



**Transport
for NSW**



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PP12/14202

Mr Alan Bright
A/Director
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Department of Planning and Infrastructure
GPO Box 39
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Department of Planning
Received
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Scanning Room

Concept Plan – Shepherds Bay Foreshore

Dear Mr Bright

Thank you for your letter received on 14 August 2012 regarding a Concept Plan and Stage 1 Project Application for a mixed use development, and associated infrastructure at Shepherds Bay, Meadowbank (MP09_0216 and MP09_0219). Please accept my apologies for the delay in providing final comments, a draft was previously supplied to Luke O'Dwyer of your Branch.

Transport for NSW has considered the Addendum Project Planning Report for the Shepherds Bay Foreshore relative to the earlier combined comments made by TfNSW and RMS. A detailed response is attached at annexure A, in summary the key recommendations of Transport for NSW (TfNSW) are:

1. That the proponent obtains the agreement of the RMS to its traffic modelling methodology. This is a large development with potential to have significant impacts on the State Road Network. It is likely to require off-site works to mitigate traffic impacts but this cannot be determined on the basis of the work undertaken so far.
2. The proponent submits a working paper responding to each issue identified in the March 2012 correspondence from TfNSW under the sub-heading of transport modelling.
3. The results of the traffic surveys provided by the proponent for the Meadowbank Precinct be used as the base case for traffic modelling comparisons.
4. That Department of Planning and Infrastructure (DP&I) note Transport for NSW (TfNSW) does not agree and cannot support the proponent's 10% reduction in traffic volumes justified on the basis of improvements in public transport provision. The proponent should re-calculate residential traffic impacts with no reduction.
5. That DP&I note TfNSW considers the parking rate remains high albeit an improvement to that originally proposed. The key considerations are the proponents stated intention to facilitate public service provision and the developments proximity to a range of existing public transport services.
6. TfNSW recommends that the developer provide the cycleway and pedestrian linkages from the development to Meadowbank Station.

Transport for NSW and RMS remain of the view that the transport impact assessment does not adequately cover all the issues for a development of this size.

Should you require further information please contact Mr Tim Dewey, Senior Land Use and Transport Planner on 82022188.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M. Ozinga', with a stylized flourish at the end.

4/10/12

Mark Ozinga
Manager, Land Use and Transport Planning



Annexure A

The developer is strongly encouraged to enter into meetings with the RMS and TfNSW so a robust traffic calculation and identification of the impacts of the development on the State Road network can be determined and mitigation measures identified.

Part 1 – Comparison of issues raised and proponent response

TMAP mode share analysis

It is acknowledged the *Concept Plan Shepherds Bay Urban Renewal Meadowbank – Strategic Netanal Model 2026 – Traffic Impact Assessment (TIA)* has provided a mode share analysis in 2006 updated to 2026 and reflecting predicted population growth in Meadowbank. Transport for NSW (TfNSW) does not agree with the redistribution of trips for the purposes of reducing traffic numbers. The need to comply with DGR 6 (specifically demonstrate how users will be able to make choices that support state plan targets) is not a justification to apply a 10% discount to rates of traffic generation, this issue is commented on in more detail below.

Traffic Data

TfNSW has suggested that the results of the recent traffic survey provided by the proponent should be used as the base case for traffic modeling comparisons. The TIA and the covering letter from Road Delay Solutions seem to indicate that the proponents still prefer a methodology which measures the difference between the theoretical trip rates from the proposed residential development subtracted from the theoretical trip rates of the current industrial land uses if 100% occupied. However, the proponent states elsewhere the current industrial uses are only occupied to a reported 59.2%.

Transport for NSW notes the comments at page 16 of the preferred project report that existing industrial units were modeled at their current occupancy rate of 59%. However this seems contradictory to a number of other references (for example at page 27 the TIA) that seem to indicate the full theoretical level of travel calculation from the partly occupied industrial warehouses was used. This apparent discrepancy between the preferred project report and the TIA should be clarified.

Transport best practice is to measure as far as possible observed traffic movements rather than rely on theoretical traffic movements. This is the reason the combined advice of TfNSW and RMS was to use the results of recent traffic surveys as the base case for traffic modeling comparisons.

Recommendation 1

The results of the traffic surveys provided by the proponent for the Meadowbank Precinct are used as the base case for traffic modelling comparisons.

Traffic Modelling

There is no indication in the TIA that the revised modeling has been agreed with and is supported by RMS as previously requested.

For example the report does not directly address previous RMS comments on traffic distribution. The prior RMS comment was that the majority of traffic would likely be heading to Chatswood, Sydney or Macquarie Park which would concentrate the volumes of traffic on specific roads leading to Church Street or Victoria Road. A statement directly responding to this prior observation was expected but not noted.

The TIA isolates the growth of background traffic (e.g. page 11) and appears to obliquely suggest that to reduce background traffic, specific measures, including the removal of the bridge between Railway Road and Banks Street and the single lane roundabout at the intersection of Porter Street and Parsonage Street should be considered, after this development has commenced. The issue of local road infrastructure removal is an issue for Ryde Council, assisted by RMS, to consider and it is not appropriate for the developer to propose as a means of ameliorating local impacts.

