



Attn: Victor Casasanta
Department of Planning, Housing and Infrastructure

Dear Victor,

Re: Submission – SSD-97528708 Mixed Use Development with Infill Affordable Housing 160 Oxford Street, Paddington

On behalf of Paddington United, I have reviewed the documentation associated with State Significant Development 97528708 (**SSD**) of 160 Oxford Street, Paddington and prepared the following commentary for your consideration. The specific documentation I have reviewed includes:

- Architectural Plans prepared by Smart Design Studio Drawing Number DA001 B
- Traffic and Parking Assessment Report (**TPA**) prepared by Varga Traffic Planning dated 17/12/2025
- Construction Traffic Management Plan (**CTMP**) prepared by Varga Traffic Planning dated 17/12/2025
- Operational Waste Management Plan (**OWMP**) prepared by MRA Version 1 dated 9/12/2025
- Construction Waste Management Plan (**CWMP**) prepared by MRA Version 1 dated 9/12/2025

The following standards have been referred to:

- Australian Standard 2890.1 – Off-Street Car Parking (**AS2890.1-2004**)
- Australian Standard 2890.2 – Off-Street Commercial Vehicle Facilities (**AS2890.2-2018**)
- TfNSW Guide to Transport Impact Assessment Version 1.1
- Woollahra Active Transport Plan Final December 2023
- Woollahra Draft Integrated Transport Strategy

I have structured my review in a format that identifies the related topic and purpose of how this topic could result in impacts to the local residents, businesses and local transport network.

Operational Waste Management

Purpose: Ensure the waste collection for bulky items can be conducted from within the development to avoid on-street collection

The OWMP does not detail the size of vehicles required to collect bulky waste. Details should be provided to confirm the size of vehicles required to collect these items. Additionally, confirmation should be obtained from a suitable contractor to verify that they are able to collect bulky waste with a low clearance vehicle that can enter and exit the development.

Waste Collection Frequency

Purpose: Ensure the waste collection can be provided by the proposed contractor to avoid on-street collection

The OWMP indicates a servicing frequency of approximately 4.5 collections per week. While the waste contractor has indicated that they can access the site, they have not indicated whether they have the capacity to accommodate this servicing frequency with a limited height vehicle. Additional details should be provided by the proposed waste collection contractor to ensure that they have the capacity to provide this service. If this cannot be confirmed, there is a risk that an alternative supplier without a low clearance vehicle would need to be engaged resulting in waste being collected from the street.

On-site Operations and Safety

Purpose: Ensure that servicing of the development can occur safely onsite to ensure protocols are observed by occupants and service providers to avoid impacting the local road network.

1. The proposed servicing arrangement requires waste vehicles to reverse within the basement. Reversing manoeuvres involving heavy vehicles introduce risks within a residential environment. The basement will have pedestrian activity and private vehicle movements occurring simultaneously. Conflicts between these different users need to be considered prior to approval to ensure that the operational conditions will be consistent with those designed.
2. The report indicates that service vehicle access has been designed in accordance with AS 2890.2, however the ramp grades and transition lengths appear to be designed in accordance with AS2890.1.

Where commercial vehicles are required to access basement levels, ramps must comply with the grade, transition and clearance requirements outlined within AS2890.2. Without this information it is not possible to confirm that service vehicles can access the basement without scraping and ensure servicing from within the site. This could result in waste and service vehicle not being able to enter the site and revert to loading and unloading within the local road network.

3. Ramps widths have not been design taking into consideration additional clearance requirements in accordance with AS2890.1. Additionally, as the development proposes to allow Small Rigid Vehicles (SRVs), swept paths showing SRV and B85 vehicles should be prepared demonstrating that the vehicles are able to pass simultaneously on the aisles and ramps.

Parking Provision & Local Road Network Impacts

Purpose: Ensure that the provision of parking is suitable for the development, achieves transport planning objectives and will not result in vehicle trips generated above those expected and modelled.

