

REF: N202510

DATE: 21 January 2021

Keylan Consulting Pty Ltd  
Suite 2, Level 1  
1 Rialto Lane  
MANLY NSW 2095

**Attention: Mr. Padraig Scollard**

Dear Padraig,

### **RE: PICTON TOWN CENTRE – ADMINISTRATION BUILDING – REVIEW OF RESPONSES**

GTA Consultants (GTA) has completed a review of responses provided by SLR Consulting Australia (SLR) in their memorandum dated 15 December 2020, in relation to the Picton Town Centre Planning Proposal. The memorandum addresses comments from both GTA's Peer Review (dated 1 December 2020) of SLR's Traffic and Transport Report (dated May 2020) and those separately provided by Transport for NSW (TfNSW).

This letter provides our response to each comment, with a primary focus on assessing the issues relevant to determining the Planning Proposal. This relates to the site for the new administration building, although some comments have also been provided for the overall CCCP which will be subject to separate applications.

#### **GTA Peer Review**

##### **Item 2.3 – Vehicle Access**

*"There is a discrepancy in the access arrangements proposed between the SLR Report and the Planning Proposal report prepared by Elton Consulting. It is believed that the Planning Proposal report shows the intended configuration with accesses on Manolis Lane and Colden Street. These locations are supported."*

SLR has confirmed that the intended access arrangements are as outlined in the Planning Proposal report, which are supported in principle by GTA.

##### **Item 3.1.1 – Parking Rates**

*"Further consideration should be given to the alternate parking rates adopted for uses not listed in the DCP, if the Planning Proposal seeks to account for the entire CCCP under full development."*

For the land uses where no DCP rate is prescribed (gallery and community facilities), SLR has provided additional information in the memorandum to confirm that the adopted parking rates were derived from similar developments in Bowral and Thirroul (based on the quantum of parking provided).

As these land uses are not directly related to the Planning Proposal site, this approach is considered to be adequate.

SLR also agrees with GTA that a site specific parking rate can be established for the existing community uses as part of a future application directly in relation to the CCCP.

### Item 3.1.2 – Parking Requirements

*“There are two critical parking aspects directly relevant to the Planning Proposal:*

- Providing 148 parking spaces for the new administration building. This is achievable with the 78 parking spaces envisaged for the basement car park and with the remainder of spaces being provided at the Council Depot site at Margaret Street.*
- Accounting for the loss of 149 public parking spaces that are presently on-site. This can be reduced to an effective loss of 89 spaces, since the old administration building will be disused and the associated demand for 60 spaces can be discounted.”*

With respect to parking for the administration building, SLR has confirmed that the on-site basement car park will accommodate 78 parking spaces, while an additional parking provision of 81 spaces (which exceeds the balance of parking spaces required) will be provided at the Margaret Street depot. This is considered an acceptable outcome.

While SLR’s response does not address the effective loss of 89 public parking spaces that are presently on-site, the GTA Peer Review acknowledges that the future reconfiguration of parking areas within the Picton Town Centre can provide sufficient capacity to offset this loss.

### Item 3.1.3 – Parking Demands

*“The SLR Report has created parking accumulation profiles for existing and proposed conditions to establish spare capacity for public parking in the Picton Town Centre. While this methodology may be accepted for the Planning Proposal in the context of accounting for the lost on-site public parking, it may not be robust enough to confirm if demands for the entire CCCP can be accommodated. There are particular concerns regarding the timing of surveys underpinning these parking accumulation profiles which occurred in off-peak conditions.”*

With respect to the Planning Proposal, it is considered that the parking demands can be satisfied for the following reasons:

- The parking requirement for the administration building (148 spaces) will be accommodated within dedicated facilities, including 78 spaces within the on-site basement car park and 81 additional spaces at the Council depot (total of 159 spaces).
- The effective loss of 89 public parking spaces will be offset by the creation of additional public parking within the Picton Town Centre.

