

Mr Ben Gresham
Project Officer – Land Use Planning
City of Parramatta
PO Box 32
Parramatta NSW 2124

Dear Mr Gresham

**Planning Proposal for 266 Victoria Road and 26 Kissing Point Road, Rydalmere
RZ/23/2016**

Thank you for your email message dated 14 February 2017, requesting Transport for NSW (TfNSW) review and comment on the above. Please accept this letter as a TfNSW and Roads and Maritime Services (Roads and Maritime) joint response.

TfNSW appreciates for the opportunity to comment on the Planning Proposal. Based on our assessment, the traffic generated from the subject site is likely to impact on the regional road network and general transport operation. TfNSW advises that further investigation would be required post Gateway and prior to proceeding to public exhibition.

Should Council proceed with the planning process for the gateway determination, TfNSW requests a comprehensive transport assessment be undertaken by preparing a Transport Management and Access Plan (TMAP). This should be supported by appropriate regional level transport modelling in consultation with TfNSW and Road and Maritime to identify local and regional impacts on transport operation and propose mitigation measures for the identified impacts.

Key comments on the Planning Proposal are provided below and the detailed comments are included in **TAB A** for the consideration during the preparation of the TMAP.

- The adopted traffic generation rates are the average of the traffic generation rates from multiple high density residential developments located within the Sydney Metro / Regional Areas. TfNSW does not support the adopted rates as these rates have been derived from the results of the surveys undertaken at the sites where higher level of public transport service is provided compared to the subject development site. It is requested that the applicant adopt the traffic generation rates based on the traffic surveys undertaken at comparable sites with similar mode share characteristics;
- The traffic generated from the proposed development would have the potential to adversely impact on general traffic and bus operation along the corridor even with the proposed mitigation measures. It is requested that the applicant identify further mitigation measures, in consultation with TfNSW and Roads and Maritime, to reduce the impacts on the general traffic and bus operation. Detailed comments on the proposed improvements are included in **TAB B**;

- It is not clear in the Planning Proposal how active transport (walking and cycling) links would be provided from the development area to public transport and the light rail stop proposed at Rydalmere. With the introduction of light rail in the existing heavy rail corridor, this corridor will be more permeable, and pedestrian access to a Rydalmere stop located immediately south of Victoria Road will be accessible from the west. It is requested that the applicant investigate a new high quality active transport connection to the Rydalmere light rail stop.
- It is noted that some of the proposed improvements may not be feasible with the existing road arrangement and are not going to result in the intersection performance being the same as or better than the future baseline AM / PM (Average Delay). It is requested that the applicant demonstrate that all suggested upgrades are physically feasible; and
- There is a risk that some of the works might be cost prohibitive particularly if property acquisition, utility relocation or major works (e.g. bridge widening) is required. It is requested that concept plans and strategic costings (with appropriate contingencies) for all works identified (including access proposals) be provided. Note: The strategic costing information will need to be provided post Gateway.

TfNSW requests that the applicant consult with TfNSW and Roads and Maritime in relation to issues identified in this letter. TfNSW would be pleased to consider any further material forwarded from the applicant.

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 Mark Ozinga, Principal Manager Land Use Planning and Development on 8202 2198.

Yours sincerely



Tim Raimond
Acting Deputy Secretary
Freight, Strategy and Planning

Objective Reference CD17/02086

TAB A – Detailed Comments on the Planning Proposal

Estimation of Traffic Generation

Comment

The adopted traffic generation rates are 0.19 veh / dwelling (AM) and 0.15 veh / dwelling (PM) for the morning and afternoon peak periods respectively based on the Roads and Maritime Services Technical Direction TD13/04a. These rates are the averages of traffic generation rates from multiple high density residential developments located within the Sydney Metro / Regional Areas. TfNSW does not support the adopted rates as these rates have been derived from the results of the surveys undertaken at the sites where higher level of public transport service is provided compared to the subject development site.

Recommendation

TfNSW and Roads and Maritime request that:

- The applicant adopt the traffic generation rates based on the traffic surveys undertaken at comparable sites with similar mode share characteristics. TfNSW and Roads and Maritime are happy to work with the applicant to identify a more suitable rate to be used. This will require the applicant to subsequently update and revise their traffic modelling;
- The traffic generation rates be verified considering the high vehicle driver mode share for the area (68% residents and 85% employees – Page 29 of the Traffic Impact Assessment (Traffic Report)). The 'trip containment' and application of 'pass-by trips' also be verified. The land use and traffic generation assumption be agreed with Roads and Maritime and Transport for NSW prior to proceeding with additional assessment; and
- The traffic generation assessment and subsequent traffic modelling be revised based on land use scenario that would generate the highest amount of road transport at full take up (i.e. retail).

