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20 January 2011

Attention: Mr Oliver Klein

Dear Oliver,

**Re: Proposed Expansion of the Existing Aged Care Facility
Sir Moses Montefiore Jewish Home
100-120 King St and 30-36 Dangar St, Randwick - MP09-0188 & MP1 0-0044
Preferred Project Report - Traffic and Transport**

As requested, Halcrow has undertaken a review of the submissions received with regard to the above Part 3A Concept Plan and Project Application as set out in the correspondence from the NSW Department of Planning (DoP) dated 15 December 2010.

The purpose of this letter is outline the traffic and transport implications associated with the "Preferred Project Report" (PPR) and to provide a response to the traffic and transport related issues identified in the submissions.

The DoP's letter raises a number of issues to be addressed, of which two (both relating to the Moriah College Child Care Centre) have a traffic related aspect. These issues are dealt with separately below.

PREFERRED PROJECT - MODIFICATIONS TO DEVELOPMENT PROPOSAL

In response to submissions, modifications to the development proposal have been undertaken as represented by the Preferred Project. With regard to traffic and transport, these can be summarised as follows:

- Development Scale;
- Traffic Generation;
- Parking Provision; and
- Service vehicle arrangements.

Development Scale

The following table presents the characteristics of the PPR Concept Plan and compares them with those of the EA Concept Plan and with the scale of development that is currently on site.

Table 1 – Development Characteristics

	Existing Home	EA Concept Plan	PPR Concept Plan	PPR versus EA
Montefiore Home				
Aged-Care Beds	276	552	508	(-) 44
Self-Care units	0	35	36	+ 1
Parking provision	147	199	197	(-) 2
Child Care Centre				
Children	80	50	80	+ 30
Parking provision	8	13	20	+ 7

Table shows that for the Montefiore Home component, the scale of the development has generally decreased.

Additional background data has been obtained relating to the operation of the Child Care Centre, the details of which are set out in greater detail within the following sections of this document. In short, the current Child Care Centre has a temporary approval for 80 children and the amended Concept Plan now proposes a Child Care Centre that would maintain this attendance level of 80 children.

Traffic Generation

The September 2010 Halcrow traffic report that supported the 2010 EA submission, calculated that the Montefiore Home component of the development would generate an additional 32 trips during the morning peak period and 41 trips during the evening peak period. This traffic generation was based on forecast employee numbers with 89 additional employees (day, evening and night shift) anticipated to staff the fully completed Home.

Whilst the latest scheme proposes 44 fewer care beds, it is unlikely that this would reduce forecast staff levels by more than one or two staff members. Therefore, the PPR Concept Plan would generate less traffic than the EA Concept Plan; however, the differences between the two would most likely be negligible.

For the Child Care Centre, the 2010 traffic report assessed an increase in children numbers of 30, from the previously reputed attendance of 20 children, to the EA Plan proposed 50 children. Using RTA trip rates, it was anticipated that the Child Care proposal would generate an additional 24 trips during the morning peak period and 21 trips during the evening peak period.

However, it is now known that the existing Child Care Centre has temporary approval for 80 children and has been operating at this level prior to the recent extension of this temporary approval. As per the Statement of Environmental Effects prepared by Gardner Wetherill & Associates, *'The existing development was assessed by NSW Department of Community Services and deemed to be suitable in meeting the Children (Care and Protection Act 1897 Centre-based and Mobile Child Care Services Regulation (No2) (1996) requirements for 80 children. Department of Community Services has re assessed the premises and has issued a License effective from 31 December 2008 to 30 December 2011.'*

As such, the traffic surveys undertaken by Halcrow in 2009 as part of the EA traffic report included the operation of an 80 place Child Care Centre. As there will be no net increase in Child Care places on the site there will be no net change in Child Care Centre assumed traffic generation between the existing and proposed (PPR) scheme.

In summary, the traffic generation assessed in the September 2010 traffic report provides a conservatively high estimate of the likely traffic generation of the amended Concept Plan. As such, the findings of the EA transport assessment remain valid for the PPR scheme.

Parking Provision

The following table sets out the SEPP/DCP parking calculation for PPR Concept Plan. In addition, the table compares the characteristics of the PPR scheme with those of the EA Concept Plan and with the scale of development that is currently on site.

