Submission RE 38-42 Anderson St and 3 McIntosh St and 2 Day St (SSD-74670720)

Disclosure:
This submission is by an individual who is a Willoughby City Councillor, but is provided in a personal capacity.

Executive summary
This submission deals with traffic/active transport issues connected with the subject site. It is contended that:
a) there is no attention to the current deficient state of bike routes, in relation to modern standards, that are adjacent to the site that and will be affected by site traffic. Nor is there adequate discussion of the impact on cyclists of the volume of traffic from the proposed development, nor is it noted that a suggested bike route to the railway station exists on paper only,
b) the justification of the time distribution of traffic predicted for Cambridge (based on an average) is flawed and leads to safety concerns for cyclists and pedestrians, and
c) there is no evidence of consultation with cyclist groups such as Bike North or Bike NSW and
d) the traffic modelling considers a peak hour time which does not reflect true (shopper traffic) peak hour in the Chatswood CBD (dominantly a retail centre), and is also flawed.
Together these concerns suggest that the Traffic Impact Assessment cannot be taken seriously as reflecting the true status of existing and future traffic adjacent to the site, and it substantially ignores the impact on cyclists.

Introduction
As noted in the proponent's Traffic Impact Assessment (TIA), vehicle access to the site is via one way Cambridge Lanene (10 km/h one-way shared zone with on road bike route and contraflow bike lane) and egress via McIntosh St (40 km/h with on road bike route and contraflow bike lane). As indicated, the roads are bike routes – in one direction on road, and in the opposite direction by a semi-separated contraflow bike lane. The proponent's included bike route map (proponent's Figure 4) shows a bike route connection to the south to the railway station (via Orchard Rd), and to the east to the CBD (via Anderson St, Wattle La, and Malvern Ave).

Firstly, some observations are noted with respect to bike travel.
Although the proponent has done extensive traffic studies around the site, the TIA makes no mention of the standard of the existing bike infrastructure on Cambridge Lane and McIntosh St, nor the likely impact of the proposed development on bike traffic on those streets, nor the accuracy of bike route information in TIA Figure 4.

The following observations are provided:

The bike route map (TIA Fig 4) appears to be the North Shore Bike Map, not the Willoughby Bike Map (no map of that name is known), as is indicated in the TIA

The provided map (TIA Fig 4) indicates an on road/shared path bike route to the station along Orchard Rd. The writer is not aware of any local on road or wayfinding signage that supports that bike route/shared path characterisation (Fig 1).

The NSW Government cycleway finder map (https://maps.transport.nsw.gov.au/egeomaps/cycleway-finder/index.html) - not referred to by the proponent, shows an alternative bike route from Cambridge Lane to the station via Help St and Railway St. The indicated Railway St bike route (on

road) lacks any actual on road and wayfinding signage and is not recognisable as a bike route, either (Fig 2).

From the above, it appears that a bike route from the proposed development site to the station remains to be competed, contrary to the proponent's map.

The safety of cyclists using McIntosh St/Cambridge Lane is currently compromised in a number of ways which have not been noted by the proponent:

a) There are no on road bike symbols except at the exit (east end) of McIntosh St (Fig 3)
b) The "No Entry" sign at the Anderson end of McIntosh St should also indicate "Bicycles excepted" (Fig 3)
c) The contraflow bike lane is not adequately marked in Cambridge Lane, in a way that motorists would be aware of its presence and purpose (Fig 4)
d) The signage at the entrance to Cambridge Lane, which should indicate presence of contraflow bike lane is confusing (Fig 5)
e) The contraflow bike lane channel at the corner of Cambridge Lane and MacIntosh St appears to be narrower than is safe or regulated (Fig 6)
f) The contraflow lane is easily blocked by bins (Fig 7) and traffic (Fig 8)
g) The cycleway entrance to McIntosh St southwards from Anderson St is marked by a bike symbol and right turn arrow on Anderson St. Modern practice would be to provide a marked bike box on Anderson St to provide better protection for a turning cyclist (Fig 9)
h) At the Help St end of Cambridge Lane a cyclist will typically turn right to the Help St shared path. This is across the path of vehicles entering the lane from Help St and unsafe. There is inadequate signage alerting motorists entering from Help St to the potential presence of cyclists riding in the opposite direction.

