

15 June 2022

Mr James Farrington
Director Planning and Compliance Division
Hornsby Shire Council

Attention: Fintan Langan
flangan@hornsby.nsw.gov.au

Dear Mr Farrington,

Dural Health Hub Planning Proposal PP/2/2022 - Response to Submissions

This letter has been prepared by *Keylan Ltd* (Keylan) on behalf of *Healing ONR PTY LTD* (Proponent) to address submissions received by Hornsby Shire Council (Council) in relation to the public notification of Planning Proposal (PP/2/2022).

As you are aware, the Proponent undertook extensive stakeholder consultation during the preparation of the Planning Proposal, as summarised in the table below:

Stakeholder	Summary/Comment
Adventist Healthcare	<ul style="list-style-type: none"> Part of Adventist Healthcare's mission is to continue to provide high quality hospital, health and well-being services for the expanding communities of Greater Northern Sydney. Notes that the Dural Health Hub will be well located in a region of Sydney which will continue to grow as ageing populations downsize and shift to aged-care facilities. Supports the proposal.
Thompson Health Care (adjoining landowner)	<ul style="list-style-type: none"> Notes that the Dural Health Hub will address a significant service gap in Dural and the local surrounds. Notes that it does not have any concerns with the Planning Proposal. Notes the Site adjoins their site at 705 - 717 Old Northern Road and is to collaboration regarding stormwater drainage as required.
Centuria Healthcare	<ul style="list-style-type: none"> Notes its intention is to work alongside Healing ONR to deliver an exceptional quality outcome for the community. Has undertaken a detailed review of the Dural Market Health Assessment (Appendix F) and support the report's findings and proposed location of the health services facility in this location.
Mind Connections Specialist Health Services (MCSHS)	<ul style="list-style-type: none"> Supports the proposal. Notes that patients from Hornsby and adjacent areas travel to Castle Hill, Norwest, Pennant Hills, and Hornsby for health care due to Dural's lack of health services. This creates longer waiting periods for urgent health needs in the Hills District.

Stakeholder	Summary/Comment
	<ul style="list-style-type: none"> The proposed Dural Health Hub will address this service gap and contribute to business growth in the area.
Dural Chamber of Commerce	<ul style="list-style-type: none"> The Dural Chamber of Commerce consulted several local businesses and members. The consensus is that the proposal would benefit Dural and the community. It is noted that the submission reflects the vote of the majority of the Chamber's members to issue a letter of support. The Chamber of Commerce has approximately 50 members, many comprising local small businesses.
Maronite Church	<ul style="list-style-type: none"> The Maronite Church supports the proposal, including the proposed public domain improvements, noting it improves connection to their Site and integrates with DA/1062/2020 Also note that the proposal addresses a significant service gap in Dural and the surrounding area.
Dural Veterinary Clinic (adjoining landowner)	<ul style="list-style-type: none"> In March 2022, the Proponent met with the landowner/operator of the Dural Veterinary Clinic and presented the vision for the Dural Health Hub, including an overview of the planning proposal and the proposed VPA works. The landowner/operator raised queries relating to construction impacts, which are a matter that will be addressed in detail at DA stage and will be subject to further consultation. The landowner/operator has verbally advised the Proponent that they had no objection to the proposal.
Private landowner at 675 – 677 Old Northern Road, Dural (adjoining landowner)	<ul style="list-style-type: none"> Principally in support of the proposal, provided the development will not impact on their site in regards of noise, traffic, nature lighting, sewage, as well as soil stability and current building structure. Note that the proposal will address a significant service gap in Dural and the local area.
Private landowners at 671 Old Northern Road, Dural	<ul style="list-style-type: none"> Principally in support of the proposal, subject to an appropriate built form response, basement carparking and infrastructure upgrades. In the landowner's experience (as a nurse) believes the proposal will service the gap in the market whilst supporting the Round Corner Town Centre.

We note that in addition to the above consultation, a total of five submissions were received in response to Council's public notification of the Planning Proposal. Council has advised that it is unable to provide copies of these submissions, however has provided us with a summary of the issues raised in submissions (without disclosing the submitters' details) via email on 24 May 2022.

Based on our review of these submissions, it appears that the submissions comprise 1 x submission from a State agency, 1 x submission from another Council, 2 x submissions from nearby landowners and only 1 x submission from a community member.

We have also been advised that Council officers briefed the Hornsby Shire Local Planning Panel (LPP) on the Planning Proposal, including issues raised in submissions, on 25 May 2022. However, we were not notified in advance of the date of this meeting, nor were we

given the opportunity to present to the LPP. In addition, we have not been able to review the officers' submission to the LPP or the minutes associated with the meeting.