Table 2 – Summary of Montefiore Nursing Home DCP/SEPP Parking Requirements

DCP / SEPP Parking Rate		Existing Home		EA Concept Plan		PPR Concept Plan	
		<i>Beds / Units or Staff / Child</i>	Parking Spaces	<i>Beds / Units or Staff / Child</i>	Parking Spaces Required	<i>Beds / Units or Staff / Child</i>	Parking Spaces Required
0.1	spaces per Care BED (visitors)	276	28	552	55	508	51
0.5	spaces per Self-Care UNIT	0	0	35	18	36	18
0.5	spaces per STAFF or VOLUNTEER	149	75	202	101	202	101
0.25	spaces per CHILD	80	20	50	13	80	20
DCP Requirement		-	123	-	187	-	190
Existing or Proposed Provision		-	155	-	212	-	217
No. of Spaces in Excessive of Minimum Requirements		-	32	-	25	-	27

Table 2 shows that the minimum SEPP/DCP parking requirements for the Preferred Project development would be 190 spaces consisting of 170 spaces for the Home and 20 spaces for the Child Care Centre.

Furthermore, Table 2 shows that the proposed parking provision of 217 spaces (consisting of 197 spaces for the Home and 20 spaces for the Child Care Centre) would comply with the relevant minimum SEPP/DCP parking requirements.

In accordance with the September 2010 traffic report, an assessment of the proposed provision compared with estimated parking demand has also been undertaken based on the site specific parking demand for the existing Home, which was calculated at 1.1 spaces per day-shift staff member.

Table 3 sets out the staff based demand parking calculation for the PPR Concept Plan as well as presenting the demand for the existing Home and the EA Concept Plan development scenarios.

Table 3 – Summary of Montefiore Nursing Home Staff-Demand-Based Parking Requirements

Site Specific Parking Rate		Existing Home		EA Concept Plan		PPR Concept Plan	
		<i>Day-Shift Staff</i>	Parking Spaces	<i>Day-Shift Staff</i>	Parking Spaces	<i>Day-Shift Staff</i>	Parking Spaces
1.1	spaces per Day STAFF	135	149	188	207	188	207
Existing / Proposed Provision (exc. Child Care Centre spaces)		-	147	-	199	-	197
Net Difference Demand & Provision		-	(-) 2	-	(-) 8	-	(-) 10

Table 2 showed that the provision of 197 parking spaces for the Home exceeds DCP's minimum parking requirement of 190 spaces. However as shown above in Table 3 the proposed provision (197 spaces) is lower than the level required to meet existing surveyed demand levels (207 spaces). The existing demand assumes that no changes to existing travel behaviour. That is no new green travel management measures are implemented.

In summary the proposed parking meets minimum DCP requirements while decreases the relative availability of car parking to existing parking demand rates of the Home.

The proposed on site parking provision is a balanced outcome which seeks to change travel demand from private vehicle usage to other modes while addressing the concerns of local residents regarding the reported lack of on-street parking.

Servicing Arrangements

The EA Concept Plan proposed that servicing of the existing Home would continue from the existing loading dock in the southwest corner of Block A and a new loading dock would be located within the car park of Block E.

The PPR Concept Plan now proposes that all servicing requirements for the full site would be undertaken from the existing loading dock in Block A. Accordingly, all supplies would be unloaded at the existing loading dock and transported via trolley to the desired location and all waste would be transport from throughout the expanded home to the waste collection points within the existing dock.

The existing loading dock would be expanded to meet the increase usage of the expanded Home and the expansion includes a waste compactor. Access to the compactor is adjacent to the existing access to the loading dock and a turning area is provided for a refuse collection vehicle to reverse in to the waste compactor area. Sufficient space has been provided such that the refuse vehicle would not block access to the existing car park whilst it is stationary collecting waste.

Aside from the four topics covered above, no modifications are proposed to the development relating to:

- Vehicle site access arrangements;
- Access to public transport services;
- Implementation and promotion of “green travel plans” for site users; and
- General construction methodologies.

RESPONSE TO SUBMISSIONS

DoP Submission

Child Care - Issue One

A dedicated off street pick-up/drop-off area should be provided for the proposed childcare centre (a designated area should be provided for this in the proposed car park).

The existing child care centre temporary approval (80 child care places and 8 staff) relies on a total of six on-street short stay (15 minute) spaces for drop off/collection purposes, one of which is across the access to the Centre’s existing car park which contains 6 spaces. The on site parking is typically utilised by staff.

