30 July 2026

The Planning Secretary
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Lodged via the NSW Planning Portal, Major Projects

Dear Sir/Madam

SUBMISSION ON STATE SIGNIFICANT DEVELOPMENT APPLICATION SSD-82160220
MIXED-USE RESIDENTIAL AND COMMERCIAL DEVELOPMENT AND CONCURRENT REZONING
184 TO 186 FIFTH AVENUE, AUSTRAL (LOT 99 DP 1284142)

1. Introduction

1.1 This submission is made by Unity Grammar College ("the submitter") in response to the public exhibition of State Significant Development Application SSD-82160220 ("the Application"), lodged by 21 Derwent Road Pty Ltd ("the proponent") for a mixed-use residential and commercial development at 184 to 186 Fifth Avenue, Austral, with a concurrent planning proposal to amend the development standards applying to the land.

1.2 The submitter operates an existing school campus on Fourth Avenue, Austral, and is the proponent of a proposed junior campus at 325 Sixth Avenue, Austral (Lot 1053 in DP 2475), the subject of development application PAN-617581 presently before Liverpool City Council. Both are in the immediate locality of the Application site.

1.3 The submitter does not oppose the redevelopment of the site in principle and supports the delivery of housing, including affordable housing, within the Leppington Town Centre. Its concern is confined to the adequacy of the transport assessment accompanying the Application, which does not demonstrate that the transport impacts of the proposal will be acceptable, because:

(a) the Transport Impact Assessment ("the TIA") models only existing conditions plus the proposal's own traffic and does not test cumulative conditions, notwithstanding that the Secretary's Environmental Assessment Requirements ("the SEARs") expressly require it;

(b) the TIA identifies a school planned immediately opposite the site, designs the proposal's public domain around it, then excludes it from the traffic model while making a nominal allowance for a future residential subdivision;

(c) the submitter's own junior school, which takes access from two of the four intersections the TIA models, does not appear to have been considered at all;

(d) the TIA relies on the future build-out of the Leppington Town Centre to discount the proposal's childcare traffic by 75 per cent, while declining to recognise that same development when modelling the network;

(e) on the rate stated in the TIA, the AM peak residential traffic generation appears understated;

(f) the height and floor space ratio standards sought materially exceed those contemplated for the site under the strategic framework for the precinct, and the traffic implications of that additional yield are untested;

(g) the intersections that would carry the proposal's traffic already operate with limited spare capacity on the proponent's own figures, and have a recorded crash history;

(h) car parking falls below the minimum requirements of the applicable draft controls for several uses, with a consequent risk of on-street overspill near school frontages; and

(i) the preliminary construction traffic management material does not address the presence of schools on the affected local roads and adopts construction hours inconsistent with the Environmental Impact Statement.

1.4 The submitter does not assert that the local road network presently operates unacceptably. Its submission is that the onus rests on the proponent to demonstrate that cumulative conditions will be acceptable, and that this has not been done. The relief sought is that the Department require further and better transport assessment before determining the Application, rather than that it be refused.

2. The Submitter's Interest

2.1 The submitter operates an existing school campus on Fourth Avenue, Austral, between Fifth Avenue and Sixth Avenue, whose traffic forms part of the existing operation of the local road network. It is also the proponent of a proposed junior campus at 325 Sixth Avenue, being Lot 1053 DP 2475, a site of approximately 12,100 square metres zoned SP2 Educational Establishment. Development application PAN-617581 for that campus, accommodating approximately 468 students and 31 staff in its first stage, is presently before Liverpool City Council.