Public Transport and Active Transport Trips

Comment

The Traffic Report prepared to support the Planning Proposal does not provide information in relation to the mode share of trips generated by the proposed development and users in particular for bus users, pedestrians and cyclists.

Recommendation

TfNSW requests that the applicant provide the following information:

- Future public transport demand generated by the proposed redevelopment;
- Future pedestrians and cyclists demand generated by the proposed redevelopment; and
- Adequacy of the existing and future public transport services and public transport and active transport infrastructures to cater for additional trips generated by the proposed development.

Road Network Operation

Comment

Based on Table 16 of the Traffic Report, the performance of the intersections located on key arterial roads such as Victoria Road and Kissing Point Road are expected to deteriorate with proposed development in particular during the morning peak periods even with the proposed upgrades. This would have the potential to impact on general traffic and bus operations on wider road network area.

Recommendation

TfNSW requests that:

- The applicant identify appropriate mitigation measures, in consultation with TfNSW and Roads and Maritime, to reduce the impacts on general traffic and bus operation; and
- Electronic copies of the modelling files be provided for the Roads and Maritime review after incorporating comments provided in this letter.

Pedestrian Links with the Proposed Parramatta Light Rail

Comment

Section 5.2 of the Planning Proposal states that the Planning Proposal also proposes improved pedestrian accessibility to Rydalmere train station. This will promote the increased use of the existing rail (or future Light Rail) network and will promote the use of public transport by future residents. However, it is not clear in the Planning Proposal how active transport (walking and cycling) links would be provided from the development area to public transport and the light rail stop proposed at Rydalmere.

With the introduction of light rail in the existing heavy rail corridor, this corridor will be more permeable, and pedestrian access to a Rydalmere stop located immediately south of Victoria Road will be accessible from the west.

Recommendation

TfNSW requests that the applicant:

- Investigate a new high quality active transport connection along and adjacent to the northern side of Victoria Rd from Bridge St to the Victoria Road rail bridge, to connect with a new proposed pedestrian path under the bridge and to the Rydalmere light rail stop; and
- Undertake the investigation in consultation with TfNSW to assess the feasibility of the connection in relation to land acquisition as part of any new pedestrian connections.

Bus Services along Victoria Road

Comment

The proposed development involves major urban renewal with significant increase in number traffic movements accessing Victoria Road). It is likely that a development of this nature will put additional pressure on Victoria Road and key intersections in the area. This would have the potential to adversely impact on traffic and bus operation along the corridor even with the proposed mitigation measures.

Recommendation

TfNSW requests that the applicant identify impacts on the bus operation as a result of the proposed development and suggests the recommended further mitigation measures to minimise the identified impacts.

Comment

TfNSW is currently investigating a number of scenarios to provide rapid transit along the Victoria Road Corridor between Sydney and Parramatta CBD via Ryde. These investigations are underway and involve detailed planning and analysis in the vicinity of the proposed development. Potential outcomes of this rapid transit investigation include road widening and intersection works to improve public transport operations along the Victoria Road Corridor.

Recommendation

TfNSW requests that the applicant consult with TfNSW during each stage of the planning of the development.

Comment

The proposed access arrangements to the site would have the potential to encourage 'rat running' of traffic through the site from Kissing Point Road to Victoria Road. This arrangement would have the potential to increase traffic movements via Bridge Street and to impact on the operation of Transit Stop Number (TSN) 211621 which is located on the slip lane from Bridge Street to Victoria Road. TfNSW advises that the removal of this bus stop is not supported.

Recommendation

TfNSW advises that the applicant should review the Victoria Road/Bridge Road intersection arrangements during the preparation of the TMAP in consultation with Roads and Maritime and TfNSW.

Active Transport Provision

Comment

The site is in a unique position to provide residential accommodation to the Rydalmere Education Precinct but also the commercial/industrial areas of the site to the east. Therefore, the provision of active transport links from the site to connect with these other land uses, is pivotal as it supports active travel whilst reducing private vehicle trip generation on the surrounding arterial roads. However, the development has not proposed adequate active transport links and facilities in particular:

- No information is provided for the provision of bicycle parking facilities to be provided throughout the proposal; and
- Section 1.4 of the Traffic Report suggests that consideration is required whether consolidation of the existing raised kerb footpaths provided is desirable to achieve a compliant footpath (or shared path) width using this existing bridge.