As discussed further in the response to Issue 2 below, it is proposed to provide a total of 20 on site parking spaces for the proposed 80 place child care centre.

A total of 14 drop off / pick up spaces will be on site within a dedicated parking area. A total of 6 dedicated child care centre staff parking spaces will be provided on site within the main Montefiore Home car parking area.

Therefore the Preferred Project proposal addresses DoP Issue One.

Child Care - Issue Two

Randwick Council has noted that the existing childcare centre is already approved for 60 children. The submitted EA sets out that 20 places are currently provided and 50 places are proposed. Further clarification in this regard is therefore sought. Should it be the case that the childcare centre is to cater for more than 50 places, further consideration should be given to on-site car parking provision.

It is now understood that the existing child care centre operating on the site has a temporary approval (ref: DA/574/2009) for 80 child care places and 8 staff. The temporary approval will lapse on 22/10/2015.

As noted in the DoP letter the Concept Plan (MP09-0188) proposed a Child Care Centre that would cater for 50 places.

The modified Concept Plan represented by the Preferred Project includes the operation of a child care centre with 80 places in line with the temporary approval.

Internal building changes made to the design to address this are detailed in JBA's response and in Jackson Teece's drawings for the Preferred Project.

In terms of parking provision, a total of 20 car parking spaces are required for a 80 place child care centre (RTA requirements). A total of 20 spaces dedicated to the use of child care centre uses have been provided (See also response to Issue 1 above).

Therefore the Preferred Project proposal seeks to increase the total number of parking spaces provided for the existing child care centre use (in line with RTA and Council requirements) and provide these spaces on site, thereby removing the need for child care drop off / pick ups to occur on street.

As such the Preferred Project proposal would substantially improve vehicular access and parking arrangements for the Child Care Centre. The 80-place child care centre currently provides 6 on site car parking spaces for staff with drop off and pick up of children occurring on street.

It is noted that the existing on street drop off and pick up arrangements are currently being managed with a staff solution as detailed in Moriah's Traffic Management Plan (prepared by Colston Budd Hunt and Kafes, August 2009), which has been accepted by Randwick Council.

The Preferred Project proposal is seeking to use the proposed redevelopment as an opportunity to implement a physical upgrade which will improve the existing arrangements in terms of both layout and number of parking spaces.

Whilst the current solution is workable, this physical improvement would significantly enhance the management solution currently in place.

The proposed parking provision and layout for the 80 place child care centre as represented in the Preferred Project proposal is satisfactory for the proposed development and will represent an improvement to the existing operating conditions associated with the child care centre and King Street.

Strategic Planning

This section outlines government plans and strategies which provide a transport context within which this proposed development should be considered including the various transport related environmental planning instruments and guidelines referenced in the DGRs.

NSW State Plan 2010

The NSW State Plan 2010 defines the NSW Government's long term plan to deliver the best possible services to the people of NSW and sets targets and measurement tools for service improvements.

It is intended to set a framework for linking the various other NSW Government plans and policies, including the Metropolitan Transport Plan and the Metropolitan Strategy.

Transport-relevant goals include:

- Improved public transport system usage and reliability
- Improved road network
- Improved Road safety
- Increase walking and cycle as a mode of travel

Beneath these goals are a number of transport-relevant priorities with associated targets.

The priorities are:

- Increase the share of commute trips made by public transport
- Increase the proportion of total journeys to work by public transport in the Sydney Metropolitan Regions to 28% by 2016.
- Safer roads
- Cleaner air and progress on greenhouse gas reduction
- Jobs closer to home
- Improve the efficiency of the road network

Metropolitan Transport Plan

The Metropolitan Transport Plan was released in February 2010 and provides a 25 year vision for the linking of Sydney's land use planning with its transport network. The plan includes a 10 year funding guarantee for essential transport infrastructure and services.

The Metropolitan Transport Plan has been integrated into the Metropolitan Plan to ensure the city's sustainable growth and seeks to help make Sydney a more connected, sustainable city as the population grows over the next 25 years.

The Metropolitan Plan, integrated with the Metropolitan Transport Plan, outlines the government's commits to the delivery of transport solutions that match Sydney's population and employment needs, and supports economic growth.

The plan aims to encourage public transport usage wherever possible.

