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Department of Planning, Housing and Infrastructure

25 May 2026

Dear Sir / Madam

This document provides responses to the traffic and transport related matters raised by the City of Sydney Council (Council) in their submission to the site at 13-17 Oxford Street and 2 Verona Street, Paddington (SSD – 87245208). The Council submission is dated 5 May 2026.

The relevant comments and associated responses, are outlined in tables on the following pages of this document.

Please do not hesitate to contact the undersigned should you have any questions in relation to this advice.

Regards

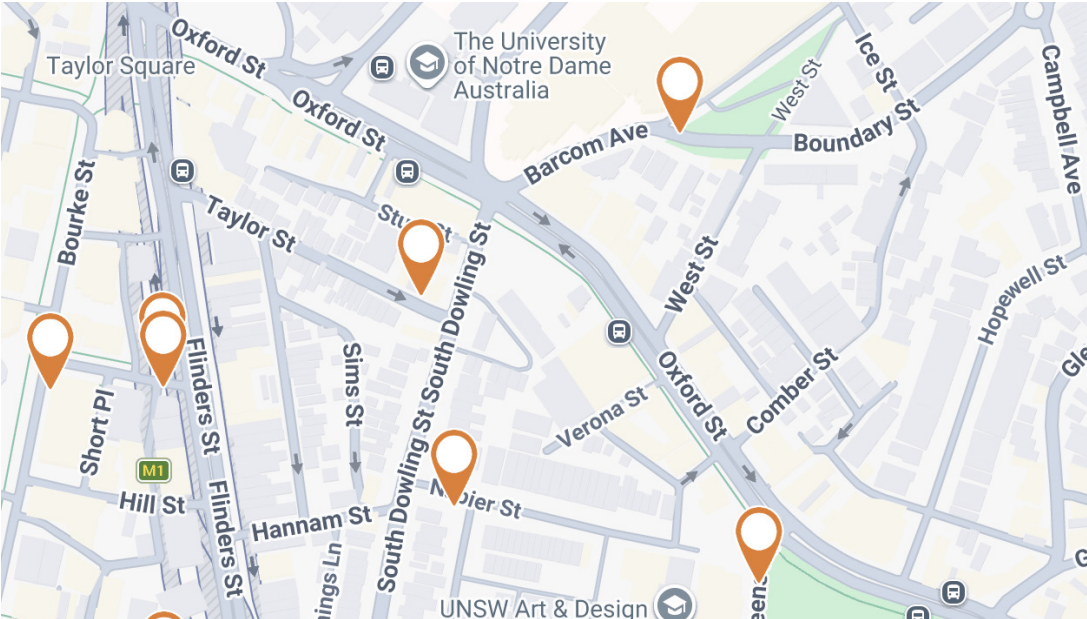


**Josh Milston**

Director | JMT Consulting

MIEAust CPEng

**Table 2: Responses to Council comments**

CoS Item Number	Council Comment	JMT Consulting Response
12.1	<p><i>Car parking</i></p> <p>The proposed 58 residential parking spaces for the development still exceeds the maximum 50 residential car parking spaces permitted under clause 7.5(1)(b) of the Sydney LEP 2012 and is contrary to clause 7.3 of the Sydney LEP 2012.</p> <p>It is reiterated that in this instance, the Sydney LEP 2012 parking rates are not more onerous than those set out in clause 19 of the Housing SEPP and therefore prevail. The development must be amended to comply with the car parking maximums set out in the Sydney LEP 2012.</p> <p>Further, it is noted that the revised plans show 2 small parking bays that do not comply with AS2890.1 series and are required to be removed.</p> <p>A condition requiring a car share bay has been recommended within Annexure B.</p>	<p>The car parking provision has been reduced to 56 (from 58) spaces compared to the RTS submission. This level of car parking is considered suitable to accommodate resident demands and provides an appropriate balance between meeting the parking needs of future residents and managing the impacts of traffic generation. Although the total car parking of 56 spaces is slightly below the minimum requirement of 61 spaces under the Housing SEPP, it remains below the maximum number of spaces permissible under the Sydney LEP – see Appendix B. In this context the proposed level of car parking is considered acceptable.</p> <p>The small parking bays identified by Council have been removed from the updated architectural plans, bringing the total number of parking spaces down to 56.</p> <p>In relation to car share there is no requirement under the Housing SEPP 2021 to provide for this on the subject site. There are numerous existing GoGet car share pods in close walking distance of the site as illustrated in the figure below. Therefore no dedicated on-site car share space is considered warranted for the subject site.</p> 

