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8th May 2017

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Dear Paul

51 Henry Street, Penrith – Mixed Use Development

Parking and Traffic Consultants Pty Ltd (PTC) has been engaged by D.R. Design Pty Ltd to provide a response to the comments raised by Penrith City Council to the Pre-DA submission for the proposed mixed use development at 51 Henry Street, Penrith.

Following the Planning Proposal on 31st August 2016, the following comments were received from Council, in a letter dated 25th November 2016:

Traffic and Access

1. *The Traffic and Parking Assessment (TPA) report is proposing a direct vehicular access to/from North Street which is Arterial Road and requires concurrence from RMS. North Street is a key transport corridor for the regional City Centre and needs to meet transport growth demands for the next 30 years.*
2. *A future road widening proposal to 4 lanes to North Street will likely include a central median island and bridge supporting structure (pier). Therefore any direct vehicular access for this planning proposal is unlikely to be supported. Preliminary advice received from the NSW Roads and Maritime Services advises that access to North Street will not be permitted.*
3. *The future road widening proposal to 4 lanes to North Street will result in the westbound carriageway being at a significantly lower level of the existing pavement to accommodate clearances under the Evan Street overpass.*
4. *The location of the driveway in North Street does not meet minimum sight distance requirements to the east. The abutment of the overhead bridge over the railway line impedes sight distances and has not been considered in the traffic report.*
5. *The TPA is proposing two direct vehicular access to/from Henry Street. The eastern end access raises concern in its location in relation to Evan Street/Henry Street signalled intersection. The Western end is adjacent to a busy car park boom gated entry / exit. The TPA is to address the following:*
    - 5.1. *The traffic generation / management of the proposed development in the context of the existing road network*
    - 5.2. *The existing network capacity and operation of the Evan Street/Henry Street signalled intersection*
    - 5.3. *To confirm proposed access arrangements (location/type) to service this development*

5.4. To ensure that the impact of the development is appropriately managed and that safe and efficient access is provided for the development

6. *The traffic report noted two attachments – Attachment 1 - Drawings and Attachment 2 - Swept Paths however no information was provided for assessment.*

Revised Development

As part of the response to the Council comments, the proposed development has been reviewed revised to provide the following mixed use facilities:

- Retail Space - 1,500m^2
- Commercial Office Space – 5,000 m^2
- Residential Units - 137 x one bedroom units
  - 301 x two bedroom units
  - 109 x three bedroom units
  - 547 units in total.

Also, as part of the review of the development proposals, it is now proposed that the access for the development will be via one driveway off Henry Street.

The details of this driveway are discussed later in this response.

Planning Policy Requirements – Car Parking

The revised parking provision for the development has been established with reference to the requirements presented in Part C10 of the Penrith City Development Control Plan 2014 (DCP) and State Environmental Planning Policy No 65 (SEPP 65) – Design Quality of Residential Developments.

The commercial and Retail component of the development has been established with reference to Part C10 of the Penrith City Development Control Plan 2014, Section C10, Table C10.2. In accordance to the DCP, the relevant parking requirements are as follows:

- Commercial Space
  - 1 space per 100m^2 GFA (Penrith City Centre)
- Retail Space
  - 1 space per 30m2

In reference to SEPP 65, the car parking provision is based on proximity to public transport in Sydney Metropolitan area. For developments within 800m of a railway station or light rail stop the minimum car parking requirement is set out in the Guide to Traffic Generating Developments (RMS). The RMS guide outlines that for high density residential developments the minimum parking provision for Metropolitan Regional (CBD) Centres:

- 0.4 space per 1 bedroom unit
- 0.7 spaces per 2 bedroom unit
- 1.2 spaces per 3 bedroom unit
- 1 space per 7 units for visitors

The site is located within 800m of Penrith Railway station and it is therefore considered acceptable to adopted the SEPP65 requirement for minimum parking provision (refer to RMS Guide to Traffic Generating Developments).

Planning Policy Requirements – Bicycle Parking

The bicycle parking provision for the development has been established with reference to the requirements presented in Part C10 of the Penrith City Development Control Plan 2014.

In accordance with Table C10.2, bicycle parking should be provided in accordance with the suggested bicycle parking provision rates for different land use types in the document 'Planning Guidelines for Walking and Cycling' (NSW Government 2004).

