

4 December 2019

Karen Harragon
Director, Social and Infrastructure Assessments
Department of Planning, Industry & Environment
GPO Box 39
Sydney NSW 2001

Dear Karen,

SSD-9831 - SUBMISSION TO STATE SIGNIFICANT DEVELOPMENT APPLICATION (SSD) FOR THE DEVELOPMENT OF THE WESTERN SYDNEY UNIVERSITY BANKSTOWN CITY CAMPUS (SSD-9831) LOCATED AT 74 RICKARD ROAD, BANKSTOWN

We refer to the above State Significant Development Application (SSD) made by the Western Sydney University seeking development consent from the Department of Planning, Industry & Environment (the Department) for '*construction of a 21-storey building (including two basement levels) for Western Sydney University education use and associated research space, conference facilities and retail uses. The proposal includes public domain works, landscaping and signage*'. The proposed Western Sydney University Bankstown City Campus (BCC) will occupy the current car park at 74 Rickard Road, Bankstown in the Canterbury-Bankstown Local Government Area (development site). Milestone lodge this submission on behalf of ALDI Stores (A Limited Partnership) (ALDI) during the public notification of this SSD.

We understand that the proposal will result in the loss of 43 existing parking spaces (on the site) and 16 spaces along The Appian Way which are currently used as Canterbury Bankstown Council (Council) vehicle bays. The proposal will provide 94 car spaces within the basement levels of the new building for future BCC staff use only. The loss of car parking, influx of 2,000 students and provision of parking for university staff only will pose significant impacts on ALDI's carpark located a short 2 minute walk from the development site.

1. BACKGROUND

ALDI own and operate the ALDI Store at 440-460 Chapel Road, Bankstown (legally known as Lot 1, DP 1176985), which is located approximately 110m to the north west of the development site (refer to **Figure 1**). The ALDI Store has frontages to Rickard Road to the south, Chapel Road to the east, Kitchener Parade to the west and has a total site area of 8,647m². The ALDI Store and associated customer car parking area comprising 133 car spaces can be accessed via entry and exit points located off Chapel Road, Kitchener Parade and Rickard Road.

The ALDI Store operates seven days a week opening at 8.30am daily and closing at 9.00pm Monday to Friday and 8.00pm Saturday and Sunday. The ALDI Store has Council's development consent to undertake deliveries 24 hours, 7 days in accordance with Condition 83 of DA Consent No. DA-1802/2000/5. Truck deliveries access the site via Kitchener Parade using 19m articulated trucks.

The existing ALDI car park is well utilised at all times and maintaining the availability of these car parking spaces for ALDI customers is a key priority as it essential for the commercial viability of the ALDI Store and ensures customer convenience and access to shop at the ALDI Store. ALDI car park has a ticketed paid parking system with the first hour free and is monitored by car park management contractor, InterPark Australia Pty Ltd.

This submission raises concerns regarding the potential adverse impacts of the proposed development to the operation and commercial viability of the ALDI Store. In particular, concern is raised over the significant impact the proposed development will have on the availability of the ALDI car parking spaces for customers of the ALDI Store. The concerns relate to both the construction and operational phases of the proposed development.

