

22 June 2017

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Attention: Aaron Sutherland – Director

Proposal: Section 75W Modification (MOD5) to Concept Plan for Kirrawee Brick Pit (MP10_0076) - amend Condition A4A to permit an alternative apartment mix and increase apartments from 749 to 808.

Property: 566-594 Princes Highway, Kirrawee

Dear Aaron,

Ason Group has been commissioned by Combined Projects (Kirrawee) Pty Ltd (the Applicant) to provide transport and traffic consultancy services to support the proposed modifications to the approved Concept Plan for mixed-use development at 566-594 Princes Highway, Kirrawee (the Site). The Site is located within the local government area of Sutherland Shire Council. The currently proposed MOD5 modifications – sought under Section 75W of Part 3A of the Environmental Planning and Assessment Act 1979 – generally seek to increase the dwelling cap from 749 dwellings to 808 dwellings (the Proposal).

As part of the MOD5 application, Ason Group provided a Traffic Impact Assessment (TIA) report dated 06 March 2017 (the 2017 MOD5 TIA report) that assessed the Proposal, focussing on the key aspects of Car Parking and Traffic Impacts. The TIA report concluded the following:

- *The parking analysis demonstrates that the modified scheme, which proposes no additional resident or visitor car parking, is acceptable on parking grounds as it is consistent with the maximum parking rates of the Concept Plan approval and the RMS parking rates applicable to the Site under SEPP 65. Furthermore, the Proposal would have no detrimental operational or functional impacts, (as it) benefits from the Site's high level of public transport accessibility and would further encourage the use of public transport and other alternative/active transport modes to access the Site.*
- *The traffic analysis above demonstrates that the current MOD5 development, which proposes 59 additional units, is acceptable as the increase in peak hour traffic generation is negligible compared with the forecast traffic generation of the approved DA scheme and (more importantly) the forecast peak hour traffic generation of the entire Site with the additional 59 units is still significantly lower than the permissible traffic generation threshold defined by the 2011 Halcrow TMAP that supported the original Concept Plan approval.*

In response to the application, Council provided initial comments in a letter dated 3 May 2017, which included comments on parking and traffic generation and Ason Group issued a letter dated 22 May 2017 that addressed the perceived issues of Council. In response to that letter, Council has provided further comments in a letter dated 13 June 2017, which – whilst silent on the parking issue – indicates that Council maintains its objection to the Proposal on traffic generation grounds.

The remainder of this letter provides our further response to Council's perceived concerns on traffic. For clarity, the format of the following consists of presenting Council's comments, extracted verbatim from the letter of 13 June 2017, with our corresponding response.

Comment a)

In order to address the traffic impact for the subject modification, the traffic report prepared by Asongroup has adopted a lower traffic generation rate for other components such as the supermarket, mini-major, and speciality store based on surveys in their East Village development at Victoria Park.

The methodology to adopt the lower generation rate from Victoria Park for Kirrawee is considered flawed for the following reasons:

- ***different demographic in the two localities***
- ***lower car ownership in Victoria park compared to Kirrawee***
- ***superior public transport options in Victoria Park including mode choice, frequency, choice of routes and destinations, accessibility, etc.***

Based on the traffic report prepared by Asongroup, the amendments will generate 84 additional trips (75 trips for Childcare Centre and the distribution centre, plus 9 trips for additional 59 units) during afternoon peak hours, which is considered conservative.

Firstly, it should be noted that the net change to the Concept Plan arising from the MOD5 Proposal relates solely to an increase of 59 units. Council's comment also refers to childcare traffic; however, that is a use that is permissible under the concept plan and occupies approved GFA and therefore can be considered to have no net impact in terms of traffic generation permitted under the Concept Plan.

Notwithstanding the above, it is accepted that this is a use that is being sought by way of a separate S96 application to the approved Development Application for the Site (DA15/1134); therefore, the following assessment considers for the childcare use.

Secondly, it is important to note that these 2 uses (high-density residential and childcare) were assessed based on RMS trip rates, specifically, trip rates from the:

- RMS Technical Direction TDT 2013/04a, *Guide to Traffic Generating Developments – Updated traffic surveys* (the RMS Guide Update) for the residential use, and
- RMS *Guide to Traffic Generating Developments* Version 2.2, October 2002 (the RMS Guide) for the childcare use.

