

Our Ref: 12S1346000

16 May 2012

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

Attention: Mr Mark Brown (Senior Planner)

Dear Mark

**RE: CRONULLA SHARKS CONCEPT PLAN (DoPI 2012/162)
REVIEW OF PREFERRED PROJECT REPORT AND RESPONSE TO SUBMISSIONS
TRAFFIC AND TRANSPORT ASPECTS**

As requested, GTA Consultants has undertaken a review of the Preferred Project Report (PPR) and associated response to submissions for the Cronulla Sharks Concept Plan with regard to traffic and transport aspects of the proposed concept development.

The purpose of the review is to provide comments to the DoPI as to how the PPR has addressed the findings and recommendations of Halcrow's *Review of Traffic and Transport Planning Assessment (Cronulla Sharks Mixed Use Development Masterplan)* dated 22 December 2011.

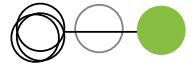
This review has considered the following documents in the preparation of this response:

- Preferred Project Report and Response to Submissions Concept Plan Application (MP10_0229) March 2012 prepared by JBA Planning (JBA PPR)
- Cronulla Sharks Redevelopment Mixed Use Masterplan Traffic Management and Accessibility Plan (Incorporating Traffic and Parking Study) March 2012 prepared by McLaren Traffic Engineering
- Response to the DoPI prepared by Roads and Maritime Services (RMS) dated 14 May 2012.

Overview of Proposed Modifications to the Development Proposal

Based on the above documents it is understood that the following key transport aspects of the concept development for the Cronulla Sharks site has been modified:

- Reduction in development yield for the Residential Precinct. No reductions to the developable floor area of the Retail and Club Precinct are proposed (JBA PPR). The net result for the site is the reduction of some 100 residential apartments.
- The total residential parking provision increased from 858 spaces to 883 spaces.
- The statement of commitments includes the provision of a shuttle bus service running between the site and Woollooware Station for a period of time beginning with the commencement of works on the site and ending when the site is first serviced by a public bus route. No details of service capacity, frequencies or operating hours are provided in the PPR



documents. The PPR suggests the appropriate time for such details is at the project application stage/s.

- The PPR retains the proposed provision of three new signalised site access intersections along Captain Cook Drive (two for the retail precinct). This is not consistent with the advice by RMS and the SRDAC which is recommending that only two signalised intersections be provided.

Traffic Generation

Potential Traffic Generation of Retail and Club Precinct

At page 69 of the PPR prepared by JBA it is stated that there will be no changes to the proposed GBA and GFA for the retail and club precinct. This is generally reflected in the PPR TMAP prepared by McLaren Engineering where this is an increase of 107 m² GFA for the Retail and Club Precinct Uses (comparison of September 2011 and March 2012 reports).

However, the proposed reconfiguration of the uses is reported in the 2012 TMAP to lead to a 12% reduction in traffic flows based on RTA (now RMS) guidelines. This is principally achieved by the reduction in the size of the supermarket and mini major areas and the increase to “slower” trading specialty retail and medical facility uses.

While the proposed reconfiguration and associated traffic generation rates are considered appropriate, it is noted that the Concept Plan application is seeking approval for an overall GFA or upper limit on total GFA and not limits on individual uses or types of retail.

The PPR TMAP analysis clearly indicates that there is significant potential variations to traffic generation associated with different types of retail. Thus the reported reduction of traffic generation of 12% would only be achieved if the indicative GFA's for each type of retail uses is constructed.

It is suggested that approval of the Concept Plan should reflect the indicative GFA's proposed for each land use.

Leisure (Ancillary Uses)

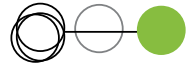
Within the Retail and Club Precinct, the proposed GFA of the “Leisure (ancillary) Use” has been reduced from 3,350 m² to 2,968 m². It is noted that this GFA represents approximately 16% of the total GFA for the Precinct. This is a significant component of the total GFA and would potentially generate traffic in its own right or lengthen the duration of visitations (ie. increasing demand for parking).

The PPR TMAP indicates that the Leisure Centre use would not generate any additional traffic. However, the PPR does not provide any justification for this assumption nor does it indicate what type of activities would be included in the Leisure Use GFA.