The TPA identifies that the proposed development will require 63 parking spaces but provides 83 parking spaces for the site. This represents a surplus of 30% of parking. There is no indication within the TPA on how these parking spaces will be allocated. The allocation of parking should be consistent with the transport objectives of TfNSW and Woollahra Municipal Council.

The TPA does not substantiate the sites current vehicle trip generation, determining the vehicle trips generated by the current site by using the TfNSW trip rates, rather than actual surveys. No information has been provided to validate the number of current parking spaces, number of residents with vehicles or their current travel demands. Without this information it is not possible to satisfactorily determine if the development in its current form with a 30% surplus of parking will not result in higher vehicle trip rates with an unsatisfactory impact to the local road network. Further, while the TPA has assessed the intersection performance, it has not considered the suitability of increased traffic within the local road network with respect to:

- Midblock capacity,
- Parking, road widths and servicing, and
- Current performance and observed operations.

The TPA does not reference how the development considers the strategic objectives of transport within the local community with consideration of:

- *TfNSW Future Transport Strategy: Which outlines the strategic directions for how transport and land use planning can achieve world-leading mobility for customers and communities. It recognises that as NSW population grows, congestion on the transport network will continue to be challenging, affecting the communities' productivity and wellbeing.*
- *Woollahra Integrated Transport Strategy: Which outlines the vision, principles, objectives and themes. This document states that the vision is for "A municipality in which active, sustainable and efficient modes of transport are the most convenient choice for most trips."*

If there is a need for the surplus of parking, this should be adequately justified with consideration of how this surplus will impact the local road network's safety and efficiency.

To avoid a potential increase in trip generation and have the development focused on more sustainable transport options, the parking provision should be minimised.

Impacts During Construction

Purpose: Minimise the impact of construction activities to residents and the local road network

1. The CTMP proposes to use Liverpool Street and Shadforth Street for small trucks (up to 8.8m) in a southbound direction. Liverpool Street and Shadforth Street are narrow local roads with two-way flow. A high frequency of construction vehicles and trucks on these streets will result in localised congestion and potential for low-speed incidents which would not be acceptable.

It is expected that there is a northbound travel demand on Shadforth Street for local residents to access the traffic signals at Gipps Street. An assessment of vehicle frequency and current vehicle demand within the local network has not been adequately undertaken to verify whether the impact of construction vehicles on these local streets can be justified.

The CTMP has identified that construction vehicles and trucks will be required to use local roads which have limited road width, limited passing opportunities, and limited to vehicles under 3 tonnes (Glenmore Road). An intensification of vehicle movements over a sustained period must be properly assessed to determine the suitability of the proposed construction vehicle access. The CTMP does not consider how this will impact the local road network or impact road users. No assessment, vehicle data analysis or observations are provided indicating an understanding of the impacts associated with construction of a development of this scale within a local area with severely



restricted road access. Further, it has not been demonstrated that the current CTMP appropriately mitigates against these impacts.

2. The CTMP has not provided adequate quantification of the exported material from the site, duration of excavation activities, and capacity of small trucks to transport the excavated material. Additional details should be provided in the CTMP to understand the impacts and frequency of construction vehicles during this stage. Additionally, details should be provided on the routes of these trucks to ensure that heavy loaded vehicles use of local roads is minimised with consideration of safety and impact to the pavement surface.
3. The CTMP indicates that construction vehicles will park on the local roads until a time they are able to access the basement parking. The CTMP does not consider the current limitation of on street parking or how this will impact local residents and businesses. The consideration that they will park in accordance with the signposted parking restrictions will impact parking availability in an area with high parking demand. The CTMP must provide details on how the impact of construction vehicles will be mitigated to avoid them relying on on-street parking spaces.

I trust the information will assist you in understanding the potential impacts the development of 160 Oxford Street, Paddington will have on the local road network.

Should you have any questions regarding the above, please feel free to contact me

Kind regards,

Michael Palamara
Director, Traffic & Transport Engineer
Headway Traffic and Transport Pty Ltd