Our client has strong concerns with the process to date given we have not been provided a formal opportunity to respond to issues raised in submissions or concerns raised by officers and the LPP.

Given these concerns, we have prepared a response to the issues raised in submissions and request that this be considered by Council officers in their assessment of the Planning Proposal and report to Council at its meeting of 13 July 2022 at which we understand Council will determine whether to support the Planning Proposal proceeding to Gateway Determination.

A detailed response to issues raised in submissions is provided at **Attachment A**. A separate response to traffic and transport issues is provided by the Traffic Transport Planning Partnership at **Attachment B**.

We note that the majority of issues raised have already been addressed through the information submitted with the Planning Proposal and we maintain that there is clear site-specific and strategic merit for the proposal to proceed to Gateway determination.

We reiterate that the proposal will not result in a precedent for similar development in the locality as the proposed controls are specifically tailored to the development of a health services facility (HSF) on the Site for which there is a demonstrable demand and a clear strategic justification.

The Site is located on the eastern edge of the Round Corner Town Centre and directly opposite the Round Corner Town Centre retail precinct, in an already increasingly urbanised precinct. Round Corner is classified as a Local Centre under the centres hierarchy in the Greater Sydney Region Plan. This Plan specifically describes Local Centres as *"collections of shops and health, civic or commercial services."*

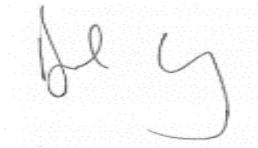
We also note that the Planning Proposal is supported by an Economic Impact Assessment (EIA) prepared by Atlas Urban Economics which concludes that the proposal will have positive economic benefits for the Round Corner Town Centre through synergistic benefits with existing aged care and medical occupiers and contributing to the trading potential of the centre through increased visitation and on-site employment.

We ask that the information contained in this letter and attachments be considered by Council officers in preparing its report to Council.

Our client would also welcome the opportunity to meet with Council officers to discuss feedback on the Planning Proposal and this Response to Submissions.

Please do not hesitate to contact Dan Keary on 8459 7511 or via email at dan@keylan.com.au should you wish to discuss any aspect of this project.

Yours sincerely



Dan Keary BSc MURP RPIA
Director

Attachments:

Attachment A: Response to the submissions

Attachment B: Response to the submission by Traffic Transport Planning Partnership

Attachment A

Response to Submissions

Ref.	Submission and feedback	Response
A	Submission 1	
A1	<i>Not supportive of the proposed two separate driveways. Prefers a consolidated left-in/left-out driveway located near the southern boundary of 679-681 Old Northern Road with a separation in accordance with Australia Standards</i>	<ul style="list-style-type: none"> The Indicative Architectural Plans provided with the Planning Proposal are conceptual only and access arrangements will be amended during detailed design for a future Development Application (DA)
A2	<i>The proposed relocation of the existing south-bound bus stop to the frontage of the subject site without appropriate justification. A bus stop indentation should be considered and investigated given the existing southbound passing lane fronting the site is anticipated to be utilised by traffic once it is extended south to the Franlee Road intersection</i>	<ul style="list-style-type: none"> This was a potential item proposed as part of the Proponent's future VPA offer If it is not supported by Council, it can be removed from the items that may be included in a future VPA Alternatively, the Proponent is open to further discussions with Council and other relevant stakeholders post Gateway determination to facilitate an appropriate public benefit outcome
A3	<i>Minimising the opportunity for any right-turn movements into/out of the site by upgrading the pedestrian refuge to a barrier kerb and constructing a concrete median within the chevron markings on Old Northern Road in vicinity of the site</i>	<ul style="list-style-type: none"> Refer to response at Attachment B
A4	<i>The application of trip generation rates for planning proposal, using the RMS Trip Generation Surveys Medical Centres – Analysis Report, are not representative or appropriate for adoption at the site and a higher rate should be applied</i>	
A5	<i>While the proposal expects development traffic will arrive from the north based on the catchment area, any traffic generated from the south would travel northbound along Old Northern Road and make a U-turn in Stonlea Circuit resulting in any development traffic turning right out of Stonelea Circuit exacerbating existing traffic and safety issues in the area</i>	
A6	<i>The use of Sydney's Strategic Travel Forecast Model (STFM) data for estimated future traffic growth should not be referenced in the traffic</i>	

