

4 March 2022

Mr Gabriel Wardenburg Team Leader – State Significant Acceleration Department of Planning and Environment 12 Darcy Street Parramatta NSW 2150

Dear Gabriel,

Response to Submissions

SSD-10349-Modification 2
TAFE Meadowbank - Multi-Trades and Digital Technology Hub

This letter has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of *TAFE NSW* (the Applicant) in response to submissions received regarding the above modification (SSD-10349 – Mod 2).

A total of 9 submissions were received during the notification period. These included two agency submissions from TfNSW and City of Ryde Council and 7 public submissions.

A response to the issues raised in these submissions is provided in Attachment 1.

In addition, a response to transport related submissions, prepared by Stantec, is provided at **Attachment 2**.

We trust that this submission adequately addresses the issues raised and enables DPIE to finalise its assessment.

Please do not hesitate to contact PJ Scollard on 8459 7508 or padraig@keylan.com.au if you wish to discuss any aspect of this submission.

Yours sincerely

Dan Keary BSC MURP RPIA Director

Attachments:

Attachment 1 Response to issues raised in submissions (Keylan)
Attachment 2 Response to transport-related submissions (Stantec)



Attachment 1

TAFE Carpark MOD Response to Submissions - Response to Public Submissions

Public Submission

No way! As a resident of See Street we strongly object to adding 2 more stories to car park. I'm probably one of only a few residents on See Street who is able to express our thoughts on this development so I'm writing on behalf of them as well. It's not very considerate to the overall landscape of the street especially considering its next to a beautify heritage house. With nothing higher on the street and without setbacks in proportion to the height it will look very much out of place and further destroy the surrounding look and feel of a suburban street. Call it what you like but a 4 story car park next to residential houses is defiantly not considered a 'minor' visual impact. We might as well use this opportunity and apply for 4 story concrete houses on the street by taking references to the reports done to the carpark. To put it bluntly what's the point of the public hearing? Just get meaningless reports done in favour of the development. I believe the approval will most possibly be granted so writing this letter is likely meaningless. Hope I'm wrong about that. We are very angry with this proposal and hope it can still be stopped

Response

Built Form

The modification application seeks the addition of two levels to the approved multi-storey carpark (MSCP). The proposed modification replicates the current building form and follows the approved vehicular and pedestrian circulation strategy.

The MSCP will enable the continued development of the Meadowbank TAFE precinct with improved facilities and associated infrastructure.

The proposed modification is consistent with the character of surrounding development as it is consistent with the height of other established buildings on the TAFE Meadowbank campus, such as the Multi-Trades and Digital Technology Hub, located to the north of the car park, will have a height of 6 storeys.

The elevation plans included in Appendix 2 of the modification application demonstrate the minor visual impact of the proposed works.

The MSCP continues to implement a 'square and rounded corner' design motif, assisting to soften the bulk and scale of the car park. This is continued to be supported by the



Publi	ic Submission	Response
		proposed landscaping and the preservation of significant trees.
		The proposed design seeks to minimise the bulk and scale of the car park. This is achieved through:
		 The street facade has been designed with a variety of setbacks and a modulation in facade heights. The horizontal nature of the structure aesthetically alleviates the scale Omission of a roof structure to the 4th level minimises its scale The selection of screen finish fades out to neutral silver to diminish into skyline The development seeks to preserve significant trees. Furthermore, suitable landscaping is provided to screen and soften the setting of the car park Heritage As detailed within the Heritage Impact Assessment addendum, the proposed amendment will not have any
		further impact on the visual amenity of the surrounding heritage items.
2	As we are located right across the street the building currently already affects our view out, we are very unhappy if the building is even taller by two levels. As you may be aware, last year we were told that a construction plan will be processed across our backyard side by which we already will suffer from the other direction.	Built Form The proposed modification to the MSCP has been carefully considered to maintain the approved design whilst maintaining efficiency and respecting the amenity of the adjoining residential area.
	We really hope our environment could be getting better, not getting worse and worse. Therefore, we sincerely suggest an alternative plan could be achieved and then our environment could not be suffered so badly.	Construction Impacts
		The location and works associated with the 'construction plan' referenced in this submission are unclear. Notwithstanding, the Applicant is committed to ensuring the modification will have minimal construction, noise, and traffic