The lack of details regarding a definition of what could be approved for construction as Leisure Use does not allow a full assessment of the traffic and parking implications of the development to be made of the Concept Plan.

Residential Traffic Generation

The PPR TMAP indicates that the traffic generation of the residential development will be reduced from 203 to 173 vehicles per hour in the PM Peak period. The traffic estimate is based on a generation



rate of 0.29 vehicles / hour / unit which is the RTA's guideline rate for high density residential developments with good access to public transport.

It is noted that the parking provision for the residential apartments (not including visitor spaces) has increase from a total of 770 spaces to 783 spaces.

Under the RTA Guidelines for "high density residential flat buildings" as reported in the PPR TMAP (page 30) a traffic generation rate of 0.29 vehicles / hour / unit is associated with a parking provision in the order of 528 spaces.

The proposed provision of 783 spaces is some 48% greater than the expected level of parking for a high density residential development. It is noted that the JBA PPR (page 50) cites the adverse implications to traffic generation of providing excessive and accessible parking and the effect it has on encouraging people to drive with public transport becoming a less attractive alternative.

It is considered that the proposed PPR parking provision of 783 resident parking spaces is generally appropriate for the proposed development's site location and poor access to public transport.

However, it is not considered appropriate for the TMAP to utilise a low traffic generation rate for the residential component on the basis of the RTA Guidelines. It is considered that the proposed development is more consistent with the RTA guidelines traffic generation rate for medium density residential development with regards to parking provision and access to public transport.

Thus in the absence of survey information for similar developments, a generation of 0.4-0.5 trips / unit / hour is considered to be more appropriate for the proposed residential development.

As such it is suggested that with the proposed residential parking rates that the traffic generation estimates of the PPR TMAP under estimate the likely generation rates thereby negating the suggested reduced traffic generation associated with the reduced residential yields.

Consideration of Fitness First Access (Adjacent Site)

The PPR concept plans show a vehicle connection between the adjacent Commercial building (Fitness First) and the new Woollooware Road North site access. It is not clear whether the traffic generation of this commercial operation has been factored into the analysis of the intersections future performance.

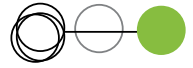
Consideration of AM Peak Road Network Conditions

No assessment of the AM Weekday Peak road network impacts associated with the proposed development has been undertaken in either TMAPs prepared by McLaren Engineering.

It is acknowledged that the traffic generation potential of the development during the AM weekday peak period is unlikely to be as significant as during the PM weekday peak or Saturday midday peak periods.

Notwithstanding the above, the proposed development will generate significant volumes of traffic during the AM peak period. Based on the PPR TMAP comments, the development is expected to generate some 690 vehicle trips per hour (ie. residential + 40% retail as stated in the PPR TMAP, page 37).

Observations of the AM peak weekday periods on the surrounding road network indicated the traffic distribution or direction of travel is significantly different to the PM weekday periods and that network



experiences traffic congestion. The addition of some 690 vehicle trips to the network is considered significant and warrants consideration to determine:

- Ability of the proposed site access arrangement to operate satisfactorily during all peak periods
- Identify intersection improvements that may be required to address specific AM peak issues
- The implications of existing and proposed development traffic flows on the operation of the proposed shuttle bus and potential future public bus service.

Notwithstanding the above, it is noted that the RTA Guidelines (2002) at Section 3.2.2 states that:

"Two periods of traffic generation need to be considered:

- *The peak activity time of the development itself;*
- *The peak activity time of the adjacent road network."*

The first component has been address in the PPR TMAP. However the second component has not been adequately addressed by assessment of the AM weekday peak period or the presentation of data supporting the statement that the typical weekday AM peak is not a peak activity time on the surrounding road network.

Intersection Operation

Site Access Intersections

It is noted that the PPR retains the proposal to construct three signalised intersections along Captain Cook Drive to facilitate access to the site.

A review undertaken by Halcrow on behalf of the DoPI of the Sidra analysis presented in the TMAP prepared McLaren Engineering (September 2011) supported the provision of three signalised intersections on the basis that signalisation was required to accommodate the estimated traffic generation of the proposed development. The review noted that without the signalisation of all three intersections, the site access arrangements would not adequately accommodate the proposed traffic generation.

