 A1
 Scale
 1 : 100

Sheet title
LEVEL 01
 Sheet number
DA-2210
 Status
A