



Representing the community's interests in safely getting
around on bicycles in Sydney's eastern suburbs



Submission on Uniting War Memorial Hospital Waverley

March 2025

BIKEast Incorporated
Bondi Junction NSW 1355
PO Box 1601
contact@bikeeast.org.au

Mitchell Price,
submitted via the [Major Projects website](#)

General Comments

BIKEast¹ is pleased to make a submission on the State Significant Development (SSD) Application for the Seniors Housing development at the Uniting War Memorial Hospital Waverley site. Our vision for the eastern suburbs includes a regional network of high-standard (safe, separated, connected, and convenient) cycleways and other bike-friendly facilities (e.g. shared paths, quiet streets) that encourage people of all ages to ride bicycles more often.

BIKEast also operates the Sydney East Chapter of [Cycling Without Age Australia](#) (CWA) a program that provides services to aged care facilities.

Birrel St and Bronte Rd are important routes in the local bike route network linking Bondi Junction with Waverley Park/Bondi/South Bondi/Tamarama and Queens Park/Centennial Park (via Birrell St) and Waverley/Clovelly and Bronte (via Bronte Rd). The Waverley Estate's location at the intersection of these routes highlights the need for improvements to the standard of bike route infrastructure and integrating active transport and sustainable transport initiative within the final designs.

Based on discussion with our members who have an interest in potential owners of Independent Living Units (ILUs) and programs for supporting residents in aged care, we have also reviewed the relevant sections of the Environmental Impact Statement (EIS) and submit comments on provision of car parking, bicycle parking, and supporting options for accessing car/e-bike sharing services. In addition to the general comments below, we provide more detailed comments on Traffic, Transport and Accessibility and the Green Travel Plan.

General Comments

BIKEast believes that any significant development in the Waverley LGA must be assessed against the urgent need to facilitate and encourage more people to ride bicycles, and embed design principles that reduce dependence on motor vehicles for trips in the local area, consistent with:

- Council declaring a "Climate and Biodiversity Emergency" in December 2019, with the Mayor "call[ing] on our political leader to do more to urgently address climate change".
- Transport emissions accounting for 20% of Australia's greenhouse gas emissions and having risen 14% between 2005 and 2020.

¹ BIKEast is a Bicycle NSW affiliated bicycle user group representing the interests of people who ride bicycles to get around in Sydney's eastern suburbs.



- Council resolving on 15 March 2022 to adopt an “ambitious” community greenhouse gas emission target of net zero by 2035².
- Council noting in September 2022 the “urgency of reducing greenhouse gas emissions” and the potential shortfall in reaching its net zero target, which could be assisted by an (unambitious) 15% reduction in private car trips by 2035.
- Council’s 2017 *People, Movement and Places Strategy* which identifies:
 - half of all trips in Waverley could be made by bike within 10 minutes
 - rates of cycling in Waverley are double that of the Sydney average, with rates Tamarama and Bronte (served by Birrell Street) almost double that again³
 - transport hierarchy which places pedestrians first, bicycles second and private vehicles last
 - strong community support for separated cycleway projects, which were nominated as the highest transport priority by a large margin⁴
- Council’s 2021 *Bike Plan Renewal engagement survey* showing that:
 - 69% of respondents feel unsafe riding around Waverley⁵
 - Approximately 72% of the community are “interested but concerned riders” – a significant majority who would benefit most from improved infrastructure⁶.

An outstanding value of the Uniting War Memorial Hospital site is its proximity to Bondi Junction CBD, railway station and bus interchange, its cycling network, plus Waverley Council’s long-standing support to car sharing services. It is in this context that we submit the following comments on the SSD Application and associated documentation.

Our specific comments relate to the following issues relevant to the planning and design stage of the proposed development.

- Overprovision of car parking spaces for ILUs
- Car sharing service: spatial planning
- Parking and use of bicycles for ILU residents
- **Error! Reference source not found.**

These issues are interlinked, and BIKEast requests they be considered together.

² CM/6.1.22.03

³ People, Movement and Places Strategy, Page 10

⁴ People, Movement and Places Strategy, Page 20

⁵ 2021 Bike Plan Renewal engagement survey, Page 2

⁶ 2021 Bike Plan Renewal engagement survey, Page 5



Specific Comments on Traffic, Transport and Accessibility

Section 10 of the SEAR⁷ (Traffic, Transport and Accessibility) details the requirements of a Transport and Accessibility Impact Assessment. Appendix A of the EIS claims that this requirement has been satisfied by s6.1.10 of the EIS and Appendix 40 (Traffic Impact Assessment).

