



**ANGEL PLACE  
LEVEL 8, 123 PITT STREET  
SYDNEY NSW 2000**

URBIS.COM.AU  
Urbis Pty Ltd  
ABN 50 105 256 228

30 November 2021

Ms Holly Villella  
Manager Place and Infrastructure, GPOP  
Greater Sydney, Place and Infrastructure  
Department of Planning, Infrastructure & Environment

By email: [Holly.Villella@planning.nsw.gov.au](mailto:Holly.Villella@planning.nsw.gov.au)

Cc: [Jorge.Alvarez@planning.nsw.gov.au](mailto:Jorge.Alvarez@planning.nsw.gov.au)

Dear Holly,

## **1 CRESCENT STREET, HOLROYD PLANNING PROPOSAL (PP\_2019\_CUMB\_002\_0)**

On behalf of Tiberius (Holroyd) Pty Ltd (the proponent) and further to our meeting with DPIE, TfNSW and the PDU on 23 November 2021, we submit the following advice relevant to the above Planning Proposal at 1 Crescent Street, Holroyd.

This correspondence provides a response to the last outstanding point of discussion involving the delivery of a pedestrian bridge over Woodville Road as TfNSW's required mechanism to ensure a modal shift from private vehicles to public transport, being Granville Station.

The proponent has provided a number of submissions on this matter (including substantial detailed technical information refuting the benefit of the pedestrian bridge) and remains steadfast that the pedestrian bridge requested by TfNSW will not support any tangible shift in transport mode preference from private vehicles. TfNSW or their traffic consultant have not provided any evidence or justification to DPIE or the proponent to support their contention for the pedestrian bridge and indeed have been previously opposed to such bridge when initially mooted in the development of the Planning Proposal.

Further, while TfNSW are requiring the proponent to provide a pedestrian bridge on land that is not subject to the proponents ownership or control, TfNSW will not provide support to compulsorily acquire land nor provide any advice in respect to whether such bridge is technically feasible.

TfNSW have also represented to the DPIE and Planning Panel that they have undertaken an 'independent peer review' of the TTPP modelling undertaken to date. Further to our correspondence dated 30 September 2021, and reviewing correspondence between TfNSW and their 'independent peer reviewer' the independent report is heavily edited by TfNSW as outlined below and in our submission is not 'independent' but simply technical advice to support their pre-determined position on the matter.



## RESPONSE TO TfNSW'S POSITION

We make the following points, responding to the comments raised by TfNSW in the recent meeting including the pedestrian bridge and independent peer review report:

### EXHAUST ALL MEASURES AND OPTIONS FOR THE BRIDGE

As stated in the proponent's previous submission (specifically 30 September 2021), while the delivery of infrastructure such as a bridge may be perceived as having benefits in terms of connectivity and safety, on closer analysis, the proponent submits that such an outcome would be an ill-conceived direction of funding. Such funds would be better invested elsewhere in the precinct to support the local community and improved amenity and accessibility as identified in the proponent's active transport study. We iterate:

- TfNSW's views on whether a bridge should be provided has fluctuated over the period of the Planning Proposal assessment, with TfNSW not supporting a bridge following their pre-exhibition review and advice recommending the removal of the bridge from the Proposal.
- The proponent's research confirms that such a bridge would have limited utility and benefit for the subject development and wider community. For public transport users, heading east to Granville Station (even with a bridge) is not the preferred or shortest path of travel from a destination and walkability perspective.
- There are too many risks and unknowns in the delivery of a pedestrian bridge including land ownership, concerns over pedestrian ramp grades, DDA compliance/safety, heritage, amongst others.
- Investment into improved pedestrian and active transport measures as identified in the proponent's active transport study is a more meaningful way to encourage walkability to railway stations and aligns with potential desire lines of residents/workers heading north to Harris Park station and Parramatta.

Despite the fact that in our opinion, the bridge is likely undeliverable primarily due to private ownership of land required, additional steps have been made to respond to TfNSW's comments at the 23 November meeting. The proponent has approached Abacus Property Group who owns the property at 1 Woodville Road, Granville and has recently obtained a planning approval to develop a Storage King facility at the site. The proponent has approached Abacus Property Group regarding the purchase of part of their site to facilitate a pedestrian bridge crossing Woodville Road and as at the date of this letter had not received a response from the property owner. If received, this will be forwarded onto DPIE under separate cover.

Further, a recent development application (DA/120/2021) at 1 Woodville Road has been approved in October 2021 for the "*Demolition of existing structures, tree removal, and staged construction of a self-storage facility comprising two buildings (one 2-storey and one 4-storey) and 36 at-grade parking spaces*". Given this is a recent investment into the future development of the site, it also potentially reduces the immediate desire to sell or amend the approved scheme to accommodate a bridge.

