Re: Submission on Application SSD-70066710 – 2-14 Vine Street, 16-30 Vine Street and 32-34 Eveleigh Street, Redfern

SUBMISSION ON PARKING AND TRAFFIC IMPACTS

This submission outlines our concerns regarding the traffic and parking impacts of the proposed Hudson Vine redevelopment.

While the architectural design is commendable and urban renewal is broadly welcomed, the proposal significantly underestimates the impact of introducing up to 900 daily occupants into an already constrained residential area.

The supporting traffic assessment is based on flawed assumptions that disconnect parking provision from actual transport demand, and mitigation strategies proposed in the Social Impact Assessment acknowledge that resident concerns are both valid and unresolved.

Without adjustments to parking provision and surrounding street management, this development will place unsustainable pressure on local infrastructure and undermine residential amenity.

Summary of Key Issues and Supporting Evidence

1. Existing Parking Pressure
2. Loss and Underprovision of Parking
3. Significant increase in site activity
4. Flaws and Omissions in the Traffic and Parking Assessment
5. Unreliable dependence on voluntary behaviour change
6. No Designated ride-share drop offs
7. Construction Phase Parking Pressure

Appendix A: Calculation of Parking Space Changes
Appendix B: Parking Occupancy Data and Survey Analysis
Appendix C: Photographic Evidence of Street Parking Conditions
Appendix D: 2021 Census Data (Car Ownership and Travel to Work)
Appendix E: Austroads Reference on 85% Parking Stress Threshold

1. EXISTING PARKING PRESSURE

Parking in the surrounding streets is already difficult, particularly during working hours. Despite the close proximity to public transport options, local observations show that **workers continue to travel by private car, as evidenced by increased parking demand during business hours**.

According to established traffic planning principles adopted by Austroads (Guide to Traffic Management Part 11), Transport for NSW (Guide to Traffic Impact Assessment), and supported by the City of Sydney's Parking Policy Review (2014), on-street parking systems experience operational stress once occupancy rates exceed approximately 70–75%.

According to Austroads, 85% occupancy at peak periods is widely recognised as the operational threshold for on-street parking, beyond which finding a space becomes difficult and changes to parking management are typically recommended.[1]

Parking surveys undertaken between 27–30 April 2025, confirm on-street occupancy levels consistently exceeding 70% during working hours, with Monday business hours recording 82% occupancy and Tuesday and Wednesday business hours recording 90-95%.
(Refer to Appendix B for parking data, and Appendix C for photographs showing Vine Street and surrounds fully parked at various times of day.)

This demonstrates that available on-street parking is operating **above recognised functional capacity thresholds, even before accounting for the increased demand** the development will generate.

2. LOSS AND UNDERPROVISION OF PARKING

The proposal will result in the removal of approximately 9 existing street parking spaces. *(Refer to Appendix A - Calculation of Loss of On-Street Parking Spaces)*

Only 23 on-site parking spaces will be provided, servicing a development expected to accommodate up to 900 people daily, despite 45 spaces being permissible under planning controls.

> *"Application of the above parking requirements to the proposed development yields a* **maximum permissible parking provision of 45 spaces***, comprising 13 residential spaces, 4 visitor spaces, 14 office spaces, and 15 retail spaces..."*
> *— Appendix M Traffic and Parking Assessment, p. 36*

1 Austroads (2020). Guide to Traffic Management Part 11: Parking Management Techniques, Edition 2. Austroads Ltd., Sydney. p. 14.

The proposed development provides only 6 commercial/retail parking spaces, despite 29 spaces being permissible (14 office + 15 retail).
Retail and commercial uses are dramatically underparked, with no dedicated parking for retail staff or customers — meaning **inevitable spillover into surrounding residential streets**.

Multiple diagrams in the submission misrepresent existing street conditions. For example, repeated illustrations show five on-street spaces on the south side of Vine Street — whereas in practice, only three functional spaces exist. This discrepancy reduces confidence in the accuracy of the traffic assessment and underestimates the loss of real-world parking supply.

3. SIGNIFICANT INCREASE IN SITE ACTIVITY

The Operational Management Plan cites an expected **building population of 750–900 people at any one time**.

