Our Ref: CE001034_ltr

Contact: Anissa Levy

30th June 2008

Cochlear Limited
C/- Andrew Harb
CRI Australia Pty Limited
Level 2, 76 Berry Street
North Sydney, NSW 2060

Attention: Stephen Shears

Dear Mr Shears,

COCHLEAR GLOBAL HEADQUARTERS
EA TEST OF ADEQUACY

I write to you in regards to the questions raised by the Department of Planning (DoP) in relation to "Transport, Traffic and Access" under the Test of Adequacy period for the Cochlear Project Application (PA). Kim Bauer of JBA Urban Planning has provided me a copy of the questions (as follows) and advised that she would like me to comment on only the first of these:

- What is the target public transport mode-share for the project? Is it consistent with the 40% public transport mode share proposed in Council's Draft Macquarie Park Traffic Study? If not, why?
- Are recommendations of Report (App I) being adopted/committed to? Reference to these should be made in the Statement of Commitments.
- LEP 137 does not apply to Cochlear site (p55).
- Please provide a Workplace Travel Plan.
- Relocation of bus stop: please provide a plan showing existing and proposed locations.

In relation to the first question I would first like to point out that the DoP Director-General's Requirements (DGRs) did not request a Transport Management and Accessibility Plan (TMAP) be undertaken for this project nor establishing a mode share target.

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The list of **DGR's in relation to Transport, Traffic & Access** follows:

- demonstrate compliance with the RTA Guidelines for Traffic Generating Development;
- existing traffic conditions, road network and road capacity on and in the vicinity of the site;
- proposed internal road and access arrangements;
- measures to promote public transport usage and modal share including bus and train networks and connections;
- pedestrian and bicycle linkages;
- proposed car parking arrangements; and
- proposed emergency evacuation and public access.

Part 1) What is the target public transport mode-share for the project?

The Cochlear Global Headquarters Traffic and Parking Impact Assessment did not specify a mode share target.

The proposed Cochlear Global Headquarters facility is to be located on Macquarie University's residual land at the North Ryde Campus known as the 'Station South Precinct' in the Macquarie University Campus Development Plan. The Macquarie University Concept Plan (MUCP) (Cox, Nov 2007) was submitted to the Department of Planning in December 2007 and currently on Exhibition.

The Cochlear traffic assessment focussed on the existing situation as the future situation was studied in detail in the Macquarie University Transport Management and Accessibility Plan (MU TMAP) prepared for the for the MUCP. The MUTMAP undertook strategic modelling for the Macquarie Park Corridor. The MUCP strategic model included the Station South Precinct where the proposed project site is located.

The model was analysed based on a 25-year scenario and an impact assessment was carried out following results achieved from the 2031 model. The MUTMAP 2031 model was based on the RTA EMME/2 Sydney network 2031 model, which uses the TDC's multi-modal Sydney Strategic Transport Model (EMME/2) as its foundation. Sub-area trip tables were provided by the RTA and the mode share established by TDC model was the basis for the mode share assumed in the MUTMAP. Based on advice provided it is considered that the matrices allowed a PT motorised mode split of 23% to be deduced for trips to/from and within the study area.

This was considered to be a worst case scenario for evaluation of the impact of development on the road network. It was complemented by a range of measures to promote public and active transport usage.

Similarly the Cochlear traffic assessment also recommended measures to promote public and active transport usage.

Part 2) Is it consistent with the 40% public transport mode share proposed in Council's Draft Macquarie Park Traffic Study? If not, why?

There are several components to the answer to this question.

Firstly no it is not consistent with the mode share proposed in Council's Draft Macquarie Park Traffic Study.

It should be noted that although the University was a Stakeholder to the Macquarie Park Traffic Study (MPTS) they were not provided copy of the Draft Report until May this year long after the MUCP had been submitted to the DoP and after the Draft Cochlear Global Headquarters Traffic and Parking Impact Assessment had already been prepared. Hence, it was not possible to be consistent with a figure that was not available at the time of undertaking the work.

Furthermore there are serious concerns with the appropriateness of the 40% mode share target set by the MPTS. This concern is shared by representatives of the RTA, who met with Macquarie University to discuss the MUTMAP and the MPTS. A discussion of this issue follows.

Background to Mode Share Target in MPC

The Macquarie Park Transport Management and Accessibility Plan (MP TMAP) (April 2002) was undertaken by for the then PlanningNSW and Ryde City Council. The MP TMAP (2002) was prepared as part of the development of the Macquarie Park Corridor Master Plan and set out a range of transport measures to accommodate future development within Macquarie Park Corridor over 15 to 20 years.