Given the land required for the bridge is under private ownership and unable to be acquired, it is not reasonable to undertake any detailed design work or acquire costings of a proposed pedestrian bridge that could not be delivered. Extracts of an indicative land acquisition is provided below in Figures 1 and 2, which has been informed on advice from Urbis' Transport team.





**Figure 1:** Extract of 17 August 2021 TfNSW Correspondence, named 'High Level Sketch of Pedestrian Bridge on Woodville Road'.



**Figure 2:** Estimated land required to be acquired to allow for bridge landing and an accessible compliant pedestrian bridge, amounting to an estimate of 300sqm of land.



- *Explore the other potential pedestrian bridge location put forth by TfNSW to the south of the railway corridor over Woodville Road*

The potential location of a bridge to the south of the existing railway infrastructure has been discussed with TfNSW and DPIE and disregarded previously by TfNSW. In their 14 October 2019 letter TfNSW did not support the location to the south as on Page 3 and 4 of the correspondence (in **Attachment A**) where the stated reasons this location was not supported, namely:

- The placement of the bridge could not be guaranteed given the land was in private ownership
- There were a number of physical constraints which would hinder connectivity to Granville Station, significant grade difference and “*the bridge would not necessarily serve the key pedestrian desire line nor provide convenient and DDA compliant access*”.

The proponent has therefore already examined and satisfied this requirement.

- *If a shuttle bus was provided in lieu of the pedestrian bridge, TfNSW sought an understanding of a long term commitment*

The proposal for a shuttle bus is just one of a suite of initiatives that are targeting a modal shift from vehicles to public transport. The proponent is committed to the long term delivery of a free shuttle running between an on-site bus stop and Harris Park Station (and possibly Parramatta Station) during peak times. This is a commitment over and above the normal preference of a travel plan and will provide additional incentives for residents and workers to travel by means other the car. The package of initiatives and reduction in retail/commercial floor space show a reduction of trips by up to 49.9% (AM) and 52.1% (PM) from the exhibited proposal as set out in our 29 October 2021 correspondence. This meets the target reduction requested by TfNSW to achieve their requested reduction of vehicles on the road network, without the requirement of a bridge.

The proponent is committed to establishing an arrangement that would allow for the initial set up and funding of a shuttle bus to operate from the site as being one of a number of mechanisms to support improved accessibility and reduced private car reliance. The precise details of the arrangements would be confirmed but it would contain the following principles:

- Developer to fund upfront capital costs for set up upon delivery and occupation of the initial stage(s) of the development.
- Developer to fund operational costs for a period of 3 years post the first OC, while stages of the project are incrementally delivered.
- Body Corporates of the residential towers, as well as the owner of the retail/commercial component, to support on-going funding to be conditioned via development consent and incorporated into the body corporate/strata committee by-laws.

It is proposed that such requirement would form part of the final DCP to be prepared for the site and approved by Council, at which point it would become conditions of relevant future development consents.



## AGREED MATTERS

There was agreement between the proponent and TfNSW on other measures to reduce travel demand and drive modal share at the 23 November 2021 meeting. It was also agreed by TfNSW that other commitments posed by the proponent in TTPP's letter dated 29 October 2021 relevant to travel demand measures are acceptable, namely:

- Reduce and set maximum car parking ratios
- Provide cycle parking facilities/e-bikes
- Implement a car share arrangement
- Implement a green travel plan

The proponent states that the above commitments as well as the shuttle bus, the significant reduction in retail and commercial floor space and a meaningful public benefit in the form of a monetary contribution towards state infrastructure will provide an impact to reduce traffic impacts on the road network. This impact was previously quantified by TTPP as reducing vehicle traffic by circa 50% from that modelled for the exhibited Planning Proposal that included the full retail/commercial floor areas.

## STANTEC 'INDEPENDENT' PEER REVIEW:

In around June 2021, at the instigation of the DPIE's Project Delivery Unit (PDU) to overcome an impasse in respect to the acceptance of the traffic modelling and associated impacts, it was agreed that an independent traffic analysis of the TTPP's work (on behalf of the proponent) would be commissioned on behalf of TfNSW.

TfNSW commissioned Stantec (formerly GTA) to undertake this review and have submitted correspondence to the DPIE and Panel representing this as an independent traffic peer review of the proponent's traffic modelling.

The proponent takes exception to this report being presented as being independent, balanced and a thorough and fair assessment.