The Environmental Impact Statement anticipates the creation of:

413 full- or part-time commercial jobs
317 full- or part-time retail jobs

By comparison, the current site use — post-production facilities, software companies, and several small offices — generates:

Predictable and stable staffing numbers,
Minimal client or visitor traffic,
Low-intensity parking demands appropriate to professional office use.

The proposed development will **dramatically intensify site use, introducing high-volume, unpredictable parking demand** from residents, workers, customers, and service providers.

4. FLAWS AND OMISSIONS IN THE TRAFFIC ASSESSMENT

The Traffic and Parking Assessment submitted by Varga Traffic Planning appears to significantly underestimate the real-world impacts of the proposed development. Several key flaws in methodology and assumptions raise serious concerns about the credibility of its conclusions.

4.1 UNREALISTIC ASSUMPTIONS ABOUT TRANSPORT BEHAVIOUR

The assessment relies heavily on optimistic assumptions about public transport uptake and active travel. While the site is located near Redfern Station and various bus routes, **observed travel behaviour does not support the claim that most residents, workers, and visitors will avoid using cars**.

According to 2021 Census data, **61% of households in the Redfern SA1 area (11703164210) own at least one motor vehicle** *(see Appendix D – Census Data)*. This car ownership rate highlights the continuing reliance on private vehicles, even in inner-city areas with good public transport access.

4.2 IGNORING TRIPS BY STAFF, CUSTOMERS, AND VISITORS

The traffic assessment explicitly excludes the traffic generation of commercial and retail staff and customers on the basis that **no dedicated on-site parking is provided for them**. However, these **trips will still occur and will contribute to traffic volumes and demand for surrounding on-street parking.**

This omission creates a serious underestimation of actual trip generation, especially given the nature of the development as a **mixed-use hub for residents, workers, visitors, and deliveries.**

4.3 MISAPPLICATION OF OFFICE TRIP RATES TO RETAIL USES

The report acknowledges that the TfNSW Guide to Traffic Generating Developments does not provide a trip rate for small-scale retail. As a result, it defaults to applying **office trip generation rates to all retail spaces:**

> *"The TfNSW Guide does not nominate a traffic generation rate for small, local shops, referring only to shopping centres incorporating supermarkets and department stores. Therefore, for the purpose of this assessment, the above traffic generation rate for 'offices' has been adopted in respect of the retail uses of the development proposal." — Traffic and Parking Assessment, p. 23*

While the proposed retail frontage may be small in area, applying office-based assumptions to retail usage significantly understates real-world impacts. **Retail businesses, even in small tenancies, generate shorter, more frequent trips, higher customer turnover, and more delivery activity** than office-based land uses.

The NSW Guide to Traffic Generating Developments lists peak trip generation rates of 5.0 trips per 100m² GFA for shopping centres compared to 1.5 trips per 100m² GFA for offices.[1]

The Austroads Guide to Traffic Management Part 11 (2020, Edition 3) notes that retail uses typically generate higher coincident trip volumes and greater parking turnover than offices, due to short dwell times and high turnover.[2]

Retail uses, even at a small scale, exhibit higher turnover and trip frequency than office uses and should not be modelled using office trip rates.

1 NSW Roads and Maritime Services (2002). Guide to Traffic Generating Developments, Version 2.2, Section 3.2: Shopping Centres and Offices.
2 Austroads (2020). Guide to Traffic Management Part 11: Parking Management Techniques, Edition 3. Austroads Ltd, Sydney. Section 4.2.2, p.16.

4.4 IMPLAUSIBLE TRAFFIC GENERATION FORECASTS

The applicant's traffic report estimates a total traffic generation of:

- **11 vehicle movements per hour during AM peak,** *and*
- **8 during PM peak**

Given that the development is expected to accommodate **up to 900 people on-site** — including residents, workers, customers, and service providers — these figures are implausibly low.

The assessment appears to assume that **traffic generation is directly tied to parking supply, rather than actual land use or occupancy**. This ignores a wide range of modern traffic drivers, including:

- *Deliveries and couriers*
- *Rideshare pickups and drop-offs*
- *Tradespeople and service providers*
- *Visitors without allocated parking*

4.5 SUMMARY

The traffic assessment submitted by the applicant **systematically underrepresents the transport and parking impacts** of the proposed development. By applying flawed methodologies, omitting key trip types, and using overly optimistic assumptions, the report presents a version of site activity that is not aligned with real-world urban conditions.