With reference to 'Planning Guidelines for Walking and Cycling', the relevant bicycle parking requirements are as follows:

- Commercial and Retail Staff - 3-5% of staff
- Residential Units - 20-30% of units
- Residential Visitors - 5-10% of units

Development Car Parking - Provisions

Based on the requirements of the DCP and SEPP65, the car parking provision for the revised development is as follows:

	Use Type	Units / GFA / Staff		DCP Rate	Minimum Spaces
Commercial	Commercial space	5,000 m^2	@	1 space per 100m^2	50
				Total Commercial Parking spaces:	**50**
Retail	Retail space	1,500 m^2	@	1 space per 30m^2	50
				Total Retail Parking spaces:	**50**
Residential	1 bedroom unit	137 units	@	0.4 space per unit	54.8
	2 bedroom unit	301 units	@	0.7 space per unit	210.7
	3 bedroom unit	109 units	@	1.2 space per unit	130.8
	Visitors	547 units	@	1 space per 7 units	78.1
				Total Residential Parking spaces:	**(474.4) 475**
				Total Parking spaces:	**575**

Development Bicycle Parking Provisions

Applying the DCP rates to the revised development leads to the bicycle parking provisions outlined below:

	Use Type	Units / GFA / Staff		DCP Rate	Minimum Spaces
Commercial	Commercial Staff	200 staff*	@	3-5% of staff	10
				Total Commercial Bicycle Parking spaces:	**10**
Retail	Retail Staff	18 staff**	@	3-5% of staff	.9
	Retail Visitors	18 staff**	@	5-10% of staff	1.8
				Total Retaill Bicycle Parking spaces:	**(2.7) 3**
Residential	Residents	547 units	@	20-30% of units	109.4
	Visitors	547 units	@	5-10% units	54.7
				Total Residential Bicycle Parking spaces:	**(164.1) 164**
				Total Bicycle Parking spaces:	**157**

* Estimated commercial staff numbers of 200 based on 25m^2 per member of staff

**Estimated retail staff numbers based on 2 staff per retail unit

Service Vehicle Requirements

With reference the DCP and the RMS Guide to Generating Traffic (the guide), the following Service Vehicle provisions are required:

- Residential Units – 1 service vehicle space per 40 units (the DCP)
- Commercial Space - <200,00m^2, 1 space per 4,000m^2 GFA (the guide)
- Retail Space – <2,000m^2, 1 space per 400m^2 GFA (the guide)

Based on these requirements, 12 service vehicle spaces will be provided as part of the residential development, two service vehicle spaces provided for the commercial portion and four spaces for the retail portion.

In accordance with table C10.3 of the DCP, the minimum design vehicle for commercial developments up to 1,500m^2 required a service design vehicle up to a Medium Rigid Vehicle (MRV) and developments greater than 4,000m^2 require and Articulated vehicle. Given that the commercial portion of the development is to be office, it has been deemed that the provision of articulated service vehicles would be not warranted; given the type of deliveries etc. that would be expected.

In accordance with Section C5 of the DCP, refuse collection will be undertaken by a Heavy Rigid Vehicle (HRV), therefore one of the residential service bays will be provided to accommodate an HRV.

Therefore the service vehicle areas would be provided to accommodate a maximum vehicle size of an HRV.

Development Traffic Generation

The revised development comprises a mixed used development incorporating 454 residential units, 1,500m^2 of retail space and 5,000m^2 of commercial office space.

In order to estimate traffic volumes likely to be generated by the subject site, reference was made to the following trip guides:

- Residential Component;
  - 'High density residential flat buildings' – RMS Technical Direction, TDT 2013/04
- Commercial and Retail Component
  - 'Office & Commercial Space' – RMS Guide to Traffic Generating Developments (2002)

Residential Traffic Generation

The TDT 2013/14 is based on recent surveys conducted for high-density residential flat buildings across the Greater Sydney Region. It is currently considered to be the most relevant guide to estimating traffic generations for residential flat buildings containing (20) or more dwellings. This guide suggests the following rates:

- AM Peak Hour Rate: 0.19 trips / unit;
- PM Peak Hour Rate: 0.15 trips /unit.