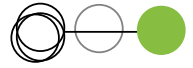
Intersection Improvements

The PPR TMAP has identified a number of intersections in the surrounding road network that are currently experiencing unsatisfactory operating conditions.

The additional traffic generation of the proposed Cronulla Sharks development will exacerbate the already congested road network.

It is acknowledged that the costs of upgrading at capacity intersections would be prohibitively expensive to the applicant of the Cronulla Sharks to fund alone. However, the development of the Cronulla Sharks site will bring forward (significantly) the need to undertake intersection improvements. As such there should be an associated contribution for the expedited works or a delay to the project until such time as works are completed.

It is understood that there are currently no plans by relevant authorities (RMS or Sutherland Shire Council) to undertake capacity improvements of intersections.



Shuttle Bus Service

It is noted that the PPR and Statement of Commitments includes the provision of a shuttle bus service between the site and Woollooware railway station prior to the potential future operation of a public bus service to and from the site.

This commitment is strongly supported.

However, there is no analysis of potential demand for a service nor an assessment of the implications of the proposed parking provision and lower traffic generation rates used in the traffic assessment.

It is agreed that the specific details of the shuttle bus service need to be developed during project application stage of the development. However it is suggested that specific objectives or performance measures need to be agreed (and approved) as part of the conditions of approval for the concept application. This should include an indication of the operating hours, service frequency and demand targets.

It is also recommended that the statement of commitments reflect that the details of proposed shuttle service operation need to be approved by the relevant authority (ie. DoPI or Transport for NSW) prior to project development consent.

Comments on RMS Submission

The RMS response to the PPR was issued to the DoPI on 14 May 2012. The following comments are provided in response to the RMS comments.

Issue 1 – One set of signals for the Retail / Club Precinct access

If the position of the RMS is adopted, ie. signalisation of one rather than two site access intersections then the resulting access arrangements would in all likelihood not adequately accommodate the estimated traffic demands of the retail / club precinct. The options to resolve this issue would be the reduction in the scale of the development, change in land use to less intense traffic generators or alternate access options.

Issue 2 and 3 - Intersection Detail Design

It is agreed that it is appropriate to undertake the detailed intersection layout design at the project application stage of development.

Issue 4 - Northern Retail Access to be Left In / Left Out

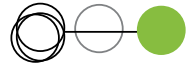
This is the result of the implementation of Issue 1 above.

Issue 5 - Uncontrolled Foot Crossing on Gannons Road Unwarranted and Unsafe

The RMS comments and proposed alternative treatment is considered appropriate and is supported.

Issue 6 – Intersection Improvements

The RMS acknowledges that the works required to upgrade poorly performing intersections to accommodate existing and development traffic flows would be prohibitively expensive to the applicant of the Cronulla Sharks site. The RMS recommends that the implications of the development on travel times needs to be considered in the assessment process.



While not explicitly stated, it is suggested that the RMS are indicating the development could be approved if in the DoPI's opinion the impacts of the development on travel times are acceptable.

Based on the review of the modelling results presented in the TMAPs and the findings discussed above, it is suggested that the adverse implications to travel times associated with the traffic delays experienced post development at the Captain Cook Drive / Gannons Road intersection would be significant and it is recommended that the development contribute towards the implementation of improvement measures (ie. signalisation) of this intersection.

Issue 7 – Shuttle Bus

The RMS comments are supported.

Summary

With regard to the summary and recommendations documented in the Halcrow review of the TMAP 2011, the above review has concluded that the PPR and associated updated TMAP has adequately addressed the following:

- Need for a bus connection to the railway station (subject to agreed and approved objectives and goals being established)
- On-Site Parking Provisions (including residential visitor parking)
- Commitment to the preparation of a Workplace Travel Plan, Construction Traffic Management Plan and an Updated Game Day Satellite Parking Plan.

However it is considered that the following matters have not been adequately assessed:

- Clarification of Club and Leisure land uses and their associated traffic generation
- Agreement with the RMS regarding signalisation of site access intersections
- Assessment of the traffic impacts of the development of the AM Weekday peak period
- Contribution to intersection improvements (Captain Cook Drive / Gannons Road).

Naturally, should you have any questions or require any further information please do not hesitate to contact the undersigned on 02 8448 1800.

Yours sincerely

GTA CONSULTANTS

Jason Rudd
Associate Director