Traffic generation is driven by actual building activity — not by the number of parking spaces provided.

5. UNRELIABLE DEPENDENCE ON VOLUNTARY BEHAVIOUR CHANGE

The applicant relies heavily on a Green Travel Plan to mitigate traffic and parking impacts, encouraging residents, workers, and visitors to voluntarily use public or active transport.

However, Green Travel Plans are aspirational rather than enforceable.
There is no guarantee that end-users' travel behaviour will align with the intended targets.

Parking and traffic impacts must therefore **be assessed based on realistic current travel behaviours, not aspirational projections**.

6. NO DESIGNATED RIDESHARE DROP-OFF ZONES

The Traffic and Parking assessment does not provide for dedicated rideshare pickup and drop-off areas.

Given that the proposed development will generate daily site activity of 750–900 people, including residential, retail, and commercial uses, it is reasonable to expect a designated rideshare pick-up and drop-off zone to be incorporated into the development.

Without a formalised rideshare facility, vehicles are likely to stop unsafely in nearby streets, exacerbating traffic congestion and creating safety risks for pedestrians, cyclists, and other road users.

7. CONSTRUCTION PHASE PARKING PRESSURE

The Construction Traffic Management Plan acknowledges that all construction workers and subcontractors will be encouraged to use public transport or park off-street. However, no clear arrangements or guarantees of sufficient designated parking have been detailed.

Given the impracticality of public transport for most tradespeople carrying tools and equipment, and travelling at early hours when public transport services are limited, it is reasonable to expect that a significant number of workers will attempt to park on nearby residential streets.

Furthermore, construction workers typically drive larger vehicles such as utes, vans, and light trucks, which occupy more space than the smaller private cars usually driven by inner-city residents. As a result, the effective parking impact of each construction vehicle may be greater than one standard car space.

We have recently observed that tradespeople for local construction projects have larger vehicles that may occupy more than one standard car space.

This will occur at the same time as the proposed Works Zones removes existing kerbside parking, compounding parking stress for local residents.

We respectfully request that the consent authority require the developer to **demonstrate secured off-street parking arrangements** for all site workers before construction commences.

REQUESTED ACTIONS

We respectfully request that the consent authority:

Require the development to maximise onsite parking provision, up to the full allowance permitted under current planning controls.

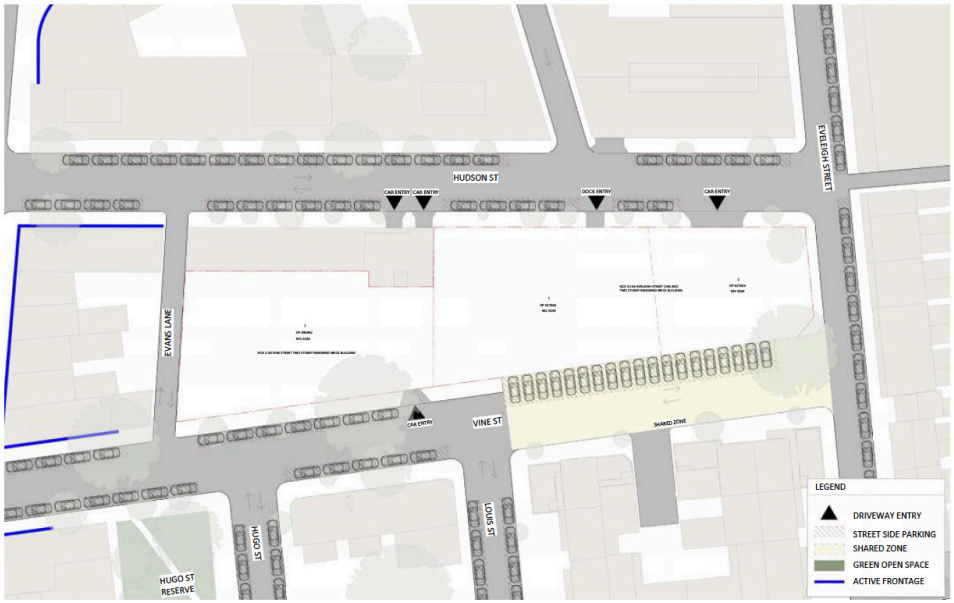
Commission or review an independent traffic assessment that reflects realistic population-based transport demand.