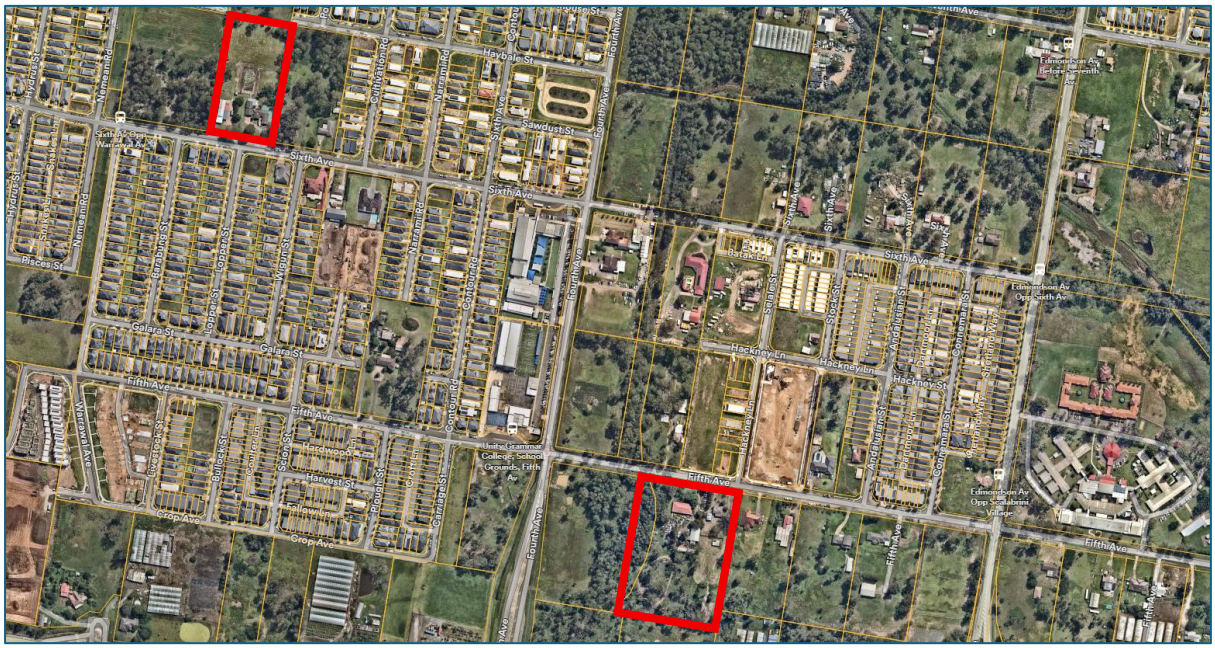

Figure 1 – The Application site and the submitter's junior campus, Austral (Nearmap, 16 March 2026)

2.2 The 325 Sixth Avenue site has a single frontage and takes its sole vehicular access from Sixth Avenue. Traffic to and from the campus must therefore travel via Sixth Avenue and, for most movements, via Fourth Avenue to the arterial network at Bringelly Road, or via Fifth Avenue. Two of the four intersections modelled in the TIA, being Fifth Avenue/Fourth Avenue and Bringelly Road/Fourth Avenue/Dickson Road, lie directly on that route. The overlap between the study intersections and the submitter's access route is direct, not incidental.

2.3 The submitter does not seek to relitigate its own application or to advance figures from its own transport assessment. Its point is confined: the Application has not tested the combined effect of the two developments on the shared network, and the Department cannot be satisfied as to cumulative acceptability on the material exhibited. The submitter has a further interest as the operator of a sensitive land use, schools concentrating arrivals and departures into narrow windows and generating substantial pedestrian activity by children in the immediate street environment.

3. The Proposed Development

3.1 The Application seeks consent for a mixed-use development comprising:

- 445 dwellings across three buildings, including 88 affordable housing dwellings to be retained as affordable housing for a minimum of 15 years, at a maximum height of approximately 53.85 metres, being up to 15 storeys;

- approximately 1,500 square metres of non-residential floor space comprising retail tenancies, a 496 square metre commercial gymnasium and a centre-based childcare facility for 120 children;
- 550 car parking spaces; and
- a new 16-metre-wide local street along the eastern boundary connecting to Fifth Avenue, with pedestrian links through the site.