The MP TMAP acknowledged that *"the single most important element of the strategic context in the Macquarie Park area is the forthcoming development of the Parramatta Rail Link (PRL). This project will significantly increase the public transport accessibility of the Macquarie park area."*

The TMAP noted that in 1996 Journey to Work census data showed that for the Macquarie Park corridor Workforce, 86% of people drove to work. As part of the TMAP process, a mode share target was set for the study, the goal was for a 20% reduction in car mode share to the Macquarie Park Corridor, to around 65%. The remaining 35% of trips to the Macquarie Park Corridor would be made on foot, cycle or public transport. Hence, the public transport mode share was targeted to be somewhat less than 35%.

A project specific multi-modal transport model was developed for the TMAP process, this involved extracting car and public transport networks and matrices from the Sydney metropolitan model. The modelling results attained a mode share of up to 23% for rail and 5% for bus in the AM and PM peak periods.

Maunsell patronage forecasting work on the PRL at the time, had predicted that with the full PRL in place 17,000 people would use the 3 PPRL stations in the Macquarie Park area during the 3.5hour morning peak in 2021, with Macquarie University Station being the busiest, with 10,000 people during the period.

Basis for the MPTS Mode Share

The Macquarie Park Traffic Study assumed a 40% public transport mode split for Macquarie Park. The strategic Sydney metropolitan model run by TPDC provided 2031 Metropolitan Sydney trip matrices (traffic and public transport). The matrices allowed a PT motorised mode split of 23% to be deduced for trips to, from and within the study area. Components of the traffic matrix were then factored down to achieve the target 40% PT mode share from the default 23% mode share.

The justification offered for the 40% mode share target over the 23 year development horizon included:

- Major public transport improvements committed in the Macquarie Park Corridor, including:
  - Bus lanes on Lane Cove Road; and
  - The Epping to Chatswood Rail Line (ECRL).
- Two stations within the Macquarie Park area were assumed to have the capacity to carry some 23,400 commuters in the one hour peak (subject to the completion of the North West Rail Link from Epping to Rouse Hill and the CBD Rail Link from Chatswood to Redfern);
- Scale of development, and hence the density of employment in the area will facilitate the introduction of many more public bus services covering more parts of Macquarie Park;
- Car parking pricing and limitations on parking supply;
- Some businesses will also develop their own transport plans to target lower car usage.
- The scale and nature of businesses expected to be attracted to Macquarie Park (i.e. with hundreds or thousands of employees in each business) will facilitate reductions in car usage through implementation of workplace travel plans.

Issues

Of particular concern from the above, are the assumptions in relation to the Epping to Chatswood Rail Line. The capacities indicated are noted to be dependent on the completion of the North West Rail Link (NWRL) and the Redfern to Chatswood Rail Link (RCRL). Recent announcements by the government have indicated that the North West Rail Link (NWRL) has been replaced by the North West Metro and current government planning web-sites no longer make any mention of the RCRL.

Even with the NWRL and the RCRL the capacity assumptions of 23,400 commuters per hour for 2 stations seems very high given the previous patronage estimates for 3 stations based on the PRL studies (17,000 commuters for 3 stations in 3.5 hours) which gave even greater potential for patronage than the ECRL, due to proposed connections from Epping to Parramatta.

There is a strong argument to say that Macquarie Park is disadvantaged by the NW Metro project, because extra heavy rail services that would have been provided under the displaced NW Rail project, will not be provided under the announced metro project. As a result the Chatswood-Epping heavy rail is reported to offer 4 services per hour in each direction. Recent discussion with the RTA Bus Network Development Section indicated that these 4 services per hour are likely to have a capacity of 1000 commuters per service, hence 8000 commuters per hour.

Given the likely reduced capacity of the ECRL, it seems ambitious to consider that the MPC will have a greater PT mode share than when the full PRL link was envisaged some 6 years ago. The modelling of the road network with 40% public transport mode share does not consider the likely, or "worst case" scenarios for the road network.

Furthermore, no assessment of the public transport system has been undertaken to evaluate if it has the capacity to carry a 40% mode share.

Should you wish to discuss any of the issues raised in this document please do not hesitate to contact the under-signed.

Yours sincerely

Anissa Levy
Manager-Sydney Office
for **Cardno Eppell Olsen**