The Metropolitan Transport Plan includes:

- The \$4.5 billion Western Express City Rail Service – a separate dedicated rail track to slash travelling times from Western Sydney to the city.
- Start of work on the \$6.75 billion North West rail link from Epping to Rouse Hill.
- A \$500 million expansion of the current light rail system with an extension from Lilyfield to Dulwich Hill.
- Improvement to bus services – including 1000 new buses in strategic bus corridors.
- New trains – addition of 626 rail carriages.
- \$158 million for cycleway.
- \$400 million for commuter car park.
- \$225 millions for ferries.
- \$536 million for motorway planning, transit corridor reservations and land acquisition.
- \$483 million to deliver important freight works in Sydney.
- \$21.9 million of State and Federal Funded road projects.

East Subregional Strategy (Draft)

This draft policy sets key directions for transport and include:

- Improve transport between Sydney's centres
- Improve existing transport systems
- Influence travel choices to encourage more sustainable travel
- Improve transport decision making, planning, evaluation and funding

State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 (the SEPP) was introduced to facilitate the delivery of infrastructure across the State by improving regulatory certainty and efficiency. Prior to the SEPP being introduced, planning for infrastructure was regulated through a complex array of local, regional and State statutory planning instruments and overlapping legislation.

The new Infrastructure SEPP provides a consistent planning regime under the Environmental Planning and Assessment Act 1979 (the Act) that outlines the approval process and assessment requirements for infrastructure proposals.

Infrastructure is defined to include hospitals, schools, railways, roads, power and water supplies, and other services necessary to maintain the State's economy and the wellbeing of its communities.

In essence the Infrastructure SEPP establishes the assessment and consultation framework for infrastructure developments, including educational establishments, to be considered under the Part 3A process.

Comment on Strategic Context

While not specifically referenced in the Transport reports for the Montefiore Home Concept Application, many of the underlying themes of the plans and strategies have relevance to the proposal and have been adopted in the planning for the site.

Current state policies provide a good framework to support local strategies to improve the level of accessibility and sustainable transport for the Randwick local government area.

A list of objectives has been developed for the assessment of the proposed Montefiore Home development which aim to support the State and local transport strategies.

The objectives for achieving sustainable travel for Montefiore would include:

- Reduce the rate of growth of car based trips;
- Support and improve sustainable transport facilities for existing users of public transport, walking and cycling to the site;
- At the same time ensure that appropriate provisions are made for car parking and for traffic travelling to and from the centre to minimise the impacts to surrounding residents.

The Montefiore site and the nature of site uses as a medical / aged care establishment has a number of advantages in relation to the achievement of above objectives, namely:

- Close proximity to good bus services providing connections to rail services thus providing good walkable access to public transport;
- As an institution there is the ability to efficiently manage travel demands through Workplace or Green Travel Plans.

However these objectives need to be considered in light of Montefiore's operational realities, which include the need for:

- varying shift times and associated varying staff arrival and departure times;
- Availability and security of transport for late night / early morning shift changes; and
- Availability and amenity impacts resulting from on street parking to surrounding residential areas.

These issues are addressed below.

Other Authority Submissions

The following tables set out all the relevant traffic related submissions made to the DoP by key authorities.

The tables include our corresponding response to each point.

Roads and Traffic Authority NSW, (13 December 2010)

2.1	The layout of the proposed car parking areas associated with the subject development (including driveways, grades, turn paths, sight distance requirements, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1 - 2004.	The layout of the proposed car parking areas associated with the subject development will comply with relevant standards including AS2890.1-2004.
2.2	The developer shall be responsible for all public utility adjustments/ relocation works, necessitated by the above work and as required by the various public utility authorities and/ or their agents.	Noted.
2.3	All works/regulatory signposting associated with the proposed development are to be at no cost to the RTA.	Noted.