3.2 The concurrent planning proposal seeks to increase the maximum building height standard from 12 metres to 55 metres, and the floor space ratio standard from 0.75:1 to 3.8:1. The Application is progressed as State Significant Development via the Housing Delivery Authority pathway, with the rezoning advanced in relation to the *State Environmental Planning Policy (Precincts, Western Parkland City) 2021*. Construction is proposed in two stages, from February 2028 to October 2029 and from April 2029 to December 2029, which therefore overlap across parts of 2029.

4. Assessment Framework

4.1 As State Significant Development, the Application falls for assessment under Division 4.7 of the *Environmental Planning and Assessment Act 1979*, and the Environmental Impact Statement must address the SEARs issued for the project. Item 9 (Transport) requires a Transport Impact Assessment "in accordance with the processes and methodology recommended in the Guide to Transport Impact Assessment (GITA) published by TfNSW," together with a preliminary Construction Traffic Management Plan and a response to the comments raised by Council and Transport for NSW.

4.2 Cumulative impact is not left to the proponent's discretion. Item 3 requires the Environmental Impact Statement to address the "cumulative impact of the proposed development standard changes on the Leppington Town Centre," and expressly requires "consideration of the development standards above what is proposed/adopted under the State Assessed Rezoning" for the precinct. Item 4 requires consideration of the "cumulative impact of this and other HDA projects on the Leppington Town Centre," and item 3 identifies "Infrastructure funding and delivery, Transport" as a matter to be addressed. Read together, these requirements oblige the proponent to assess the proposal in the context of the future precinct which the rezoning and the wider Housing Delivery Authority programme will produce, not against today's conditions in isolation.

4.3 The TIA records that Transport for NSW, in its advice on the request for SEARs dated 9 April 2025, "initially stated ... that the impact of trips generated by other approved developments near key intersections should be considered as part of modelling for the project," and that it "has since advised that ... traffic modelling is now only required to assess existing conditions plus development traffic." Two observations follow. An agency's agreement to confine the scope of intersection modelling does not displace the SEARs' independent requirement that cumulative impact be assessed, nor the obligation under item 9 to apply the GITA. And the stated basis for the relaxation, being the extent of strategic modelling already completed for the area, is only as sound as the inputs to that modelling: if the strategic work did not capture the concentrated peak hour demand of the education uses now planned on these local streets, neither it nor the Application has tested that demand.

5. Ground 1: Cumulative Traffic Impact Has Not Been Assessed

5.1 Section 9.3 of the TIA states that modelling has assessed "existing conditions plus development traffic," and Table 13 is headed "2025 intersection performance with the proposed development." No future year scenario is modelled, no background growth is applied, and no other development is included save for the nominal allowance at paragraph 5.3 below. This is notwithstanding that the development would not be complete until at least December 2029 on the proponent's own programme. The TIA therefore says nothing about the conditions that will prevail when the development is occupied; it compares the proposal against a snapshot of a single day in September 2025. Item 9 of the SEARs requires the TIA to apply the GITA, the methodology of which contemplates assessment of the future traffic environment in which a development will operate, including relevant committed and planned development. An assessment confined to a 2025 base case, for a development occupied from 2029, does not in the submitter's respectful submission satisfy that requirement.

5.2 The TIA does not overlook the school planned immediately opposite the site. Section 4.2 records that "a future school is in planning immediately opposite the site to the east," and that "connection to the future school is also facilitated via future pedestrian crossing on the new local street." The new 16 metre local street on the eastern boundary is to be shared with that site, so the proposal's own public domain design has been shaped around the school's presence. Section 9.3 then excludes it from the traffic assessment, in these terms:

"While a future school is planned for the adjacent site to the east, this development remains in planning stages with insufficient information available to consider this development as part of this assessment. Further, as it is not yet approved, there is no requirement for this potential future development to be considered as per TfNSW's original comments on the request for SEARs."