### ***The report is not 'independent'***

It is important for the Panel to be aware that the report should not be considered independent and has been heavily modified by TfNSW with the independent peer reviewer being instructed by TfNSW to make significant changes to the report that was submitted. We have, through a GPIA request been provided with documentation confirming TfNSW officers have marked up and recommended significant changes to the independent report, the intention being to strengthen the extent of the impacts, as opposed to a more balanced assessment. Stantec have incorporated these changes in the final report that was submitted to the Panel and confirmed in correspondence that it is independent. An example of the TfNSW comments on the Stantec report is provided in Attachment B.

### ***The report does not review the modelling undertaken***

The Stantec report that has been submitted by TfNSW does not provide any review of the modelling undertaken to date by TTPP for the Planning Proposal. The analysis was limited to re-calibrating trip distribution patterns but again without supporting analysis to both confirm the rationale for alternative trip distribution patterns, nor any re-modelling and optimising the road network to test this assumption.



### ***The report is not balanced***

As confirmed in a meeting with TfNSW, Stantec were instructed to re-model a 'worst case scenario' based on the STFM to the east of the subject site – changing the traffic distribution to show the worst case scenario to the traffic network. Such analysis 'skews' the results and is not a fair or balanced method in which to assess traffic impacts.

It should be noted, as per our previous correspondence that the proponents traffic distribution has been supported initially by Stantec (GTA) in the initial TIA report (2015), extensive economic research, peer reviewed by various expert consultants, both economic and transport and remains consistent with TfNSW Statement of Evidence in the Land and Environment Court matter that reviewed the proposal as exhibited.

It should be noted that while we strongly disagree with the basis upon which the Stantec report is presented, the proponent has been able to significantly reduce the projected number of vehicles generated from the development through a combination of reduced retail and commercial floor area and a suite of 'green travel' initiatives. The effect of this is a projected 50% reduction in vehicle movements at the peak periods, which aligns with the requirements of the TfNSW and its consultants.

At no stage through the extensive planning process have the proponent or any of the extensive consultant team identified a requirement for a pedestrian bridge to facilitate a modal shift from a vehicle to Granville Station. TfNSW's traffic consultant has not mentioned a bridge or its requirement in their report that was submitted to the Panel. No expert can connect the relationship between the bridge and a reduction in residential yield. TfNSW have never provided any justification or economic evidence to the proponent or DPIE to support this infrastructure or correlation between the bridge and modal shift from vehicles to public transport. For this reason, we strongly submit there is no justification, nor public benefit to TfNSW's request for a pedestrian bridge.

## **SUMMARY**

We trust this advice can assist in the finalisation of the assessment report and welcome the progression of the Proposal to the December Panel meeting. If there are any other matters that require clarification or additional information required, please contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Tim Blythe".

Tim Blythe

Director

Cc: Huw Williams, ACE; [Huw.Williams@acequity.com.au](mailto:Huw.Williams@acequity.com.au)

Naomi Daley, Urbis; [ndaley@urbis.com.au](mailto:ndaley@urbis.com.au)





**Attachment A:** TfNSW correspondence, dated 14 October 2019



Matthew O'Donnell – Director: Mod Urban  
Shop 1, 118 Macpherson St. Bronte NSW 2024  
PO Box R1702  
Royal Exchange  
NSW 1225

RE: Gateway Determination – PP\_2019\_CUMB\_002\_00

**Gateway Determination – Consultation  
Planning Proposal (Prior to Public Exhibition) - 1 Crescent Street, Holroyd**

Please accept this letter as a joint response from Transport for NSW (TfNSW) and Roads and Maritime Services (Roads and Maritime) regarding the subject Planning Proposal.

TfNSW and Roads and Maritime appreciate the opportunity to provide comment on the planning proposal at this stage, noting we still have concerns with the scale of the proposal and its potential traffic impacts for the site and area, including its accessibility to public transport.

The Transport Impact Assessment (TIA), dated 1 May 2019 should be revised to include an assessment on the implications of the proposal on all modes of transport on existing and committed future infrastructure and services in the area. There is no consideration of the public transport and active transport demands and associated service and infrastructure requirements. Given that the site is not in close proximity to mass public transport, the report needs to review the underlying assumptions regarding trip generation for all modes of transport and undertake the multimodal assessment.

Roads and Maritime advised (the then) Holroyd City Council on 8 February 2016 that key intersections, such as Parramatta Road/Woodville Road and Crescent Street/Woodville Road, are likely to require significant infrastructure improvements to provide additional capacity to accommodate the level of traffic generated by the proposed development. The intersection of Parramatta Road, Woodville Road and Church Street, in particular plays a critical role in the Sydney Regional road network.