Response **Public Submission** impacts on the nearby residential area, as the works will be undertaken in accordance with the Noise and Vibration Impact Assessment and relevant conditions of consent. I object to the modification being made under the TAFE Meadowbank **Built Form** SSD10349-MOD-2 Additional two levels to the approved car-park. The proposed building is consistent with the character of The additional 2 levels will exceed all other Building and Tree heights surrounding development as it is consistent with the height of currently on See Street. other established buildings on the TAFE Meadowbank campus. It is noted that the Multi-Trades and Digital The additions will be major eyesore to the suburban house lined street scape Technology Hub, located to the north of the car park, will have on the eastern side of See Street. a height of 6 storeys. The modified building will, from any position along See Street, tower over The car park continues to implement a 'square and rounded every other building, the TAFE Building behind it are set back and do not corner' design motif, assisting to soften the bulk and scale of impose on the area as much as this will. the car park. This is continued to be supported by the Using the current Multi storey car park which is nearing completion and has proposed landscaping and the preservation of significant lights connected and working, throws a constant light pollution across our trees. houses and front yard after dusk. The panelling used to make the building **Lighting Impacts** interesting in the day time hours is overwhelmed by the internal Car park lights and is an ugly industrial wasteland at night. The proposed additional The lighting design of the carpark aims to reduce adverse levels will increase the Light pollution over the Heritage listed property of 34 effects to nearby residents and ensure that the vehicle drivers See Street and 1a Angas Street and will be seen by all the houses and home have a smooth transition from the high external illuminance units in in the nearby area and double the area impacted. to the lower illuminances within the interior to the carpark. I objected to the original heritage impact statement as it referenced a 24 hour lighting during unoccupied hours will dim to 50% building and occupation that was 17 years out of Date, this has not been where possible with minimum safety lighting requirements rectified in the latest amendments. The heritage impact Statement is not being met at all times. The car parking lighting is proposed in taking into consideration the significance of the buildings at 34 See Street accordance with the methodology outlined in the Lighting and 1a Angas Street have with the Mellor Meadowbank Manufacturing Impact Assessment. works, which used to occupy the site of the Meadowbank TAFE. This also **Heritage Impacts** disrespects the heritage listed monument (on the Corner of See and Angas Streets) of the respected manager of the Mellor Meadowbank Manufacturing The Heritage Impact Assessment submitted with the works and Meadowbank TAFE sites History. Modification Application provides an assessment of surrounding heritage items. It is noted that heritage item 116 under the RLEP 2014, at 34 See Street and 1a Angas Street,



The most significant impact the additional 2 levels will have on the surrounding area are on the Shadows cast over the buildings at 34 See Street and 1a Angas Street. This building will shroud the buildings and yards in shade where the current building only has a minor impact. I have attached for your review the Specific Architectural drawings SHADOW DIAGRAMS IMPACT STUDY, see "2. Appendix B_Architectural Drawings_Carpark pg9" and "Mod2 Appendix 2 - Architectural Plans pg8" to illustrate the impact. This is not acceptable.

I also object to the direction of the traffic flow within the Multi storey car park as the Up-ramps to the higher levels are facing the street. This will increase the car noises that will reverberate across the road to residential dwellings and a Primary School. The Up-ramps should have been placed on the Western side of the building and the noise retained within the TAFE precinct. This can still be changed before the opening and final stages of the current multi storey car park.

I object that the additions that are being proposed to a public building are to make the building a viable proposition to sell this to a private Company, who will charge staff and students. The majority of the TAFE Students are starting out in their working life and have little income, so they will not have spare cash to spend on parking in the car park. The previous Open car park opposite 10 See Street was not fully utilised while there was a menial charge. The TAFE students wouldn't pay to Park as they want to save money so they will then clog the Streets around Meadowbank. If the intent is to make this a Commuter car park that will defeat the whole purpose as to why this was being built in the 1st place and increase traffic through the back streets of West Ryde, Ryde and Meadowbank.

The Current Car park needs to be Free for TAFE Staff and Students to free up the Streets currently made unsafe by the Staff and Students that have to move their cars every 2 hours in fear of council park rangers booking them. There is a Day Care next to the Car park in the TAFE grounds, across the road in Angas street as well as the Italian Bilingual School from K to 6 and the

Response

was formerly used as a nursing home, but this use has ceased. Regardless of the status of operation of the nursing home, the building itself still embodies heritage significance.