Transport NSW

3.1	The EA must demonstrate the provision of sufficient on-site car parking for the proposal having regard to local planning controls and RTA guidelines. (Note: the Department supports reduced car parking rates in areas well-served by public transport)	<p>The Halcrow traffic report dated 01/09/2010 included a comprehensive 'demand based' parking assessment that used site specific data (namely a July 2009 Staff Travel Questionnaire Survey) to calculate an appropriate level of parking for the development.</p> <p>This methodology was primarily undertaken to determine the existing demand for the various travel modes used to access the site.</p> <p>The survey was also used to determine the level of current use of both on site and off parking by Montefiore.</p>
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		<p>Community consultation has highlighted the lack of available on street parking as a key issue and the perceived contribution of the existing Montefiore Home to this community issue.</p> <p>It has been noted that on street parking availability is affected by a number of surrounding uses, including the TAFE, UNSW, Randwick Racecourse, not just Montefiore.</p> <p>However, in recognition of the complexity of this particular site in terms of the demand for on-street parking, the Home undertook this additional study to confirm what a sufficient on-site provision would be based on actual demand rather than theoretical numbers.</p> <p>The Travel Survey Questionnaire collected data on the use of public transport, carpooling, and cycling as well, and determined the parking numbers in consideration of all forms of transport used by staff and visitors. A Green Travel Plan is also included in the proposal.</p> <p>It is our opinion that the proposed 217 parking spaces achieves the appropriate balance with regard to local planning controls, RTA guidelines, and the maintenance of appropriate levels of availability of on-street parking for neighbouring properties and other uses in the area.</p>
3.2	Provide an assessment of the implications of the proposed development for non-car travel modes (including public transport, walking and cycling), potential for implementing a sustainable travel plan for	As stated at section 3.4 of the Halcrow traffic report, the development and implementation of a Green Travel Plan would be part of the proposed development. It is proposed that a

	<p>staff and visitors and provision of facilities to increase non car mode travel.</p>	<p>Green Travel plan be prepared prior to the operation of any new development on the Montefiore site.</p> <p>The main objective of the Green Travel Plan is to implement measures which encourage and enable a reduction in the percentage of private motor vehicle trips made to and from the site in favour of public transport, walking and cycling transport modes.</p> <p>A Green Travel Plan for the site would include measures to:</p> <ul style="list-style-type: none"> • increase awareness and access to public transport services, • promote car sharing arrangement; and • discourage on street parking arrangements. <p>In tandem with the Green Travel Plan, the proposed parking allocation is based on demand as discussed at point 3.1, to achieve a balanced outcome for the development, the surrounding community and broader transport planning principles.</p>
3.3	<p>Further, the Environmental Assessment and Traffic Assessment Report does not consider the targets and initiatives of the Metropolitan Transport Plan - Connecting the City of Cities (MTP), the NSW State Plan 2010 and the draft East Subregional Strategy, as per the recommendations in the DGRs. These matter require further attention.</p>	<p>See comments above under “Strategic Planning”</p>
3.4	<p>TNSW supports a minimalist approach to car parking in locations well serviced by public transport. Given the accessibility of the site to a number of strategic bus corridors as well as walking and cycling facilities, TNSW recommends car parking provision to a maximum of 174 spaces in</p>	<p>As stated above, the previously-proposed provision of 212 parking spaces was based on a comprehensive site specific demand assessment, taking into account on-site patterns of use including staff shifts and visitation, but also in consideration of concerns</p>

	<p>accordance with the rates recommended in Randwick City Council's Development Control Plan - Parking (1998). Opportunities to reduce this provision should be considered in relation to the preparation of a Workplace Travel Plan (WTP).</p>	<p>voiced by neighbouring residents regarding the availability of on-street parking.</p> <p>The TNSW's minimalist approach to car parking is supported, and the home has committed to preparing a Workplace (Green) Travel Plan to encourage the use of public transport options in the area.</p> <p>This overall strategy is intended to increase the current utilisation of public transport, while reducing the use of on-street parking.</p> <p>As stated at 3.1, it is our opinion that the proposed 217 parking spaces for the revised scheme achieves the appropriate balance with regard to local planning controls, RTA guidelines, and the maintenance of appropriate levels of availability of on-street parking for neighbouring properties and other uses in the area.</p>
3.5	<p>The NSW State Plan (2010) sets a mode share target to public transport for work trips of 28% by 2016. TNSW notes that the existing mode share to the development by public transport is 20%. As a minimum, the proponent should justify parking rates and other measures to encourage public transport use against achieving a 28% mode share to public transport, in accordance with the State Plan target.</p>	<p>As stated above, justification of the proposed parking rates has been provided by the comprehensive site specific demand assessment.</p> <p>The objective of the Workplace (Green) Travel Plan would be to achieve a further 8% increase of mode share to public transport by 2016 in accordance with the State Plan target.</p> <p>Measures to achieve the increase of non private vehicle modes of travel to and from the site would include This would include:</p> <ul style="list-style-type: none"> • Reducing on site parking supply relative to existing demand; • Car share / car pooling system; • On site bicycle facilities; • Travel Plan information distribution systems; and