Overprovision of car parking spaces for ILUs

The Traffic Impact Assessment applies the statutory requirements for calculating the **Combined Parking Requirements** (Table 4) adding in the Applicant's claim for higher levels Table 5 (p.27) reasoning "commercial feasibility and to ensure all parking provisions for residents are provided onsite" (p.25). BIKEast raises the following concerns with the Applicant's claim:

- Inappropriate allocation of car parking spaces increases construction costs
- ILU prices would be bundled with the cost of basement car parking; and
- Proposal based on presumption that all ILUs would have requirements for car storage (at rates according to size of ILU & social housing allocation 0.4/ILU).

The Applicant's rationale appears to assume that all prospective ILU residents would own and want to pay the cost for a bundled car parking space.

ABS Census transport data for residents within the Waverley-Bondi Junction SA2 area are presented in the Green Travel Plan which concludes that *travel mode data also demonstrates minimal use of private vehicles*.⁸ Of course the incoming occupants of ILUs would be drawn from a much wider geographic area where the (sustainable) habits of non-private car use are not so strong. No data is advanced about the mobility of residents of ILUs/retirement villages – the sociability of retirement villages may well influence travel patterns and mode choice (including car sharing services).

Based on anecdotal evidence, the provision of a basement car parking space adds significantly to the price of an ILU. It is also worth noting that not all incoming residents of ILUs own a car, and that within 6 months of moving in, new residents often sell their cars to unload the financial burdens of car ownership and enjoy the availability of public transport and e-bike / car sharing options.

Could the cost of ILUs be lowered by offering some ILUs without car parking spaces?

Might this approach also improve the commercial viability of local e-bike and car sharing services?

With the cost of housing being a prominent societal issue, we believe it could be opportune to review SEPP Housing 2021 Seniors Living to amend the high levels of car parking required. This would be a win for the Applicant's commitment to Ecologically Sustainable Development (ESD), consistent with its 2023 report actions "to disrupt entrenched disadvantage" (p.3) and ensuring transport choice.

⁷ Planning Secretary's Environmental Assessment Requirements (SEAR)

⁸ Traffix Consultants – Appendix 22 Green Travel Plan, p.7.



Car sharing service: spatial planning

ILU residents would benefit from easy access to car sharing services, shared with the public.

The benefits of car sharing relate to this proposal's aims:

- enables greater choice of transport mode, consistent with ESD and physical and mental health
- social equity, affordability – especially given the 23 ILUs allocated for social housing
- a good number of carshare spots on site or in proximity would give enable people without ownership to drive or be driven in a car.

Inclusion of car sharing services would strengthen the Applicant's goal of integration with the local community - as expressed in the Applicants intergenerational design for this site.

Car sharing services effectively reduce private car ownership and demand for car storage and cater to people who already live car-free⁹. The efficiency of car sharing is reflected in the Table 4 Waverley DCP (p.54-55), mentioned in the Traffic Impact Assessment (p. 30) – "1 car share space can be provided in lieu of 4 car spaces". The Traffic Impact Assessment presents a site audit (p. 3-7) that omits car sharing. It appears that the Applicant is not planning for residents of ILU to use car sharing services.

- The Traffic Impact Assessment and other documentation (Appendix 2 - Architectural Plans) appear to deal only with the Applicant's cars collectively, where those cars-in-their-pool are shared by staff not residents.
- To Waverley DCP – 2022 (incl. Waverley DCP - SSD Edina 7.8.4 (c) page (p.117) rates of car share spaces refer back to the general provisions B7, being the same generally for residential development and for Edina.
- On car sharing spaces Waverley DCP B7 7.7 (b) "...must be publicly accessible ..." And 7.7 (c) "in optimum positions within the parking area.. to allow ease of access to car share vehicles by residents and the public."
- The Applicant's comment to Waverley DCP – SSD refers back to General Provisions B7 7.7 (b) (p. 51): "...accessible to those who use those spaces..." – i.e. not publicly accessible, as stated in Clause 7.7 (b).
- The Traffic Impact Assessment (p.30) dismisses Council's guidance on rates of provision for car sharing spaces on the basis that "the ILU component would not be considered a standard residential ... development."