In addition, maintaining the operational performance of the M4 interchange is crucial. We need to better understand the impact of the traffic generated by the Planning Proposal including any proposed intersection treatment or road network change in the vicinity of the M4 Motorway - as queues onto the M4 would result in major road safety and network efficiency issues.

Whilst Roads and Maritime has planned upgrades in the area (as detailed further below), these aim to address *current* congestion. The upgrades do not include future traffic generated by the proposal as incorrectly stated in the Transport Impact Assessment (TTPP).

The location of the site and its walking distance from Granville and Harris Park railway stations is not considered to be conducive for transit oriented development for future residents, given that the walking distance to each station is shown to be 1.2km in the Urban Design Report (Architectus). Further, the walking routes appear to have a number of constraints, which would hinder pedestrian connectivity (further increasing walking times), including safe pedestrian crossings on Woodville Rd, lower traffic speeds, and safe, separated cycling paths.



Pedestrians accessing the 907 Northbound or the M91 would need to cross Woodville Rd at Parramatta Rd pedestrian crossing which makes it questionable whether pedestrians would use these services.

There are also concerns that the planning proposal may set a precedent in this area for similar high density mixed zonings on sites adjacent to the subject site, which may result in further cumulative transport impacts.

The planning proposal has not addressed a number of strategic planning directions and objectives including:

- Section 9.1 Ministerial Direction for “Integrating Land Use and Transport”
- Premier’s priorities - The NSW Premier’s priorities include a key priority of well-connected communities with quality local environments with a target of increasing the proportion of homes in urban areas within 10 minutes’ walk of quality green, open and public space by 10 per cent by 2023. This includes increasing walkability to parks, green spaces, plazas, libraries, landscapes, museums and public transport.
- Parramatta Road Corridor Urban Transformation Strategy (PRCUTS), noting that the site is located within the Granville Precinct. PRCUTS has been given statutory weight through a Section 9.1 Direction which requires planning proposals to be consistent with the objectives of the Strategy and implementation documents to the satisfaction of the relevant planning authority. The proposal may set a precedent in terms of densities and land uses for the Precinct.

Should the planning proposal be progressed in its current form, TfNSW and Roads and Maritime requests the matters detailed in **Attachment A** be addressed prior to public exhibition.

Thank you again for the opportunity of providing advice for the above Planning Proposal. If you require clarification of any issue raised, please don't hesitate to contact Robert Rutledge on 8822 0974. For future correspondences, please email [development@transport.nsw.gov.au](mailto:development@transport.nsw.gov.au).

Yours sincerely



14/10/2019

**Mark Ozinga**

Principal Manager, Land Use Planning & Development  
Customer Strategy and Technology

CD19/07044



## **Attachment A:**

### **Traffic and Transport Study Requirements**

#### **Comment**

At a preliminary Gateway meeting with the proponent (June 2019) arranged by Department of Planning, Industry and Environment (DPIE), Roads and Maritime advised that the 2015 survey counts used in the SIDRA modelling were considered to be outdated. It was recommended that the traffic modelling be revised to utilise the mesoscopic base model prepared by GTA for the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) for the Granville area. This will enable all stakeholders to have a better understanding of the traffic impacts on the adjacent arterial road network and any required road infrastructure to accommodate the traffic generated by the proposed development, and the identification of a developer funding mechanism.

It should be noted that Roads and Maritime has since provided the PRCUTS base model to the proponent as agreed with DPIE. It is advised that the mesoscopic base model should be the latest version as calibrated and validated for PRCUTS under the Granville Precinct.

As stated earlier, the TIA does not provide a multimodal assessment of the combined impacts the planning proposal will have on the surrounding transport network. There is no consideration of the public transport and active transport demands and associated service and infrastructure requirements. Given that the site is not in close proximity to mass public transport, the report needs to review the underlying assumptions regarding trip generation for all modes of transport and undertake the multimodal assessment.

#### **Recommendation**

It is recommended the TIA should be revised and present a multimodal analysis supported by the above traffic modelling and should also identify measures to mitigate the impact of the planning proposal on all modes of transport.

The intersection of Parramatta Road/Church Street/M4 Motorway On-Ramp should include measures to mitigate the current and future impacts of the development on movement, place and safety performance of key road users including pedestrians, buses and general traffic. The report should also consider and identify any developer funding mechanism that may be required to deliver the identified improvement measures.

Accordingly, the Out of Sequence Checklist for the planning proposal should also be updated and adequately address the Section 9.1 Directions for the Parramatta Road Corridor Urban Transformation Strategy.