The proposal accommodates a total of 547 units and leads to an estimated **AM peak hour rate of 104 trips** and a **PM peak hour rate of 82 trips**. These rates are based on developments with reasonable access to public transport. Since it has been established previously that the site has excellent access to public transport, the above rates are considered appropriate.

Commercial and Retail Traffic Generation

The RMS Guide provides the following rates for commercial sites:

- PM Peak Hour Trip Rate: 2 trips / 100m^2 GFA;

No rate is presented for the morning peak, however there is no evidence to suggest it would be higher or lower than the evening peak.

The commercial and retail space has a proposed gross floor area of 6,500m^2. Applying this area to the above rates leads to an estimated **peak hour rate of 130 trips**.

Combined Traffic Generation

Based on the above figures the revised development is estimated to generate the following traffic volumes:

Period	Residential Trip Generation	Commercial / Retail Trip Generation	Combined Trip Generation
AM Peak Hour Trips	104	130	234
PM Peak Hour Trips	82	130	212

As discussed in the TPA, the traffic activity throughout the Penrith CBD will change a s a result of the proposed 'Key Sites' developments and as such, any traffic modelling undertaken at this stage, on the current traffic in the vicinity of the site, would not reflect the likely traffic activity upon the completion of the

proposed development.
It is therefore proposed to undertake the traffic modelling for this development at the DA stage of the process, when it is expected the 'Key Sites' traffic model would be available.

Car Park Assessment

According to AS2890.1, Table 1.1 the classification of the off street parking will be as follows:

- Residential Parking - User Class 1A (residential, domestic and employee parking)
- Commercial and Retail Parking - User Class 1A (residential, domestic and employee parking)

At this stage of the development process the details of the car park layout design is not available.

The parking will be provided in accordance with AS2890.1 and AS2890.6 and the detailed layout will be provided at the DA stage of the design process.

Bicycle parking and End of Trip Facilities will be designed in accordance with AS2890.2 and the 'Planning Guidelines for Walking and Cycling' and these layout designs will be provided at DA stage.

The service vehicle spaces will be designed in accordance with AS2890.2. and the maximum vehicle size will be an HRV. The spaces and access will be designed to accommodate the design vehicle (maximum HRV) and in accordance with the requirements of AS2890.2.

Access Assessment

Given the proposed parking provision of 575 spaces, in accordance with AS2890.1, Table 3.1, the Access Facility Category will be Category 3.

Subsequently in accordance with Table 3.2 of the standard, the driveway entry with will be 6.0m, the exit width will be 4.0m to 6.0m and the driveway will include a separation of 1.0m to 3.0m in width.

The driveway will be located on the Henry Street frontage of the development, taking into consideration the proximity of the Henry Street/Evans Street signalised intersection to the east and the driveway access to the adjacent car park to the west.

The driveway location and design of the driveway will be provided at the DA stage of the design process and will be designed in accordance with AS2890.1.

The service vehicle area will be designed to accommodate six MRV's for servicing the commercial and retail portion, one HRV for refuse collection and 11 car derived vans/utes to service the residential portion and the access and any service docks designed in accordance with the relevant requirements of AS2890.2.

Details of the service areas and access will be provided at DA stage.

A management plan will be put in place to manage the service and this will also be provided at DA stage.

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Response to Council Comments

Taking into consideration the significant changes to the development as described in this letter, below is a summary of PTC's responses to the Council comments:

1. A revised single access driveway is proposed off Henry Street and therefore the development will not impact on the upgrade to North Street.

2. A revised single access driveway is proposed off Henry Street and therefore the development will not impact on the upgrade to North Street.

3. The urban design team will assess this as part of the overall development.

4. A revised single access driveway is proposed off Henry Street and therefore the development will not impact on the upgrade to North Street.

5. The single driveway access will be provided to cater for the residential, commercial, retail and service vehicle activity and will be designed in accordance with the requirements of AS2890.1. and AS2890.2
   The location of this access will take into consideration the adjacent intersections.
   The traffic modelling for the development will be undertaken at the DA stage, when it is expected that the 'Key Sites' development modelling will be available to provide a more accurate reflection of the traffic activity in Penrith CBD at the completion of this development.

6. Noted. Due to the significant changes to the development, the plans indicating the access layouts and vehicle swept paths will be provided at the DA stage.

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