CoS Item Number	Council Comment	JMT Consulting Response
12.2	<p><i>Vehicle access and car park design</i></p> <p>The following outstanding information and amendments are required regarding the proposed vehicle access and car park design:</p> <ul style="list-style-type: none"> <li>i. Updated swept paths of the revised 6.5m driveway design.</li> <li>ii. The revised plans show the gradient along the vehicle ramp to/from Verona Street varies from 5% to 10% (previous documentation stated 5% grade). This does not comply with AS2890 series and introduces an unacceptable crossfall for heavy vehicles.</li> </ul> <p>Gradients must not exceed 5% for 6m prior to the building line and the maximum rate of change of grade is 6.25%. The driveway ramp must be updated to provide a compliant ramp grade, grade transitions and crossfall for heavy vehicles.</p>	<ul style="list-style-type: none"> <li>i. Swept paths for the driveway, including for passenger vehicles and a 10.6m City of Sydney waste truck, are provided as Appendix B of this document</li> <li>ii. AS2890.1 requires a maximum gradient of no more than 5% so as to allow exiting drivers to adequately view pedestrians and vehicles on the adjoining roadway. Therefore this requirement applies to exiting vehicles.</li> </ul> <p>The proposed design complies with this requirement by providing for a gradient of 5% on the path of the exiting vehicle – noting the entering vehicle (on the southern side of the driveway) will be positioned on an internal waiting bay. This is indicated in the swept paths provided as Appendix B of this document. All internal ramp gradients and transitions as submitted in the architectural plans comply with the relevant requirements of AS2890.1.</p> <p>The comment around the crossfall of the ramp is noted, however Council must recognise that Verona Street falls sharply from south to north resulting in different starting levels at either end of the ramp. In this context a crossfall on the internal ramp is unavoidable.</p> <p>The vehicle entry arrangements including swept paths and ramp crossfalls will be the subject of further design resolution during the detailed design phase of the project, with sign off from a suitably qualified engineer required to confirm the layout conforms with the requirements of AS2890.1 prior to the issue of a Construction Certificate.</p>

CoS Item Number	Council Comment	JMT Consulting Response
12.3	<p><i>Resident/ staff bicycle parking</i></p> <p>Due to the proposed yield increase, an addition of 2 staff bicycle parking spaces are required to be located in a separate bicycle parking area. A condition of consent is recommended in Annexure B requiring 67 spaces comprising 65 resident spaces and 2 staff spaces).</p>	<p>As per Council's feedback two additional staff bicycle parking spaces have been provided within the dedicated bicycle parking area on level B2 of the building.</p>
12.4	<p><i>Visitor bicycle parking</i></p> <p>It is reiterated that visitor bicycle parking is to be accommodated on site and is not to be located in the public domain. The proposed approach to conditioning a Roads Act (section 138) approval is not supported.</p> <p>The proposed 14 visitor bicycle spaces are required to be located on the site. Given site constraints, locating visitor bicycle parking within the basement is acceptable to the City in this instance.</p>	<p>Following Council's advice, the required visitor bicycle parking spaces will be provided within the dedicated bicycle parking area on level B2 of the building. Within this bicycle parking area on B2 there will be:</p> <ul style="list-style-type: none"> <li>- 49 bicycle spaces for residents</li> <li>- 14 for visitors</li> <li>- 2 for staff</li> </ul> <p>The remaining residential bicycle parking allocation (16 spaces) is accommodated in the residential storage cages, which are numbered on the updated architectural plans. Storage area within the cages are a minimum of 1840mm long by 800mm wide as required under AS2890.3.</p>

## Appendix A: Car Parking Calculations

### Sydney LEP Calculations

Land Use	Type	No. of units	Max. Parking Rate	Max. No. of Spaces*
Residents	Studio	3	0.2 / unit	1.0
	1 bed	13	0.4 / unit	5.0
	2 bed	29	0.8 / unit	23.0
	3/4 bed	19	1.1 / unit	21.0
<b>Sub-Total</b>				50
Visitor <sup>1</sup>				8
<b>Total</b>		<b>64</b>	-	<b>58</b>

