

To: Steven Mitchell

From: Kris Stone

Company: Scentre Group

SLR Consulting Australia

cc:

Date: 21 December 2023

Project No. 620.040504

**RE: Eastgardens Planning Proposal
Response to Department of Planning and Environment Gateway
Conditions – Traffic and Transport Consideration**

1.0 Introduction

SLR Consulting Australia Pty Ltd (**SLR**) has been engaged by Scentre Group to provide traffic and transport input in relation to the Eastgardens Planning Proposal (**Planning Proposal**).

This advice relates specifically to the traffic and transport matters documented in the Department of Planning and Environment (**the Department**) Gateway Determination dated 4 October 2023.

2.0 Background

The following is a summary of the Planning Proposal application and assessment background relevant to traffic and transport:

- SLR prepared a traffic and transport assessment (**SLR Assessment**) dated July 2018 (Reference 620.12132-R02-v3). The SLR Assessment was submitted to approval authorities as part of the Planning Proposal package.
- Cardno was engaged by Bayside Council (**Council**) to undertake an independent review of traffic matters including the SLR Assessment. The Cardno review findings were documented in their advice dated June 2018 (Reference 80018011 v2).
- In October 2018, SLR prepared a response to the traffic matters raised in the Cardno peer review (Reference 620.12132-L01-v3). The advice concluded that there were no outstanding traffic matters that precluded a decision to approve the Planning Proposal with conditions.
- Subsequent liaison with Council indicated that the SLR response had adequately addressed the Cardno peer review matters and no further material was required.
- The Department of Planning and Environment issued a Gateway Determination dated 4 October 2023 (Reference RR-2022-1337) permitting the increase in maximum building height and floor-space-ratio proposed by the Planning Proposal, subject to conditions. See **Attachment A**.

3.0 Purpose

The purpose of this advice is to respond to the Determination Notice conditions so that these 'outstanding' matters can either be narrowed or resolved.

It is anticipated that this advice will form an addendum to the original SLR Assessment prepared in 2018.

4.0 Determination Notice Gateway Conditions

The Department's Gateway Determination conditions relevant to this advice are reproduced below in *italics*. The Department correspondence is included at **Attachment A**.

- 1 *"Prior to consultation the planning proposal is to be amended to:*
 - a-d) [Not relevant to this advice]
 - e) *Include a revised traffic assessment which has been updated to:*
 - i. *Reflect changes to bus services since 2018 and consider potential implications for the proposal and proposed bus interchange upgrades*
 - ii. *review the data to identify how traffic conditions may have changed in post-COVID conditions and consider the potential implications for the proposal*
 - iii. *address matters raised by TfNSW in scoping advice*
 - iv. *consider how active transport and walking can be facilitated."*

The TfNSW matters referenced at Item 1e)iii) are documented in separate correspondence dated 30 November 2022 (Reference SYD22/01301/01). The TfNSW matters are summarised below in *italics*. The full TfNSW correspondence is included at **Attachment A** and referenced later herein.

1. *Proposed bus interchange.*
2. *Aimsun future year and development options traffic assessment.*
3. *Proposed intersection upgrades.*

The complete TfNSW matters are expanded later herein.

5.0 Technical Consideration

5.1 Item 1e)i) Changes in Bus Services since 2018

The modelling undertaken as part of the SLR Assessment considered bus services and routes that were current at the time (December 2017). While it is acknowledged that these arrangements have changed in the subsequent six (6) years, the change is not significant enough to warrant an entirely revised AIMSUN model given the following:

- Bus movements are lower in 2023 compared to that originally assessed in 2017.
- Bus movements are a small proportion of vehicle trips on the surrounding road network.
- The SLR Assessment did not assume any change to the transport mode share observed in 2017. i.e. there was no reliance on an increasing bus mode share.

Regarding the potential implications for the bus interchange design, **Table 1** and **Table 2** overleaf summarise the comparative December 2017 and October 2023 bus routes.