Ref.	Submission and feedback	Response
	<i>report because it was provided for a different past project under an Access Agreement</i>	
A7	<i>Future year scenarios modelling does not account for a future scenario where surrounding approved developments and Old Northern Road/Franlee Road intersection upgrades have not been completed, limiting scope of the impact of the subject development traffic; and</i>	
A8	<i>SIDRA Intersection and modelling results provided in Table 5.4 – 5.6 and Appendix D used to model the five intersections on the surrounding road network.</i>	
A9	<i>Should a Gateway Determination be issued, the amendments to the Indicative Architectural Plans and Traffic and Transport Assessment should be made.</i>	<ul style="list-style-type: none"> The Proponent would consider the recommended changes to the Indicative Architectural Plans and Traffic and Transport Assessment post Gateway determination
B	Submission 2	
B1	<i>The appropriateness of the subject site for the proposed land use, having regard for other sites that may already be zoned to permit a health services facility.</i>	<ul style="list-style-type: none"> The appropriateness of the site has been assessed and supported by a Site Sieve Mapping Assessment, Visual Impact and Urban Design Assessment, Economic Assessment, Agricultural Viability Assessment, stakeholder consultation and Market Assessment The supporting information has been provided to Council and Councillors and clearly outlines the fundamental site characteristics required to establish an HSF, which the Site meets The Proposal for the development of an HSF at the Site is consistent with the North District Plan's priority to enhance walkability in and around local centres, specifically providing fine grain urban form, diverse land use mix, high amenity and walkability, in and within a 10-minute walk of centres In addition, the Sieve Mapping Assessment undertaken by Architectus and provided with the Planning Proposal clearly establishes site suitability for the proposed HSF as follows: <ul style="list-style-type: none"> There are four centres within the identified study area where sites exist that achieve the relevant selection criteria (zoning, location and access). These centres are North Kellyville, Glenhaven, Round Corner and Dural.

Ref.	Submission and feedback	Response
		<ul style="list-style-type: none"> ○ Sites were assessed based on the following criteria: <ul style="list-style-type: none"> - Direct and convenient access and egress off and onto a main arterial road - Proximity to a town centre (max. 200m) - Site area that can accommodate 1,500m² floorplates (day surgery) including uniform construction grid - Sufficient area to accommodate parking for an ambulance and their unrestricted movement - Sufficient area and height to accommodate a back of house loading dock for a Medium Rigid Vehicle and allowance for dedicated medical waste ○ No sites were identified that satisfy the applicable zoning and permissibility requirements as well as all the site development requirements for redevelopment in the form of the desired health services facility (HSF) ○ Of the sites that satisfy development criteria but not zoning, 679-685 Old Northern Road (the Site) is likely to be one of the lowest impact due to its location adjacent to the Round Corner Town Centre
B2	<i>The Hills LSPS identifies Round Corner as a town centre and the planned expansion site at No. 488-494 Old Northern Road, Dural will service future retail demand in the area, however no further expansion is planned for the Round Corner Town Centre.</i>	<ul style="list-style-type: none"> • The Planning Proposal notes that Round Corner is identified in The Hills Shire LSPS as a town centre, which is the third largest category in their hierarchy of centres behind metropolitan and strategic centres • Round Corner is classified as a Local Centre under the centres hierarchy in the Greater Sydney Region Plan. This Plan specifically describes Local Centres as “collections of shops and health, civic or commercial services.”
B3	<i>A planned hospital is to be delivered at Rouse Hill, approximately 8.8 km west of the subject site, which is expected to service the health-related needs for much of the growth in new release areas and potentially a catchment within the Hornsby Shire. Investigations underway to support the delivery of the hospital and it is requested that the proponent should give consideration to locating health facilities land uses within close proximity to the proposed Rouse Hill Hospital</i>	<ul style="list-style-type: none"> • The Market Assessment prepared by Health Projects International and provided with the Planning Proposal demonstrates that the proposal responds to the existing demand for health services within the Hills Shire and Hornsby Shire LGAs. In summary: <ul style="list-style-type: none"> ○ the demand for private health care in Dural is much higher as the demographic structure consists of an aging population

Ref.	Submission and feedback	Response
		<ul style="list-style-type: none"> ○ there will be an undersupply in the primary catchment of same day care places by 122 places in 2025, increasing to 307 by 2035 ○ based on an analysis of Medicare utilisation in the area together with the population growth profile, there is sufficient demand to require six additional GP consultation rooms every year to cater for residents located within 15 minutes' drive of the Site • The Market Assessment also comprehensively addresses the relationship of the proposal to the planned Rouse Hill Hospital. In summary: <ul style="list-style-type: none"> ○ the planned Rouse Hill Hospital will not directly compete with the proposed HSF as it focuses on public healthcare and has a large focus on overnight services ○ the investment from the public sector highlights the chronic undersupply of acute hospital beds in the region but does not address the private acute bed gap. The increase in public service provision brings a new cohort of service providers, physicians, nurses and allied health staff that promote the development of health services and facilitate further investment in the region • Furthermore, the locality surrounding the Round Corner Town Centre is poorly connected to the Hornsby Ku-ring-gai Hospital and Health Precinct and planned Rouse Hill Hospital by public transport. If local residents currently need to access the Hornsby Ku-ring-gai Hospital and Health Precinct, two to three buses are required and over 1-1.5 hours of travel one way, potentially resulting in a 3 hour turnaround trip. Round Corner residents will also be unable to access the planned Rouse Hill Hospital due to the poor frequency of the bus services to Rouse Hill (AM Peak: 1 service, PM Peak: 3 services) • Coupled with the undersupply of day surgeries and hospitals and the identified demand for such facilities in the locality, this further highlights the need for additional health infrastructure in the