\* Rounded to nearest whole number

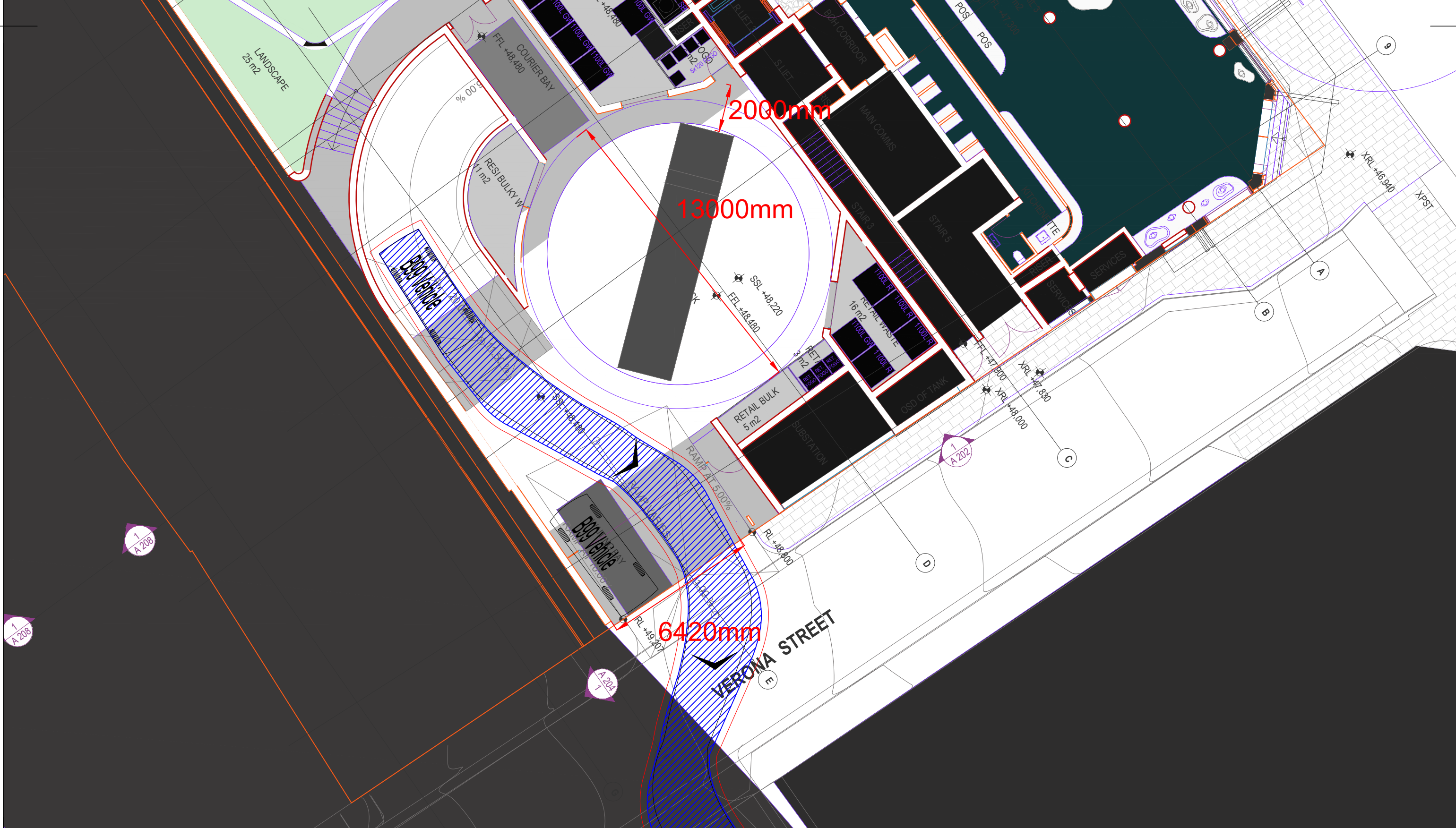
<sup>1</sup> for each dwelling up to 30 dwellings—0.167 spaces / unit, and for each dwelling more than 30 and up to 70 dwellings—0.1 spaces / unit, and for each dwelling more than 70 dwellings—0.05 spaces / unit,

**Housing SEPP 2021 Calculations**

Land Use	Type		No. of units	Minimum Parking Rate	Min. No. of Spaces
Residents	Non-Affordable Housing	Studio / 1 bed	10	0.5 / unit	5.0
		2 bed	22	1.0 / unit	22.0
		3/4 bed	18	1.5 / unit	27.0
	Affordable Housing	Studio / 1 bed	6	0.4 / unit	2.0
		2 bed	7	0.5 / unit	4.0
		3/4 bed	1	1.0 / unit	1.0
<b>Total</b>			<b>64</b>	<b>-</b>	<b>61</b>

## Appendix B: Vehicle Swept Paths

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**Job Title**  
 13-15 Oxford St, 17 Oxford St  
 & No 2 Verona St, Paddington

**Client**  
 WT Malouf

JMT Consulting  
 ABN: 32 6358 30054  
 www.jmtconsulting.com.au  
 PO Box 199, Kingsford NSW 2032

