



5 February 2014

Our ref: 10116B

Director General
NSW Department of Planning and Infrastructure
23-33 Bridge Street
SYDNEY NSW 2000

Attention: Mr Brent Devine

Dear Brent,

**re: Casuarina Town Centre
Concept Approval and Project Application Approval 06_0258
Section 75W Modification No. 7**

We write with reference to your email of 16 January 2014 requesting additional information in relation to the above Modification 7. The Proponent has provided the following information in response to your request.

1. Traffic Matters

The Department has requested additional information in relation to traffic impacts of the development. Consultants Cardno Eppell Olsen, who have been the traffic consultants for the project since inception, have provided additional advice contained in Attachment 1. This states:

In respect of the traffic impacts of the proposed shopping centre development, it is noted that:

- *The current approval for the site permits 2,300sqm GFA retail plus 1,160sqm GFA specialty shops/restaurants (total = 3,460sqm GFA)*
- *The current proposal/application seeks 3,300sqm GFA retail plus 1,660sqm GFA specialty shops/restaurants (total = 4,960sqm GFA)*
- *The traffic assessment undertaken by Cardno Eppell Olsen ("Casuarina Town Centre Concept Plan Traffic Impact Study") in June 2008 (Attachment 7 to the Environmental Assessment) considered and assessed a proposal on the subject site for a supermarket/retail complex of 8,163sqm GFA.*

The June 2008 traffic assessment used the following traffic generation rates for these uses:

- *Shopping centre = 12vph per 100sqm GFA*
- *Specialty shops = 10vph per 100sqm GFA*
- *Restaurants = 5vph per 100sqm GFA.*

Using these rates, the total traffic generation of the three options presented above is summarized as follows:

- 3,460sqm GFA (current approval) – 392vph (note that the 1,160sqm GFA specialty shops/restaurants is all conservatively assessed at the higher rate of 10vph per 100sqm GFA)
- 4,960sqm GFA (current proposal/application) – 562vph (note that the 1,660sqm GFA specialty shops/restaurants is all conservatively assessed at the higher rate of 10vph per 100sqm GFA)
- 8,163sqm GFA (June 2008 traffic assessment Cardno Eppell) – 980vph (note that the entire GFA was assessed at the higher rate of 12vph per 100sqm GFA).

From the above, it is clear that the traffic generation for the subject shopping centre site as used in the June 2008 traffic assessment by Cardno Eppell Olsen is over 70% greater than the generation of the currently proposed centre.

The traffic analysis reported in the June 2008 traffic assessment by Cardno Eppell Olsen concluded the following, in respect of the impact on adjacent intersections (noting that this assessment included traffic diverted to the subject intersections as a result of closure of Dianella Drive at the Tweed Coast Road):

- Tweed Coast Road/The Boulevard Road – a signalized intersection is recommended and its projected maximum Degree Of Saturation is 0.45 at 2018 AM peak, 0.64 at 2018 PM peak, 0.50 at 2028 AM peak and 0.68 at 2028 PM peak, noting that the maximum acceptable DOS for a signalized intersection is 0.90 – 0.95.
- Casuarina Way/The Boulevard Road – a signalized intersection is recommended and its projected maximum Degree Of Saturation is 0.69 at 2018 AM peak, 0.85 at 2018 PM peak, 0.70 at 2028 AM peak and 0.91 at 2028 PM peak, noting that the maximum desirable DOS for a signalized intersection is 0.90 – 0.95.

Note that whilst traffic signals were recommended at the Casuarina Way/The Boulevard Road intersection, the Council and NSW Roads and Traffic Authority (RTA, now RMS) requested and conditioned that the intersection be assessed, designed and constructed as a roundabout. Analysis of a two lane roundabout at this location (as reported in a Cardno Eppell Olsen Design Note dated 7 July 2009) confirmed that its projected maximum Degree Of Saturation is 0.37 at 2018 AM peak, 0.52 at 2018 PM peak, 0.44 at 2028 AM peak and 0.58 at 2028 PM peak, noting that the maximum acceptable DOS for a roundabout is 0.85.