While these shortcomings are not the current responsibility of the proponent, they should be noted in the TIA as things affecting cyclist/pedestrian safety and needing attention, given proposed increased usage of these streets by motorists and cyclists and pedestrians.

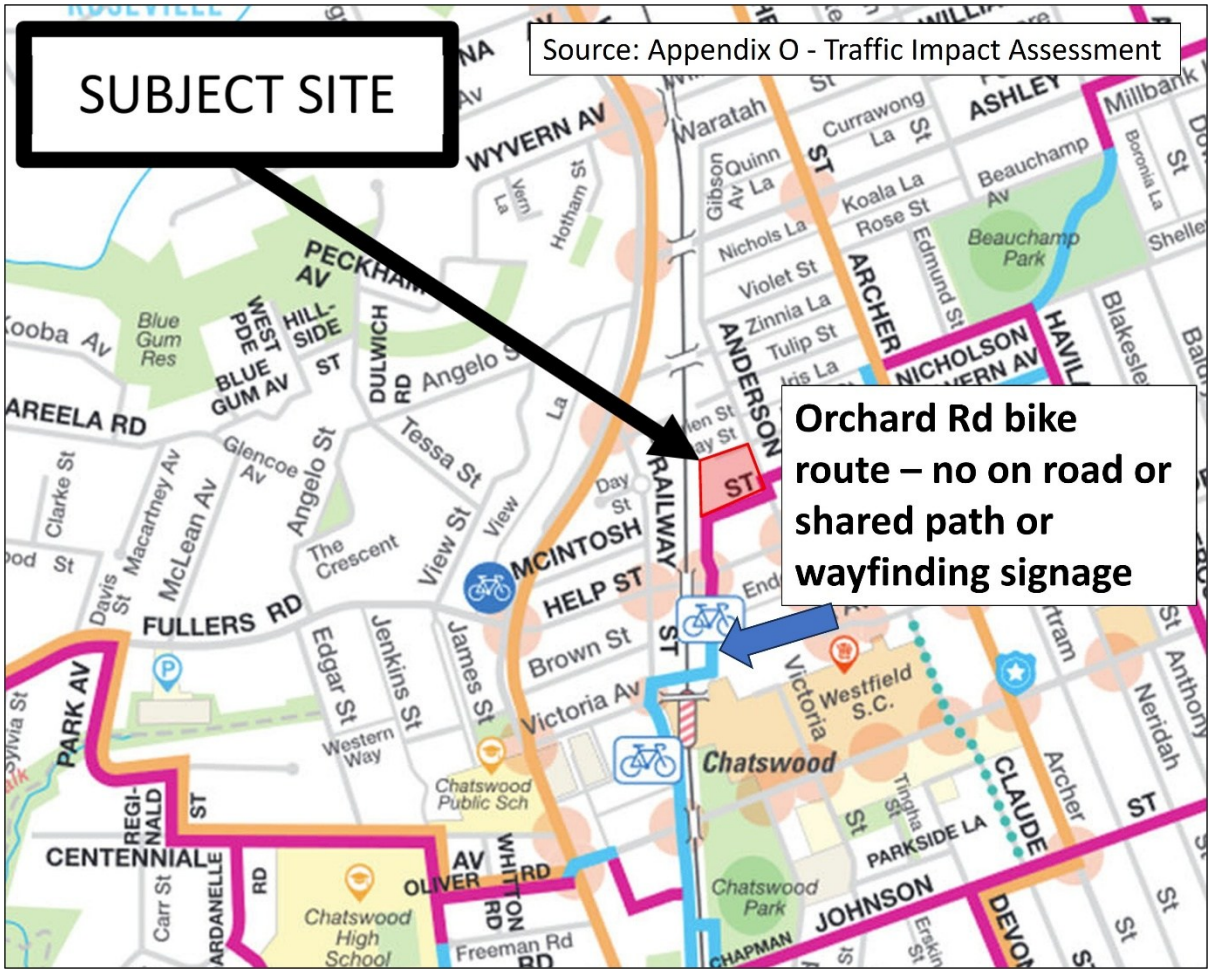


Figure 1 Extract from proponent's Fig 4. The shown shared path/on road route along Orchard Rd to the station does not appear to be recognised by on road or wayfinding signage, i.e. is a route on paper only.