Coordinate with the City of Sydney Council to improve surrounding street parking protections, including expanded resident-only zones and time-restricted visitor parking.

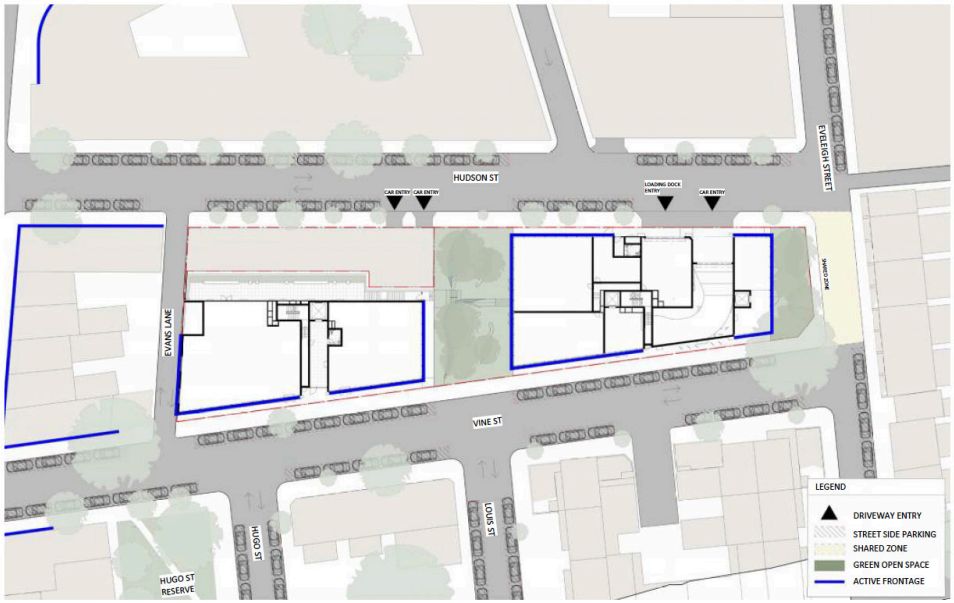
CALCULATION OF LOSS OF ON-STREET PARKING SPACES

	Current	Proposed	Change
Vine Street, North side, from Evans Lane to Eveleigh Street	26 (7 parallel, 19 perpendicular)	17 (8 parallel + 9 parallel)	-9
Vine Street, South side from Hugo Street to Louis Street	5	5	0
Vine Street, South side from Louis Street to Eveleigh Street	0	7	+7
Eveleigh St, East Side, VIne Street to Hudson Street	5	0	-5
Hudson Street, south side, Evans Lane to Eveleigh St	12	10	-2
	48	**39**	**-9**