5.3 That reasoning cannot, with respect, be sustained. A development sufficiently known and proximate to shape the proposal's own public domain design, and to share delivery of the local street on its eastern boundary, is a foreseeable generator of traffic on that street. The question for the Department is not whether the proponent has done the minimum required, but whether it can be satisfied that the impacts of the proposal are acceptable. The difficulty is compounded by what the same section does next:

"A nominal 40 vehicle trips have been assigned to the northern leg of the new intersection (20 vehicle trips in and 20 vehicle trips out) to consider potential future traffic associated with the residential subdivision on the northern side of the new intersection."

5.4 The proponent has therefore made a forward allowance for potential traffic from a residential subdivision while declining to make any allowance for two schools, on the basis that unapproved future development need not be considered. The exclusion criterion has been applied selectively. If a nominal allowance is appropriate for a future residential subdivision, it is appropriate, and considerably more material, for known education uses whose peak hour demand falls in precisely the periods modelled.

5.5 The submitter's own junior campus at 325 Sixth Avenue does not appear to have been considered anywhere in the TIA, notwithstanding that its application is a matter of public record, was lodged well before the TIA was finalised on 3 June 2026, and that two of the four modelled intersections sit on its sole access route. A school of the order of 468 students and 31 staff, generating concentrated arrivals and departures within the modelled peaks, is a material input to any cumulative assessment of these intersections.

5.6 Section 9.3 further asserts that "there are no known approved developments of significance near the site that would materially impact the study intersections." That is difficult to reconcile with the Environmental Impact Statement accompanying the same Application, which identifies a substantial pipeline of nearby development including significant residential proposals on Bringelly Road and Rickard Road, and with the Leppington Town Centre being the subject of a State-assessed Rezoning Proposal intended to deliver substantial uplift across the precinct. The submitter does not contend that every proposal must be individually modelled, only that the assertion is not supported by the Application's own material.

5.7 The materiality of these omissions is heightened by their timing. The TIA identifies the network peak hours as 7:45am to 8:45am and 3:15pm to 4:15pm, which correspond closely with school arrival and departure periods. School traffic is sharply concentrated in those hours, and the proposal's own 120-place childcare centre adds further movements into the same AM window on the same streets. The period in which cumulative demand is likely to be most acute is the period the TIA has assessed least completely.

6. Ground 2: The Future Precinct Is Relied Upon to Reduce Trips but Excluded from the Network Assessment

6.1 Table 12 estimates the proposal's traffic generation. For the childcare centre a rate of 0.64 vehicle trips per child in the AM peak is adopted, consistent with the GITA rates for long day care centres, which applied to 120 children yields approximately 77 AM peak trips. Table 12 reports 19. The reduction is achieved through two discounts described in section 9.1.2: an assumption that 25 per cent of childcare trips are "linked trips" already on the network, and a further "50 per cent

reduction factor … to consider internal trips by residents within the development and future surrounding LTC."

6.2 In discounting its own traffic generation the proposal therefore relies expressly on the future build-out of the Leppington Town Centre. In modelling the network it relies on a 2025 base case in which that precinct does not exist. The proponent takes the benefit of the future precinct where it reduces its assessed impact and disclaims it where it would increase it. Those two positions cannot both be correct. If the future build-out is sufficiently certain to support a 50 per cent reduction in childcare trip generation, it is sufficiently certain to require a future year cumulative network assessment.

6.3 The reduction is also, on its face, optimistic. The surrounding precinct is substantially undeveloped, and section 3.4 of the TIA records that "limited walking and cycling infrastructure is currently available near the site," with only "intermittent footpaths" along Fifth Avenue. A more conservative assumption would materially increase the AM peak traffic attributed to the childcare centre, on a network already operating at Level of Service D at one key intersection in that peak.

7. Ground 3: Apparent Understatement of AM Residential Traffic Generation

7.1 The submitter raises a discrete matter of arithmetic which, if correct, materially affects the assessment. Section 9.1.1 states that residential generation rates of "0.19P + 1.79 for the AM peak hour and 0.20P for the PM peak hour have been adopted for this assessment, where P is the number of off-street parking spaces provided." Table 12 identifies the residential input as 512 car spaces, consistent with the parking schedule at Table 8.