Therefore, Council's comment that this Proposal, and the 2017 MOD5 TIA report that supported it, adopts East Village Derived (EVD) trip rates is incorrect as the 2 key uses – high-density residential and childcare – were assessed based on RMS rates.

Again, notwithstanding the above, the EVD trip rates were originally adopted by the *Revised Traffic Impact Assessment, South Village – Proposed Mixed-Use Development* prepared by Ason Group and dated 29 January 2016 (the 2016 TIA report). This document presented the Traffic, Transport and Parking study that supported the Development Application (DA15/1134) to Council approved by the Joint Regional Planning Panel on 2 May 2016. Therefore, these EVD trip rates could be considered 'approved' trip rates as they were adopted by an assessment of what has subsequently become an approved development.

Council's comment that the methodology of adopting the EVD trip rates is flawed (for this MOD5 Proposal or the former DA Proposal), is questionable on 2 grounds. Firstly, the RMS Guide at Section 3.1 (Land Use Traffic Generation – Introduction) states in the second sentence that surveys "*of existing developments similar to the proposal, can also be undertaken and comparisons may be drawn*". Therefore, this is a methodology, which consistent of surveys of East Village shopping centre to estimate the likely traffic demand of South Village shopping centre, is in fact recommended by RMS guidance.

Furthermore, whilst one might argue the difference between the demographics, car ownership and public transport accessibility of East Village and the Brick Pit site as it is today, traffic impact analysis requires predicting the conditions in the future. With the development of South Village and other developments in Kirrawee, the area will gentrify, which – when combined with ongoing improvements to the public transport network – will result in the area having characteristics (demographics, public transport use, etc) that are significantly different from what they are today, and more likely closer to those for the East Village area.

Finally, in NSW the authority on traffic generation and trip rates is not local Council but the NSW Roads & Maritime Services. These EVD trip rates have been presented to RMS on several occasions as part of traffic reports submitted for the South Village proposal and – to my knowledge – no concerns have been raised by RMS relating to their appropriateness of using these rates.

Comment b)

Council's latest, more detailed traffic modelling using SIDRA includes changes proposed to the road network as part of the current Brick Pit approval, the Roads and Maritime Services Gateway to the south pinch point works, and more recent development approvals in the locality. This modelling indicates that the President Avenue and Oak Road intersection is currently operating with acceptable Level of Service (LoS) D with average intersection delays of 46 seconds.

In order to assess the impact of the current approval for the Brick Pit, Council has run a traffic model using the Halcrow Report (October 2011) approved generation rates and distribution. The modelling indicates this intersection will operate unsatisfactorily with LoS F and an average delay of 90 seconds, which is a significant deterioration in performance.

The additional traffic generated in the proposed modifications will make worse a situation that will already be unsatisfactory.

There have been several modifications to the Brick Pit proposal since 2012, several of which have included increasing the scale of the development resulting in additional traffic generation. In the same period, there has been additional traffic growth and significant changes proposed in the road network that also impact performance.

As mentioned previously, some of the limited capacity in the local road network must be preserved to allow land already zoned in Kirrawee centre to be developed and for its future logical expansion to occur, rather than sterilising those sites in favour of allowing more intense development on the Brick Pit site.

Unfortunately the impact of the development on the road network, particularly the Oak Road and President Avenue intersection, was not satisfactorily addressed as part of the original approval and subsequent modifications. The current proposal does not include any measures to offset the additional impact that it will impose on the network, and therefore cannot be accepted.

The following presents Table 3.1 from the Halcrow October 2011 report referred to by Council, which presents the trip rates adopted by Halcrow at the time the study was undertaken.

Table 3.1 – Predicted Traffic Generation

Land Use	GLA / Units	Thursday Evening Peak		Saturday Peak	
		Rate (per 100m ²)	Trips	Rate (per 100m ²)	Trips
Supermarket	5,370	14.00	752	13.20	709
Mini-Major	1,280	4.60	59	1.17	15
Specialty	2,940	4.14	122	9.60	282
Showroom	2,860	1.46	42	2.88	82
Office	860	2.00	17	0.00	0
Residential	433	0.29	125	0.29	125
Total			1117		1213

It was confirmed by NSW Department of Planning & Environment that these are the rates Council adopted for the SIDRA analysis referred to in their comment. It is noted that these trip rates are from the RMS Guide, with the trip rates for the first 3 uses (supermarket, mini-major and specialty) referred to as shopping centre 'category' trip rates. The other 2 rates represent the standard RMS Guide rates for office and high-density residential and the showroom rate was based on data provided by RMS based on recent data.

