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DSN

30 September 2020

Department of Planning, Industry & Environment
Regional Assessments
PO Box 1148
GOSFORD NSW 2250

Attention: Louise Starkey

SSD-10414 - MIXED USE DEVELOPMENT, LOT: 112 DP: 1022614 LOT: 1-4 DP: 1191104, 8-16 WATT STREET GOSFORD

On 7 September 2020 TfNSW accepted the referral by the Department of Planning, Industry & Environment (DPIE) through the Planning Portal regarding the abovementioned application (Development Application). DPIE referred the Development Application to TfNSW for comment. This letter is a submission in response to that referral.

TfNSW understands the proposal to be for a Concept application for a mixed use development in four stages at 8-16 Watt Street, Gosford. It is understood that the proposal is for a mixed use development comprising commercial, conference, retail, education and entertainment facilities, hotel, student accommodation and retirement independent living units. The proposal seeks to increase the Floor Space Ratio (FSR) and height limit from 5:1 and 36 metres to 8:1 and 133.0 metres respectively and includes basement car parking for approximately 1,200 car spaces.

It is noted that the proposal includes removal of existing overhead pedestrian bridge on Mann Street and replacing it with an at-grade pedestrian (zebra) crossing linking the publicly accessible internal plaza to Burns Place and Gosford Train Station.

TfNSW Response & Requirements

TfNSW's primary interests are in the road network, traffic and broader transport issues. In particular, the efficiency and safety of the classified road network, the security of property assets and the integration of land use and transport.

Central Coast Highway (H30) and Henry Parry Drive (MR673) are classified State roads and Mann Street, Watt Street, Faunce Street and Erina Street East are local roads. Council is the roads authority for these roads and all other public roads in the area, in accordance with Section 7 of the *Roads Act 1993*.

TfNSW has reviewed the referred information including:

- Environmental Impact Statement (EIS) prepared by Barker Ryan Stewart dated 27 August 2020;
- Architectural plans prepared by ADG architects dated July 2020;
- Traffic Impact Assessment (TIA) prepared by SECA Solution dated 27 March 2020 and;
- Planning Secretary's Environmental Assessment Requirements (SEARs) dated 17 January 2020.

TfNSW provides the following comments for DPIE's consideration:

Consultation Advice

- Table 24 of the EIS advises that no response was received from TfNSW. TfNSW provided an email response to BRS on 25 March 2020, containing the following advice:

  "Thank you for the discussion on the phone regarding the Gosford Gateway site.

  TfNSW consider the following should be assessed (but not be limited to) within the traffic assessment:

  1. *Integration of the development with the Gosford Train Station, located opposite. Consideration should be given to pedestrian access given the overhead bridge is proposed to be removed. This should include signalised pedestrian links.*
  2. *Impacts of the subject development on the immediate road network including intersections and access to the car parks.*
  3. *Further impacts on the State road network including Pacific Highway / Manns Road corridor to the north, and Central Coast Highway to the south.*
  4. *Discussion with Council regarding any modelling and knowledge of other approved developments that they may have to assist with your proposal.*

  The traffic assessment should consider the development staged, and the ultimate development plus 10 years growth on top of this."

Operational Traffic Impact

TfNSW recommends that the following comments are addressed in the revised TIA:

- The development is proposed to be constructed in four stages and the exact timeline of staged delivery is unknown at this stage. The TIA however assumes that the whole development would be constructed within a 5-year timeframe. TfNSW highlights that the TIA has not undertaken Sidra modelling for the whole development for the estimated completion year (+5 years) and an additional +10 years growth assessment to demonstrate the impact on surrounding road network, as required by *Austroads Guide to Traffic Management, Part 12, Integrated Transport Assessments for Developments*.

- The TIA has assessed the impact of whole development rather than assessing the impact for individual stages. This modelling approach is inconsistent with the TfNSW consultation advice provided to BRS via email on 25 March 2020. TfNSW highlights that it is important to model individual stages of the development to identify any necessary road network improvements that may be required to be delivered in association with respective stages.

- The Gross Floor Area (GFA) adopted for various land uses to calculate parking demand in Table 3-2 and traffic demand in Table 4-1 of the TIA does not match proposed GFA of various land uses in Section 4.1.2 – 4.1.5 of the EIS. TfNSW considers that Table 3-2 and Table 4-1 should be updated to include proposed GFA specified in the EIS to calculate parking and traffic demand for individual stages of the development.

- TfNSW does not concur with the following traffic generation assumptions adopted in the TIA.

    - The TIA adopts trip generation rates of 0.52 trips (AM) and 0.37 trips (PM) per 100m^2 GFA for proposed commercial and retail uses citing a development with good public transport connectivity in Honeysuckle Precinct (Newcastle). The adopted trip generation rates are significantly lower than the rates provided in the TfNSW Technical Direction (TDT 2013/04a) for office blocks and shopping centre (retail) which have also been derived from surveyed sites having good public transport connectivity. TfNSW advises that trip generation rates for proposed commercial and retail uses should be adopted from TDT 2013/04a.