7.2 Applying the stated PM rate yields 102.4 vehicle trips, and Table 12 reports 102, which confirms that P equals 512 is the intended input. Applying the stated AM rate to the same input yields 99.1 vehicle trips. Table 12 reports 74. There is therefore an apparent discrepancy of approximately 25 vehicle trips in the AM peak, being roughly 24 per cent of the total AM generation of 104 trips reported for the whole development, and it arises only in the peak coinciding with school arrival periods.

7.3 The submitter does not assert that an error has necessarily been made, and there may be an explanation not apparent from the exhibited material. It requests that the Department require the derivation of the AM figure to be set out and, if correction is required, the modelling to be revised. Taken with Ground 2, this suggests the AM peak generation may be materially greater than the 104 trips assessed, which matters because the conclusion that all intersections continue to operate satisfactorily depends on that input.

8. Ground 4: Density Sought Exceeds the Strategic Framework, and the Transport Consequences Are Untested

8.1 The concurrent planning proposal seeks a floor space ratio of 3.8:1 and a height of 55 metres, in place of 0.75:1 and 12 metres. The TIA's own account of the strategic framework records a materially lower intended yield: section 2.6.1 states that the Leppington Town Centre Indicative Layout Plan "indicates the site is on R4 High Density Residential zoned land and identified by 2.0:1 FSR controls," and section 2.6.4 that, following recent amendments, "it is understood that the proposed updates would allow for 2.5:1 FSR controls." The proposal therefore seeks a floor space ratio approximately 52 per cent above the amended strategic figure and approximately 90 per cent above the exhibited Indicative Layout Plan.

8.2 The road hierarchy, street cross sections, active transport network and intersection arrangements described at sections 2.6.2 and 2.6.3 of the TIA comprise the transport infrastructure planned to serve the precinct at the yield the strategic framework contemplates. If individual sites are consented substantially above that framework, the adequacy of that planned infrastructure is called into question. Item 3 of the SEARs anticipates precisely this, requiring "consideration of the development standards above what is proposed/adopted under the State Assessed Rezoning" and identifying "Infrastructure funding and delivery, Transport" as a matter to be addressed. The TIA does not engage with that requirement in transport terms. It does not assess whether the planned infrastructure remains adequate at the standards sought, nor identify what additional infrastructure would be required, nor how it would be funded and delivered.

9. Ground 5: Existing Network Constraint and Road Safety

9.1 The submitter relies on the TIA's own existing conditions results, at Table 6, which record for the 2025 base case:

Intersection	AM DOS	AM delay (sec)	AM LOS	PM DOS	PM delay (sec)	PM LOS
Fifth Avenue/Fourth Avenue	0.41	17	B	0.19	14	A
Fifth Avenue/Edmondson Avenue	0.46	46	D	0.29	27	B
Bringelly Road/Fourth Avenue/Dickson Road	0.90	31	C	0.92	34	C
Bringelly Road/Edmondson Avenue/Rickard Road	0.90	36	C	0.90	33	C

9.2 The Fifth Avenue/Edmondson Avenue intersection already operates at Level of Service D in the AM peak with an average delay of 46 seconds, and the TIA acknowledges that "some level of delay is currently experienced" there for the right turn onto Edmondson Avenue, particularly in the AM peak. Both Bringelly Road intersections already operate at a degree of saturation of 0.90 or above in both peaks, and one of them, Bringelly Road/Fourth Avenue/Dickson Road, is on the submitter's access route. With the proposal added (Table 13), those results are essentially unchanged. The submitter does not characterise them as demonstrating failure. Its point is that a network already operating at these levels has limited residual capacity, and that where residual capacity is limited the incremental effect of unassessed cumulative demand is precisely the matter requiring rigorous testing rather than exclusion.