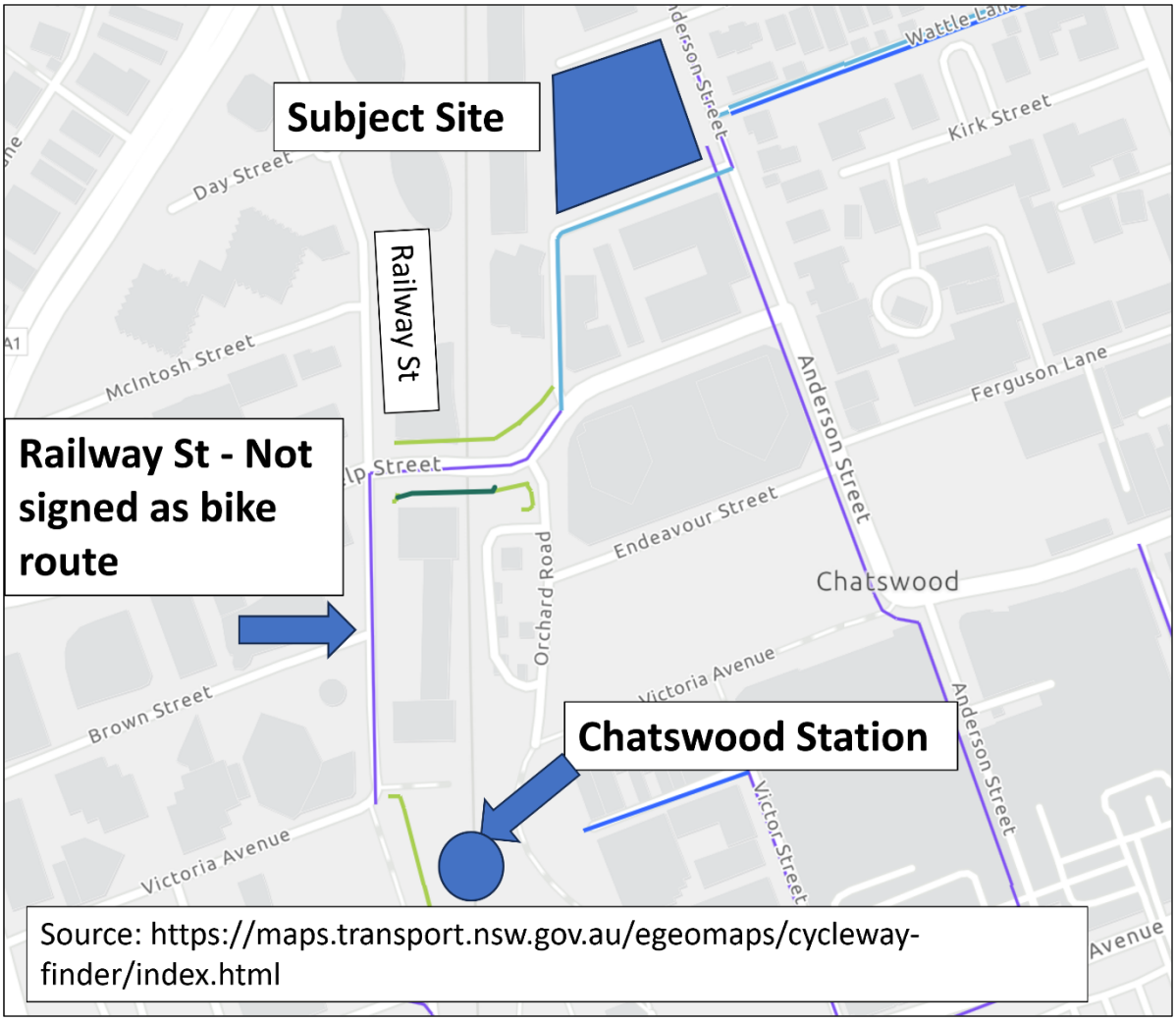


Figure 2 NSW Government cycleway finder map (not referenced by proponent). The map shows a bike route connection to the station via Railway St. The Railway St route is not defined by actual on road or wayfinding signage so is a route on paper only.

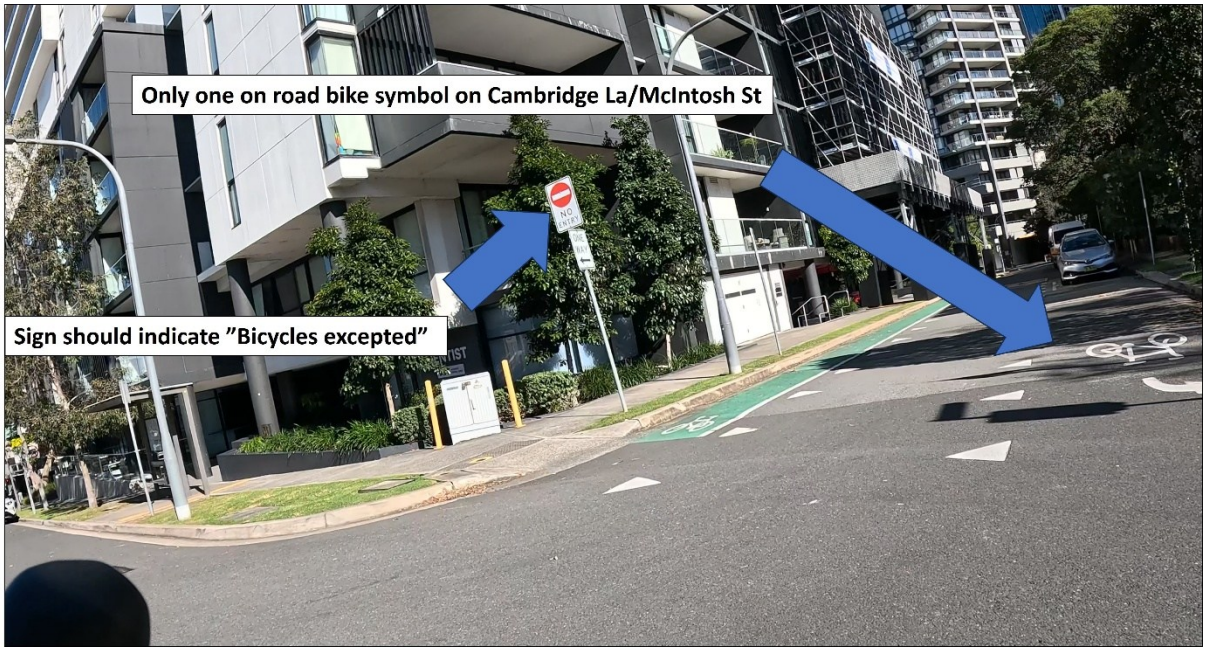


Figure 3 Exit from McIntosh St to Anderson St. Photo shows the single on road bike symbol in Cambridge Lane/McIntosh St. Additional signage required for bike route.

