

Mr. Brendon Roberts
Team Leader – Key Sites Assessments
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Attention: Emily Dickson

Dear Mr. Roberts,

**Parramatta Leagues Club Hotel (SSD 8800) – 1 Eels Place, Parramatta
Notice of Exhibition**

Thank you for your letter dated 14 January 2019 requesting Transport for NSW (TfNSW) comment on the subject State Significant Development (SSD) application. The application proposes the development of Parramatta Leagues Club Hotel, intended for 209 hotel beds with ancillary uses (pool, gym, café, bars and function room) over 17 storeys, and vehicular access from O'Connell Street.

The exhibited Environmental Impact Statement (EIS) and supporting documentation has been reviewed. Comments and advice to the Department of Planning & Environment on the SSD application are provided below.

Consultation

Comment

Section 2.7: Consultation of the EIS states that the Applicant met with TfNSW on 17/12/2018 and incorrectly notes that “no formal feedback” was provided. The timeframe provided by the Applicant to respond to the proposal prior to lodgement was insufficient.

It is noted that following the consultation meeting, comments on the proposal were provided by TfNSW, which included comments from Roads and Maritime Services (Roads and Maritime) and the Sydney Coordination Office (SCO) in an email to the applicant on 21/12/2018.

Recommendation

The EIS should note and consider the comments provided following the consultation meeting on 17/12/2018.

The above should be provided as part of the Applicant's Response to Submissions.

Access Road ownership

Comment

A new 6m access road directly south of the site and opposite Ross Street has been approved as part of the Western Sydney Stadium (WSS) development. The hotel development proposes to utilise this access road for the development.

This access road is within the Venues NSW site, and provides left-in/left-out access from O'Connell Street. The access road forms part of an internal road system that provides access to parking areas and loading areas within the WSS site. It is unclear if there are any legal rights for the proposed development to use the private access road or if it will be dedicated as public road to Council.

The Transport and Accessibility Impact Assessment states that negotiations between the Applicant and Venues NSW, Lend Lease and Parramatta Park Trust seeking to widen the 6m access road are ongoing. The EIS further notes that formal owner's consent has not been secured for lodgement of the DA.

The Stage 1 Concept Proposal (SSD 7534) for the stadium includes the approval of a future development (20,000 sqm GFA) on the northern corner of the site and adjacent to the new access road and the future hotel site.

Recommendation

To address the above, the following actions are recommended:

- The applicant provide evidence that the access road would be available for use, which could include formal approval from Venues NSW to confirm owner's consent has been granted to Parramatta Leagues Club for the future use and widening of the access road for this proposal.
- Further details should be provided of the future use of the access road and whether the road will be dedicated as a public road.
- Further details of the timing and access arrangements of the future development of the building that will front the access road should be provided and considered as part of this proposal.

The above should be provided as part of the Applicant's Response to Submissions.

Proposed Access

Comment

The hotel proposes a porte-cochere and loading dock facility which will be accessed via the new access road. The proposal seeks to widen the access road to 10m on the northern side of the road to accommodate coach and pedestrian flows to the stadium and hotel site.

Eels Place is a signalised intersection that allows controlled movements onto O'Connell Street. The road is approximately 10-12m wide and provides access to the new multi-storey carpark.

The Transport and Accessibility Impact Assessment does not consider the cumulative impact of the access road from the stadium carpark and future management of stadium events. There is no discussion on how access to the hotel will be managed during major events and the possibility of the access road being closed temporarily.

Recommendation

- Alternate access is available from Eels Place which should be further investigated by the applicant.
- The Transport and Accessibility Impact Assessment does not provide any discussion or analysis on the existing access to the site from Eels Place. It is recommended that the

assessment includes swept path movements for proposed service vehicles accessing the site from Eels Place.

The above should be provided as part of the Applicant's Response to Submissions.

Operation of the hotel during Western Sydney Stadium events

Comment

It is understood that an Event Management Plan (EMP) for the stadium is currently being developed by Venues NSW to comply with their project approval requirements.

With regards to traffic and transport implications of major events, the Transport and Accessibility Impact Assessment makes reference to a report by BECA consultants which was prepared as part of the Western Sydney Stadium Stage 2 DA.

The BECA report states that small and medium sized events at the stadium are unlikely to have an adverse impact on the capacity of surrounding road network and during major events the intersection operation at O'Connell Street/ Eels Place will continue to operate satisfactorily.

It further recommends that mitigation measures for major events include the preparation and implementation of an Event Day Management Plan and an example was provided by BECA.

Recommendation

Any approved Event Management Plan prepared for the operation of the Western Sydney Stadium events should be reviewed as part of the Hotel development to ensure that any additional measures required to operate the Hotel during events are incorporated. The review should be undertaken in consultation with Venues NSW, Parramatta City Council and SCO and should include mitigation measures for impact on Eels Place and the new access road during all events.

The above should be provided prior to the issuing of any Occupation Certificate.

Traffic Assessment Methodology

Comment

The traffic assessment does not consider future road network changes and the redistribution of traffic to O'Connell Street as a result of the operation of Parramatta Light Rail (PLR) – Stage 1 project.

The report suggests that phasing adjustments to the traffic signals be undertaken to optimise the intersection performance within the surrounding road network.

Recommendation

It is recommended that:

- the Transport and Accessibility Impact Assessment include details of the traffic analysis undertaken for the PLR project in consultation with the PLR team
- Any proposed signal phasing adjustments would be subject to RMS approval.