Table 1 Bus Routes Stopping at Westfield Eastgardens in October 2017

Routes Stopping at Westfield Eastgardens	Number of Services
301 - Eastgardens to City Circular Quay via Mascot	34
302 - Eastgardens to City Circular Quay via Kingsford	19
310 - Eastgardens to Central Railway Square via Botany Rd	103
316 - Eastgardens - Bondi Junction via Randwick Junction	41
317 - Eastgardens to Bondi Junction via Randwick Junctions & Beauchamp Rd	45
353 - Eastgardens to Bondi Junction	78
391 - La Perouse or Port Botany to Central Railway Square	64
392 - Little Bay to City Circular Quay via Eastgardens & Prince Henry Hospital	88
400 - Burwood - Bondi Junction via Eastgardens (limited stops)	249
410 - Bondi Junction to Rockdale	31
X10 - Eastgardens - Central Railway Square (Express Service)	4
X92 - Little Bay to City Museum (Express Service)	6
Total	762

Table 2 Bus Routes Stopping at Westfield Eastgardens in December 2023

Routes Stopping at Westfield Eastgardens	Number of Services
375 - Eastgardens to Randwick (loop)	60
350 - Sydney Airport Domestic to Bondi Junction	217
392 - Little Bay to Redfern	205
356 - Eastgardens to Bondi Junction	99
392X - Little Bay to City Museum	17
307 - Eastgardens to Mascot Station (loop)	52
Total	650

Table 1 and **Table 2** show that the total number of buses servicing the Eastgardens site has reduced between 2017 and 2023.

Based on the October 2023 timetable information, the maximum on-site accumulation is approximately four (4) buses at any one time depending on the individual dwell time. This does not account for layovers. The peak accumulation from 2017 was not estimated, however, it is forecast to have been higher than 2023 given the higher number of distinct bus routes and services.

The Planning Proposal does not prejudice future possible improvements to the bus interchange, nor does it propose a fixed arrangement.

Interchange design elements like the general arrangement, number of stops and layover spaces, and driver and patron facilities should be workshopped and refined with TfNSW and Council. This process has already commenced with the first meeting held 13 December 2023.

The interchange concept design should be progressed and refined before the Planning Proposal is finalised in 2024.



5.2 Item 1e)ii) Changes in Traffic Conditions post-Covid

The SLR Assessment forecasted future background traffic (i.e., no Planning Proposal) on the surrounding road network as follows:

- **2017 Background:** Quantified by traffic surveys undertaken in December 2017.
- **2031 Background:** 2017 Background plus 1% per annum growth plus the approved (ultimate) Meriton Pagewood development traffic.

This approach is typical of major traffic assessments and the assumed 1% annual growth is consistent with that adopted for the Meriton Pagewood Planning Proposal.

This methodology and assumptions were reviewed by Council, Cardno, and TfNSW (then NSW RMS) in 2018 and no contrary comments were received.

It is accepted that Covid has significantly altered population travel behaviours. Some of the effects were intense and short-lived, while others like increased work-from-home and lower public transport use are still very different, albeit normalising to a new equilibrium.

Two sources were reviewed to establish the differences in pre- and post-Covid travel, and if amendments to the SLR Assessment could be warranted. The sources include:

- 1 Broader Sydney travel trends reported by TfNSW.
- 2 Westfield Eastgardens site patronage trends recorded by Scentre Group.