Figure 4 Inadequate signage of contra-flow lane in Cambridge Lane

Figure 5 The signage at the entrance to Cambridge Lane is confusing for motorists and bike riders and does not adequately warn motorists as to possible presence of cyclists

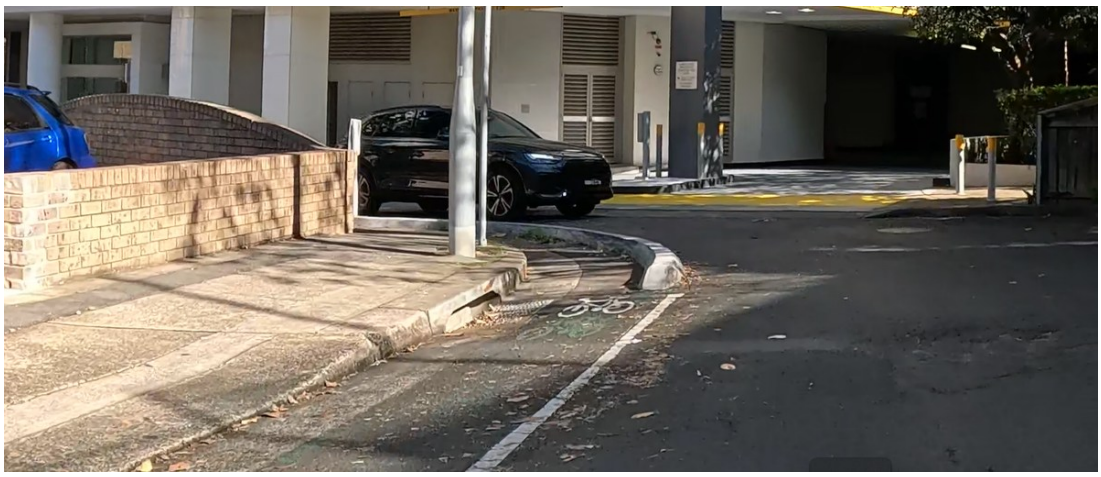


Figure 6 The bike lane channel at the corner of McIntosh St and Cambridge Lane appears to be narrower than regulated.