The methodology employed by Council to adopt the rates above (excluding the showroom rate) is significantly flawed as these rates do not represent 'approved' rates as Council suggests, but are officially out-dated rates from the RMS Guide, last published as Version 2.2 in October 2002. Furthermore, the RMS Guide at Section 3.6.1 (Shopping Centres) acknowledges that the shopping centre rates were based on surveys undertaken by RMS in 1990.

Recognising the deficiencies of the out-dated RMS Guide rates, in August 2013 RMS published the Technical Direction TDT 2013/04a, *Guide to Traffic Generating Developments – Updated traffic surveys*, referred to as the RMS Guide Update. This document provided updated rates, based on recent survey data, for the following uses:

- Low and high density residential
- Housing for seniors
- Office
- Business parks and industrial estates
- Shopping centres (note, the individual category rates adopted in the Halcrow 2011 report were not updated)
- Bulky goods retail stores
- Major hardware and building supplies stores

Importantly, the RMS Guide Update indicated that traffic generation rates had generally reduced since the publication of the 2002 RMS Guide. For example – and in relation to the uses specific to the South Village proposal (at the time) – high-density residential trip rate forecasts reduced by 34-48% from 0.29 trips per unit during both peak hours to 0.19 and 0.15 trips per unit during the AM and PM peak hours respectively; and office trip rates reduced by 20-40% from 2.0 trips per 100m² of GFA during both peak hours to 1.6 and 1.2 trips per 100m² of GFA (AM and PM respectively).

Accordingly, analysis that adopts these out-dated rates (such as Council's SIDRA analysis) should be viewed with a great deal of scepticism as it does not provide an accurate forecast of future traffic demands and would likely over-estimate the traffic impacts in the area, and therefore at intersections such as the signalised intersection of President Avenue with Oak Road referenced in Council's comment. Based on this, we have limited (if any) confidence in the accuracy of Council's modelling and results.

By contrast, since the Halcrow 2011 TIA report, further traffic studies have been undertaken for the South Village proposal, including a 2014 Traffix TIA that supported the approved MOD3 application, the 2016 TIA report that supported the approved DA, and the 2017 MOD5 TIA report. All these studies concluded that the Proposal is supportable on traffic planning grounds as the committed regional and local upgrades (some of which are now being delivered) have been developed to accommodate significantly more traffic than is now expected for the Site. As these studies adopted best-practise methodology using current data to inform predicted future traffic demands, we have significantly greater confidence in the conclusions of those studies compared with Council's conclusion on network performance.

In summary, the following lists our concerns with Council's comments and analysis as it relates to traffic impacts:

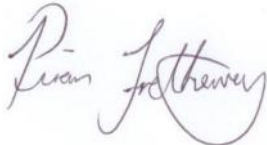
- Council questions the validity of the EVD shopping centre trip rates and suggests that the Proposal is unsupportable as it relies on these trip rates. However, the traffic generation of the primary MOD5 use of high-density residential (and the secondary S96 use of childcare) is based on RMS rates, not the EVD rates.
- Notwithstanding the above, the EVD trip rates are valid trip rates, because:
 - They are derived in accordance with RMS guidance,
 - They are based on recent data and therefore reflect current travel and transport behaviour, suitable for forecasting the future traffic demands of South Village,
 - They were adopted for the 2016 TIA study that supported the subsequently approved DA15/1134 for the Site, and
 - NSW RMS – the authority on traffic generation – have not raised any concerns with the use of these trip rates.

- Council's analysis that is based on the Halcrow 2011 report rates is flawed, because:
 - These rates are out-dated as they were from the 2002 RMS Guide, which in turn relies on survey data from as early as 1990.
 - These rates were updated by RMS in 2013 as part of the RMS Guide Update, which indicates peak hour trip generation for the key uses has reduced.

In conclusion, Council no longer raises any issues on parking. We have reviewed Council's further comments on traffic impacts; however, our review indicates significant flaws in the methodology Council has adopted for their assessment. Conversely, our analysis above demonstrates that the Proposal remains supportable on traffic planning grounds as the committed regional and local upgrades (that are currently being delivered) have been developed to accommodate significantly more traffic than is now expected for the Site.

Should you have any questions, please contact the undersigned.

Yours sincerely,



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