    - The TIA considers that there will be no additional traffic demands from the proposed conference facility during commuter peak periods. Given the seating capacity of conference facility (900 seats), TfNSW considers that it will generate traffic during commuter peak periods. Since the TfNSW guide does not provide specific traffic generation rates for a conference facility, it would be reasonable to adopt traffic generation of 90 trips during peak hours to reflect the proposed parking provision for this land use.

- Section 4.3.3 of the TIA states the following:
  "It is understood that the Hunter Central Coast Development Corporation is undertaking strategic transport modelling to provide for the Gosford revitalisation and it would be expected to identify any necessary changes to road and transport infrastructure to provide for the future demands of the city centre moving forward.
  The future scenario allowing for ongoing growth has therefore not been assessed using Sidra modelling."

  TfNSW is not aware of a strategic transport model being prepared by Hunter Central Coast Development Corporation (HCCDC). Even if such a model is being prepared by HCCDC, it does not exempt the Applicant from assessing the impact of development traffic in the future (+10 years) as part of the development application assessment.

- The TIA does not assess the impact of development traffic on the State road network including Pacific Highway / Manns Road corridor to the north, and Central Coast Highway to the south. This was requested within the TfNSW consultation advice provided to BRS via email on 25 March 2020.

- TfNSW raise concern regarding continuing intensification within the Gosford Central Business District (CBD) and surrounds prior to acceptable works being proposed to mitigate the impacts of the development. TfNSW recommend that DPIE consider options to enable equitable cost sharing of future road upgrade works as a result of the intensification of development within the Gosford CBD, apportioned relative to the number of trips generated by each development.

- TfNSW recommend Central Coast Council (Council) to undertake an update of the S7.11 plans informed by a Traffic Impact Assessment (TIA) in consultation with TfNSW, to determine appropriate upgrades to the State road network and funding mechanisms. The TIA is to consider cumulative impacts of the continued intensification of the Gosford CBD and the surrounding residential areas on the State road network.

Construction Traffic Impact

- Construction traffic generation is yet to be determined. It is understood that this will be prepared as part of the Construction Traffic and Pedestrian Management Plan (CTPMP) once the project is approved. The TIA further noted these demands would be significantly less than those generated by the completed development and can therefore be accommodated on the existing roads and intersections with minimal impact. The following comments are provided in this regard.

    - Estimates for construction traffic should be provided and included in the revised TIA. Even though traffic generated during construction phase will be less than operational phase and will take place in stages, loading and service areas will only be provided off-street once the development is complete. The TIA further noted that a work zone will be required either on Faunce Street or Watt Street during construction phase. However, estimates for construction traffic are not provided in the assessment to ensure that the site and work zone will be able to accommodate total incoming, outgoing and awaiting loading traffic.

    - Heavy vehicle types to be used during the construction phase are not outlined in the TIA. This should be included in the revised TIA noting that the surrounding road network only allows general access vehicles.

    - The TIA noted that parking for construction staff shall require consideration and will be prepared in CTPMP once the project is approved. However, the revised TIA should consider how parking spaces for construction workers/staff will be considered to minimise the impact of surrounding road network.

Pedestrian & Cyclist Impact

- The proposal will significantly increase pedestrian and cyclist movements in the area. The review of crash data for the past 10 years (up to September 2020) indicates that there have been 12 pedestrian crashes in the vicinity of the development. Consideration should be given to upgrading existing crossing facilities, such as refuges and pedestrian (zebra) crossings in the vicinity, to comply with current Austroads and TfNSW guidelines at the full cost of the developer. The upgrade could include, but not be limited to, raised threshold (wombat) crossings, kerb extensions and associated drainage and street lighting improvements.

- The proposal involves removal of existing overhead pedestrian bridge across Mann Street and installation of a new at-grade pedestrian (zebra) crossing aligned with the internal plaza. Considering the traffic volume and history of pedestrian crashes on Mann Street, TfNSW does not support proposed pedestrian (zebra) crossing. TfNSW supports installation of a signalised

midblock crossing. The signalized crossing is considered a safer crossing facility and would also assist in reducing traffic flow interruptions that would otherwise occur with proposed pedestrian (zebra) crossing.

TfNSW recommends that existing two pedestrian refuges on Mann Street between Faunce Street and Burns Crescent are removed in association with the recommended signalised midblock marked foot crossing to encourage pedestrians to use the new safer crossing facility.

- Considering the above recommendation, the revised TIA should model a signalised midblock crossing on Mann Street to determine the traffic impact of removing the overhead pedestrian bridge.