### **Proposed Pedestrian Bridge**

#### **Comment**

TfNSW and Roads and Maritime has undertaken a preliminary review of the proposed pedestrian bridge over Woodville Road, and it is not supported at this location for the following reasons:

- The subject land required for the placement of the pedestrian bridge on the eastern side of Woodville Road is in private ownership and not a party to the planning proposal; therefore there is no guarantee that the land required for the bridge can be secured.
- There are a number of constraints beyond the site, which would hinder pedestrian connectivity to Granville Station; including the railway bridge and railway corridor and the significant difference in grade between Woodville Road and Railway Parade, which is not



accessible by pedestrians. Therefore the bridge would not necessarily serve the key pedestrian desire line nor provide convenient and DDA compliant access.

### Recommendation

It is recommended that an alternative pedestrian link(s) be investigated to the other nearby railway stations.

### Public Transport

#### Comment

Safe pedestrian connectivity to 907 and M91 bus route would need to be considered and mode share of the planning proposal to buses should be based on the walking distance to the bus stops, frequency of service and capacity.

### Recommendation

Improvements to active transport infrastructure to Parramatta CBD and Granville and Harris Park stations should be investigated to encourage a mode shift. Any proposed mode shift should be appropriately justified and evidence based.

### Road Upgrades

#### Comment

The “Parramatta Congestion Improvement Program” aims to reduce current congestion in Parramatta and surrounding areas by upgrading key intersections. As previously advised, the proposed upgrades under the program are designed to address *current* existing congestion in the Parramatta area and does not factor in traffic proposed to be generated from the subject Planning Proposal.

The approved works under the program include the following:

- Extending the left turn lane from the exit ramp onto Church Street for Parramatta bound traffic.
- Creating a third right turn lane from the exit ramp onto Church Street before Woodville Road and Parramatta Road bound traffic.

The above M4 exit ramp upgrade works are expected to be complete by December 2019.

Future upgrades of intersections proposed under the current program are in the detailed design phase and have not yet been approved for construction. These include the following:

- creating three through lanes for southbound vehicles along Woodville Road at the intersection of Church Street
- creating and two through lanes for northbound vehicles along Woodville Road at the intersection of Church Street
- adding a dedicated left turn lane from Woodville Road onto the M4 Motorway
- creating dual right turn lanes from Woodville Road onto Parramatta Road
- creating a dedicated right turn lane from Woodville Road onto Crescent Street
- maintaining the dual left turn lanes from Crescent Street onto Woodville Road
- converting the bus priority lane on Parramatta Road into a free traffic lane
- creating a shared through and right turn lane and one dedicated right turn lane from Parramatta Road onto Church Street
- creating three westbound through lanes along Parramatta Road onto the M4 Motorway
- maintaining the dual left turn lanes from Church Street onto Parramatta Road



- changing the southbound kerbside lane on Woodville Road from south of Junction Street to a left turn only onto Parramatta Road.

For further information on the program, refer to the Roads and Maritime webpage:

<https://www.rms.nsw.gov.au/projects/sydney-west/woodville-rd-parramatta-rd-church-st-intersection-granville/index.html>



Comment

## NETWORK AND LOCALISED IMPACTS

### Travel Times

- Travel time results show that the addition of development traffic has the biggest impact on westbound travel times along Parramatta Rd in the PM peak (peak direction). The travel time increases from 23:28 to 26:42 but it is important to note that this additional delay for westbound traffic is experienced at a number of intersections along the route rather than the Parramatta Rd/Woodville Rd/Church St intersection alone.
- In the morning peak, the increase to eastbound travel times along Parramatta Rd corridor (peak direction) caused by the development is only marginal (up to 10 seconds) for a trip total travel time of 27 minutes.

Travel Time (mm:ss)	AM		
	Base + Future Layout Upgrade	Base + Future Layout + Development	Base + Future Layout
Eastbound	27:09	27:20	27:30
Westbound	26:21	26:45	23:28

**ask**

Replace 2nd bullet point: "It should be noted that while the increase to eastbound travel times along Parramatta Rd corridor in the morning peak caused by the development is 10 seconds, this would delay would further increase, if unreleased vehicles entered the model study area."

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## NETWORK AND LOCALISED IMPACTS

### Intersection Performance – AM

Intersection	Base + Future Layout Upgrade		Base + Future Layout + Development	
	Delay	Throughput	Delay	Throughput
Woodville Rd / Crescent St	24.9 B	1187	26.7 B	1085

**ask**

Insert.....Although 2-3 seconds appears like a minor delay, the intersection throughput decreases (due to unreleased demand).