These provisions can be achieved irrespective of the outcomes of the parking surveys and accumulation profiles prepared by SLR. Notwithstanding, the undertaking of parking surveys and the parking accumulation profile is beneficial in confirming that there are no pre-existing issues with parking capacity within the Picton Town Centre. It can also inform future decision making for the Council, including for applications for the CCCP or any site specific DCP that may be drafted for the town centre.

Accordingly, the following comments (although not directly applicable to the Planning Proposal) are provided for consideration:

- SLR has undertaken an additional parking survey on Friday 11 December 2020 to account for conditions during a regular school term. A comparison between the new and earlier survey in January 2020 (during school holidays) shows very similar parking occupancy rates with the exception of the ‘central block’ zone at the end of the survey (4pm), in which 41 less vehicles were recorded in the December survey.
- Notwithstanding, there have been changes in travel behaviour experienced generally during the year 2020, associated with the Covid-19 Pandemic. At this stage there is no known

horizon when travel behaviour will return to pre-pandemic conditions and thus an additional survey is considered to be impractical.

- The methodology for creating a parking accumulation profile is considered to be a high-level approach. This process starts with the number of occupied parking spaces obtained from the parking surveys and thereafter adjusts according to the traffic movements recorded in the 2019 surveys. As the parking occupancies are not directly sourced from an all-day parking survey, authorities may request these surveys (and locations of counts) to verify the profile.
- GTA is not able to verify the parking accumulation profile for future (CCCP) conditions. The following information could clarify how the future demand was estimated:
  - nominating the percentage of parking demands as a function of peak demand at each time and for each land use
  - outlining the factor(s) used to expand the future demand over the existing demand profile.
- SLR acknowledges that a detailed parking survey could be undertaken with future applications for the CCCP to directly capture the parking occupancy at regular intervals. This is still a recommended approach for future planning stages to understand localised demands and to inform any strategies on implementing timed restrictions.

#### **Item 3.2.1 – Access Arrangements**

*“The access location appears to be situated directly opposite the entrance to the basement car park for Picton Mall. It is desirable to offset these driveways to minimise conflicts arising from through movements between these sites.*

*Clarification may be required as to whether the AIMSUN software model will need to be updated, noting potentially different movements at the intersection of Manolis Lane and Colden Street.”*

SLR has clarified in their response to Item 2.3 that the site access arrangements will be as per those outlined in the Planning Proposal report. These accesses are sufficiently offset from the Picton Mall access and are supportable.

It is accepted that the location of the accesses at the administration building will not have a material impact on the Aimsun software assessment.

#### **Item 3.2.2 – Parking Layout**

*“The concept layout of the basement car park for the new administration building shows limited detail regarding the accesses and circulation between levels. This is needed in order to confirm that the intended yield of 78 spaces is achievable”.*

SLR has responded that the basement parking provision of 78 parking spaces has been estimated using a conservative parking rate and that there would in any case be additional parking available elsewhere (at the depot). It is accepted that this is not a critical issue for determining the Planning Proposal, and it would be an internal matter for Council to be satisfied that two levels of parking will be sufficient at the administration building site.

### Item 3.2.3 – Service Vehicles

*“The Planning Proposal should address servicing vehicle provisions either for the new administration building in isolation or as an integrated solution for the CCCP, as required under the DCP.”*

SLR has responded that the future location for a service vehicle access will be outside the administration building site (noting the design constraints), and within several potential locations around the CCCP. While this can be an acceptable outcome, GTA considers this to be a planning matter as to whether a service vehicle location needs to be nominated as part of the Planning Proposal (e.g. by condition or site specific DCP).

### Item 3.3.1 – Trip Generation

*“Further justification should be given for the adopted trip rates, including why any Transport for NSW based trip rates are unsuitable for the nature of use or site location.”*

SLR has responded that all trip rates have ultimately been sourced from Transport for NSW (TfNSW), with the exception of the first principles approach for the community uses which GTA supports (based on the new data of comparable sites provided by SLR).