- The proposed staging plan appears to indicate provision of a pedestrian (zebra) crossing on Faunce Street north of the Mann Street roundabout. TfNSW highlights that the location of any new pedestrian (zebra) crossing needs to meet TfNSW traffic and pedestrian volume warrants and is subject to the support of local traffic committee. It is recommended that the location provides a pedestrian refuge, similar to the other two approaches of the roundabout, which would facilitate staged crossing of Faunce Street.

Active Travel Plan

- The Active Travel Plan (also known as Green Travel Plan) requires further information to achieve the goals towards higher sustainable transport modes. Understanding that the proposal is a mixed use development, further detail in the Travel Plan is required to respond to the diversity of land use activities and associated trips.

  The Active Travel Plan is amended to include the following recommendations:

  - Establish mode share targets that encourage high sustainable transport use e.g. public transport, walking, cycling;

  - Provide details on car to dwelling / person ratio and limiting and managing the provision of car parking at the site;

  - Identify strategies that reduce the proportion of single occupant car travel to / from the site and increase the use of public and active transport travel to the site;

  - Identify the party or parties responsible for delivery and implementation of each element of the Travel Plan throughout various stages of the development lifecycle, including for its ongoing implementation, monitoring and review, for a period of at least 5 years following the issuance of any (interim or final) Occupancy Certificate (OC);

  - Identify funding and resourcing for those actions, including any ongoing actions required to influence travel demand, and determining an appropriate process for that to occur; for a period of at least 5 years following the issuance of any OC;

- Include a high quality Travel Access Guide (TAG) which provides information to occupants about how to travel to the site by sustainable transport modes. This should include information about public transport connectivity, end of trip facilities, and local pedestrian and cycling connections;

- Demonstrate an understanding of potential trips and travel behaviours of new residents, employees, visitors, students and include mitigation that encourage sustainable transport use. This should include consideration of demographics, estimated number of daily trips generated directly from the development, hours of use and expected impacts to the network from the development;

- Provide information as to how the travel plan will be delivered and any mitigations to deal with cumulative impacts from the development;

- Map out the actual walking, cycling and public transport access routes to the site;

- Develop materials that will be provided to residents, employees, students and visitors to encourage sustainable transport use;

- Provide robust commitments towards sustainable transport including promotion of carpooling and car sharing and allocation of priority parking to support these initiatives;

- Provide details of behavior change programs to target regular users of the site to achieve sustainable transport outcomes;

- Provide information in regard to entertainment events and how mass trips (if generated) will be managed with limited impact to the network e.g. tickets to include public transport;

- Identify provisions for electric vehicles including bikes, such as charging stations and provision of end of trip facilities;

- Provide details of a bike share scheme; the role of a travel coordinator and how the multiple uses of the site be managed e.g. overseeing the implementation across tenants, residents, hotel and education facilities;

- Provide details of the monitoring and review process including annual reviews, travel surveys and evaluation against mode share targets.

- A copy of the final plan must be submitted to TfNSW for endorsement, prior to the issue of any OC.

Advice to DPIE

TfNSW recommends that the following matters should be considered by DPIE in determining this development:

- TfNSW has no proposal that requires any part of the property.

- It is unclear how many parking and service bays will be provided within individual stages of the development. TfNSW considers that sufficient parking and service bays should be provided within individual stages of the development to meet requisite parking demand on standalone basis.

- Council should ensure that appropriate traffic measures are in place during the construction phase of the project to minimise the impacts of construction vehicles on traffic efficiency and road safety within the vicinity.

- Council should have consideration for appropriate sight line distances in accordance with Section 3 of the *Austroads Guide to Road Design Part 4A (Unsignalised and Signalised Intersections)* and the relevant Australian Standards (i.e. AS2890:1:2004) and should be satisfied that the location of the proposed driveway promotes safe vehicle movements.

- DPIE should ensure that the applicant is aware of the potential for road traffic and railway noise to impact on development on the site, in particular, noise generated by freight traffic including during night hours. In this regard, the developer, not TfNSW, is responsible for providing noise attenuation measures in accordance with the NSW Road Noise Policy 2011 and the Department of Planning's Development near Rail Corridors and Busy Road – Interim Guide 2008.

  If the external noise criteria cannot feasibly or reasonably be met, TfNSW recommends that DPIE apply internal noise objectives for all habitable rooms with windows that comply with the Building Code of Australia.

- TfNSW highlights that in determining the application under Part 4 of the Environmental Planning and Assessment Act, 1979, it is the consent authority's responsibility to consider the environmental impacts of any road works which are ancillary to the development. This includes any works which form part of the proposal and/or any works which are deemed necessary to include as requirements in the conditions of development consent. Depending on the level of environmental assessment undertaken to date and nature of the works, the consent authority may require the developer to undertake further environmental assessment for any ancillary road works.

Should you require further information please contact Dipen Nathwani, Development Assessment Officer, on 0418 514 166 or by emailing development.hunter@rms.nsw.gov.au.

Yours sincerely

Marc Desmond
A/Manager Land Use Assessment, Hunter Region