



Daniel Lukic - 9710 05668
File Ref: DN17/0009

10 July 2017

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Dear Sir/Madam

Development Referral No. DN17/0009

Proposal: Section 75W Modification (MOD 5) 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

Thank you for the opportunity to provide further comments to the proponent's second response to Council's submission for this application.

Traffic Impact Assessment of the Brick Pit 2017 MOD5

In response to the further traffic report and comments from the applicant dated 22 June 2017, this technical document outlines the traffic generation assumption and volume used for Brick Pit development and traffic impact assessment of the 2017 MOD5.

Table 1: 2011 Approved Concept Plan (Halcrow, 2011), Traffic Generation Rate and Volume

Land Use	Halcrow Traffic Report (2011) Area (m ²) / Units	Thursday PM Peak		Saturday Midday Peak	
		Rate per 100m ² / units / per children	Trips	Rate per 100m ² / units / per children	Trips
Supermarket	5,370	14.00	752	13.20	709
Discount Supermarket	-				
Mini-Major	1,280	4.60	59	1.17	15
Speciality	2,940	4.14	122	9.60	282
Showroom	2,860	1.46	42	2.88	82
Medical Centre	-				
Coles Dark Store	-				
Childcare (Total No of Children)	-				
Office	860	2.00	17	0.00	0
Residential Units	432	0.29	125	0.29	125
Amenities / Circulation	933	-			
Total Trips			1,117		1,213

Table 2: 2013 Modified Concept Plan (Traffix, 2013), Traffic Generation Rate and Volume

Land Use	Traffix Report (2013) Area (m ²) / Units	Thursday PM Peak		Saturday Midday Peak	
		Rate per 100m ² / units / per children	Trips	Rate per 100m ² / units / per children	Trips
Supermarket	4,320	14.00	605	13.20	570
Discount Supermarket	-				
Mini-Major	2,500	4.60	115	1.17	29
Speciality	2,902	4.14	120	9.60	279
Showroom	3,881	1.46	57	2.88	112
Medical Centre	417	2.20	9	2.20	9
Coles Dark Store	-				
Childcare (Total No of Children)	-				
Office	-				
Residential Units	749	0.15	112	0.15	112
Amenities / Circulation	933	-			
Total Trips			1,018		1,111

Table 3: 2015-16 DA15/1134 (AsonGroup, 2016), Traffic Generation Using Halcrow Rate and Volume

Land Use	AsonGroup Traffic Report (2015-16) Area (m ²) / Units	Thursday PM Peak (Using Halcrow Rate)		Saturday Midday Peak (Using Halcrow Rate)	
		Rate per 100m ² / units / per children	Trips	Rate per 100m ² / units / per children	Trips
Supermarket	4,500	14.00	630	13.20	594
Discount Supermarket	1,380	7.25	100	6.63	91
Mini-Major	1,250	4.60	58	1.17	15
Speciality	1,909	4.14	79	9.60	183
Showroom	3,902	1.46	57	2.88	112
Medical Centre	316	2.20	7	2.20	7
Coles Dark Store	-				
Childcare (Total No of Children)	-				
Office	-				
Residential Units	749	0.15	112	0.15	112
Amenities / Circulation	933	-			
Total Trips			1,043		1,114

Table 4: 2015-16 DA15/1134 (AsonGroup, 2016), Traffic Generation using East Village Rate and Volume

Land Use	AsonGroup Traffic Report (2015-16) Area (m ²) / Units	Thursday PM Peak (using East Village Rate)		Saturday Midday Peak (using East Village Rate)	
		Rate per 100m ² / units / per children	Trips	Rate per 100m ² / units / per children	Trips
Supermarket	4,500	8.53	384	8.09	364
Discount Supermarket	1,380	7.25	100	6.63	91
Mini-Major	1,250	2.81	35	0.72	9
Speciality	1,909	2.53	48	5.89	112
Showroom	3,902	1.46	57	2.88	112
Medical Centre	316	1.21	4	1.21	4
Coles Dark Store	-				
Childcare (Total No of Children)	-				
Office	-				
Residential Units	749	0.15	112	0.25	187
Amenities / Circulation	933	-			
Total Trips			740		879

Table 5: 2017 MOD5 (AsonGroup, 2017), Traffic Generation Using Halcrow Rate and Volume

Land Use	AsonGroup Traffic Report (2017) Area (m ²) / Units	Thursday PM Peak (Using Halcrow Rate)		Saturday Midday Peak (Using Halcrow Rate)	
		Rate per 100m ² / units / per children	Trips	Rate per 100m ² / units / per children	Trips
Supermarket	4,500	14.00	630	13.20	594
Discount Supermarket	1,533	7.25	111	6.63	102
Mini-Major	1,280	4.60	59	1.17	15
Speciality	2,818	4.14	117	9.60	271
Showroom	1,448	1.46	21	2.88	42
Medical Centre	1,133	2.20	25	2.20	25
Coles Dark Store	585	0.5	3	0.5	3
Childcare (Total No of Children)	90	0.7	63	-	-
Office	-				
Residential Units	808	0.15	121	0.15	121
Amenities / Circulation	273	-			
Total Trips			1,150		1,173

Table 6: 2017 MOD5 (AsonGroup, 2017), Traffic Generation using East Village Rate and Volume