The trip rates are considered to be acceptable for all land uses, being either based on appropriate surveys or provide for a conservative assessment. Reference should also be made to our response to TfNSW Comment 5 in relation to the trip rates adopted for the administration building.

### Item 3.3.3 – Intersection Modelling

*“The AIMSUN intersection network model only adopts development volumes for the year 2036, when all upgrades for the Picton Town Centre have been assumed to be completed. Testing however should be undertaken for the 2019 (i.e. existing) scenario or an intermediate scenario (with partial network upgrades) to confirm whether the CCCP can operate with acceptable traffic impacts before all of these upgrades have been implemented.”*

SLR has responded that Council has committed to constructing the road upgrades assumed in the Aimsun model by 2036. As development volumes are only modelled for the 2036 scenario, which includes these upgrades, the opening of the administration building would presumably need to be conditioned on this year. Notwithstanding, an assessment could be undertaken at a later stage to test the development volumes against the existing network configuration, if an earlier year of opening is sought.

### Item 4.2.1 – Overall Comments

*“Additional information should be documented regarding the modified Aimsun network model prepared by SLR Consulting, including information regarding the calibration and validation results for all time periods and justifications for any departures from the TfNSW Guidelines or changes to the intersection phasing arrangements.”*

SLR clarified that the Aimsun model has been based on the original models used by Council to inform the 2026 Transport Plan. As the 2026 Transport Plan only considered peak hours as opposed to each hour within the overall peak period, the Aimsun model retained the same process for consistency. This approach is supported in the circumstances.

#### Item 4.2.2 – Report Comment 1 – Rebase Model

SLR has provided additional information to clarify:

- That disaggregated travel time results were not used in the original model for calibration/validation and averaged results for corridors were instead used for consistency with previous reporting. This approach is supported in the circumstances.
- The median seed selection for each scenario and time period, which can be used to test base and future scenarios. While the seed numbers differ for each scenario (for each peak period), While it is generally recognised as best practice to retain the same to minimise any changes in outputs arising from fluctuations in core modelling assumptions (e.g. demand loading, vehicle characteristics, driving behaviour and path choices) which hasn't been done in this case, the impact is expected to be negligible.

#### Item 4.2.3 – Report Comment 2 – Future Model

Noting that the travel times with the addition of development volumes are generally consistent with base conditions, SLR has attributed a marked reduction in the westbound travel time during the PM peak period to sensitivity of movements from Prince Street onto Argyle Street. It is accepted that delays can be variable from this single lane approach when there is right turning traffic obstructing other vehicles travelling behind.

Some outputs (e.g. link level service plans, maximum queues) were provided for the rebase model only, and it is suggested that outputs for all scenarios be made readily available, if requested by TfNSW.

#### Item 4.2.4 – Model Comment 1 – Rebase Model

SLR has reiterated that the rebased model is based on Council's adopted Aimsun model, which is understood to not include public transport and gradient inputs. It is thus accepted that these inputs are not critical for assessment of the Planning Proposal.

#### Item 4.2.5 – Model Comment 2 – Future Model

SLR provided clarification on the following changes made specifically for the future model:

- Details regarding the construction of future roads as was adopted in Council's Aimsun model.
- Peak period vehicle trips based on the parking accumulation profile.
- Reduced signal timing to correspond with the timing adopted in Council's Aimsun model.

These responses adequately account for the discrepancies previously raised for this scenario.

#### TfNSW Detailed Comments

##### Item 1

*"Consideration should be given to the provision of pedestrian refuges to assist pedestrians in crossing the local roads and to encourage mode shift through safe crossing opportunities to access the site. We recommend this is discussed with Council (traffic team)."*

SLR has responded that this aspect can be addressed post Gateway as part of any future development application. This approach is supported as it is anticipated that the pedestrian desire lines will form according to the design of the CCCP.