The above should be provided as part of the Applicant's Response to Submissions.

Freight & Servicing

Comment

The proposal includes one (1) loading dock space with vehicular access proposed from the new access road. The hotel loading dock has been designed to accommodate a Medium Rigid Vehicle (MRV) and positioned opposite the loading area of the Parramatta Leagues Club. It is unclear as to whether this arrangement can adequately service the demands generated by the development.

Recommendation

To better understand how the single proposed loading dock space will meet demand, SCO recommends the applicant conducts an analysis of projected freight and servicing movements (number and type by day).

SCO suggests the applicant explore options for managing loading spaces for the hotel and league club collectively, in particular for waste collection to facilitate the use of HRV collection vehicles.

The above should be provided as part of the Applicant's Response to Submissions.

Construction Pedestrian and Traffic Management

Comment

The following comment refers to Appendix D: Framework Construction Traffic Management Plan of the Transport and Accessibility Impact Assessment.

Construction vehicle access directly from O'Connell Street will not be supported by the SCO, as O'Connell Street will become the main north-south route for vehicles through the Parramatta CBD during the construction of the PLR. It should also be noted that O'Connell Street and George Street will be impacted by PLR enabling works during 2019.

It is preferred that all construction access and egress should be via Eels Place and the applicant should provide turning paths to demonstrate the proposed vehicle types can safely navigate the proposed site access/egress via Eels Place.

As stated in the TIA, there will be limited on site car parking for an average of 100-150 construction workers. To avoid impacting residents and businesses in the area, SCO suggests the applicant communicates to workers not to park in surrounding streets and that an alternate parking facility be nominated in the event onsite parking is full.

Several construction projects within the Parramatta CBD are likely to occur at the same time as this development. The cumulative increase in construction vehicle movements from these projects could have the potential to impact on general traffic and bus operations on O'Connell Street, as well as the safety of pedestrians and cyclists particularly during commuter peak periods.

Recommendation

As part of any condition of consent, the Applicant must prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with the Sydney Coordination Office (SCO)

within TfNSW. The CPTMP should be endorsed by the SCO prior to any construction activity on the site and take into account the potential impacts of the proposed development on the Parramatta Light Rail (PLR) project and bus services on O'Connell Street.

The CPTMP must address the following matters:

- Traffic and public transport customer management in the vicinity of the development.
- Location of all proposed work zones.
- Construction vehicle access arrangements.
- Proposed construction hours.
- Estimated number and type of construction vehicle movements including volume, time of day and truck routes.
- Construction program highlighting details of peak construction activities and proposed construction staging.
- Any potential impacts to general traffic, cyclists, pedestrians and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works.
- Cumulative construction impacts of projects in the Parramatta CBD precinct, the duration of the impacts.
- Measures proposed to mitigate any associated general traffic, public transport, pedestrian and cyclist impacts should be clearly identified and included in the CPTMP.
- Construction activity to take into consideration the event management plan currently being prepared for WSS. Construction should not take place during bump-in, during and bump-out of events at the stadium and potentially Parramatta Park.
- All construction vehicles are to enter and exit site in a forward direction. No reversing into site should be allowed to minimise traffic safety risks.
- Drivers should be instructed to circulate on the arterial ring roads if site access is delayed. Drivers will find their own layover areas and advise other drivers. This is to be ensured that drivers follow site instructions.
- Construction vehicle movements should be limited during peak periods, AM (7am–9:30am) and PM (4pm–6:40pm) to reduce impacts on bus operations and traffic flow. These peak periods have the highest level of pedestrian activity in the CBD.
- Include measures to reduce the likelihood of construction workers driving into the CBD to park, placing further demand on kerbside parking and the road network during construction.

Workplace Travel Plan

Comment

A workplace travel plan is a package of actions implemented to manage travel generated by a workplace. Primarily, travel plans seek to reduce car trips and encourage the use of lower impact alternatives, such as walking, cycling, public transport and telecommunications.

Travel plans have been used internationally to moderate car use and its impacts, including congested road networks, emission of pollutants (e.g. greenhouse gases) and physical inactivity. Travel plans provide a strategy for managing car use in the public interest by engaging employers and site managers in taking responsibility for trips and impacts their site generates.¹

¹ Wake D, Thom A, Cummings R, 2010; *Evaluating workplace travel plans*, Australasian Transport Research Forum 2010

As such the implementation of a Workplace Travel Plan (WTP) could be a potential measure to mitigate the environmental impacts associated with employee private vehicle travel to the development.

Recommendation

DP&E should include a development consent condition whereby a detailed Workplace Travel Plan (WTP), which includes target mode shares for staff to reduce the reliance on private vehicles, should be prepared in consultation with Parramatta City Council. The WTP should include a Travel Access Guide, must be implemented accordingly, updated annually and reflect the operational requirements of the hotel. These plans should be submitted to DP&E and be approved prior to the issuing of any Occupation Certificate.

I trust the above will be of assistance in assessing the SSD application. If you require any further information regarding this matter, please do not hesitate to contact Ken Ho, Transport Planner, via email, at ken.ho@transport.nsw.gov.au.

Yours sincerely



26/2/2019

Mark Ozinga

**Principal Manager, Land Use Planning & Development
Freight, Strategy & Planning**

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