Ref.	Submission and feedback	Response
		locality, consistent with the 30 minute city principle in the Greater Sydney Region Plan
B4	<i>The potential traffic implications of the planning proposal development on the capacity of Old Northern Road and the surrounding road network, including traffic travelling from Box Hill and North Kellyville Growth Centres on Kenthurst Road and vehicular movements accessing the site from the south on Stonelea Court, Kenthurst Road and Maple Street. The Hills LSPS identifies an arterial by-pass for Round Corner, however no commitment from TfNSW for the funding or delivery of this arterial by-pass. Further consultation with TfNSW is required before progression.</i>	<ul style="list-style-type: none"> Refer to response at Attachment B
C	Submission 3	
C1	<i>The stormwater management options that propose to discharge stormwater over the adjoining property at No. 705-717 Old Northern Road, Dural. The submission notes that no agreement has been reached between the two property owners, however the property owner at the affected site would be open to discuss further options if the proposal was to progress to a Gateway Determination.</i>	<ul style="list-style-type: none"> Noted. Consultation with this landowner has occurred and as outlined in the Planning Proposal, the landowner has advised that they are open to collaborating on a stormwater solution and do not have any concerns with the Planning Proposal
D	Submission 4	
D1	<i>Amenity impacts, including proposed building height, on properties within the vicinity, namely No. 691 Old Northern Road, Dural</i>	<ul style="list-style-type: none"> Potential amenity impacts, including proposed building height, are comprehensively addressed in the Planning Proposal and there will be no adverse impacts on 691 Old Northern Road, as summarised below: <ul style="list-style-type: none"> the future building would present as a two storey building when viewed from Old Northern Road consistent with the current 10.5m height limit and surrounding current and approved built form character of the Round Corner town centre the Visual Impact Assessment prepared by Achitectus and provided with the Planning Proposal demonstrates that the future building would have minimal visual impact when viewed from the north and south along Old Northern Road and from Stonelea Circuit

Ref.	Submission and feedback	Response
		<ul style="list-style-type: none"> ○ substantial perimeter landscaping and the retention of established trees on the Site will further mitigate any potential visual impact of the future building ○ the Site is located south of 691-693 Old Northern Road which prevents overshadowing impacts. This is shown in the shadow diagrams submitted with the Planning Proposal which show no overshadowing of this property.
D2	<i>Incompatibility with surrounding character and land uses on the eastern side of Old Northern Road</i>	<ul style="list-style-type: none"> • The Site is located within the existing urban footprint of the Round Corner Town Centre which is undergoing significant transition and is now characterised by a range of urban uses and higher density-built forms. This includes land on the eastern side of Old Northern Road which comprises a mix of uses including commercial, medium density residential development, the DA approved Maronite Church and the recently completed Thompson Health Care residential aged care facility. • The urban character of the locality was specifically recognised Boston Blyth Fleming v Hornsby Shire Council [2018] NSWLEC 1270), in which the Commissioner stated that “<i>I agree with both the experts that this area is already characterised as an urbanised precinct...</i>” • As shown in the Indicative Architectural Plans, the future building on the Site can be designed to be compatible with this urbanised context as the bulk and scale of the building can be effectively broken down through a stepped building form that responds to the topography of the Site, upper level setbacks and landscaped setbacks and setting back the upper level of the building • The future building would be consistent with the current 10.5m height limit when viewed from the street and the building would step with the level changes from west to east across the Site • As shown in the Visual Impact Assessment, the proposal demonstrates compatibility with the current and approved proposed future character of the Round Corner Town Centre and Old Northern Road and would have no significant visual impacts in the locality