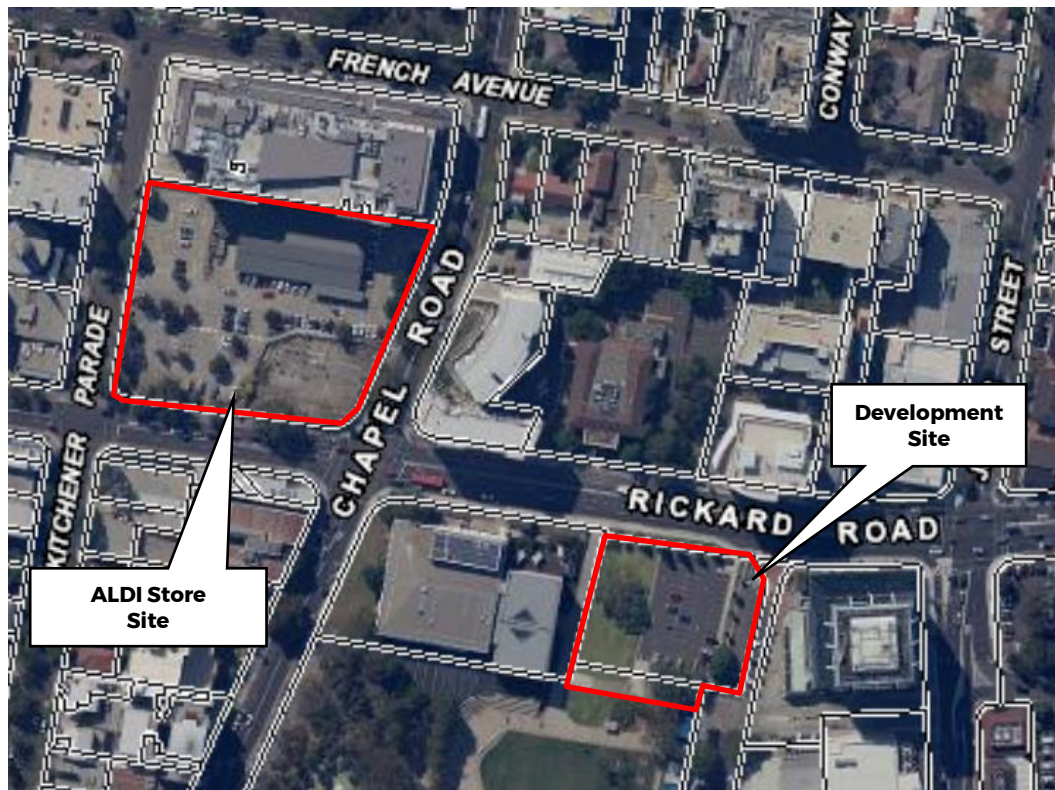


Figure 1: Aerial Photograph Illustrating Site Context
Source: Six Map 2019

2. ISSUES OF CONCERN

2.1 Inconsistent documentation

Milestone has reviewed the submitted SSD documentation available on the Department's website. The following insufficient and inconsistent information in relation to the proposed development is noted and should be addressed by the applicant:

Proposed Capacity of the BCC

Section 8.14 Impacts on Parking of the Environmental Impact Statement (EIS) prepared by Urbis dated 24 October 2019 (Page 192) indicates the following:

'It is anticipated that 5% of students will travel to and from campus by private vehicles, creating a demand of 200 spaces. This makes up 3% of the parking within the Bankstown CBD.'

Section 5.9.2 Other Parking of the Transport Management and Accessibility Plan (TMAP) prepared by Arup dated 27 August 2019 (Page 53) states:

'Based on a 5% student car driver mode share and a maximum student population of 2,000 at any one time, demand for parking is not expected to exceed 100 spaces, representing less than 1.5% of the parking provision in the Bankstown CBD.'

It is understood from the TMAP that the proposed BCC will accommodate around 2,000 students and 650 staff. However, the submitted EIS provides an inconsistent number of student parking demand and no information relating to estimated number of staff that will require car parking.

This is not only a significant variation but fundamental to the scope and impacts generated by the proposed development including parking requirements. Confirmation is sought from the Department of the estimated number of students and staff that the proposed development will accommodate and request revised reports are submitted by the applicant to correct the inconsistencies.

2.2 Car Parking Implications - Construction Phase

The proposed development involves construction of a 21 storey building over two basement car park levels on the development site. This will involve a lengthy construction period of 18 months and a significant on-site presence in terms of construction personnel.

The Preliminary Construction Pedestrian and Traffic Management Plan (CPTMP) prepared by Arup dated 27 August 2019 submitted with the SSD addresses traffic management during the construction phase of the proposed development. Milestone notes the following from CPTMP relating to car parking implications for the development during the construction phase:

'Initially, no on-site parking will be provided for construction staff. Construction staff will be encouraged to use public transport. Any staff driving will need to avail of public parking in the surrounding area.'