Existing Ground Plane

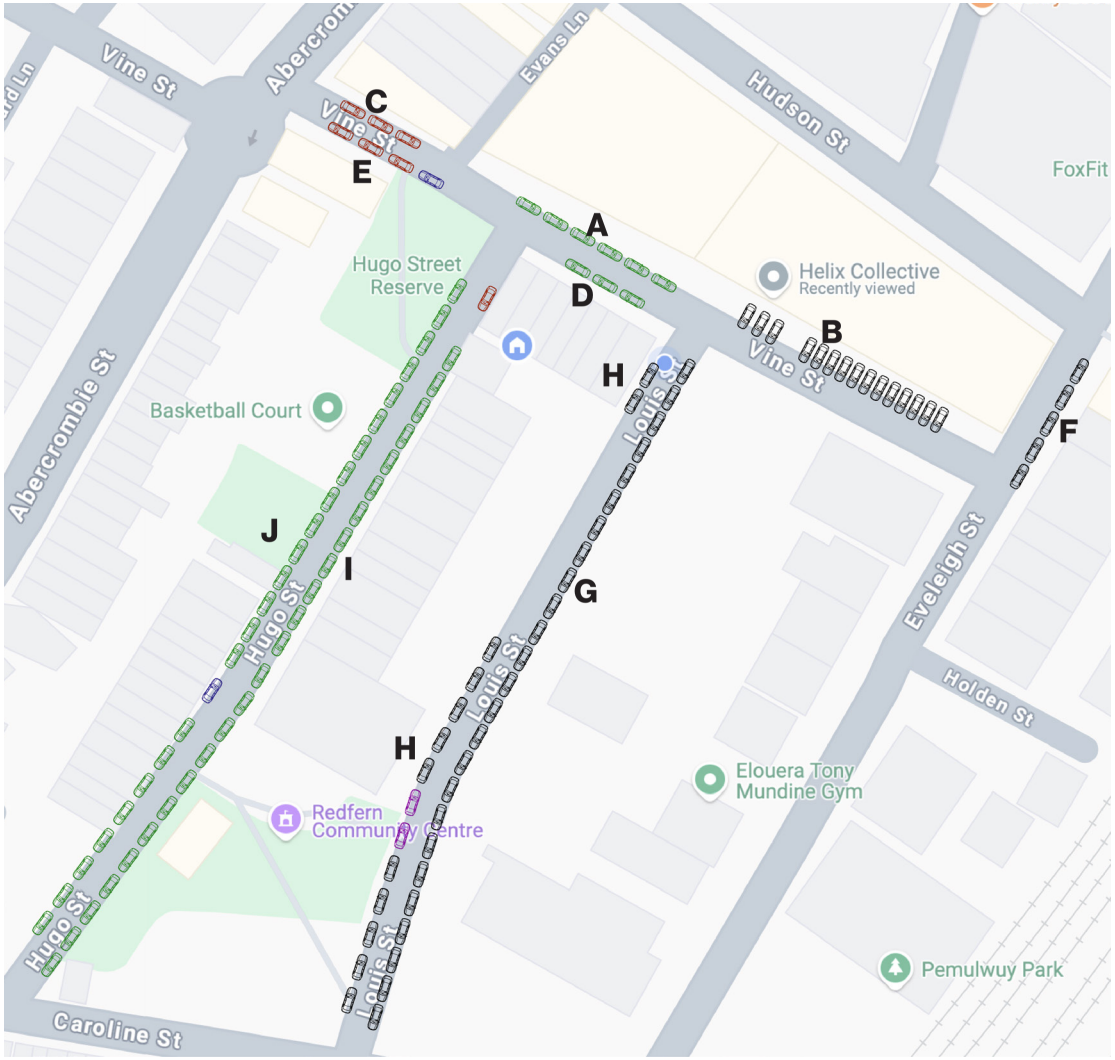


Proposed Ground Plane



Comparison of Existing and Proposed Ground Planes, as presented in Appendix C of the applicant's Design Report (page 60, Section 7.1).

PARKING SURVEY MAP AREA



PARKING SURVEY ANALYSIS

Total public parking spaces available in survey area: **112**
Total residents exempt & unrestricted parking spaces available: 63

Date	Time	Category	% of total parking	% of resident exempt
Sunday 27/4	2.40pm		42.62%	44.44%
Monday 28/4	2.40pm	**Work**	**81.97%**	84.13%
Monday 28/4	7.20pm		73.77%	66.67%
Tuesday 29/4	7.20am		68.03%	68.25%
Tuesday 29/4	11.15am	**Work**	**95.08%**	101.59%[1]
Tuesday 29/4	2.00pm	**Work**	**90.16%**	96.83%
Wednesday 30/4	10.15am	**Work**	**92.62%**	93.65%

While the survey sample was necessarily limited due to the Easter holiday period, the data collected demonstrates that **parking occupancy regularly exceeds 90% during workday hours** — well above the 85% threshold recognised by Austroads as the point of functional capacity.

During periods of high occupancy, multiple vehicles were observed parked illegally, indicating that **demand was exceeding available parking supply**.

1 Number is above 100% due to the additional illegally parked cars at this time, demonstrating the current parking stress.