9.3 Section 3.5 of the TIA reports, for the five years from 2020 to 2024, eight crashes at the Fourth Avenue/Fifth Avenue intersection, six of which "involved vehicles travelling in adjacent directions", four at Fifth Avenue/Edmondson Avenue and two at Fourth Avenue/Bringelly Road. In respect of the first, the TIA observes that the intersection "has recently been upgraded to a roundabout which likely has improved the ability for vehicles on the minor road to turn out onto Fourth Avenue." That conclusion is expressed in terms of likelihood and is not supported by post upgrade crash data or safety analysis. The submitter does not dispute that the upgrade may have improved safety, but submits that on the intersection with the highest recorded crash frequency in the study area, on the route between two school sites and carrying substantial numbers of children as pedestrians and passengers, an assumption expressed as "likely" is an insufficient basis on which to dispose of road safety.

10. Ground 6: Limitations of the Traffic Survey

10.1 Section 3.6 of the TIA records that turning movement counts were completed "on Thursday 18 September 2025 from 6:30am to 9:30am and 3:00pm to 6:00pm." The entirety of the traffic modelling for a development of 445 dwellings, and for a concurrent rezoning of the site, therefore rests on counts taken on a single day. That provides no basis for assessing day to day variability and no means of identifying whether the surveyed day was representative. Of particular relevance in a locality containing schools, the assessment does not confirm whether the surveyed day fell within the school term and whether all schools in the vicinity were operating normally. Nor has the base case been adjusted for growth between September 2025 and the earliest occupation of the development, at least three years later. The submitter requests confirmation of the representativeness of the survey day, including its relationship to the school calendar, and validation of the base case.

11. Ground 7: Car Parking Provision and On-Street Overspill

11.1 The parking assessment at section 5.1 of the TIA is undertaken against the draft Leppington Town Centre Development Control Plan. The TIA acknowledges the instrument "is still in draft format" and, as to the absence of a visitor parking rate for high density residential uses, that this "is understood to be an error." Assessment against a draft instrument with acknowledged gaps filled by the assessor's own judgment is a matter the Department may wish to weigh. On the TIA's own figures, several components fall below the minimum requirements of that draft control:

(a) Gymnasium: 25 spaces are required for the 496 square metre gymnasium; five are proposed, a shortfall of 20;

(b) Retail in Buildings B and C: three spaces are required for 291 square metres of retail floor space; none are proposed; and

(c) Residential in Buildings B and C: 304 spaces are required; 301 are proposed.

11.2 The justifications offered rest on the same assumption identified in Ground 2, being a walkable, built-out precinct generating internal pedestrian trade, the gymnasium shortfall being justified on the basis that the gym "would largely attract residents within the development itself … who would walk to the site rather than drive." As the TIA itself records at section 3.4, walking infrastructure near the site is presently "limited." Where the assumption of walk-up patronage does not hold the demand does not disappear; it presents as demand for on-street parking. That demand would be accommodated on Fifth Avenue and on the new 16 metre local street along the site's eastern boundary, being the street the TIA identifies as providing pedestrian connection to the school opposite via a "future pedestrian crossing." On-street overspill in the immediate vicinity of a school frontage and a school crossing raises both amenity and child safety considerations.

12. Ground 8: Pedestrian and Active Transport Provision in a School Context

12.1 Section 3.4 of the TIA records that "limited walking and cycling infrastructure is currently available near the site," that footpaths on Fifth Avenue are "intermittent" and provided only on the northern side, and that further infrastructure "will be delivered as more of the LTC and surrounding area is developed." The draft Development Control Plan envisages "a shared path along the southern side of Fifth Avenue adjacent to the site" and a bi-directional cycleway on Edmondson Avenue, and section 4.2 records that connection to the school opposite "is also facilitated via future pedestrian crossing on the new local street."