Ref.	Submission and feedback	Response
D3	<i>Precedence for similar developments within the rural areas of Hornsby Shire</i>	<ul style="list-style-type: none"> The proposal will not result in a precedent for similar development in the locality as the proposed controls are specifically tailored to the development of an HSF on the Site for which there is a demonstrable demand and a clear strategic justification The appropriateness of the site has been assessed and supported by a Site Sieve Mapping Assessment, Visual Impact and Urban Design Assessment, Economic Assessment, Agricultural Viability Assessment, stakeholder consultation and Market Assessment The supporting information has been provided to Council and Councillors and clearly outlines the fundamental site characteristics required to establish an HSF, which the Site meets Furthermore, the Planning Proposal limits the proposed maximum building height to the development of an HSF on the Site rather than a general height increase that would apply to other forms of permissible development on the Site
D4	<i>Traffic implications related to the development on the site</i>	<ul style="list-style-type: none"> Refer to response at Attachment B
D5	<i>Pedestrian access and safety within the area</i>	<ul style="list-style-type: none"> A pedestrian refuge island on Old Northern Road south of Stonelea Circuit and a signalised pedestrian crossing at the Old Northern Road and Kenthurst Road intersection are currently available to provide safe crossing opportunities across Old Northern Road Potential items for inclusion in a future VPA offer with Council generally comprise public domain and pedestrian accessibility works which will integrate with and complement recently approved public domain works associated with the Maronite Church at 669 Old Northern Road and the Round Corner Town Centre Expansion Site at 488-494 Old Northern Road immediately opposite the Site. This will contribute to the creation of a walkable town centre north of the approved signalised pedestrian intersection at Old Northern Road and Franlee Road and improve pedestrian connectivity and accessibility within the broader Round Corner Town Centre
D6	<i>Inadequate public transport and associated services for customers and residents in the area</i>	<ul style="list-style-type: none"> The Site is connected with the wider locality through a public transport network

Ref.	Submission and feedback	Response
		<ul style="list-style-type: none"> A bus stop is located 40 metres to the south of the Site on the same side of the Old Northern Road and another bus stop is located 70 metres to the north on the opposite side of the Old Northern Road As detailed in the Traffic and Transport Assessment submitted with the Planning Proposal, the Site is connected with regular bus services to Parramatta and Castle Hill (bus services every 30 minutes during peak periods and every 30-60 minutes during off-peak periods) However, it is poorly connected to the Hornsby Ku-ring-gai Hospital and Health Precinct and planned Rouse Hill Hospital by public transport Coupled with the undersupply of day surgeries and hospitals and the identified demand for such facilities in the locality, this further highlights the need for additional health infrastructure in the locality consistent with the principle of a 30 minute city
D7	<i>Impacts on sensitive receivers from increased noise and lighting generation related to a health services facility</i>	<ul style="list-style-type: none"> These are issues that can be adequately addressed in detail at DA stage
D8	<i>Lack of sewage infrastructure for the site</i>	<ul style="list-style-type: none"> The Planning Proposal is supported by a sewage infrastructure letter and plan at Appendix W which outlines four options which can be implemented to satisfactorily service the Site
D9	<i>Environmental impacts due to the proposed removal of significant trees on site</i>	<ul style="list-style-type: none"> An Arboricultural Impact Assessment (AIA) and a Flora and Fauna Assessment (FFA) were provided in support of the Planning Proposal The AIA identifies 4 trees to be retained and a further 3 to be potentially retained subject to further investigation The FFA concluded no tests of significance under Section 7.3 of the Biodiversity Conservation Act 2016 were required for threatened species, given the impact of the proposed works are considered negligible on foraging habitat utilised The proposal provides further compensatory tree planting to offset tree removal
D10	<i>Overdevelopment of the site and increased hard stand surfaces</i>	<ul style="list-style-type: none"> A Stormwater Management Plan was provided with the Planning Proposal, which outlined three solutions that could be implemented to address stormwater management at DA stage

Ref.	Submission and feedback	Response
		<ul style="list-style-type: none"> The proposal also incorporates substantial landscaped areas and below ground parking to reduce the extent of hard stand surfaces
E	Submission 5	
E1	<i>Building height increase in a generally residential area</i>	<ul style="list-style-type: none"> As noted in the response to D2 of this submission, the indicative-built form is consistent with the emerging urbanised character of the surrounding locality
E2	<i>Bus stop location and the impacts that this may have on school children accessing the area, as well as multiple buses stopping out the front of the proposed site</i>	<ul style="list-style-type: none"> Refer to response to A2
E3	<i>Power outages in the area and possible further stress placed on the power grid within the area</i>	<ul style="list-style-type: none"> The Planning Proposal is supported by an Infrastructure and Services Assessment which concludes that the majority of utility connections are available within Old Northern Road fronting the Site or nearby. Electrical services may require lead in works or a new crossing under Old Northern Road This matter will be further addressed at DA stage

Attachment B

Response to the submission by Traffic Transport Planning Partnership

Our Ref: 20318

15 June 2022

Healing ONR Pty Ltd
679-685 Old Northern Road
Dural, NSW, 2158

Attention: Mr Steven Jacobs

Dear Steven,

**RE: DURAL HEALTH HUB PLANNING PROPOSAL, 679 - 685 OLD NORTHERN ROAD, DURAL
TRAFFIC RESPONSE TO SUBMISSIONS**

As requested, please find herein The Transport Planning Partnership (TPPP)'s response to submissions issued by Hornsby Shire Council via email dated 24 May 2022.