PARKING SURVEY

MAP	STREET LOCATION	SECTION	PARKING RESTRICTIONS	PUBLIC PARKING SPACES AVAILABLE	Residents Exempted / Unrestricted Spaces Available	Non-work day Sun 27/4, 2.40 pm	Work day, after hours Mon 28/4, 7.20 pm	Work day, Mon 28/4, 2.40 pm	Work day, Tue 29/4, 7.20 am	Work day, Tue 29/4, 11.15 am	Work day, Tue 29/4, 2.00 pm	Work day, Wed 30/4, 10.15am
A	Vine Street (North Side)	Between Evans Lane & Louis St	2P Residents Exempted	6	6	5	5	3	5[1]	7[2]	6	6
B	Vine Street (North Side)	Between Louis & Eveleigh St	2P 90º	15	0	6	15	12	15	15	15	15
C	Vine Street (North Side)	Between Evans Lane & Abercrombie St	Unrestricted	3	3	3	3	3	3	3	3	3
D	Vine Street (South Side)	Between Hugo & Louis St	2P Residents Exempted	3	3	2	3	2	3	3	3	3
E	Vine Street (South Side)	Between Hugo & Abercrombie St	1 Disabled + 3 Unrestricted	4	3	2	3	3	2[3]	4	4	4
F	Eveleigh Street (East Side)	Between Vine & Hudson St	2P	5	0	3	5	5	5	5	4	5
G	Louis Street (East Side)	Between Vine & Caroline St	2P	25	0	9	17	21	12	20	20	20
H	Louis Street (West Side)	Between Vine & Caroline St	2P x 12, + 2 Council Only	12	0	6	10	10	8	12	10	14
I	Hugo Street (East Side)	Between Vine & Caroline St	2P 23 Residents Exempted, 1 Unrestricted	24	24	6	21	15	15	26[4]	23	21[5]
J	Hugo Street (West Side)	Between Vine & Caroline St	2P 24 Residents Exempted, 1 Disabled	25	24	10	18	16	15	21	22	22
			TOTALS	**122**	**63**	**52**	**100**	**90**	**83**	**116**	**110**	**113**

1 All spaces occupied, as trades vehicles needed more than standard car lengths.
2 Includes additional illegally parked vehicles.
3 No space for additional cars due to trades vehicles.
4 Includes 2 illegally parked vehicles.
5 Includes 1 council, and 1 illegal vehicle.

PHOTOGRAPHS OF PARKING OCCUPANCY DURING BUSINESS AND NON-BUSINESS HOURS

View towards Vine Street (North Side) between Eveleigh and Louis St

Sun 27th April, 2.43pm. 6 out of 15 spaces occupied.

Mon 28th April, 2.37pm. 15 out of 15 spaces occupied.

Tue 29th April, 2.00pm. 15 out of 15 spaces occupied.

View looking south along Louis St

Sun 27th April, 2.42pm. 15 out of 37 spaces occupied.

Mon 28th April, 2.37pm. 27 out of 37 spaces occupied.

Tue 29th April, 2.00pm. 30 out of 37 spaces occupied.

View looking south along Hugo St

Sun 27th April, 2.45pm. 16 of 49 spaces occupied.

Mon 28th April, 2.37pm. 39 of 49 spaces occupied.

Tue 29th April, 2.00pm. 45 of 49 spaces occupied, including additional illegally parked cars.

Source: Australian Bureau of Statistics (2021). Census QuickStats: Redfern (SA111703164210). Retrieved from https://www.abs.gov.au/census on 30th April, 2025.

Australian Bureau of Statistics

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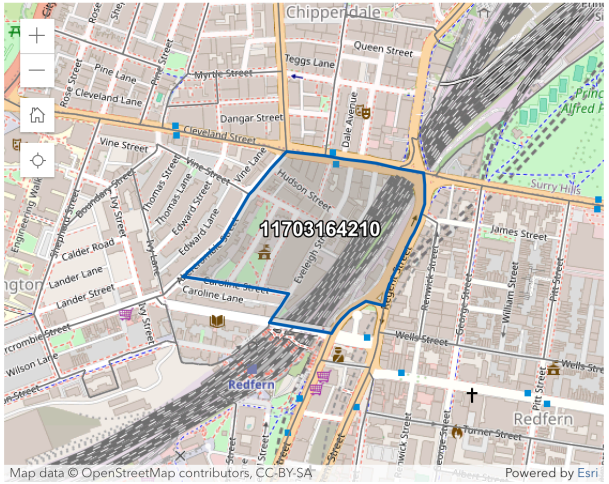
Geography type Statistical Areas Level 1
Area code 11703164210

People	**646**
Male	53.5%
Female	46.5%
Median age	27
Families	**87**
Average number of children per family	
for families with children	2
for all households (a)	0.4
All private dwellings	**243**
Average number of people per household	2.4
Median weekly household income	$2,024
Median monthly mortgage repayments	$2,197
Median weekly rent (b)	$540
Average number of motor vehicles per dwelling	0.8

(a) This label has been updated to more accurately reflect the Census concept shown in this data item. The data has not changed.
(b) For 2021, median weekly rent calculations exclude dwellings being occupied rent-free.