It is very important to note that the above intersection needs have been identified as that required to accommodate the full development proposed within the Town Centre as per planning estimates in 2008. Such development included, in addition to the 8,163sqm GFA shopping centre, 4,792sq.m GFA of commercial/community facilities, 3,700sqm GFA of shops, 441 high density residential/tourist units, 563 medium density residential/tourist units, 42 detached residential dwellings and 133 public (beach) parking spaces. Therefore, the necessary intersection needs for the currently proposed centre would logically be less than that identified above.

Based on the findings of the June 2008 traffic assessment, and recognizing that those findings relate to a 2028 design horizon and a shopping centre with generation 70% greater than that now proposed, it is concluded that the identified intersection works resulting for the centre assessed in June 2008 would be more than adequate for the currently proposed centre.

2. Parking Provision

We advise that Consolidated Properties Group (Peter McGregor and Bill Bennett) met with Lindsay McGavin (TSC Manager Development Assessment) on the 14th November 2013 at the Tweed Shire Council offices to discuss the proposal generally. At this meeting Mr

McGavin acknowledged the reduction in parking and the rationale behind it as being supportable.

It is anticipated that this would be formally assessed when the application is referred to Council.

The merits of the parking provision have been assessed by Cardno Eppell Olsen in their report contained in Appendix 4 to the environmental assessment of Modification 7 submitted with the application. Further justification is provided in Attachment 1 which states:

As documented in the 29 November 2013 Technical Memorandum by Cardno the proposed car parking supply is considered to be appropriate and acceptable, noting the following:

- > The minimum number of car parking spaces required for the development (including the 20% reduction allowance for ESD) is 232 car spaces*
- > The proposed development will provide 241 car parking spaces on site*
- > Therefore, the proposed supply exceeds the minimum requirement.*

The following points should also be noted to justify the ESD parking relaxation and the appropriateness of the proposed parking supply:

- > Substantial cycle parking facilities (28 spaces) will be provided on site*
- > The site location is within immediate proximity (short walking distance) of a large part of the shopping centre catchment*
- > The existing adjacent community has a well-established network of paths (cycle and pedestrian) which supports (and achieves) an active transport environment (ie. many walkers and cyclists)*
- > A future bus route is proposed on Casuarina Way immediately adjacent to the subject site*
- > An additional 16 car parking spaces are available (recently constructed) on street immediately adjacent to the site (on The Boulevard)*
- > When the adjacent sites are developed (for complimentary commercial/community purposes) there will be some level of cross use of the available spaces on site and on street (ie. some patrons will park once and visit multiple sites).*

Given all of the above, it is our view that the car parking supply as proposed will be more than adequate.

3. Drainage Swale

The Department has requested additional information on adjustments to the drainage swale resulting from this modification and any potential implications on the approved stormwater management regime. Cardno Eppell Olsen reviewed this request and provide the following response:

As shown in Section A of the attached Casuarina Town Centre Figure No. DA122 (08/09/2010), approved 1 July 2011 (Attachment 2), it is intended to partially realign the alignment and reconfigure the cross section profile of the swale bordering the southern boundary of the retail centre. The construction of the Stage 1 bulk earthworks for the overall Casuarina Town Centre site is currently underway. As noted in Section A, the compensatory earthworks will be undertaken on the southern side of the swale profile in order to maintain the flow capacity of the open channel downstream (i.e. west) of Casuarina Way.

4. Timing of Expansion

Consolidated Properties Group advises that it is ready to commence construction of Stage 1 immediately. The anchor tenant is in place, funding is available and a builder identified. There is community expectation that the centre will be built and a general sentiment that it is long overdue.

Stage 2 will be subject to market forces and the rate of development in the surrounding area. It is noted that the demographic report provided with the application indicates an underlying need for Stage 2 now.

5. Land Owners Consent

Land owners consent and a political donations form are attached (Attachments 3 and 4).