Background

A Planning Proposal has been submitted for an additional permitted use (APU) to facilitate a health services facility at 679-685 Old Northern Road, Dural.

Submissions were received raising traffic related concerns regarding the development. It is assumed that one of submissions was from TfNSW, based on the technical feedback. The traffic related items have been listed and addressed in the following.

Response to Traffic Submissions

It is expected that Submission 1 is from TfNSW, due to the technical nature of the comments.

Submission 1

- *Not supportive of the proposed two separate driveways and would prefer a consolidated left-in/left-out driveway located near the southern boundary of 679-681 Old Northern Road with a separation in accordance with Australia Standards.*

Noted. This can be addressed as part of the future DA.

- *The proposed relocation of the existing south-bound bus stop to the frontage of the subject site without appropriate justification. A bus stop indentation should be considered and investigated given the existing southbound passing lane fronting the site is anticipated to be utilised by traffic once it is extended south to the Franlee Road intersection.*

Noted. This can be further assessed should a Gateway Determination be received.

- *Minimising the opportunity for any right-turn movements into/out of the site by upgrading the pedestrian refuge to a barrier kerb and constructing a concrete median within the chevron markings on Old Northern Road in vicinity of the site.*

Noted. This can be further assessed should a Gateway Determination be received.

- *The application of trip generation rates for planning proposal, using the RMS Trip Generation Surveys Medical Centres – Analysis Report, are not representative or appropriate for adoption at the site and a higher rate should be applied.*

It is not clear why the rates from TTPP's traffic report are not representative or appropriate, and what rates TfNSW would prefer.

The medical centre analysis report, undertaken on behalf of TfNSW, includes a survey of several sites, including some located in outer parts of Sydney with low public transport accessibility, such as Dural, Dee Why, Riverstone and Sans Souci. On this basis, it is considered that the TfNSW analysis report is appropriate and considerate of the various types/accessibility of medical centres in Sydney. Additionally, these studies by TfNSW were commissioned to advise and provide input into the update of the TfNSW *Guide to Traffic Generating Development 2002*, which is considered to have outdated survey data.

It should also be noted that the trip generation assessment is conservative in some respects, noting that:

- the provision of 35 consulting rooms includes 19 specialist rooms and 16 general medical centre rooms. The high number of rooms is to enable doctors to have their own personal offices and work in shifts. That is, not all doctors would be working at the same time, and as such, would not be generating patient traffic at the same time.
- the Day Surgery trip rate is based on the parking provision and is a conservative method of assessment. Day surgeries tend to generate longer duration of stays and a lower turnover of parking and therefore, a lower turnover of traffic compared to a medical centre. The Day Surgery proposes 4 operating rooms, 20 recovery bays and 15 short stay beds. Patient arrivals and departures for the proposed 35 beds are unlikely to occur at the same time, as such the estimate of 40 vehicles per hour is considered significantly conservative.

As a sensitivity case, TTPP has reassessed the traffic generation of the medical centre based on the floor area of the entire site and not just the consulting rooms, i.e., inclusive of ancillary space such as pathology, imaging centre, laboratories. Based on the rates from the TfNSW study, the medical centre trip generation of 72 – 90 vtpd as summarised in Table 1, which is consistent with the results of the trip generation based on the number of rooms.

Table 1: Trip Rate based on Floor Area vs Rooms

Uses	Yield	Traffic Rate based on TfNSW Study			Traffic Generation (vph)		
		AM Peak	PM Peak	SAT Peak	AM Peak	PM Peak	SAT Peak
Medical centre and consulting	1,796m ² GFA	0.04	0.046	0.05	72	83	90
	35 rooms	2.1	2.4	2.6	74	84	91

The results also suggest that the ratio of the number of rooms to floor area is consistent with sites surveyed by TEF as part of the TfNSW study.

As we are undertaking traffic modelling to address one further concern, we have used their rates in the modelling.

- While the proposal expects development traffic will arrive from the north based on the catchment area, any traffic generated from the south would travel northbound along Old Northern Road and make a U-turn in Stonelea Circuit resulting in any development traffic turning right out of Stonelea Circuit exacerbating existing traffic and safety issues in the area.