Search all persons QuickStats for another area

2021 | Enter a location, postcode or geography



To view more QuickStats or Community Profiles for a different area, see Search Census data.

Number of registered motor vehicles *Occupied private dwellings (excl. visitor only and other non-classifiable households)*	11703164210	%	New South Wales	%	Australia	%
None	67	35.1	262,031	9.0	673,969	7.3
1 motor vehicle	93	48.7	1,096,761	37.8	3,353,737	36.2
2 motor vehicles	23	12.0	989,258	34.1	3,366,738	36.3
3 or more vehicles	3	1.6	508,694	17.5	1,745,924	18.8
Number of motor vehicles not stated	5	2.6	43,732	1.5	134,848	1.5

Note: *Motor vehicles excludes motorbikes, motor scooters and heavy motor vehicles.*

More information on Number of registered motor vehicles (VEHD)
Table based on place of enumeration

Number of registered motor vehicles per dwelling.
Source: Australian Bureau of Statistics (2021). Census QuickStats: Redfern (SA1 11703164210). Retrieved from https://www.abs.gov.au/census on 30th April, 2025.

Method of travel to work on the day of the Census, top responses *Employed people aged 15 years and over*	11703164210	%	New South Wales	%	Australia	%
Car, as driver	47	12.9	1,587,613	43.1	6,347,498	52.7
Train	39	10.7	62,460	1.7	170,326	1.4
Walked only	38	10.4	92,368	2.5	306,045	2.5
Bicycle	13	3.6	14,466	0.4	79,089	0.7
Motorbike/scooter	9	2.5	14,917	0.4	49,683	0.4
Did not go to work	47	12.9	487,646	13.2	1,417,449	11.8
Worked at home	140	38.4	1,141,467	31.0	2,531,262	21.0
People who travelled to work by public transport (a)	64	17.5	147,492	4.0	554,711	4.6
People who travelled to work by car as driver or passenger (b)	59	16.2	1,737,359	47.2	6,961,762	57.8

Note: *Respondents had the option to report up to three methods of travel to work on the day of the Census.*

(a) Includes people who used public transport (train, bus, ferry, tram/light rail), as at least one of their methods of travel to work on Census day.
(b) Includes people who travelled by car (as a driver, or as a passenger), as at least one of their methods of travel to work on Census day.

More information on Method of travel to work (MTWP)
Table based on place of usual residence

Method of travel to work on the day of the Census.
Source: Australian Bureau of Statistics (2021). Census QuickStats: Redfern (SA1 11703164210). Retrieved from https://www.abs.gov.au/census on 30th April, 2025.

3.2.2 Principle 2: Occupancy or Utilisation

Parking occupancy is one of the central concepts in parking management. Whether in reference to on-street parking or to an off-street car park, parking occupancy describes the percentage of spaces that are occupied at any given time. Parking occupancy rates, also called 'utilisation', reflect the relationship between parking supply and demand. A low occupancy rate in an area means that there are many spaces that are empty or unused. While this may be convenient for drivers traveling to that destination, lower occupancy rates can also mean that oversupplies of parking or inappropriate parking prices exist in the area. By contrast, an area, or precinct that has a very high level of occupancy could mean that the available parking supply is limited and needs management to accommodate a certain level of demand.

Ideally, the occupancy of parking facilities should be high enough to ensure that they are occupied at a level that justifies the supply but not so high that it is unreasonably difficult to find a space. Eighty-five per cent occupancy at times of peak demand means that approximately one parking space in every seven should be vacant. When peak parking occupancy (the average of the four highest hours of demand in a day) is regularly above 85%, a change to the parking management approach may be necessary. This 85% benchmark is a recognised best practice approach to the management of on-street parking. It means that the parking resource is well used but people can still easily find a space, thus reducing customer frustration and congestion. Generally, parking is considered 'at capacity' when available spaces are 85% occupied at times of peak demand (Shoup 2005).

Austroads (2020). Guide to Traffic Management Part 11: Parking Management Techniques, Edition 3. Austroads Ltd, Sydney. Section 3.2.2, p.9.