12.2 The submitter supports each of these elements. Its concern is that the exhibited material neither commits to their delivery nor assesses their adequacy for school related pedestrian movement. In particular, it does not appear to establish:

(a) whether the shared path on the southern side of Fifth Avenue will be delivered as part of this development, and if so at what stage;

(b) the design, location, control and delivery timing of the "future pedestrian crossing" on the new local street, and whether it will be capable of safely accommodating school arrival and departure volumes; and

(c) whether footpath provision on the site's frontages will be continuous and connected to the existing intermittent network, and how children walking to and from schools in the locality will be accommodated between the new local street, Fifth Avenue and Fourth Avenue.

12.3 The submitter requests that these matters be resolved and that delivery of frontage active transport infrastructure be secured by condition, rather than left to the general expectation that facilities "will be delivered as more of the LTC and surrounding area is developed."

13. Ground 9: Construction Traffic and Pedestrian Management

13.1 Item 9 of the SEARs requires a preliminary Construction Traffic Management Plan as part of the TIA, and section 10 responds with an overview Construction Pedestrian and Traffic Management Plan ("CPTMP"). Section 10.7 states that construction vehicles would include heavy rigid trucks of up to 12.5 metres, truck and dog combinations of up to 18.1 metres and semi-trailers of up to 19 metres, generating "up to 100 heavy vehicles per day or 10 heavy vehicles per hour," and acknowledges that although movements would be "confined to the arterial road network wherever feasible," "use of Fourth Avenue and Fifth Avenue (local roads) would be required in order to access the site."

13.2 Fourth Avenue is the road on which the submitter's existing campus is situated and the principal route by which traffic to and from its proposed junior campus would reach the arterial network. The construction programme would therefore route heavy vehicles along local roads carrying school traffic and school pedestrian activity. The TIA's assessment is that 100 heavy vehicles per

day "is notably lower than the operational traffic expected to be generated by the development and therefore is expected to be manageable." A comparison between construction volumes and the development's own future operational volumes does not address the question that matters, which is the interaction between heavy construction vehicles and children on local roads.

13.3 Three further matters require resolution. First, section 10.3 states that Council's standard construction hours are understood to be "Monday to Saturday: 7:00am to 5:00pm," while the Environmental Impact Statement states "Monday to Friday, 7:00am to 6:00pm"; on either version construction would coincide with school arrival periods from 7:00am. Second, the two construction stages overlap during 2029 and it is unclear whether the estimate of 100 heavy vehicles per day accounts for concurrent activity. Third, section 10.6 states that "exact construction worker numbers are currently unknown," with the consequence that no assessment of on-street parking displacement during construction has been undertaken.

13.4 Section 10.8 concludes that "no footpaths are currently provided along the southern side of Fifth Avenue and therefore the impacts to pedestrians and cyclists are expected to be minimal." That reasoning is inverted. The absence of footpaths on the construction frontage is not a reason to conclude that pedestrian impacts are minimal but a reason for concern, because pedestrians, including children, must share the carriageway with construction traffic. It is also inconsistent with the draft Development Control Plan's designation of a shared path along that frontage.

13.5 The submitter requests that the Department require, and secure by condition, that any Construction Pedestrian and Traffic Management Plan:

(a) identify all schools on or adjacent to nominated construction vehicle routes, and be prepared in consultation with them;

(b) prohibit heavy vehicle movements on Fourth Avenue and Sixth Avenue during school arrival and departure periods, and restrict such movements on Fifth Avenue during those periods;

(c) provide continuous, protected pedestrian routes past the construction site and along nominated haulage routes, notwithstanding the current absence of footpaths;

(d) address construction worker parking based on confirmed worker numbers, with measures to prevent overspill into streets serving school frontages;

(e) account for concurrent activity where construction stages overlap; and

(f) include a mechanism for notification to, and liaison with, affected schools before and during construction.