The assessment provided in the Heritage Impact Assessment concludes the proposed amendment will not have any further impact on the visual amenity of the surrounding heritage items.

Overshadowing

The proposed modification ensures minimal impact to the amenity of the adjoining residences, with overshadowing kept predominately to See Street, utilising the favourable north to south orientation of the site. As a result, the additional levels will not result in any additional overshadowing of residential properties on See Street until approximately 5pm at the winter solstice.

Traffic Impacts - Noise and Flow

In accordance with the Noise and Vibration Assessment prepared by JHA (submitted with the application), suitable management measures will be implemented to ensure noise emissions are not intrusive and do not impact on the amenity of nearby residential properties.

With regard to traffic flows, the Response to Transport-Related Submissions (Attachment 2) details that vehicle circulation is consistent with the approved lower levels of the MSCP.

Vehicle circulation is consistent with the lower levels of the car park. The current configuration of the car park and the ramps is considered appropriate, as it seeks to separate inbound vehicles to the eastern side of the car park and outbound vehicles to the western side of the car park, resulting in efficient



soon to be completed Meadowbank K to 12 School. The increased traffic flow and now the continual movement of cars will put the lives of children at risk.

The increased traffic flow which has also not been taken into consideration in the revised documents, and the need for the additional parking spaces are not needed as the number of staff and students have not increased as stated in your submission. Quote: "Considering that this application only seeks to increase the total on-site car parking provision and no changes are proposed to staff and student numbers previously forecast, no increase in traffic generation is expected from that previously assessed in the original TAIA (GTA, 2020)." So why are you adding more car park spaces?

The removal of the car parking space from the TAFE Meadowbank Multi-Trades and Digital Technology Hub (MTDTH) was made months before the drawings of the current multi-storey car park (MSCP). The addition of 2 floors is not requires as the multi storey car park catered for the MTDTH car spaces that were removed in their modifications, you are just double counting. NSW Projects have deliberately deceived the community by designing a car park that can have 2 additional floors added after the lower building was approved. This is underhanded and deceitful and in breach of the NSW Governments Projects Code of Conduct.

In closing, the current building is nearing completions with landscaping in the final stage, the additional 2 floors will require the removal of the panels, safety barriers, Lighting poles on the top floor and the reinstatement of the construction fencing and security. Not to mention the additional landscaping that will need to be redone post the additions being completed. This is a waste of tax payer money for no added benefit to the Staff, Student or community. I ask you, where do the Staff and students park for the next 12 months while the additions are being put to the building, as you have built over all available parking spaces on the TAFE property? You are impacting the community again for not benefit. Make the current multi storey car park free to Staff and students of TAFE and open it as soon as possible in its current state for perpetuity.

Response

operation of the car park. Changing the travel direction of the ramps would create more conflicts between vehicles on the ground level, as a result of inbound vehicles having to cross the travel path of outbound vehicles to access the upper levels of parking

This design approach minimises potential vehicle conflicts. Furthermore, vertical cladding battens are provided on the ramps which will provide screening.

Car Park Usage

Condition E1 of SSD 10349 states the MSCP must not be leased by or leased to the general public or persons not associated with TAFE.

As detailed within the Response to Transport-Related Submissions (Attachment 2) the MSCP is for Meadowbank TAFE use only. Boom gates will be installed on entry and exit from the car park so as to avoid other users parking within the car park. Controlled access is part of the already approved design.

Fees apply to both staff and students for both the existing and proposed car parks. TAFE 's general policy is to keep the carpark fees low for the staff and students to encourage them to utilise the TAFE carparks rather than on-street car parking spaces. Since April 2020, the use of TAFE carparks has been free of charge.