**Drawing Title**  
 Turning Paths

**Drawing No**  
 2268\_04

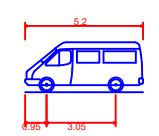
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 21.05.26

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 — 300mm Envelope  
 — Wheel Envelope

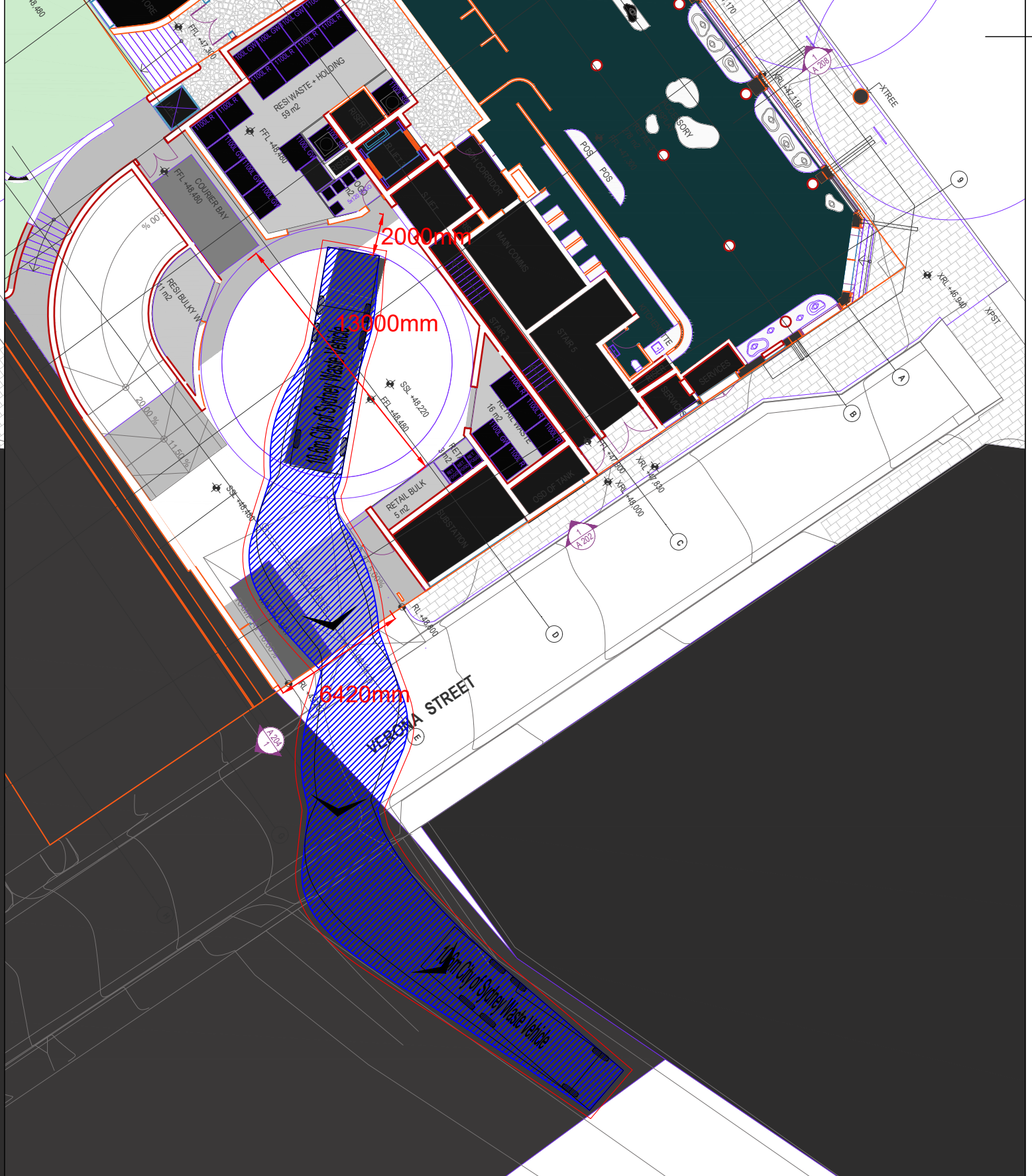
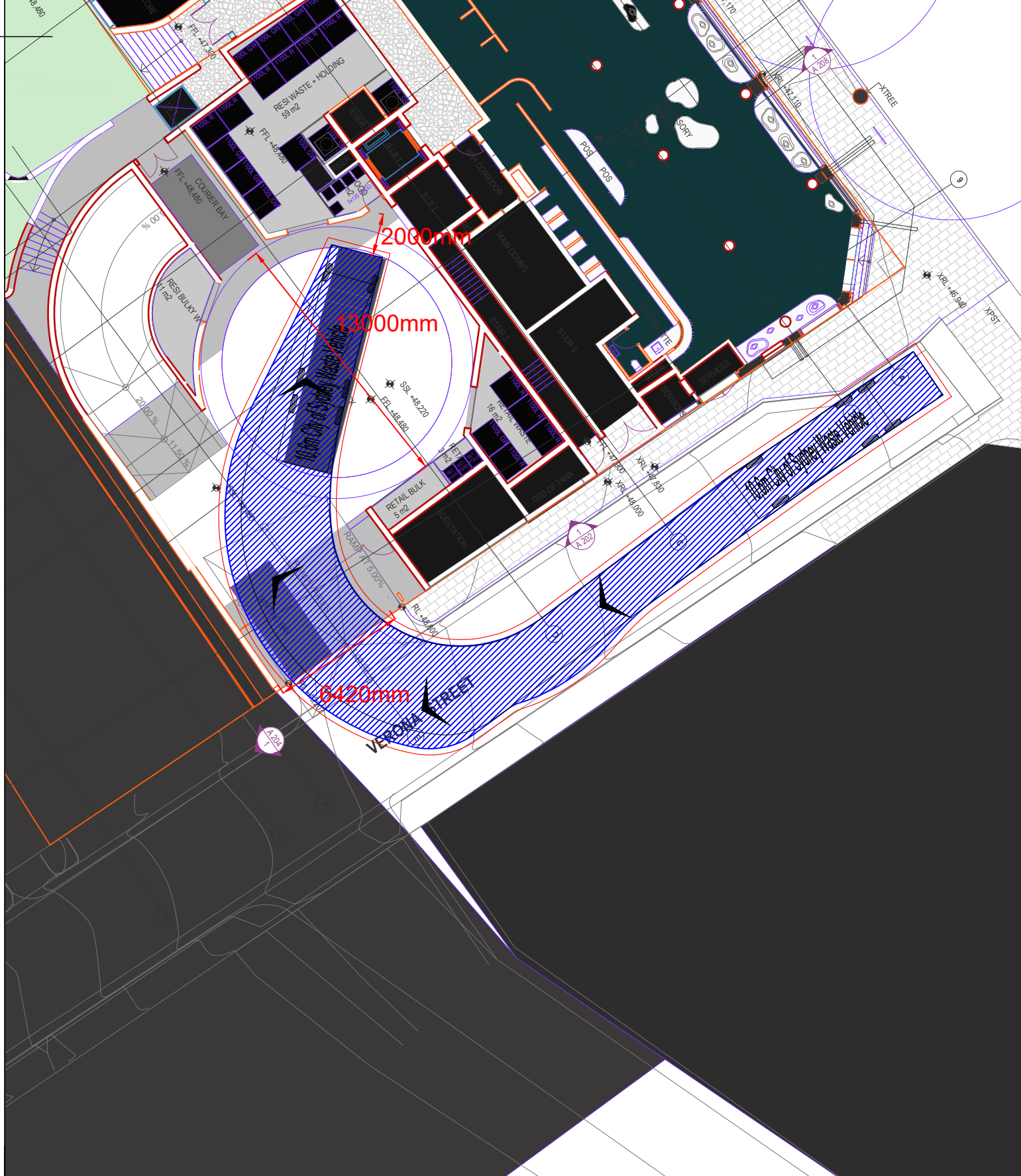
**Job No**  
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**Scale at A3**  
 1:150

**Vehicle type(s)**



B99 Vehicle	5.200m
Overall Length	1.940m
Overall Width	2.200m
Overall Body Height	0.312m
Min Body Ground Clearance	1.840m
Track Width	4.00 sec
Lock to Lock Time	6.250m
Curb to Curb Turning Radius	



**Job Title**  
13-15 Oxford St, 17 Oxford St  
& No 2 Verona St, Paddington

**Client**  
WT Malouf

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**Drawing Title**  
Turning Paths

**Drawing No**  
2268\_03

**Date**  
21.05.26

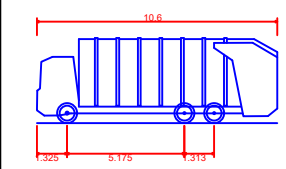
**Legend**

- Body Envelope
- 300mm Envelope
- Wheel Envelope

**Job No**  
2268

**Scale at A3**  
1:150

**Vehicle type(s)**



10.6m City of Sydney Waste Vehicle

Overall Length	10.600m
Overall Width	2.500m
Overall Body Height	3.800m
Min Body Ground Clearance	0.304m
Track Width	2.500m
Lock-to-lock time	4.00s
Curb to Curb Turning Radius	10.500m