Figure 7 Bins blocking bike lane

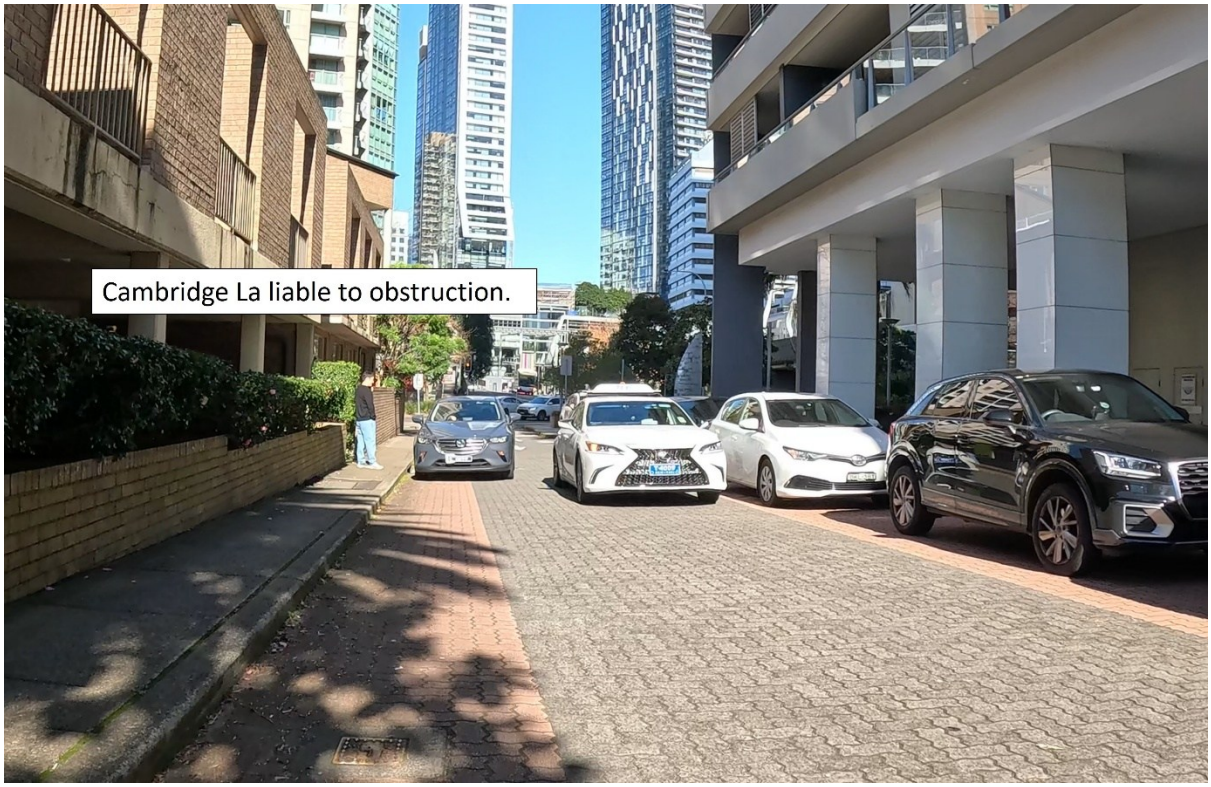


Figure 8 Even with current light traffic Cambridge Lane can become blocked.

Figure 9 A marked on road bike box from Anderson St to McIntosh St would be modern convention, affording better protection for cyclists. The "No Entry" sign opposite should indicate "Bicycles excepted"

Figure 10 Cyclists may turn right from Cambridge Lane to Help St shared path across incoming traffic. There is inadequate signage to warn incoming traffic.

Second - Traffic on Cambridge Lane shared zone

The proponent's TIA notes that there will be significant traffic on Cambridge Lane, partly as a result of the proposed inclusion of a gymnasium in the proposed development, with provision of 53 car parking spaces for gym patrons, and also as a result of visitors to the proposed food and beverage outlet (19 car spaces). Acknowledgement is made in the TIA of