Project Justification

The proposed modification is in response to the reallocation of car parking within the campus, including the future removal of 100 at grade car parking spaces from the western side of the campus. In addition, it will assist with alleviating existing



Public Submission		Response
		car parking demand associated with the site that currently occurs on the surrounding streets.
		Traffic Impacts
		The proposed additional two levels of parking will not generate additional traffic beyond that estimated for the existing approval, but rather will result in a minor redistribution of traffic associated with vehicles that were previously parking on surrounding streets now parking within the MSCP.
4	The local streets near the TAFE are already overcrowded with cars, with limited parking for residents during the day. The issue will only get worse as insufficient parking has been provisioned for the new school site. I therefore support the proposal to add additional parking at the current site. On a related note, can the planners who eventually approve the construction (assuming it goes ahead) PLEASE ensure the impact to residents is minimised as much as possible, particularly as it relates to noise and parking. If a crane is required, please use an electric one so that residents don't have to suffer unnecessarily as was the case with a diesel crane used on the nearby school site. Please also provide adequate parking for workers so that they do not clog up local streets (maybe they could use the other floors of the new carpark!).	This submission provides support for the proposed modification application as it will alleviate parking issues on the surrounding road network. Construction Impacts
		In accordance with the Noise and Vibration Assessment prepared by JHA (submitted with the application), suitable management measures will be implemented to ensure noise emissions are not intrusive and do not impact on the amenity of nearby residential properties.
		As detailed within the Preliminary Construction Management Plan submitted with the modification application, the use of on-street parking on the surrounding local road network by construction personnel will not be permitted.
		The appointed contractor is required to propose an appropriate approach for reducing construction worker travel by private car (including but not limited to use of public transport as noted above, carpooling, group transport and/or shuttle services from subcontractor premises or key transport nodes).



The additional levels of the carpark SHOULD NOT receive DA approval. Reasons include:

Pedestrians walking along see st will have yet more obstacles with a higher volume of cars. The pedestrians will be some of the 3500 students <18 years old walking to school.

Heritage listed building and structures on See street, which have been lovingly restored and landscaped will be overshadowed. This will create cold homes and increase dampness. The heritage buildings cannot be altered or knocked down. The heritage needs to be preserved and the building need to be protected

The heritage building must not be dwarfed by ugly square boxes. It's time to preserve heritage. The structure is within 100m of heritage so should abide by rules that other local house have to follow to be in keeping with heritage areas.

These extra levels were obviously planned prior to construction start. What is to stop another 5 storeys being added. The height cannot be increased from current DA approval

The non-compliance of the construction has already negatively impacted residents. The negative mental health impacts from non-compliance is life threatening. Schools infrastructure and TAFE infrastructure have no respect for residents. State Significant Development does not translate to 'stuff the residents' although this has been the attitude from all involved.

See st and Constitution rd. intersection is already a death trap. So many near accidents with commuters walking up Constitution rd. As the DA is also being updated to remove safety upgrades to local streets, this will result in accidents. When an accident occurs, this letter will be provided to those in the accident to show that local residents tried to put safety first.

Car park will only increase number of cars in already congested streets. Aim should be to minimise private cars and utilise already existing public transport. What other TAFEs have bus, train and ferry servicing the students.

Response

Pedestrian Safety

No change to the approved pedestrian and vehicle access arrangements are proposed. As per the approved plans, the access arrangements will clearly differentiate between pedestrian pathways and roadways with pedestrian safety being prioritised.

Heritage Impacts

As detailed within the Heritage Impact Assessment addendum, the proposed amendment will not have any further impact on the visual amenity of the surrounding heritage items.

Overshadowing

The proposed modification ensures minimal impact to the amenity of the adjoining residences, with overshadowing kept predominately to See Street, utilising the favourable north to south orientation of the site. As a result, the additional levels will not result in any additional overshadowing of residential properties on See Street until approximately 5pm at the winter solstice.

Built Form

As mentioned in the response to Submission 1, the proposed design seeks to minimise the bulk and scale of the carpark through the implementation of setbacks, design finishes and soft landscaping.

Landscaping

The original application involves landscaping works, including hard and soft landscaping, and the planting of trees as per Condition B37 and B38 of SSD 10349. These landscaping



TAFE must be treated like a 'CBD site' and minimise private transport.

The design of the TAFE building is world class architecture. This will now be dwarfed by an ugly square car park.

Having parking onsite does not make a TAFE more attractive. Public transport does and this requirement has been met.

The cost of using the car park will be prohibitive and the building will become an ugly white elephant. As confirmed by TAFE employees, the parking station will be sold off to a commercial parking station company and be out of reach for those who need parking.

See street is incorporated into the green pathway which is to encourage cycling and walking from Macquarie Park. Mix in the cars entering the car park will be dangerous, and defeat the purpose of the green pathway.

The streets surrounding TAFE will already be a carpark due to volume of cars. We don't need another carpark!