		<ul style="list-style-type: none"> Fleet cars.
3.6	<p>TNSW notes the proponent's consideration of a number of sustainable transport options including a car sharing scheme, bicycle facilities and fleet cars. TNSW requests that Travel Demand Management measures be included as part of WTP for staff. Information on how to prepare a WTP is available at www.pcal.nsw.gov.au. The WTP can include initiatives such as the following:</p> <ol style="list-style-type: none"> Provision of car pooling and car share spaces in priority locations; Discounted annual public transport tickets for staff; Preparation of a Travel Access Guide (TAG) for visitors to the site. Information on how to prepare a TAG is available at www.rta.nsw.gov.au. 	<p>The development and implementation of a Green Travel Plan forms part of the proposed transport for the future development of the site.</p> <p>The overarching principles of the Green Travel Plan are discussed at 3.2.</p> <p>The development of the Green Travel Plan will make use of the information and guidelines available from TNSW and RTA.</p>
3.7	<p>TNSW supports the proponent's commitment to providing end of trip facilities for cyclists and pedestrians. TNSW requests that bicycle parking for staff should be prioritised in convenient locations that are well lit, sheltered and secure. Provision should also be made for visitor bicycle parking at grade and located close to major entrances in well lit and secure locations. The Department's Planning Guidelines for Walking and Cycling (2004) and the NSW BikePlan (2010) provide relevant context and specifications.</p>	<p>This is being addressed in the design. The current bicycle parking and locker rooms in Building A are being expanded to provide additional capacity in a central location on site. A plan showing this expansion is included in JBA's report.</p>

State Transit Authority of NSW, (8 October 2010)

4.1	<p>The proposed development is in close proximity to the Randwick Bus Depot. To ensure minimal impact on future residents, the development should have in place suitable Mitigation measures against noise and light. An appropriate guide is the Planning NSW's interim guidelines for</p>	<p>This issue is being separately addressed in JBA's report.</p>
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	"Development Near Rail Corridors and Busy Roads" reference can also be made to AS/NZ 2107;2000 Acoustics. The STA understands that this may be dealt with at the construction certificate stage.	
4.2	The construction work should not have an impact on STA School Services and Special running buses operating past the King St Frontage. As such the STA will require in due course to be contacted by the proponent to discuss the demolition and construction management plan for stages 1 to 3. This involvement is to ensure that bus services are not adversely impacted.	A Construction Traffic Management Plan (CTMP) will be prepared prior to issue of relevant Construction Certificates and as appropriate, comments on the Draft CTMP will be sought from the STA. Section 5 of the Halcrow report sets out the general principles that would be incorporated in the CTMP, including how the proximity of the site to the Bus Depot would be managed.

Randwick City Council, (7 December 2010)

5.1	The applicant states that the existing childcare centre caters for 20 children and that this application proposes an enlargement of the childcare centre to cater for 50 children. The existing childcare centre is approved for 60 children and licensed for 80 children. The car parking and traffic analysis provided with respect to existing and future needs of the childcare centre should be reviewed to ensure that the demands for car parking/ traffic and drop off/ pick up are based on the higher number of children.	<p>This was an error and it has been corrected.</p> <p>This issue has been is addressed in the response to the DoP's Issues 1 and 2 (see above). Further information relating to the status of the various approval are addressed in JBA's response.</p>
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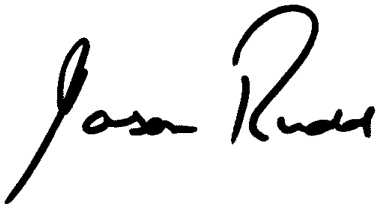
5.2	<p>The application states that the proposal will provide for an additional 212 carparking spaces which will be adequate to meet a projected overall demand of 207 carspaces for the expanded facility including all additional staff. However, the proponent's traffic report states that "although measures implemented by centre management has reduced the demand for on-street parking generated by people associated with the Home, it is noted that some staff may continue to park on street as is their lawful right." Given that, with the expanded facility, there will be staff who will still choose to park on residential streets as a matter of preference, an appropriate commitment should be made by the proponent to apply more stringent management initiatives to ensure that all staff driving to work parks their cars on site.</p>	<p>As stated at Section 2.7.3 of the Halcrow Transport and Traffic Report, Montefiore Home management has implemented measures to improve access to the on-site car parks, namely a greater distribution of swipe cards to employees and volunteers. In addition, less frequent visiting volunteers are buzzed through at reception with security being advised in advance of their scheduled (rostered) arrival.</p> <p>Current Council on-street parking regulations local to the site allow all users, including staff and visitor to the Home, to use the on-street parking. It is not the responsibility of the Home to impose regulations on on-street parking, as it has no jurisdiction over these spaces.</p> <p>However, the Home has and will continue to encourage staff to park on site as it is understood to be a concern for its neighbours.</p> <p>It is noted that high demand for on street car parking is a district-wide problem. A number of different land uses in the vicinity of the Montefiore site compete for these parking spaces on any given day, including the TAFE, UNSW, Randwick Racecourse, Montefiore, and the neighbouring residents, most of whose homes are of a vintage which does not have off-street parking.</p>
5.3	<p>The parking assessment should assess the adequacy of the parking facilities in catering for overlapping staff shifts.</p>	<p>The Halcrow Transport and Traffic report notes that there is currently a transition of staff between shifts, particularly between the Day and Evening shift, generally occurring over a 1-hour period.</p>