Recommendation

TfNSW requests that the applicant:

- Provide bicycle parking in accordance with the relevant Council DCP and Australian Standards Bicycling Parking Facilities AS2890.3;
- Provide a shared pathway between the site and the campus in the future designs of the bridge. This will limit the number of vehicles traveling between the sites, moreover would enable greater cycle link between the site and other cycleways in the Parramatta region including a connection to the Parramatta foreshore cycle path;
- Ensure that the pedestrian links between the site and bus infrastructure are maximised and adhere to Crime Prevention Through Environmental Design (CPTED) principles;
- Ensure bike parking and end of trip facilities are provided according to best practice and locations illustrated within the assessment (as per Parramatta DCP 2011 standards); and
- Develop green travel plans and wayfinding strategies to assist with making the pedestrian and cycling convenient and efficient.

Development Control Plan

Comment

It is not clear from the Planning Proposal whether a site-specific DCP will be prepared for the site.

Recommendation

TfNSW and Roads and Maritime recommend that the revised planning proposal be supported by a site specific DCP which includes key matters such as: appropriate parking rates, vehicle and active transport access to and through the site / precinct, etc.

Proposed Improvements

Comment

Section 7.2 of the Traffic Report includes the layout of the intersections with the proposed improvements. It is noted that some of the proposed improvements may not be feasible with the existing road arrangement and are not going to result in the intersection performance being the same as or better than the future baseline AM / PM (Average Delay). Detailed comments on the proposed improvements are included in **TAB B**.

Recommendation

TfNSW requests that the applicant demonstrate that all suggested upgrades are physically feasible.

Costing of Infrastructure

Comment

There is a risk that some of the works might be cost prohibitive particularly if property acquisition, utility relocation or major works (e.g. bridge widening) is required.

Recommendation

Roads and Maritime requests that concept plans and strategic costings (with appropriate contingencies) for all works identified (including access proposals) be provided. The concept plans and costings would need Roads and Maritime endorsement. Note: The strategic costing information will need to be provided post Gateway.

Funding Mechanism

Comment

It is likely that the demand from the proposal will require upgrades on the State Road network. These would be quantified as part of the regional transport assessment. A source of funding infrastructure required is unclear at this stage.

Recommendation

TfNSW requests that Council note that a funding mechanism may be required to be included in the Planning Proposal.

TAB B – Detailed Comments on the Proposed Improvements

Victoria Road / Railway Street / Bridge Street Intersection

Comment

It is noted that the Bridge Street left turn out access is to be signalised. Roads and Maritime understands that the reasoning behind the signalisation of this movement is associated with the applicant's suggested relocation of the pedestrian crossing to the eastern side of the intersection and the need to provide pedestrian protection.

Recommendation

Roads and Maritime advises that:

- The current arrangement in relation to the pedestrian crossing location is preferred;
- For the SIDRA layout (Figure 25 of the Traffic Report), the pedestrian crossing be retained on the western side of the intersection (and not relocate it to the eastern side); and
- Consider creating a dual left turn signalised slip from Railway Street onto Victoria Road and provide a Traffic Island to remove the current conflict with pedestrians.

Comment

It is noted that:

- Victoria Road is proposed to be widened to accommodate the second right turn lane. However, no further information indicating which side of Victoria Road to be widened is provided. The proposed widening will have major implications on the approach and departure to the bridge and Victoria Road flyover which are currently fixed;
- The proposed upgrades for some of the intersections are not going to result in the intersection performance being the same as or better than the future baseline AM / PM (Average Delay); and
- The proposed improvements at this intersection shown in Figure 2 the Site Access Arrangement (Figure 1 of the Traffic Report) is reliant upon agreement from the Western Sydney University - Parramatta Campus.

Recommendation

Roads and Maritime request that the applicant:

- Provide further information indicating which side of the road they are proposing to widen in order to provide the second right turn lane on Victoria Road;
- Investigate further improvements for this intersection (subject to feasibility) which may include dual right turn lanes from Railway Street onto Victoria Road eastbound; and
- Update the Traffic Report with clear evidence from the Western Sydney University that they are supportive "in-principle" of these changes / access arrangements. Should "in-principle" agreement not be obtained from the Western Sydney University to these changes / access arrangements, then the report clearly needs to be updated to indicate, investigate and analyse safe and feasible alternative access arrangements which do not detrimentally impact the network efficiency of Kissing Point Road, James Ruse Drive, and Victoria Road.

Kissing Point Road / Bettington Road / New Access Intersection

Comment

The proposed upgrades for some of the intersections are not going to result in the intersection performance being the same as or better than the future baseline AM / PM (Average Delay).

