



7 August 2014

Our Reference: SYD14/00640 (A7058099)
Council Ref: Planning Proposal to Amend Canterbury LEP 2012

The General Manager
Canterbury City Council
PO Box 77
CAMPSIE NSW 2194

Attention: Allan Shooter

Dear Sir/Madam

PLANNING PROPOSAL TO AMEND CANTERBURY LEP 2012 – AGENCY CONSULTATION

Reference is made to Council's email dated 11 June 2014, regarding the abovementioned Planning Proposal referred to Roads and Maritime Services (Roads and Maritime) for comment in accordance with section 56 of the *Environmental Planning and Assessment Act, 1979*.

Roads and Maritime has reviewed the submitted information and notes that the planning proposal for various properties within Belmore, Roselands, Punchbowl, Lakemba, Riverwood and Campsie would facilitate increased development yields and densities at the subject sites through various proposed amendments to zonings and controls within the LEP, consequently increasing traffic generation potential of the properties. It is noted that the impacts are likely to vary considerably from site to site.

The net potential increase in housing capacity from specific site rezonings through this planning proposal is approximately 770 dwellings. In addition, existing B6 zoned lands proposed to be zoned B5 will now permit significant traffic generating land uses such as bulky goods premises. Therefore, Roads and Maritime has concerns that the cumulative impacts of the further development on the classified road network have not been adequately considered, particularly for the sites fronting Canterbury Road. The cumulative impact of the planning proposal may trigger the need for, or bring forward a need for, intersection or road transport upgrade/improvement works.

The traffic implications of the proposed rezoning and suitability of the existing road network to cater for such increases in traffic generation should be considered. In this regard, the following comments are provided for Council's consideration:

Traffic Impact Assessment

1. Council should identify suitable road network upgrades/transport infrastructure improvements required to ameliorate any traffic and safety impacts associated with the proposed rezoning. This should include identification of pedestrian, cyclists and public transport infrastructure.
2. To assess the implications of the proposed rezoning, Roads and Maritime requires the traffic implications of the proposed rezoning to be considered. At a minimum, a detailed description of the likely traffic impacts of the increase in maximum developable yields of the sites would be required. If the rezoning is likely to generate a significant volume of traffic, a Traffic Impact Study would be required. As a guide Table 2.1 of the Roads and Maritime publication *Guide to Traffic Generating Developments* outlines the key issues that may be considered in preparing a Traffic

Impact Study. Traffic generation rates shall be based on the Guide and the Roads and Maritime Technical Direction TDT2013/04a. Traffic distributions must be identified and any assumptions clearly justified.

3. Depending on the scale of the traffic volumes, SIDRA modelling may be required to assess the suitability of any key intersections on the classified road network which may be significantly impacted by the rezoning of the subject properties. If SIDRA modelling is required, Roads and Maritime generally requires analysis to consider the performance of the intersections in the AM and PM peaks with and without the proposed rezoning, for the existing year traffic volumes and 10 year projected volumes (e.g. forecast year 2025), or other relevant development design horizons if development is likely to be staged over time. These requirements may vary depending on the scale of the additional traffic volumes and likely timing of development.
4. Electronic copies of all modelling undertaken to support the planning proposal should be provided to Roads and Maritime and Council for review.

Access Restriction – Classified Roads

5. As a principle, Council should be aware that the Roads and Maritime preferred strategy is to deny access to the classified road where alternative local road access is available. This principle is supported by clause 101(2a) of State Environmental Planning Policy (Infrastructure) 2007. When subdividing or development an allotment with frontage to a classified road that does not have frontage to another road, where practicable, a single shared access point to the classified road may be permitted with an appropriate junction treatment to serve the subdivided lots or development. Multiple additional access points to the classified road would not be supported.

Where this is not feasible, Roads and Maritime is likely to restrict access to left in/left out as traffic volumes increase and right turning movements begin to compromise road safety and traffic efficiency.

Roads and Maritime encourages Council to assist by ensuring that future development along classified roads is assessed and determined cognisant of the opportunity to consolidate existing lots and thereby reduce the number of access points to classified road or even eliminate access to classified roads.

Road Reservations

6. Council should ensure that all existing road and transport corridors, as well as road widening proposals, are not affected by the proposed amendments to the LEP and associated maps. Classified State Roads i.e. Canterbury Road (MR167) and Punchbowl Road (MR549) should retain the zoning of SP2 Infrastructure "Classified Road".