the need to keep the Cambridge Lane shared zone safe for active transport users, and a calculation provided that to show that "on average, (there will) be fewer than one vehicle within the shared zone at any one time". The proponent calculates that the maximum usage of Cambridge Lane would be 160 vehicles/h, while the safe upper limit would be 166 vehicles/h. With respect to these calculations it is noted that:

a) Vehicles do not arrive according to some "average" scheme, but can be clumped, especially if arrival is controlled by nearby lights, as is the case here, and
b) In any case, the maximum 160/h calculated is very close to the supposed safe upper limit of 166 vehicle/h, and it can be expected that that safe upper limit will be exceeded from time to time.

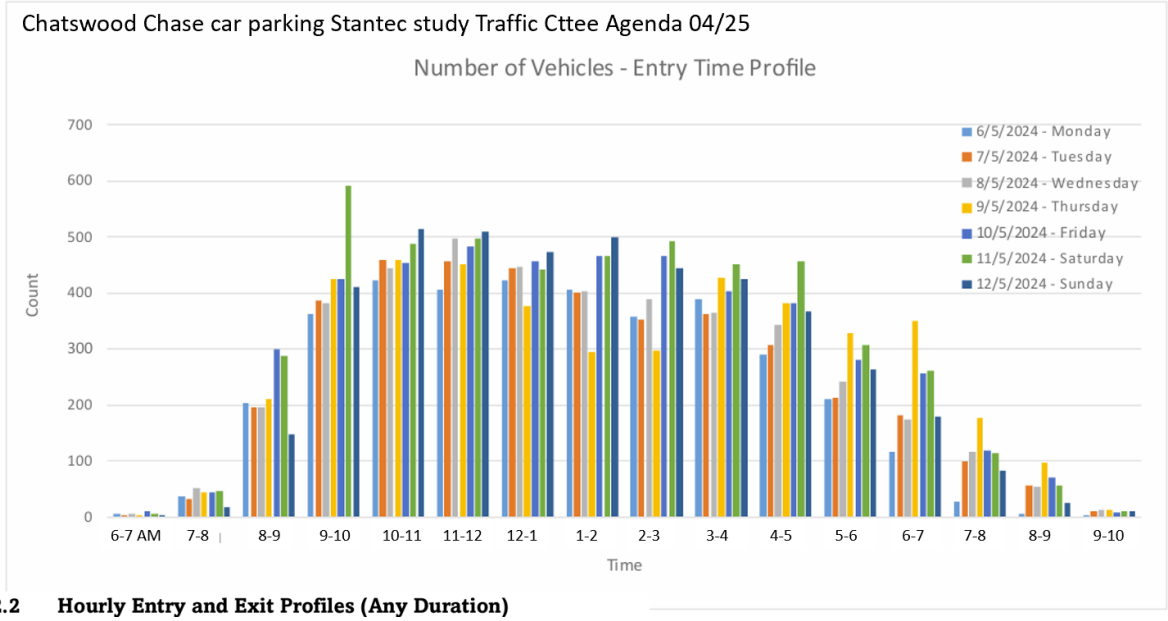
As a result, it can be expected that the adequate safe sight line distance discussed will not be maintained.