The TMAP indicates that the draft Bankstown Complete Streets project estimated 865 on-street parking spaces within the Bankstown CBD. The final Bankstown Complete Streets project has been adopted by Council at the 22 October 2019 Council meeting and estimated there will be a total of 530 on-street parking spaces once all adopted street improvements are constructed.

On-street parking spaces surrounding the development site are 15 minute, 30 minute and 1-2 hour time limited (refer to **Figure 2**).

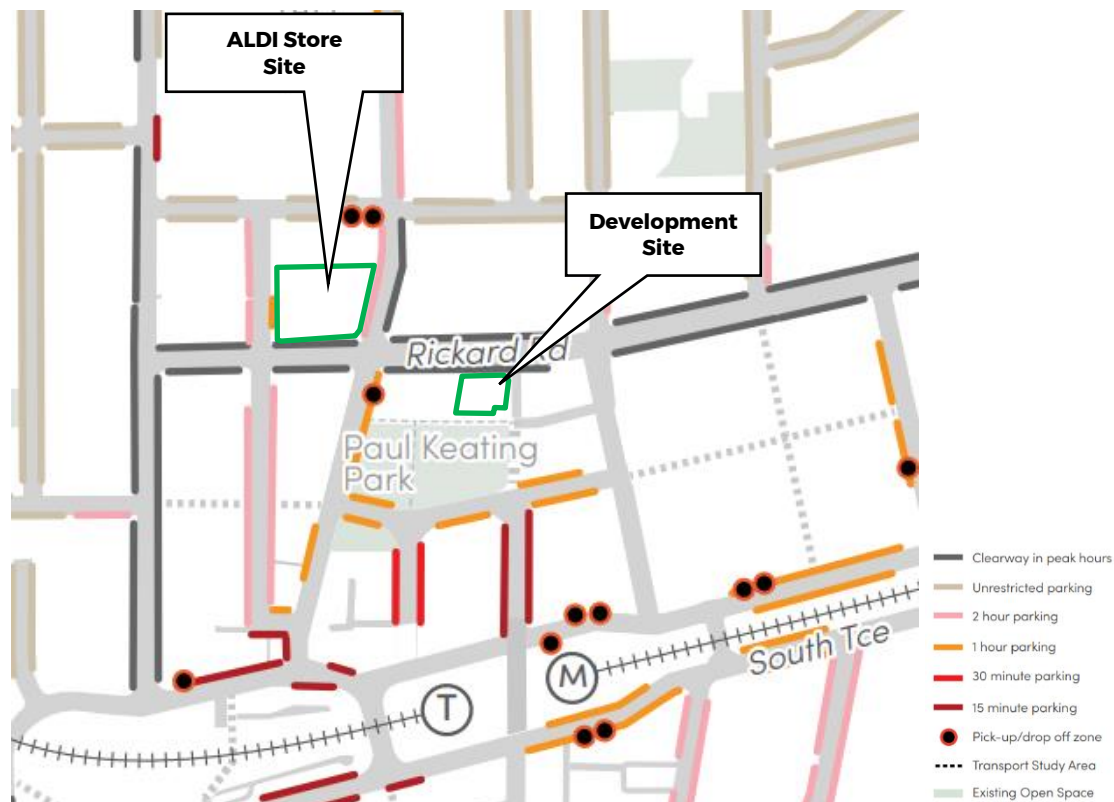


Figure 2: Future Bankstown CBD On-street parking
Source: Bankstown Complete Streets Project

In light of the above factors, car parking associated with the construction phase of the proposed development will likely be located within ALDI's car park (133 car spaces) given its proximity, ease of access via three street frontages, its at-grade design and free parking period allowance. It is expected the parking of vehicles related to construction activity will commence early in the morning and lasts throughout the day. This has the potential to impact on the availability of car parking spaces within ALDI's car park as construction workers seek to park in a convenient area without time restrictions and

low parking fares. It is likely many construction workers will drive to the site due to heavy tools and equipment that are required to be transported each day. As a result less car parking spaces will be available for use by ALDI customers who may therefore seek alternative arrangements for grocery shopping. The reduced availability of car parking for ALDI customers has the potential to have adverse impacts on the commercial viability of the ALDI store through reduced sales.