Recommendation

Roads and Maritime request that the applicant investigate further improvements at this intersection to ensure that the intersection performance is the same as or better than the future baseline AM / PM (Average Delay). Some suggested ideas could include the following:

- Bettington Road approach – A dual right turn from this approach and a through and left turn lane with a slip lane. However, this would require land from the park;
- Kissing Point Road (western approach) – A dedicated left turn lane from Kissing Point Road into Bettington, as due to the proximity to the off ramp, through vehicles are constantly held up by left turning vehicles and it's a safety risk for rear end crashes. (Subject to feasibility);
- New Access – Dual right turn lanes and a through and high entry angle left turn slip lane (Likely to be most feasible); and
- Kissing Point Road (eastern approach) – A dedicated left turn lane into New Access Road is proposed to remove the vehicle conflicts and to minimise the rear end crash risk and congestion at the intersection, as the kerbside lane on this approach is heavily utilised by traffic getting onto James Ruse Drive. Should preferably have a high entry angle slip on it as well, to remove conflict with pedestrians.

Kissing Point Road / James Ruse Drive Access Ramps Intersections

Comment

The following comments are provided in relation to the proposed Kissing Point Road / James Ruse Drive Access Ramps arrangements:

- Roads and Maritime support the need to create the dual right turn movement on the eastern approach of Kissing Point Road. No information is provided to demonstrate how this will be physically feasible with retaining the two through lanes in each direction; and
- The proposed second lane on the northbound on ramp needs to be as long as possible and designed to comply with relevant Austroads requirements.

Recommendation

Roads and Maritime requests that the applicant demonstrate that:

- Dual right lanes on the eastern approach of Kissing Point Road could be provided without widening the bridge whilst retaining the two through lanes in each direction; and
- The proposed second lane on the northbound on ramp needs is designed to comply with relevant Austroads requirements and is physically feasible.

Access Points along Victoria Road and Kissing Point Road

Comment

The following comments are provided in relation to the proposed Kissing Point Road / James Ruse Drive Access Ramps arrangements:

- James Ruse Drive is being investigated to operate with a higher movement function to cope with the expected growth within Parramatta and the surrounding area. This may extend the existing 90km/h speed zone along James Ruse Drive currently north of Kissing Point Road further to the south including the section adjacent to the site;
- Potential vehicle merging / weaving which will occur along James Ruse Drive in the vicinity of the access; and
- The access options along Kissing Point Road and Victoria Road are constrained due to close proximity to James Ruse Drive on-load and off-load ramps.

Recommendation

Roads and Maritime Requests that applicant:

- Design any direct access from the site onto James Ruse Drive based on a 90km/h speed limit with appropriate deceleration lane, acceleration lane and weave area;
- Review / analyse vehicle merging / weaving which will occur along James Ruse Drive in the vicinity of the access. This will need to be looked at via manual calculations from the latest version of the Highway Capacity Manual with the details of these calculations provided within the report; and
- Undertake additional assessments (including modelling possibly microsimulation – Post Gateway) to adequately assess the impacts (i.e. weaving / merging). Further measures or alternate access arrangements may be required to ensure the movement and road safety functions of Kissing Point Road and Victoria Road are maintained / addressed.

Deferred Improvements Assessment

Comment

Section 1.3.3 of the Traffic Report indicates that improvement options for various intersections are noted to be deferred as ongoing operational considerations for TfNSW, Roads and Maritime and Council as they may be affected by other developments or projects. The intersections listed are:

- James Ruse Drive/Hassall Street/Grand Avenue;
- James Ruse Drive/Victoria Road; and
- Victoria Road/Clyde Street.

In addition, the Traffic Report claims that the subject proposal is only contributing 5% to peak hourly traffic at James Ruse Drive / Hassall Street / Grand Avenue, 8% to James Ruse Drive / Victoria Road and 5% at Victoria Road / Clyde Street which is consistent with typical daily fluctuations. Based on the information provided within Table 16 of the Traffic Report, it is noted that the average delays at these intersections are expected to increase substantially with the proposed developments during commuter peak periods.

Roads and Maritime do not support the reasons that are provided to not to address intersection performance issues at these locations. Furthermore, the upgrade of these intersections cannot be guaranteed as they do not have Government funding commitment.

Recommendation

Roads and Maritime requests that:

- The impact of the development on the operation of these intersections be assessed / addressed with feasible ameliorative measures identified; and
- If it is identified that the intersection would significantly worsen beyond the future baseline and the level of feasible improvement works required cannot be justified on the proposed development, then the report may need to be updated to give consideration to a development staging plan which identifies the maximum development yield that can be accommodated with and without the various improvement works.

Streetscape Adjacent to State Roads

Comment

The proposed development has frontages to major State Roads such as James Ruse Drive, Kissing Point Road and Victoria Road.

Recommendation

Roads and Maritime advises that the Traffic Report informs any Urban Design Study to ensure the urban form and streetscape adjacent to the State Roads (i.e. James Ruse Drive, Kissing Point Road and Victoria Road) would be suitable and does not compromise the movement and road functions of these roads.