Trees in schematic diagram do not represent reality and try to make design better than it is. Streets around TAFE have been raped of trees with no intention of planting new trees to complete landscaping. The trees will not be planted as they will run out of money.

If more parking is desired, place it in the planned bus station on the western side of Constitution Rd, i.e. where the pedestrian tunnel will end up. Keep the western side cars on that side to prevent eastern roads being impassable.

Response

works will be undertaken and will act as an additional screening barrier.

Height of Building

The modification application seeks consent for two additional levels of car parking. No further increase to the height of the car park is anticipated.

Construction Impacts

The proposed construction works will be carried out in accordance with the construction and traffic management plans and relevant conditions of consent.

Public Safety

This modification is solely for the purposes of creating additional levels to the approved MSCP. The proposal does not involve any changes to the safety upgrades of the local streets.

Traffic Impacts

Based on the proportional increase in parking, it is anticipated that around 216 vehicles would enter the MSCP in the AM peak hour with the additional two levels of car parking. This represents around 84 vehicles that would have been previously parking on the surrounding streets during the critical AM peak hour now parking within the MSCP.

In regard to concerns about the volume of cars, the original approval requires the applicant to prepare a public domain enhancement strategy, in consultation with Council (Condition B35). This strategy will be implemented to encourage walking and cycling to the TAFE campus.



Public Submission		Response
		Car Park Usage
		As detailed above, Condition E1 of SSD 10349 states the car park must not be leased by or leased to the general public or persons not associated with TAFE. TAFE is committed to remaining compliant with this condition of consent.
		Location
		The location of the carpark is the result of extensive consultation and planning. The location of the car park is approved under SSD 10349.
6	Now with some details and plans of the mod-2 revealed, this modification is actually a doubling up of the number of car park spaces and not acceptable at all. There is really no need to waste taxpayers money on this modification; it will not solve the parking mess in the surrounding streets (2P Residential Parking Zone 8) as most students are not prepared to pay an even miserly \$5 per entry for an all-day parking spot.	Project Justification
		The proposed modification will result in a net increase of 149 spaces within the multi storey car park. These additional
		spaces are in response to the reallocation of car parking across the TAFE Campus. This will increase the total parking provision within the multi-storey car park from 245 to 394 spaces.
	Traffic impact has not been adequately addressed. – The study is missing.	Traffic Impact Assessment
	As for the heritage impact. The (flawed) report is just a copy of the original version with significant short comings in regards to the heritage property under the name of Bartonville There is no nursing home in the street since many, many years, as the "Laurels" have ceased operations about 20 years ago.	A Traffic Impact Assessment was included with the modification application at Appendix 4. It is considered the report adequately assessed the traffic impact of the proposal.
		Traffic Impact
	Also the shadow diagram shows how monstrous this eye soar is in the street during the winter months in particular.	The Response to Transport Related Submissions (Attachment 2) notes:
	The location has also a short coming, as many students have to walk a couple of 100 meters to get to their course venue Humans don't like to walk so much, so they will be avoiding the dedicated new car park.	The proposed additional two levels of parking will not generate additional traffic beyond that estimated for the existing approval, but rather will result in a minor redistribution of traffic associated with vehicles that



Publi	c Submission	Response
	The whole modification-2 is anything but value for money. Heaps of demolition work is required to top up 2 more levels costing millions of taxpayers dollars. Hidden Agenda (?)	were previously parking on surrounding streets now parking within the multi-storey car park.
		Heritage Impact
		The Heritage Impact Assessment submitted with the Modification Application provides an assessment of surrounding heritage items. This assessment concludes the proposed amendment will not have any further impact on the visual amenity of the surrounding heritage items.
	According to Grapevine (every rumour has some truth) a future planned sell off of the new car park monster - once approved – to a private operator, is not only against the original approval, but simply a cash grab to fund other local Tafe infrastructure, which is not needed too. The 'wines' are a new tunnel for cyclists and pedestrians from the Western side of the tail tracks (West Ryde) to the old tafe campus sites and the new schools at Meadowbank	
		Overshadowing
		The additional levels will not result in any additional overshadowing of residential properties on See Street until
	Summary:	approximately 5pm at the winter solstice.
	We strongly object against this unnecessary modification.	Location
	Please withdraw this modification-2. We reserve the right to take legal action.	The location of the MSCP is the result of extensive analysis and planning. The location of the MSCP has been previously deemed acceptable and approved as part of the original SSD (10349).
		Car Park Usage
		Condition E1 of SSD 10349 states the car park must not be leased by or leased to the general public or persons not associated with TAFE. TAFE is committed to remaining compliant with this condition of consent.
7	To all the Guys in Planning, Education and TAFE Departments of NSW	This submission is noted.
	Please lift your game and be honest and not deceptive - Taxpayers in NSW are not as stupid as you may think! Strongly Object this Modification-2	The issues raised in this submission are similar to the issues raised in the above submission (Submission 6). Please refer to the response provided to Submission 6.