## Item 2

*"TfNSW recommends a site specific Development Control Plan (DCP) accompanies this planning proposal to set out the access points, service vehicle arrangements and travel demand management measures to guide the assessment of the future development application(s)."*

SLR has responded that a site-specific DCP is not deemed necessary at this planning stage since the Council Administration Building is in an early concept development phase. It is argued that the resolution of access, service vehicle and travel demand arrangements *"has been or can be demonstrated to be able to be satisfied as part of the Planning Process"*.

Notwithstanding, the development scheme as put forward in the Planning Proposal relies on external areas for car and service vehicle parking which have not been fully defined. This is presumably with the intent of achieving the targeted floor yield and limiting basement levels. In our view, it remains a town planning matter as to how these arrangements could be appropriately conditioned or if a site specific DCP for the CCCP would be needed.

The correct access arrangements should be also referenced in the Traffic and Transport Report. In our view, there are no unique circumstances with the site (i.e. the site has direct frontages on local roads) that would require any special conditioning.

## Item 3

*"The intersection performance should be modelled to assess the impact of the development on the network in the absence of the Picton Town Centre Transport Plan 2026 network improvements (realignment of the Argyle Street/ Lumsdaine Street intersection to include signal control; proposed improvements to the Argyle Street/ Prince Street intersection; right turn ban to traffic turning from Menangle Street at the Argyle Street/ Menangle Street intersection; and proposed upgrade to signal control at the Menangle Street/ Prince Street intersection). TfNSW notes that the status of proposed changes to the road network outlined within the Picton Town Centre Transport Plan 2026 are uncommitted/unfunded, as it was prepared "to discuss this plan with elected members and the wider community, with a view to securing support and funding to allow delivery of the plan by 2026".*

SLR asserts that Council has committed to these intersection upgrades which will be completed by 2036. Reference should be made to the response to Peer Review Item 3.3.3.

## Item 4

*"TfNSW requests that the electronic copies of the AIMSUN modelling files (and any model development/calibration and validation report) are provided for our review and comment."*

N/A

## Item 5

*"Table 12 of the Traffic and Transport Report – Trip rates: The trip rate assumed (presumably vehicle trip rate) for Administration Building (1.65 vtpm AM and 1.28 vtpm PM per 100sqm) appears to reflect the average rate for office premises from the former RMS TDT 2013/04a Updated Traffic Surveys. It should be noted that the mode share of the localities surveyed had high public and active transport mode share and were mostly in close walking distance to high frequency heavy rail services in Sydney. It is not expected that these rates would be reflective of the subject locality which has an approximate mode share of 4.74% to public transport for travel to work according to ABS Census data from 2016. We recommend that a rate is sourced from a comparable site with consideration to mode share and accessibility factors."*



It was noted in our peer review that the adopted trip rates are comparable to the average trip rates published in the Technical Direction. Notwithstanding, a review of the two surveyed commercial developments that are outside the Sydney metropolitan area (Newcastle and Wollongong) indicate that the trip generation is below this average. This also correlates with a lower than average number of person based trips.

While SLR has clarified that the trip rates were a revised average after discarding the three sites with the highest public transport mode split, they still remain associated with sites within the Sydney metropolitan area. While this methodology is not considered appropriate for the subject site (not being an outer suburb of Sydney), the adopted trip rates appear to be conservative in relation to the surveyed sites outside the metropolitan area and thus can remain valid to inform the Aimsun modelling assessment.

#### Item 6

*"An appropriate funding mechanism should be in place to help ensure that developer contributions are obtained on an equitable basis for the provision of state and regional transport infrastructure required to support development uplift and future growth in the Picton Town Centre."*

This matter is largely outside of the transport planning remit although GTA generally agrees with SLR that the proposal would not be of a scale to trigger regionally significant transport requirements and is also an infill development within an established area.

We trust that the above response suitably addresses your needs. Naturally, should you have any questions or require any further information, please do not hesitate to contact me on (02) 8448 1800.

Yours sincerely

**GTA CONSULTANTS**



**Steve Manton**  
**Associate Director**