		<p>This overlapping of staff shifts is beneficial for a number of reasons, including:</p> <ol style="list-style-type: none"> 1. Arrival and departure trips occur over a broad period; and 2. Demand for staff parking is gradual throughout the changeover period and can be managed by the gradual departure of staff. 3. In addition, the parking layout has been designed to allow for easy access entering and leaving the site so that this flow occurs smoothly. Staff can enter either via King or Dangar, and exit via King Street.
5.4	<p>The report should outline the proposed allocation of parking spaces between staff members, residents, family visitors and external services, including medical consultants, tradesmen and the like.</p>	<p>In order to maximise the utilisation of proposed on site parking, allocation of particular parking spaces to individual uses is not proposed.</p> <p>The exceptions would be:</p> <ul style="list-style-type: none"> • Child care centre staff parking; • Child care centre drop off / pick up parking • Loading and service vehicle areas; and • Mini bus parking areas.
5.5	<p>The implications of any weekend peak traffic when family members are likely to pay visits. Given that the access driveways are gated, the report should indicate whether vehicles would queue and park on public roads as a result of the intensified operation.</p>	<p>Generally, weekend traffic does not peak significantly like weekday traffic. Weekend traffic including family visitors tends to be spread throughout the day. Conversely, weekday traffic including visits from family tend to accord with general morning and evening peak traffic periods. Therefore, with a view to assessing peak conditions on the local road network as a whole, weekend traffic would not present the busiest traffic conditions.</p> <p>With regard to queuing on street, the busiest forecast weekday period for arrivals is the morning peak hour, during which 79 vehicles would access</p>

		the site, via the entry-only Dangar Street access and the two-way King Street access. On average this equates to 40 vehicles per hour or one vehicle every 1.5mins. On this basis, any further investigation of the entry accesses and the potential for queuing is unwarranted.
5.6	Existing parking restrictions relating to kerb side spaces in the vicinity to the site.	The proposal does not physically impact upon available on-street parking (ie. no changes to existing parking controls are proposed) and the proposal aims to reduce the likelihood of Home related traffic parking on-street.
5.7	Details of any short-term parking spaces within the site, including those adjacent to the main reception area.	There are four spaces on site at the main reception entrance for taxi drop-off and pick-up.
5.8	As referred to above, the application needs to consider the parking needs and traffic implications of the childcare centre based on the current and proposed children numbers.	See comments in response to DoP comments on Child Care Centre (see above).
5.9	<p>It is noted the following details are not included in the traffic study which would be critical to assessing the traffic impacts at a micro-level in the immediate vicinity of the subject site:</p> <ul style="list-style-type: none"> • Details on the direction of traffic and one-way / two-way movements of all internal roads. • Details on the drop-off and pick-up zones for both the aged care facility and the child care centre. • Access routes for service vehicles. • Access facilities for people with disabilities. • Details of on-street pedestrian safety related facilities such as pedestrian refuges. 	These details have been included on the Access Plan, included in JBA's response.

Should you require any further information regarding the above, please do not hesitate to contact the undersigned.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Jason Rudd'. The signature is fluid and cursive, with the first name 'Jason' written in a larger, more prominent script than the last name 'Rudd'.

Jason Rudd
Associate Director
Transport Planning