Public Submission Response Now with some details and plans of the mod-2 revealed, this modification is actually a doubling up of the number of car park spaces and not acceptable at all. There is really no need to waste taxpayers money on this modification; it will not solve the parking mess in the surrounding streets (2P Residential Parking Zone 8) as most students are not prepared to pay an even miserly \$5 per entry for an all day parking spot. Traffic impact has not been adequately addressed. – The study is missing. As for the heritage impact. The (flawed) report is just a copy of the original version with significant short comings in regards to the heritage property under the name of Bartonville. - There is no nursing home in the street since many, many years, as the "Laurels" have ceased operations about 20 years ago. Also the shadow diagram shows how monstrous this eye soar is in the street during the winter months in particular. The location has also a short coming, as many students have to walk a couple of 100 meters to get to their course venue. - Humans don't like to walk so much, so they will be avoiding the dedicated new car park. The whole modification-2 is anything but value for money. Heaps of demolition work is required to top up 2 more levels costing millions of taxpayers dollars. Summary: We strongly object against this unnecessary modification. Please withdraw this modification-2. THANK YOU

Table 1: Response to public submissions



TAFE Carpark MOD Response to Submissions – Response to Agency Submissions

Agen	cy Submission	Response
1	City of Ryde Council	
	Council is not making any submission with respect to the MOD but seeks that the residents' concerns as raised directly with the DPE regarding the proposal be addressed	We note Council's request that residents' concerns be addressed. A response to public submissions is provided in the above table.
2	Transport for NSW (TfNSW)	
	 Car Park Demand and Operation TfNSW request clarification as part of the Response to Submissions (RtS) regarding the justification for proposed increase in parking. The increase in car parking provision may generate additional traffic to utilise the carpark. TfNSW recommends that the car park is restricted for the Meadowbank TAFE use only and that suitable controls should be provided at the carpark access point to address this part in the RtS. 	The Response to Transport-Related Submissions provides a detailed response to the car parking demand and operation matters raised by TfNSW (Attachment 2).
		It is noted that the proposed modification is in response to the reallocation of car parking within the campus, including the future removal of 100 at grade car parking spaces from the western side of the campus. In addition, the amendment will assist with alleviating existing car parking demand associated with the site that currently occurs on the surrounding streets.
		The multi-storey car park is for Meadowbank TAFE use only. Boom gates will be installed on entry and exit from the car park so as to avoid other users parking within the car park. Controlled access is part of the already approved design.
	 It is noted that preference is to reduce the amount of car parking for the proposed development in favour of travel demand management initiatives identified such as those identified in the original development consent – particularly considering the development planned is in-close proximity to Meadowbank Railway Station and West Ryde Station. 	The Response to Transport-Related Submissions provides a detailed response to the travel plan matters raised by TfNSW (Attachment 2).
		It is noted that a detailed Travel Plan will be prepared for the TAFE campus outlining measures and initiatives to reduce private vehicle travel to the site, in accordance with the conditions of the current consent. The detailed Travel Plan will



Agency Submission	Response
 Condition D14(b) of the development consent for SSD 10349, refers to 'Multi-Trades and Digital Technology Hub TAFE NSW Meadowbank Travel Plan (Issue E)' prepared by GTA Consultants. This document should be updated for the proposed modification of additional levels of the multi-story carpark. Condition D14(b) would need to be updated accordingly. The Travel Plan should also be updated to include the development of a Car Park Management Strategy that encourages the use of car sharing and reduces the prevalence of single occupant car travel to the site, such as converting existing spaces to end of trip facilities and bike parking that support travel to the site by active transport modes. 	include specific tools and actions to help achieve the objectives and mode share targets as required by Condition D14(d).

Table 2 Response to agency submissions