Thirdly, with respect to traffic counts.

As is widely acknowledged, Chatswood is a significant retail centre, and local traffic is dominantly shoppers rather than, say, people getting to work. Various public and shopping centre car parks around Chatswood CBD accommodate almost 6,000 cars. An analysis of car park entry and exit data provided by the Chatswood Chase shopping centre owners, included in the April 2025 agenda of Willoughby Council Traffic Committee, shows that the peak morning retail traffic is in the time zone 10:00 am to noon, when around twice as many cars/h enter the car park, than during the 8:00 – 9:00

am period (Fig 11). The TIA appears to refer to a 8:00 am to 9:00 am peak hour (eg TIA Fig 14).

Figure 3: Number of Vehicles – Entry Hourly Profile (any duration)



4.2.2 Hourly Entry and Exit Profiles (Any Duration)

Figure 11 Car entry data, Chatswood Chase car park, from Willoughby Council Traffic Committee April 2025 meeting agenda.

According to the TIA, with respect to traffic count surveys done to support the traffic analysis: "The surveys were undertaken between 7:00am and 9:00am and between 2:30pm and 6:00pm on Thursday 19 November 2022." The weekday am peak period indicated by the Chatswood Chase car park data was thus not surveyed. The key streets in the traffic survey, Help St and Anderson St, are both important streets for vehicles entering Chatswood for retail purposes, so it can be reliably concluded that the peak am traffic time interval was not sampled, and the traffic rates mentioned in the TIA are likely only about half the true peak volumes. The TIA is thus of extremely limited value or no value at all in discussing peak hour traffic.

Fourthly, - consultation

While there are bike routes along Anderson St, McIntosh St, Help St, and Cambridge Lane, it appears that no attempt has been made to contact cycling groups such as Bike NSW or Bike North for comment on the likely impact of the development on cyclists. It is noted that all of these streets provide the bike route link from Chatswood Chase via Malvern Ave and Wattle La to streets west of the railway line and further west down Fullers Rd. A cyclist's Strava heat map (for period 1/1/25 – 30/5/25, Fig 12) shows that cyclist's street usage. The denser orange traces on that map reflect greater route usage, with significant usage of Cambridge Lane and McIntosh St. (GPS errors on the map are likely due to satellite signal dropout from shielding by existing high buildings).

Figure 9 Strava heat map of cyclist's rides - 1/1/25- 30/5/25, showing usage of subject side ingress/egress roads in relation to Chatswood Chase shopping centre. The density of the orange lines indicates the relative frequency of usage of a road/route. McIntosh St and Cambridge Lane are regularly used.

Conclusion

The TIA is inadequate in that:

a) It does not identify existing bike route design and signage short comings in roads that provide ingress and egress from the building that are also bike routes, nor recommend necessary improvements. Nor does it acknowledge that there is actually no signed (with wayfinding or on road signage) bike route to the station in the immediate vicinity, contrary to what is shown on the proponent's bike route map.
b) It justifies significant vehicle usage of Cambridge Lane (a shared lane) using a methodology (average vehicle time separation usage) that is flawed
c) It does not identify the true peak hour time (retail traffic usage) of traffic on the local feeder roads, but uses a peak hour which is not true peak
d) It does not demonstrate that consultation with representative cyclist groups has occurred.