Milestone also notes from the CPTMP that:

'A final Construction Pedestrian and Traffic Management Plan will be developed by the appointed Contractor and submitted to Council for approval following liaison with relevant stakeholders such as Council, TfNSW, RMS and neighbouring developments.'

Milestone requests the final CPTMP clearly states that under no circumstances that construction staff are to use the ALDI car park. Milestone requires to review and comment on the final CPTMP prior to its approval by the Department.

2.3 Car Parking Implications - Operational Phase

The proposal will result in the loss of 59 existing car parking spaces on the site that are currently used by the public and Council Staff. The proposal will provide 94 car spaces within the basement levels of the new building for future BCC staff use only.

We understand that the Bankstown Development Control Plan 2015 does not specify a parking rate for tertiary educational establishments, neither does the Roads and Maritime Services' publication *Guide to Traffic Generating Developments, Section 5 - Parking Requirements for Specific Land Uses (October 2002)*. The submitted TMAP states:

'With the introduction of Metro, and the CBD car parking review being undertaken by Council as part of the draft Bankstown Complete Streets Project, the provision of additional public parking in the city centre is not aligned with the future vision for the CBD.'

The proposed parking provision for the University / Education space is considered adequate in the context of the broader transport objectives for the Bankstown CBD.'

Notwithstanding, it is considered the proposed 94 car spaces are insufficient to meet the parking requirements of the proposed BCC as it comprises only 14% of the total 650 staff employed.

The TMAP states that a comprehensive Green Travel Plan will be prepared to inform staff and students of public transport options and encouraging use of public transport. However, given the limited car spaces on site for staff use only, students who drive to the BCC will seek alternative car parking arrangements outside the BCC site and use existing public parking spaces in the surrounding Bankstown CBD area, most likely within the ALDI car park which is a convenient parking location with an hour free parking period and ongoing low parking fares of \$8 for 2-3 hours.

Milestone expects staff will park outside the proposed development and most likely within the ALDI car park should the car parking of the development be fully occupied by other staff.

Further, Council staff who use existing car park currently located at the development site will also seek alternative car parking arrangements and most likely within on-street spaces and the ALDI car park.

It is a reasonable conclusion that the ALDI car park will be used to meet car parking demands of the proposed development. From an ALDI perspective this situation is unacceptable and inequitable as it will result in reduced availability of car parking for genuine ALDI customers. In addition this has the potential to adversely impact on the commercial viability of the ALDI Store through reduced sales.

3. CONCLUSION

Based on Milestone's review of the publicly exhibited SSD documentation, we raise significant concerns that the proposed development will give rise to parking within ALDI's parking spaces during the construction and operational phases of the proposed development and as a result, reduce access to car parking for ALDI customers and staff. The use of ALDI's car park by construction workers, university students and staff will adversely impact on the commercial viability of the ALDI Store.

Based on Milestone's review of the available SSD documentation we request the Department obtains the following information from the applicant:

- Clarification and correction of inconsistencies regarding student and staff parking demand and available on-street parking in the Bankstown CBD in context of the adopted Complete Streets strategy.
- A thorough assessment of the impact of the expected number of construction workers during all phases of construction as well as 650 staff and 2,000 students parking in the Bankstown CBD focussing on the ALDI Store car park.
- A detailed Green Travel Plan is submitted to demonstrate how construction workers will be encouraged to travel to and from the site via public transport. The Green Travel Plan must state ALDI's car park must not be used at any time.

Should the State Significant Development Application be supported by the Department we request the following:

- The final CPTMP containing information relating 'under no circumstances that the construction staff can use the ALDI car park' to be provided by the applicant.
- Milestone on behalf of ALDI to review and comment on the final CPTMP prior to it is approved by the Department.
- Comprehensive Green Travel Plan containing information relating 'under no circumstances that the staff and students can use the ALDI car park' to be provided by the applicant.

We welcome the opportunity to discuss these issues with the Department in more detail. Please do not hesitate to contact the undersigned should you require further clarification of this matter.

Yours sincerely

Milestone (AUST) Pty Limited



Patrick Lebon
Director