14. Amenity

14.1 The submitter raises amenity to ensure the matter is considered against the SEARs rather than as a principal ground. Item 7 requires that "a high level of environmental amenity for any surrounding residential or other sensitive land uses must be demonstrated," together with a solar access analysis of overshadowing during the winter solstice at hourly intervals between 9am and 3pm. A school is plainly a sensitive land use for these purposes. Given a proposed height of up to approximately 53.85 metres in a locality presently characterised by low density development, the submitter requests that the Department satisfy itself that overshadowing, visual privacy, wind and reflectivity impacts on surrounding sensitive land uses, including schools and their outdoor play and assembly areas, have been specifically assessed and demonstrated to be acceptable, and that construction noise, vibration and dust impacts on nearby sensitive receivers be addressed in the relevant management plans and secured by condition.

15. Conclusion and Requests

15.1 The submitter supports housing delivery within the Leppington Town Centre and does not oppose the redevelopment of 184 to 186 Fifth Avenue in principle. Its submission is that the Application, as exhibited, does not demonstrate that the transport impacts of the proposal will be acceptable.

15.2 The transport assessment tests a single day in September 2025 against a development to be occupied from 2029 onwards. It excludes the school immediately opposite the site, around which

the proposal's own public domain is designed, while in the same paragraph making a nominal allowance for a residential subdivision, and it omits the submitter's junior campus entirely although that campus loads onto two of the four modelled intersections. On the proponent's own figures one key intersection already operates at Level of Service D in the AM peak and two operate at ninety per cent or more of capacity in both peaks. In that setting the omitted demand is not a technicality: the AM peak the assessment treats least completely is the peak in which school traffic, childcare traffic and residential traffic would coincide.

15.3 The submitter therefore respectfully requests that the Department:

(a) require a supplementary transport assessment, prepared in accordance with the GITA methodology as required by item 9 of the SEARs, which adopts an appropriate future year cumulative base case incorporating background traffic growth and the traffic generated by committed and planned development in the vicinity, including the school planned immediately opposite the site and the submitter's junior campus at 325 Sixth Avenue, and which models cumulative performance of all study intersections in both peak periods;

(b) require the proponent to reconcile its treatment of future development, being the reliance on future precinct build-out to discount childcare trip generation on the one hand and the exclusion of future development from network modelling on the other, and to adopt a consistent position;

(c) require the derivation of the AM residential traffic generation estimate to be set out and verified, and the modelling to be corrected if required;

(d) require assessment of the transport infrastructure necessary to support the yield sought by the concurrent planning proposal, having regard to the floor space ratio contemplated for the site under the strategic framework, together with the means by which that infrastructure is to be funded and delivered, consistent with item 3 of the SEARs;

(e) require a road safety assessment of the study intersections which accounts for the presence of schools on the affected local roads and for associated child pedestrian activity;

(f) require confirmation of the representativeness of the September 2025 traffic survey, including its relationship to the school calendar, and validation of the base case;

(g) require justification of the car parking shortfalls by reference to demonstrated demand, and impose measures to manage on-street parking overspill in the vicinity of school frontages;

(h) secure delivery of frontage active transport infrastructure by condition, including the shared path on the southern side of Fifth Avenue and the pedestrian crossing on the new local street, with design and timing resolved;

(i) impose conditions requiring a Construction Pedestrian and Traffic Management Plan addressing the matters set out at paragraph 13.5, including restrictions on heavy vehicle movements during school arrival and departure periods and consultation with affected schools;

(j) resolve the inconsistency in stated construction hours between the Transport Impact Assessment and the Environmental Impact Statement; and

(k) satisfy itself that amenity impacts on surrounding sensitive land uses, including schools, have been assessed and demonstrated to be acceptable consistent with item 7 of the SEARs.

15.4 Should the Department form the view that these matters cannot be resolved by the imposition of conditions, the submitter submits that the appropriate course is to require the proponent to provide the further assessment described above and to re-exhibit the amended material, rather than to determine the Application on the basis presently before the Department.

15.5 The submitter requests that it be notified of the determination of the Application and would welcome the opportunity to provide any further information the Department may require.

Yours faithfully

Mari Alvarez
Associate Director
Ascot Project Management