The intent of Waverley DCP seems clear. However, the Applicant's comments seems to result in lower standards (less choice, less ESD) appear then to apply to an ILU a unit in "residential development". It would benefit the Applicant to obtain data about the uptake of car sharing services by residents of existing ILUs where these services are available (e.g. Leichhardt, Mosman or Parramatta).

We urge the Applicant to consider car sharing services for ILU residents and possible design and planning consequences.

⁹ SEPP Housing 2021 certainly needs updating to encourage 'car-free' choices.



Parking and use of bicycles for ILU residents

Provision for bicycles is part of Waverley DCP 2022 Edina E7 7.8.3 (f) which refers up to the general provisions B7 7.4 Pedestrian/Bicycle Circulation and Safety and B7 7.2 (a) – (k), found at Attachment 43 (pp. 44,45). The Traffic Impact Assessment (p.47) refers to staff, visitors and residents being provided with bicycle facilities, with spaces for the resident “in the form of storage cages” (p. 29)

minimum bicycle parking requirements

Both the Traffic Impact Assessment and Green Travel Plan (pp. 47 and 11, respectively) refer to residents, and others, being provided with end-of-trip facilities and secure bicycle storage within the basement. Elsewhere, Appendix 7 Architectural Design Report page 137 describes the storage for ILUs as follows:

Each apartment has been provided with well-designed and compliant storage. As a minimum each apartment will achieve the following storage areas: • Studio = 4m³ • 1 Bedroom = 6m³ • 2 Bedroom = 8m³ • 3 Bedroom = 10m³ • At least 50% of the required storage will be located within the apartment.

Does this mean that an ILU resident is expected to store their bicycle either in their apartment or in the storage cage? If true, does this then mean that, in real terms, no secured bicycle parking spaces are planned to be provided? If this is the case, then the TIA Table 6 (p.29) is misleading, or one might even say double-dipping?

Management of personal e-bicycles also need further consideration together with location of charging facilities. Data about ownership of these vehicles and use by residents of ILUs would be valuable for planning and design rather than deferring consideration until construction or occupation stage to avoid lost opportunities for sustainability.

Closer scrutiny of how bicycles are accommodated within the proposed development is desirable given the attention required to managing conflicts in the circulation of vehicles and between pedestrians and cyclists; E.g. as for Waverley DCP SSD Edina – Part E7 7.8.2 (c) and 7.8.2 (e).

Cycling Without Age – for RACF and ILUs – planning & design

Cycling Without Age (CWA) is a not-for-profit program providing *a community service by connecting those no longer able to ride for themselves with their community and the outdoors by giving them free rides on trishaw ebikes, piloted by volunteer cyclists*. The CWA services offer inclusivity, provide joy, and connections inter-generationally. This program aligns with the Applicant’s commitment to ‘disrupt entrenched disadvantage’.

CWA already operates programs in Sydney’ eastern suburbs. For example, residents at M by Montefiore (with 79 luxury ILUs) enjoy outdoor rides and this retirement village provides housing and charging facilities for this trishaw e-bike.

Being outdoors, trishaw e-bike rides, are sometimes in nature, such as Centennial Park so that participants can enjoy being outside while obtaining the evidenced-based benefits for mental and physical health. The Green Transport Plan (3.10 Mobility) mentions well-being and health, although omitting both car sharing services and such innovative services as CWA which have planning and design consequences.