6. Conclusion

It is clear that the traffic and other implications of a centre of the size proposed have been addressed as part of the concept plan application. This is the clear intention of the legislation regarding concept plans as it enables the overall impacts of a development to be considered including cumulative impacts of other stages of a development. This has been undertaken in this case.

The proposed road network has been assessed as having sufficient capacity to accommodate a development in excess of that proposed as part of this modification.

Should any additional clarification of these matters be required, please do not hesitate to contact this office.

Yours faithfully

BBC Consulting Planners

A handwritten signature in black ink, appearing to read 'Dan Brindle', is written over a faint, light blue circular stamp. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dan Brindle
Director



ATTACHMENT 1 – Cardno Eppell Olsen Advice

Technical Memorandum

Title	Casuarina Shopping Centre Traffic Response		
Client	Consolidated Properties Group	Project No	CE008491
Date	4 February 2014	Status	Final
Author	Brett McClurg	Discipline	Traffic and Transport
Reviewer	Brett McClurg	Office	Brisbane

This Technical Memorandum has been prepared in response to a request for additional information from the NSW Department of Planning and Infrastructure (by email dated 16 January 2014). It deals with the following two matters:

- > Traffic Impacts
- > Car Parking Quantum

The advice herein is additional to the traffic assessment documented in the earlier Technical Memorandum by Cardno dated 29 November 2013, and the latter should be considered in conjunction with the advice herein.

Traffic Impacts

In respect of the traffic impacts of the proposed shopping centre development, it is noted that:

- > The current approval for the site permits 2,300sqm GFA retail plus 1,160sqm GFA specialty shops/restaurants (total = 3,460sqm GFA)
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Using these rates, the total peak hour traffic generation of the three options presented above is summarized as follows:

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Car Parking Quantum

As documented in the 29 November 2013 Technical Memorandum by Cardno the proposed car parking supply is considered to be appropriate and acceptable, noting the following:

- > The minimum number of car parking spaces required for the development (including the 20% reduction allowance for ESD) is 232 car spaces
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- > The site location is within immediate proximity (short walking distance) of a large part of the shopping centre catchment
- > The existing adjacent community has a well-established network of paths (cycle and pedestrian) which supports (and achieves) an active transport environment (ie. many walkers and cyclists)
- > A future bus route is proposed on Casuarina Way immediately adjacent to the subject site
- > An additional 16 car parking spaces are available (recently constructed) on street immediately adjacent to the site (on The Boulevard)
- > When the adjacent sites are developed (for complimentary commercial/community purposes) there will be some level of cross use of the available spaces on site and on street (ie. some patrons will park once and visit multiple sites).

Given all of the above, it is our view that the car parking supply as proposed will be more than adequate.