Developer Contribution for Road / Transport Improvements

7. Council should consider how the road network upgrades are funded. This is particularly important for proposed rezonings which facilitate a series of incremental developments which contribute to the need for the road network upgrades, but do not on their own warrant the upgrade. In this regard, Council should ensure that appropriate funding mechanisms are in place for developer funding or contributions for required road/transport infrastructure improvements that may be required as a result of the future development (i.e. Voluntary Planning Agreements or Section 94 plan where applicable).

This should include provisions for pedestrian and cycleway links to/from development sites and consider developer contributions for future intersection or road upgrades on classified roads which may be required as a result of the cumulative impact of development in the LGA.

Child Care Centres

8. During the exhibition of the Draft Canterbury Local Environment Plan 2012, Roads and Maritime requested that the LEP include a control to effectively prohibit Child Care Centres where such properties have a direct frontage to classified roads, based on road safety grounds. It is noted that a subclause to this effect was not included in the adopted LEP. It is noted that the Zone B5 *Business Development* permits, with consent, Child Care Centres. Roads and Maritime has concerns with road safety risks to child pedestrians for Child Care developments fronting classified roads, as classified roads typically carry high traffic volumes with high travel speeds. For safety reasons, Roads and Maritime does not support new Child Care developments being permitted with direct frontage to classified roads. Given this, Roads and Maritime does not support Child Care centres being permitted in Zone B5 (Business Development).

Promoting increased use of sustainable modes of travel

9. Roads and Maritime strongly supports development which will reduce car dependency and encourage the use of active/sustainable modes of travel including buses, cycling and walking. The design of future developments and subdivisions should encourage the use of alternative modes of transport with an aim to link developments to any existing paths, public transport nodes and centres.

Any development within the Canterbury Local Government Area should minimise vehicle-kilometres travelled by private vehicles by providing high density and mixed development around public transport infrastructure.

Site Specific Comments

10. Roads and Maritime has reviewed the site specific information and would raise no objection to the planning proposal for Site **C** (56 Graham Road, Narwee), Site **H** (2-16 Sixth Avenue, Campsie), Site **J** (998 Punchbowl Road, Punchbowl, also known as 1499 Canterbury Road), Site **K** (Part of 2-12 Harp Street - involving Lot 7 DP 20173, Lot 3 DP 8240, Lot 1 DP 124196, and Lots A and B DP 379354, and 1-9 Alfred Street, Campsie), Site **L** (131-133 Victoria Road, Punchbowl), Site **M** (5-9 Croydon Street and 56-57 Railway Parade, Lakemba), Site **N** (26-30 Campsie Street and 1 Assets Street, Campsie), and Site **O** (134-140 Brighton Avenue, Campsie). Roads and Maritime considers the proposed rezoning and changes to development controls for these sites is unlikely to have a significant impact on the classified road network.
11. Roads and Maritime cannot make an informed comment on the remaining sites. Roads and Maritime provides the following site specific comments (and assessment requirements) for Council's consideration:

A.1: Block bounded by Canterbury Road, Stanley Street, Perry Street, Una Street and 403-411 Canterbury Road Campsie (B6 to B5).

Roads and Maritime Services will support the proposed rezoning of Site A.1 subject to the traffic impacts being fully considered. In this regard, the increase in maximum developable yield should be quantified and the resultant potential traffic impacts assessed. If the potential traffic impact are likely to be significant, Roads and Maritime may require the traffic impacts at key intersections with (and access points on) Canterbury Road adjacent to the site to be considered and modelled using SIDRA.

Roads and Maritime would not support additional access points to Canterbury Road for future development/subdivisions where alternative local road access is available and therefore access should be provided or maintained to the adjoining local roads where practicable.

A.2 Part of 677-687 Canterbury Road and 48 Drummond Street, Belmore 642-658 Canterbury Road, and 2, 2B and part 2C-2D Liberty Street Belmore (B6 to B5).

Comments and requirements as with site A.1.

A.3 1112-1186 Canterbury Road, Roselands (B6 to B5).

Roads and Maritime would not permit direct vehicular access to Canterbury Road for future developments/subdivisions where alternative local road access is available. Therefore, all access would need to be obtained via the adjoining local road network. Roads and Maritime will support the planning proposal subject to the traffic impacts being fully considered. This would need to consider traffic impacts and capacity issues on Dunlop Lane, and impacts on the junctions of Fairview Avenue, Ewen Street and Stephenson Street with Canterbury Road (if likely to be significant).

A.4 1375 Canterbury Road, Punchbowl (B6 to B5).

