

Date: 10<sup>th</sup> March 2017  
Your Ref: MP07\_0026 MOD5  
Our Ref: 14/351

Natasha Harras  
NSW Department of Planning & Environment  
320 Pitt Street, Sydney  
Delivered via email: [Natasha.Harras@planning.nsw.gov.au](mailto:Natasha.Harras@planning.nsw.gov.au)

Dear Natasha,

**RE: MP07\_0026 MOD5 – Response to RMS Submission dated 13<sup>th</sup> February 2017**

Please find below our responses to the RMS comments (dated 13<sup>th</sup> February 2017) regarding the traffic assessment for the proposed modification to the Epiq Estate.

**RMS Comment 1:**

The traffic generation rate in the Ballina Shire Council contributions plan is related to an economic decision made by Council and is not considered relevant to actual traffic generation estimation.

The average rate of 7.4 trips published in TDT 2014/04a provides only a conservative estimate of likely trip generation and the surveyed 6.54 trips at Goonellabah are applicable to that site only. A better estimate of likely trip generation is achieved by aggregating the survey site data.

**Response 1:**

Averaging the data for all regional sites (Coffs Harbour, Lismore, Orange, Wagga Wagga and Wollongong) investigated the RMS Technical Direction 2013/04a results in an average daily trip rate of 6.33. The adopted local rate of 6.45 vpd is considered appropriate when applying the aggregate survey data as suggested by the RMS.

**RMS Comment 2:**

The conversion to Gross Leasable Floor area is applicable to shopping centres with multiple tenancies under one roof. Shopping centres tend to have communal space, such as walkways and plazas, which is shared by all tenancies. The supermarket is a stand-alone development. Applying a gross leasable floor conversion is not considered applicable in this instance.

**Response 2:**

The supermarket is not a standalone development with 1,950m<sup>2</sup> of shops and offices to be provided in addition to the supermarket. Although communal spaces are not considered, an allowance for columns, machinery/plant rooms, storage areas and the like still needs to be made. Without final design plans the conversion of this area to GFA cannot be exactly calculated. The conversion proposed is considered appropriate to take these areas into consideration.

NDC note that the previously approved traffic generation rate for the site as proposed by Cardno and Ardill Payne and Partners is 46 trips/100m<sup>2</sup> of GFA (without linked trips). The NDC assessment proposes an equivalent of 81 trips/100m<sup>2</sup> GFA (without linked trips). The overall traffic predicted by NDC to be generated by the supermarket is considered conservative to that previously approved.

**RMS Comment 3:**

Linked trips are applicable to shopping centres where more than one commercial premise might be visited in a trip. The supermarket is a stand-alone development.

The economic impact assessment for the proposal identifies the residential development as having a population of about 1,700 people. The main trade area will have a population of 12,690 people in 2026. This suggests that about 87 percent of trips to the main trade area in 2026 will be external to the residential development in the estate.

**Response 3:**

The supermarket site includes multiple tenancies with linked trips also accounting for people dropping into the centre on their way home from work (instead of a sole purpose trip to the centre).

The RMS reference to the economic impact assessment should be considered in context with the Ballina Shire Strategic Road Plan that identifies the northern portion of Hutley Drive being connected to North Creek Road by 2019. This new connection will provide ample capacity for the fully developed Epiq site and the additional trade area as described in the economic impact assessment.

It is clarified that the traffic assessment submitted with the application proposes to limit the release of the development to the capacity of the existing road network until this connection is provided.

**RMS Comment 4:**

The storage length requirements at the Henderson and Montwood Drive intersections with North Creek Road remain unknown.

**Response 4:**

The storage requirements are noted in the previously approved study by Cardno. It is noted the configuration of the existing North Creek Road alignment and surrounding intersections will somewhat dictate intersection layouts. Strategies such as larger painted median islands and longer diverge tapers will be investigated due to the existing constraints.

Should you have any questions please don't hesitate to contact me,

Yours sincerely,

**NEWTON DENNY CHAPELLE**



**CHRIS PICKFORD**

Civil Engineer

For and on behalf of Newton Denny Chapelle