It is agreed that the right turn from Stonelea Circuit into Old Northern Road has existing issues with traffic having to find gaps in both directions of traffic. However, due to the delays experienced at this movement, people are unlikely to choose it as a preferred route. If arriving from the south, people are more likely to choose their route earlier and arrive via New Line Road as suggested in the traffic study. Alternatively, south bound traffic can make a u-turn at the Old Northern Road and New Line Road roundabout, particularly as this roundabout operates well at the moment (see modelling below)

- The use of Sydney's Strategic Travel Forecast Model (STFM) data for estimated future traffic growth should not be referenced in the traffic report because it was provided for a different past project under an Access Agreement.

Noted. A future DA submission will update the traffic assessment report as requested.

- Should a Gateway Determination be issued, the following amendments to the Indicative Architectural Plans and Traffic and Transport Assessment should be:
 - Indicative Concept Plans:
 - Sufficient details regarding relocation of existing road infrastructure (i.e., sign posts, traffic signal posts, street lights, power poles, construction of retaining walls, etc.) to accommodate the proposed footpath along the Old Northern Road frontage between Kenthurst Road and the subject site;
 - A consolidated left-in/left-out driveway with a separation in accordance with Australia Standards. Sufficient details and sight distance assessment is required with respect to any proposed driveway.
 - Appropriate justification for the proposed bus relocation and further details regarding the design of the bus stop area; and,
 - Sufficient details for any proposed concrete median and/or upgraded pedestrian refuge.

Noted. This can be further assessed should a Gateway Determination be received.

- Future year scenarios modelling does not account for a future scenario where surrounding approved developments and Old Northern Road/Franlee Road intersection upgrades have not been completed, limiting scope of the impact of the subject development traffic; and,
- SIDRA Intersection and modelling results provided in Table 5.4 – 5.6 and Appendix D used to model the five intersections on the surrounding road network.
- Traffic and Transport Assessment:
- Table 5.1 of the Traffic and Transport Assessment should be updated with revised traffic generation for the site using the recommended trip rates;
- STFM data used in Appendix C should be deleted regardless if growth rates on the surrounding road network have seen minimal change since the provision of the STFM data in 2019;
- An additional modelling scenario should be undertaken for future year scenarios without considering cumulative traffic generated from approved developments to assess the impact of 35% of the subject development traffic using existing priority-controlled Old Northern Road/Franlee Road intersection on a standalone basis; and,
- SIDRA modelling files (.sip) for the five intersections on surrounding road network modelling should be provided.

We have previously answered the majority of these points but we do note the following:

- As discussed above, it is unlikely that people will prefer Stonelea Circuit as a preferred route, due to delays expected at this location. People would choose their travel routes earlier and are likely to arrive via New Line Road.
- We note that the development traffic should not be assessed in isolation for a Planning Proposal where other projects nearby are approved and are owned and being developed by the same proponent as this site. Accordingly, the proponent for the proposed Health Services Facility is also responsible for the delivery of the Franlee Road and Old Northern Road intersection upgrade.
- Notwithstanding, the SIDRA modelling has been revisited with the cumulative development traffic and the intersection upgrade of Franlee Road and Old Northern Road removed from the model. The traffic distribution of the site traffic has been retained as per the submitted TIA; however, we note that realistically, the traffic distribution would alter if the Franlee Road and Old Northern Road is not upgraded. There would be similar issues to that of Stonelea Circuit, where delays would be experienced while giving way to through traffic along Old Northern Road.

The results of the modelling are presented in Table 2, Table 3 and Table 4.

Table 2: SIDRA Modelling Results AM Peak Hour

Intersection	Scenario 0 (Surveyed Conditions)		Scenario 1 (Year 2026 Base)		Scenario 2 (2026 + Development)		Scenario 3 (Year 2036 Base)		Scenario 4 (2036 + Development)	
	Ave Delay	LoS	Ave Delay	LoS	Ave Delay	LoS	Ave Delay	LoS	Ave Delay	LoS
Old Northern Road/ Kenthurst Road	34	C	42	C	52	D	81	F	84	F
Old Northern Road/ Stonelea Court	89	F	93	F	105	F	164	F	205	F
Old Northern/ Franlee Road	45	D	50	D	74	F	83	F	436	F
Old Northern Road/ New Line Road	20	B	20	B	20	B	21	B	22	B
Old Northern Road/ Glenhaven Road	18	B	19	B	19	B	21	B	21	B

Table 3: SIDRA Modelling Results PM Peak Hour

Intersection	Scenario 0 (Surveyed Conditions)		Scenario 1 (Year 2026 Base)		Scenario 2 (2026 + Development)		Scenario 3 (Year 2036 Base)		Scenario 4 (2036 + Development)	
	Ave Delay	LoS	Ave Delay	LoS	Ave Delay	LoS	Ave Delay	LoS	Ave Delay	LoS
Old Northern Road/ Kenthurst Road	34	C	32	C	35	C	44	D	51	D
Old Northern Road/ Stonelea Court	158	F	171	F	235	F	758	F	766	F
Old Northern/ Franlee Road	44	D	49	D	81	F	90	F	375	F
Old Northern Road/ New Line Road	22	B	23	B	23	B	24	B	25	B
Old Northern Road/ Glenhaven Road	17	B	17	B	18	B	23	B	24	B