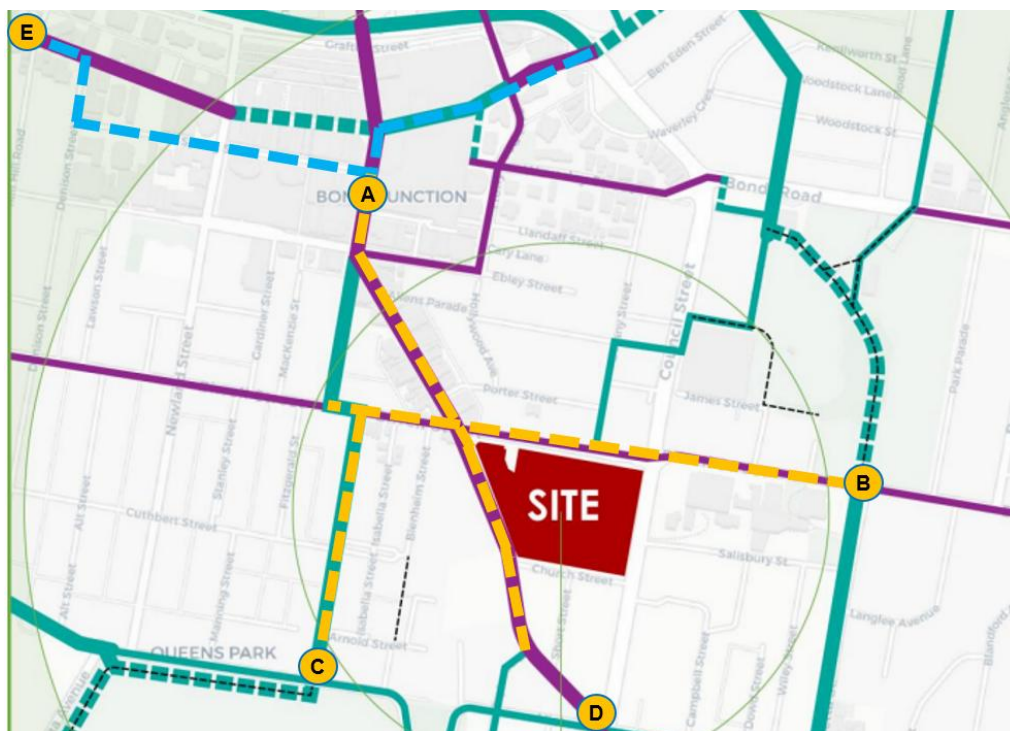


Specific Comments on the Green Travel Plan

Section 2.2 of the Green Travel Plan states that: *Bicycle facilities are provided in the surrounding area, with several on-road and off-road bicycle routes available in the locality.*

While this statement is not untrue, it is inaccurate to describe bike routes as ‘cycleways’ and the existing bike routes adjoining the site are all onroad and not particularly ‘bike friendly’. We have used the diagram included in the Green Transport Plan to highlight a significant missing elements of the existing network (Bondi Junction cycleway – blue dashed line) and routes where significant improvements are required to create ‘bike-friendly’ separated cycleways (yellow dashed lines) that could enable residents, visitors and workers to access the Bondi Junction shopping centre (A), Waverley Park (B), Queens Park (C), Charing Cross village (D), and Centennial Park/ Woollahra/ Paddington (E). Only when these connections have been completed to a similar standard to the Bondi Junction cycleway will it be accurate to say that these “cycleways can be used in conjunction with one another in order to provide connections to the wider bicycle network”.

We urge the State Government and Waverley Council to prioritise funding for these network improvements to enable more sustainable transport outcomes in association with the proposed development of the site.



While this Green Travel Plan outlines some actions, it anticipates the work to be undertaken at the occupation stage. In previous section we have noted the risk of under-estimating:

- the usage of bicycles and micromobility devices (all types of human/electric powered), with the uptake of e-bikes, and
- for ILU residents, usage of car sharing services.



As recommend above, further scrutiny of these issues may be warrant amending elements of the design of the site. Further, the Green Travel Plan refers to later providing site-specific measures and noting that such measures would need to include relations with service providers offsite. This is the practice with modern transport operators, as well as the literature on experience with Green Travel Plans/Travel Demand Management.

Concluding Remarks

BIKEast supports the proposed development of the Uniting War Memorial Hospital Waverley site and is pleased to see that the Applicant has made significant commitments to Ecologically Sustainable Development (ESD), as detailed in Appendix 19¹⁰, and particularly Mobility. However, we are concerned that unless surrounding bike route infrastructure is not improved before the proposed development is completed, and on-site infrastructure for bicycle parking doesn't meet best practise, that commitments to UN Sustainable Design Goals for Sustainable Cities & Communities, and the associated targets and initiatives detailed in section 3.10 will be difficult to achieve. For this reason, we are pleased that the Applicant has committed to preparing an Integrated Transport Plan (section 7) and look forward to providing input to this Plan when the opportunity arises.

Sincerely,



Mark Worthington

President, BIKEast (Advocacy Coordinator for Waverley LGA)

¹⁰ WSP, December 2024, ESD Concept Strategy Report