The TIA does not make it clear whether the road network would cope with the background traffic demand without this proposed development. If the road network can support background growth without the development, then there is a strong nexus for the development to pay for the road upgrades, because the tipping point for traffic congestion is caused by the development.

Considering the above TfNSW does not agree with the statement on page 16 of the preferred project report that:

...all other road infrastructure upgrades are triggered by the growth in intrusive local and regional background traffic, with the theoretical contributions, attributed to the Concept Plan development considered minor in comparison.

The TIA has not responded to the RMS notation that while SIDRA is an appropriate tool to show the impact of development on individual intersections, it is not the most appropriate tool to show the impact on a number of intersections linked by SCATS. The combined TfNSW/RMS response recommended that for assessment of impacts along intersections Church Street (Devlin Street) and Victoria Road, it was recommended that a model such as Linsig or Transyt be used. A direct response to this statement was expected but not noted.

Recommendation 2

The proponent obtains the agreement of the RMS to its traffic modelling methodology. The proponent then submits a working paper responding to each issue identified in the March 2012 correspondence under the sub-heading of transport modelling and other issues identified by RMS or TfNSW. In particular the proponent addresses the recommendation that an appropriate traffic model be used for assessment of intersections Church Street (Devlin Street) and Victoria Road.

Car Parking supply and 10% Mode Shift to public transport used to justify reduced traffic development traffic generation

TfNSW requests DP&I reject the proponents proposed 10% reduction in traffic volumes originating from the development justified on the basis of a 10% modal shift to public transport.

As previously stated, the need to comply with DGR 6 (specifically demonstrate how users will be able to make choices that support state plan targets) is not a justification to apply a 10% discount to rates of traffic generation

The proponents comments on train availability and the role of regional train services reflects an individual development focus rather than the necessary whole of network focus to ensure services are equitable for all customers and are not supported.

The proponents focus on public transport services for the purposes of reduction in traffic generation rates does not carry through to development car parking rates. Although the car parking rates appear to be marginally reduced, they are still significant for an area with good public transport accessibility. The rate of 1 visitor car space per 5 units is excessively high for a development of this size and could be used as a defacto second car space by many residents. It is strongly recommended that further reduced car parking rates are used. TfNSW has a number of examples from the draft Green Square TMAP that can be supplied upon request.

Recommendation 3

That Department of Planning and Infrastructure (DP&I) note Transport for NSW (TFNSW) does not support the proponent's proposal of a 10% reduction in traffic numbers. For this approach to be supported specific government announced initiatives would need to be provided and described.

Recommendation 4

That DP&I note TFNSW considers the parking rate for this development improved to that originally proposed but still high especially considering the proponents stated intention to facilitate public service provision and in consideration of the developments proximity to a range of existing public transport services.

Pedestrian and bicycle access

The proponent's site has good active transport accessibility given its close proximity to the Parramatta Valley Cycleway. This cycleway is nearing completion, providing completely off-road and intersection-free access to (inter alia) Sydney Olympic Park and Parramatta. The TIA does not respond to the March 2012 combined comments of TfNSW and RMS regarding pedestrian and bicycle access. This is incongruous with other sections of the TIA which increases the bicycle mode share to partly justify a 10% reduction in traffic generation.

The only bicycle paths the proponent is proposing are within the wider development boundaries as shown on Figure 41 of the TMAP. TfNSW notes the proponent's Figure 32 does not propose any bicycle access between the development and Meadowbank station, notwithstanding the comparatively short distance involved.

TfNSW does not agree with the proponent's statement on page 16 of the preferred project report:

The proponent has no power to extend the bicycle network beyond the Concept plan site as the land is not part of the Application and is owned by Council and other private individuals.

Recommendation 5

TfNSW recommends that the VPA between Ryde Council and the developer include the cost of funding cycleway and pedestrian linkages to Meadowbank Station and the regional cycleway network as well as within the development boundary. Without this provision in the VPA it is unlikely that the bicycle paths will be upgraded in the timeframes provided, or meet the projected mode share shifts without additional funding.

Other Issues

TfNSW notes and supports the proponent's commitment to preparation of a Travel Access Guide (TAG) and Workplace Travel Plan (WTP) on page 16 of the preferred project report as a condition of Approval of the Concept Plan and successive Project Approvals.

TfNSW notes and supports the proponent's commitment towards providing bicycle parking within the development.

The proponent should note the Metropolitan Transport Plan is no longer current government policy and should obtain the necessary approvals from DP&I to reference the *NSW Long Term Master plan Discussion Paper* instead.

The proponent's response to the RMS SCATS cabin in Waterview Street appears reasonable pending further details as to how it will be incorporated into the Gateway tower in Stage 5 development application and confirmation of maintenance vehicle parking and turning area.

End of annexure comments