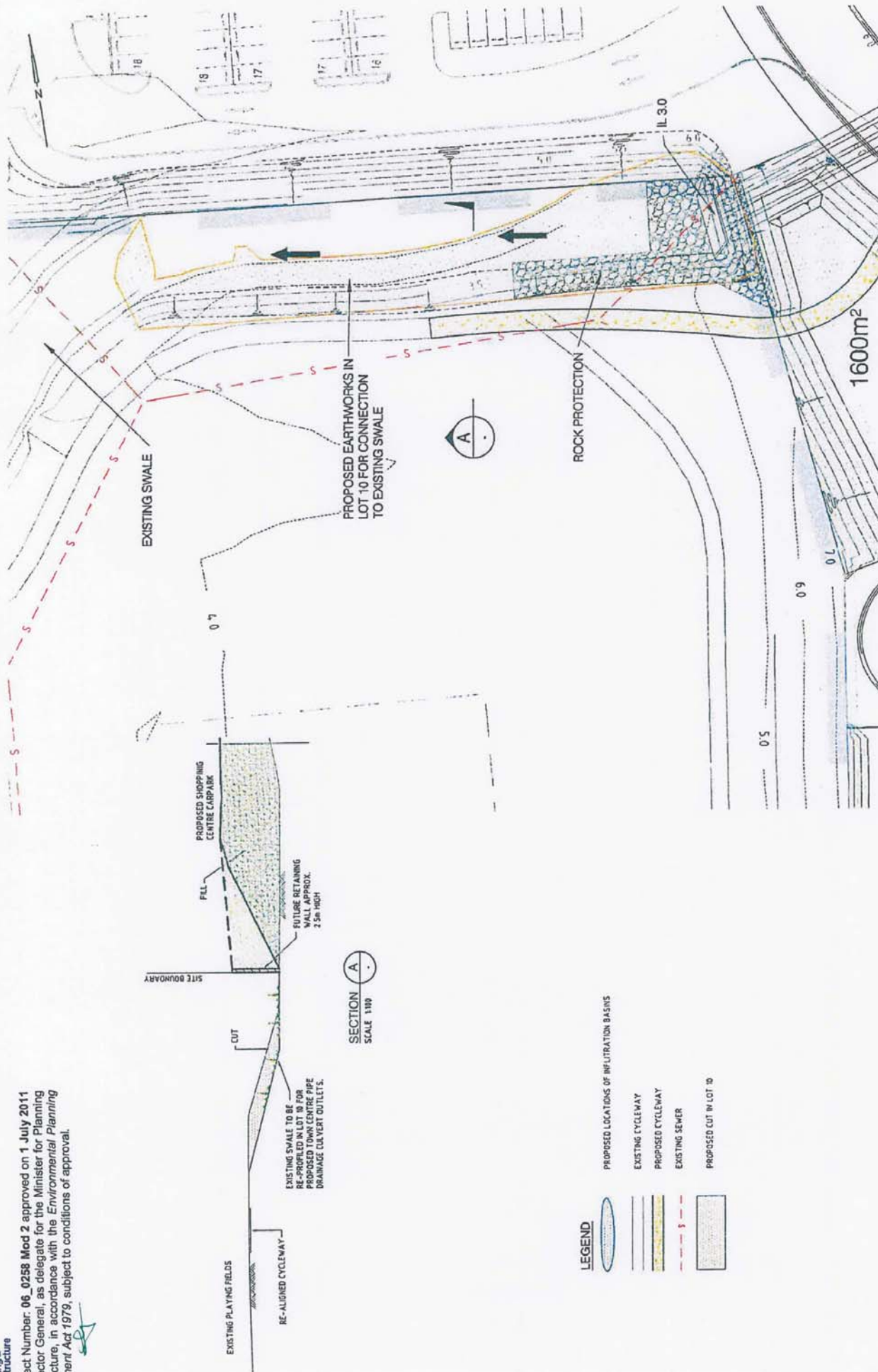
In respect of the car park layout, this has been addressed in detail in the 29 November 2013 Technical Memorandum by Cardno and we conclude that the proposed car park will operate effectively and efficiently.



ATTACHMENT 2 – Figure No. DA122 (08/09/10)

Major Project Number: 06_0258 Mod 2 approved on 1 July 2011
by the Director General, as delegate for the Minister for Planning
& Infrastructure, in accordance with the *Environmental Planning
& Assessment Act 1979*, subject to conditions of approval.

Signed: 



- LEGEND**
- PROPOSED LOCATIONS OF INFILTRATION BASINS
 - EXISTING CYCLEWAY
 - PROPOSED CYCLEWAY
 - EXISTING SEWER
 - PROPOSED CUT IN LOT 10

2 1 0 2 4 6 8m
SCALE BEFORE REDUCTION
1:100
5 10 15m
SCALE @ A1
1:250

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KINGS BEACH (No. 2) PTY LTD
CASUARINA BEACH TOWN CENTRE
STAGE 1 SECTION 75W SUBMISSION

FIGURE No. DA122 (08/09/10)
PROPOSED ADDITIONAL WORKS IN LOT 10

SCALE	DATE	BY	REV
1:250	11 SEPTEMBER 2010	DA122	1

7079/4/1 - FIG DA122