Land Use	AsonGroup Traffic Report (2017) Area (m ²) / Units	Thursday PM Peak (Using East Village Rate)		Saturday Middy Peak (Using East Village Rate)	
		Rate per 100m ² / units / per children	Trips	Rate per 100m ² / units / per children	Trips
Supermarket	4,500	8.53	384	8.09	364
Discount Supermarket	1,533	7.25	111	6.63	102
Mini-Major	1,280	2.81	36	0.72	9
Speciality	2,818	2.53	71	5.89	166
Showroom	1,448	1.46	21	2.88	42
Medical Centre	1,133	1.21	14	1.21	14
Coles Dark Store	585	0.5	3	0.5	3
Childcare (Total No of Children)	90	0.7	63		-
Office	-				
Residential Units	808	0.15	121	0.25	202
Amenities / Circulation	273	-			
Total Trips			824		902

Table 7: Traffic Volume Summary

	2011 Approved Concept Plan (Halcrow, 2011)	2013 Modified Concept Plan (Traffix, 2013)	2015-16 Modified Concept Plan (AsonGroup, Using Halcrow Rate) – DA15/1134	2015-16 Modified Concept Plan (AsonGroup, using East Village Rate) – DA15/1134	2017 Modified Concept Plan (AsonGroup, Using Halcrow Rate)	2017 Modified Concept Plan (AsonGroup, using East Village Rate)
Thursday PM Peak	1,117	1,018	1,043	740	1,150	824
Saturday Middy Peak	1,213	1,111	1,114	879	1,173	902

Proposed MOD5

Although the 2017 MOD5 does not result in any change to the approved GFA of 14,190m², it consists of a substantial reduction in low traffic and parking generator GFA such as amenities / circulation area from 933m² to 273m² and showroom area from 3,902m² to 1,448m².

In lieu of this, it proposes to increase high parking and traffic generating areas such as the child care centre with 90 children, medical component of 817m², Coles Dark Store of 585m², and speciality store of 909m².

Whilst the Child Care centre and other GFA changes are permissible use, they are a significant change of use and hence should still be considered as a modification given that they will influence traffic impacts and were not considered in the conclusions of previous DA traffic impact assessments. It is misleading to suggest otherwise.

Accepted Traffic Generation Rates

The letter from the applicant dated 22 June 2017 indicates the lower traffic generation rate using the East Village rate is considered acceptable for the 2017 MOD5 and supported as part of the DA15/1134 by JRPP and Council.

Whilst the DA15/1134 was approved by JRPP, there is nothing specific in the determination or Council and RMS submissions to indicate that the East Village rates were accepted by Council, RMS and/or the JRPP.

On the contrary, it is Council's position that the traffic impacts and conditions of consent associated with DA15/1134 were accepted by all authorities based on the fact that the DA was substantially identical to that approved by the PAC for MOD3 using the Halcrow rates. It should be noted that Council did raise significant concerns with the lower rate adopted for the residential component for the MOD3 application given the range of results obtained by the RMS surveys for Technical direction TDT 2013/04a.

This is supported in the knowledge that RMS has adopted the Halcrow traffic generation rate and volume for the traffic modelling associated with the Gateway to the South Pinch Point project. It is therefore inconsistent to state that the East Village rates are now the accepted rates.

As previously stated, to compare East Village with South Village is considered inappropriate due to different demographic, car ownership, public transport accessibility and surrounding land use pattern. It is also inappropriate to assume that these rates should be adopted because the context may change in the future.

Traffic Impact from the 2017 MOD5

It is pertinent to note that when considering the original Concept Application approved by the PAC and subsequent modifications there has already been a 73% increase in the number of residential dwellings (432 to 749) and a 10% increase in retail GLA.

The current MOD5 and S96 applications seek an additional 59 dwellings and changes of use to approximately 3,000m² of the retail component that have significantly higher traffic generating characteristics.

It is Council's view that this site has already been granted a disproportionately large share of road network capacity in this locality and that any further increase in development intensity would constitute overdevelopment of the site. Other development sites in the locality will be unable to reach their potential.

Notwithstanding, Table 7 indicates that the 2017 MOD5 and S96 would generate an additional 107 vehicle trips during PM peak and 59 vehicle trips during Saturday Midday peak compared to approved DA15/1134 using the accepted concept plan traffic generating rates (Halcrow Rate). The traffic modelling undertaken by Council indicates that the President Avenue / Oak Road intersection is currently operating with acceptable Level of Service (LoS) D with average intersection delays of 46 seconds.

Council revised traffic modelling indicates that with the traffic generated from approved DA15/1134 (using Halcrow trip generation rate) the President Avenue / Oak Road intersection would operate unsatisfactorily with LoS F with average delay of 85 seconds. This is a significant increase in delay and indicates the intersection requires upgrading for the approved Brick Pit traffic to maintain the current LoS. Unfortunately, this was not satisfactorily addressed as part of the approved Brick Pit applications and original concept plan.

Therefore, the additional traffic generated from the 2017 MOD5 will further deteriorate the intersection LoS and delay, and hence cannot be supported without increasing the capacity of the President Avenue / Oak Road intersection at the cost of the applicant.

Should you require any clarification of the matters raised in this letter, please do not hesitate to contact Daniel Lukic on 9710 5668.

Yours sincerely

A handwritten signature in black ink, appearing to be 'P. Barber', with a stylized flourish at the end.

Peter Barber
Director Shire Planning