

File No: NTH 10/00202/04 Your Ref: MP07_0026_MOD5

The Director Modification Assessments Planning and Environment GPO Box 39 SYDNEY NSW 2001

Attention: Amy Robertson - Planner (Amy.Robertson@planning.nsw.gov.au)

Dear Sir / Madam,

Proposed Modification to Ballina Pacific Pines Development, Lennox Head MP07_0026 MOD5

I refer to your letter of 25 November 2016 requesting comment from Roads and Maritime Services in relation to the proposed modification the approved residential subdivision of Lot 75 DP 1213425.

Roles and Responsibilities

The key interests for Roads and Maritime Services are the safety and efficiency of the road network, traffic management, the integrity of infrastructure assets and the integration of land use and transport.

In accordance with Clause 104 of State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) Roads and Maritime is given the opportunity to comment on the application as it is considered a traffic generating development listed under Schedule 3.

Roads and Maritime Response

Roads and Maritime has reviewed the proposed modification and considers that the supporting traffic assessment (TIA) has underestimated the daily traffic movements generated by the proposed development.

The following comments are provided to assist the Consent Authority in making a determination;

- Section 6.4.1 of the TIA adopts a traffic generation rate of 6.45 daily residential trips and applies a discounted of 25 percent for internal trips. This rate with the discount is 35 percent lower than that recommended in the update to the *Guide to Traffic Generating Developments* (TDT 2013/04a), which identified an average daily traffic generation rate of 7.4 external trips for low density residential developments in regional areas.
- Section 6.4.2 of the TIA has discounted supermarket traffic generation by 25 percent to adjust for conversion from gross floor area and gross leasable floor area. This conversion is generally applicable to large shopping centres. Office space is the only exclusion from traffic generation calculations that could be considered appropriate for this assessment and the applied discount may underestimate the traffic generated by the supermarket and retail components by up to 25 percent.

The external trips generated by the supermarket and retail precinct have been further discounted by 35 percent for linked trips. The TIA does not provide adequate justification for this discount and it may underestimate traffic generated by link trips with an origin and destination external to the site.

Roads and Maritime Services

The supporting Economic Impact Assessment highlights the residential development as having a future population of approximately 1,700 people whilst the main trade area for the supermarket would have a population of 12,690 people in 2026. This suggests that approximately 87 percent of the main trade area is external to the development and that a greater proportion of linked trips would be associated with external trips.

 Section 6.5 of the TIA identifies the need to upgrade the Henderson Lane and Montwood Drive intersections with North Creek Road. Both intersections are close to downstream junctions. After reviewing the traffic generation calculations, the design of these intersections should be further investigated to ensure that sufficient separation of intersections treatments can be achieved to provide the required vehicle storage, deceleration and taper lengths for traffic turning from North Creek Road.

The consent authority should be satisfied that the traffic impacts arising from the proposed modification have been adequately described and that appropriate road related infrastructure has been identified to accommodate the traffic demands generated by the proposed development.

To ensure that environmental capacities of the road network are not exceeded, the Consent Authority could request a further sensitivity analysis to address abovementioned issues and inform consideration of the number of lots to be released prior to implementation of the Hutley Drive connection.

If you have any further enquiries regarding the above comments please contact Matt Adams, A / Manager Land Use Assessment on (02) 6640 1362 or via email at: <u>development.northern@rms.nsw.gov.au</u>

Yours faithfully

13 December 2016 for Liz Smith A / Network & Safety Manager, Northern