Table 4: SIDRA Modelling results Saturday

Intersection	Scenario 0 (Surveyed Conditions)		Scenario 1 (Year 2026 Base)		Scenario 2 (2026 + Development)		Scenario 3 (Year 2036 Base)		Scenario 4 (2036 + Development)	
	Ave Delay	LoS	Ave Delay	LoS	Ave Delay	LoS	Ave Delay	LoS	Ave Delay	LoS
Old Northern Road/ Kenthurst Road	31	C	37	C	39	C	52	D	59	E
Old Northern Road/ Stonelea Court	90	F	110	F	165	F	519	F	648	F
Old Northern/ Franlee Road	36	C	49	D	78	F	71	F	217	F
Old Northern Road/ New Line Road	22	B	23	B	24	B	24	B	26	B
Old Northern Road/ Glenhaven Road	16	B	16	B	16	B	17	B	17	B

The updated modelling presents the following key results:

- Stonelea Circuit – Old Northern Road intersection is failing under existing conditions, due to the right turn movements, which experience delays. However, the through movements along Old Northern Road are operating well.
- Franlee Road – Old Northern Road intersection is near capacity under existing conditions, due to the turning movements into and out of Franlee Road. Old Northern Road through movements are operating well.
- The addition of background traffic growth along Old Northern Road is expected to increase delays at these intersections which are near or at capacity. This is due to vehicles on side roads giving way to a higher number of vehicles along the main road.
- The addition of development traffic will further add to these existing issues, with development traffic increasing through movement traffic along Old Northern Road and turning movements, in and out of Franlee Road.
- Based on the results of the modelling, the priority controlled intersections along Old Northern Road, such as Franlee Road need to be upgraded, to improve delays and safety of vehicle turning movements into Old Northern Road, particularly right turn movements. Alternatively, right turn movements could be banned all together.
- It is noted that the development traffic distribution has allowed for exiting traffic from the site to turn around at Franlee Road and travel northbound along Old Northern Road via right turn. With increasing traffic flows, it is unlikely that drivers would choose this as an option. It is expected that drivers would be better off undertaking a longer route, rather than experience the heavy delays associated with the right turn movement into Old Northern Road.
- However, the TTPP's modelling has retained this distribution for consistency with the Planning Proposal TIA.
- In the unlikely case that the Franlee Road and Old Northern Road intersection is not upgraded, it is recommended that a further analysis of the anticipated traffic distribution is undertaken post Gateway Determination. However, we note that the proponent of this Planning Proposal site is also responsible for the upgrade of the Franlee Road and Old Northern Road intersection.

The SIDRA movement summaries are provided in Attachment One.

The following submissions are not expected to be feedback from TfNSW.

Submission 2

- *The potential traffic implications of the planning proposal development on the capacity of Old Northern Road and the surrounding road network, including traffic travelling from Box Hill and North Kellyville Growth Centres on Kenthurst Road and vehicular movements accessing the site from the south on Stonelea Court, Kenthurst Road and Maple Street. The Hills LSPS identifies an arterial by-pass for Round Corner, however no commitment from TfNSW for the funding or delivery of this arterial by-pass. Further consultation with TfNSW is required before progression.*

The roads are already overcapacity based on our traffic study. Several developments have however been approved in the local area with similar traffic effects noting that improvements are planned for the adjoining road network.

Submission 4:

- *Traffic implications related to the development on the site;*

This is addressed in detail in the TIA submitted as part of the planning proposal and in the updated modelled presented above. It would be further addressed in the detailed design as part of the future DA.

- *Pedestrian access and safety within the area;*

Noted. To be addressed during detailed design as part of a future DA.

Submission 5:

- *Bus stop location and the impacts that this may have on school children accessing the area, as well as multiple buses stopping out the front of the proposed site; and*

The traffic generation assessment is based on car travel being the primary mode share. For those who travel by bus, the Planning Proposal has made provision for the bus stop and improved pedestrian links.

Further discussions would be undertaken with TfNSW in relation to the potential relocation of the bus stop. Any identified pedestrian access and impacts could also be addressed then.

We trust the above is to your satisfaction. Should you have any queries regarding the above or require further information, please do not hesitate to contact the undersigned on 8437 7800.

Yours sincerely,



Ken Hollyoak
Director

Encl. Attachment One – SIDRA Outputs