Comments and requirements as with site A.1. If the traffic impacts are likely to be significant, the potential impacts on the junction of Canterbury Road and Victoria Road should be assessed. Roads and Maritime would likely require access to be provided from Victoria Road for any future development/subdivision.

B. Land comprising Lot 91 DP 3682 (part of 677-681 Canterbury Road, Belmore) (R3 to B5).

It is noted that Site B overlaps/adjoins with Site A.2, therefore traffic impacts of Site B and A.2 should be assessed together. Requirements as with site A.1.

D. 60 and 67 Lucerne Street, 61 and 65 Yangoora Road, 53A Benaroon Road, and 92 Knox Street, Belmore

Roads and Maritime would have no objection to the planning proposal for the rezoning of site D, however recommends that Council considers the cumulative traffic impacts of the planning proposal as a whole and if significant, consider impacts on key intersections on the nearby classified road network.

E. 130 Croydon Street and 276-278 Haldon Street, Lakemba

Roads and Maritime will support the planning proposal subject to the potential traffic impacts of the increased developable yield being considered, and if significant, the impacts at the junctions of Croydon Street and Canterbury Road, and Haldon Street and Canterbury Road should be considered.

F. 548-568 Canterbury Road, Belmore

Roads and Maritime notes that the planning proposal to increase permissible building height of the subject site has the potential to generate a significant volume of additional traffic. Roads and Maritime will support the proposed rezoning subject to the potential traffic impacts of the maximum developable yield of the site being considered and assessed. Traffic impacts on Canterbury Road and the junction of Elizabeth Street and Canterbury Road should be assessed. Roads and Maritime is likely to require access to be provided from the adjoining local road network for any future development or subdivision of the subject site.

G. 844-854 Canterbury Road, Roselands (R4 to B5).

Roads and Maritime has considered the proposed rezoning of the subject site from R4 to B5. It is noted that this rezoning would result in the elimination of permissible floor space ratio controls and may result in a significant increase in the traffic generation from the site. It is also noted that a number of the lots affected are land-locked with access to Canterbury Road only at present. Roads and Maritime will support the proposed rezoning subject to the maximum likely traffic impacts of the site, impacts to the intersection of Ledge Street and Canterbury Road, and the traffic impacts at any future access junction with Canterbury Road being assessed.

I. Land bounded by Canterbury Road, Thompson Lane, Wilson Lane and Chapel Road, Belmore (R4 to B5).

Roads and Maritime will support the proposed rezoning of Site I subject to the potential traffic impacts being considered and assessed. If the impacts are significant, Roads and Maritime would require the impacts at the intersections of Chapel Street, Burwood Road and Thompson Lane with Canterbury Road to be considered. The Roads and Maritime preference is for access to be provided via Thompson Lane, subject to environmental capacity considerations. Consideration to the environmental capacity of Wilson Lane and access arrangements would need to be considered in the Traffic Assessment. The consolidation of allotments and direct vehicular access points to Canterbury Road for any future development of the subject site should be encouraged where practicable.

P. 28-42 Josephine Street, Riverwood

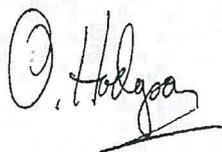
Roads and Maritime will support the proposed rezoning of Site P subject to the potential traffic impacts being considered and assessed. The potential traffic impacts at the junction of Belmore Road and Josephine Street should be considered, and if likely to be significant, the intersection should be modelled using SIDRA.

Roads and Maritime recognises that the subject planning proposal is relatively small in the context of the other major developments and planning proposals throughout Canterbury LGA and the wider Sydney Metropolitan area, however Roads and Maritime recommends that Council does not proceed with the planning proposal until any required road/transport infrastructure improvements are identified to ameliorate any safety or traffic impacts on the road network as a result of cumulative development of the subject lands and where necessary, ensure an appropriate funding mechanism for collecting contributions is in place. Roads and Maritime will commence its detailed assessment of the rezoning once the above issues are addressed.

Note: Please be advised that the Roads and Maritime Services Corridor Planning team is currently reviewing the planning proposal, specifically concerning the properties fronting Canterbury Road affected by the proposed amendments. Once this review is completed, Roads and Maritime will provide further advice to Council by means of an addendum letter detailing any further requirements.

If you have any questions in relation to this matter, please contact the nominated Land Use Planner, Rachel Nicholson on phone: 8849 2702 or email: Rachel.Nicholson@rms.nsw.gov.au.

Yours sincerely,



Owen Hodgson
Manager Land Use
Network and Safety Section