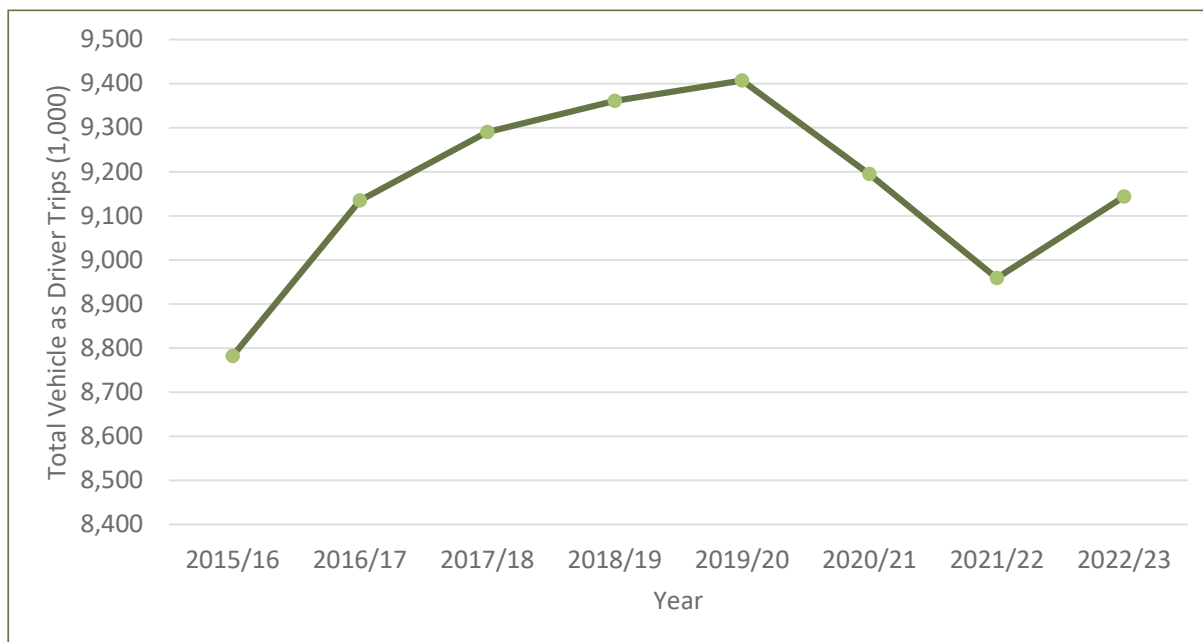
5.2.1 Broader Sydney Travel Trends

The Household Travel Survey¹ (HTS) is a comprehensive source of travel behaviour statistics published by TfNSW for the greater Sydney metropolitan region. The HTS has been undertaken continuously since 1997/98 and is typically comprised of responses from 2,000-3,000 households per year. **Figure 1** shows the HTS derived total number of trips made by a vehicle driver for the period 2015/16 – 2022/23.

¹ <https://www.transport.nsw.gov.au/data-and-research/data-and-insights/surveys/household-travel-survey-hts>



Figure 1 Total Trips by Vehicle as Driver



It is clear from **Figure 1** that the post-Covid number of vehicle trips are still significantly lower than pre-Covid. The latest data is comparable to the number of trips reported in 2016/17.

Figure 2 shows the HTS derived proportion of trips made as a vehicle driver for the period 2015/16 – 2022/23.

Figure 2 Proportion of Trips Made by Vehicle as Driver

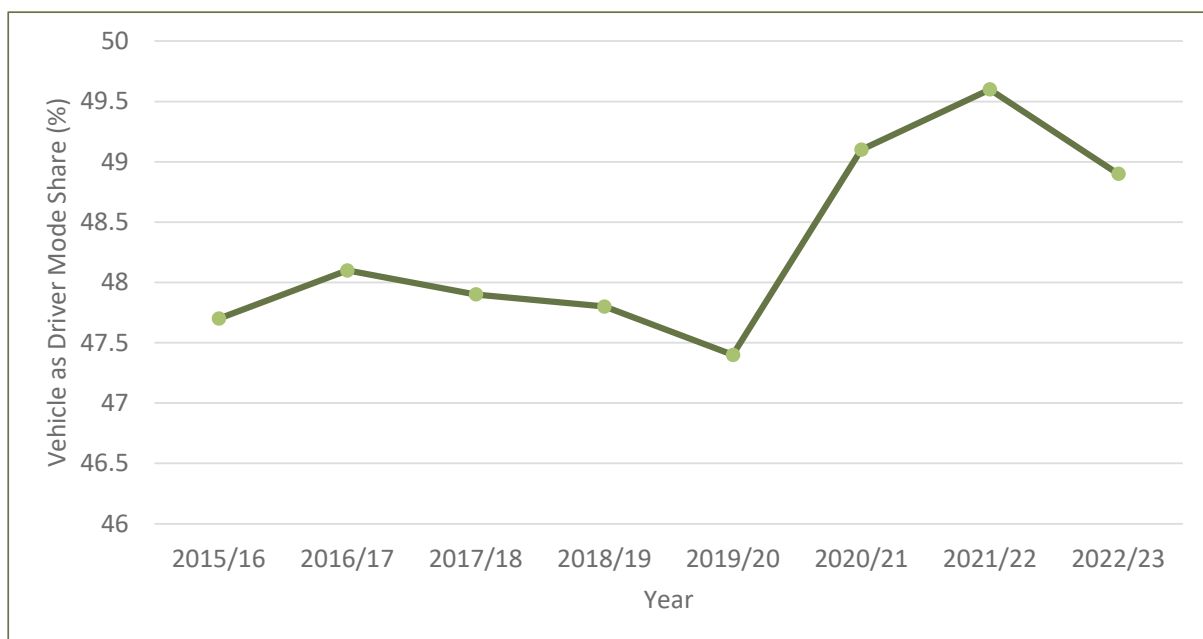
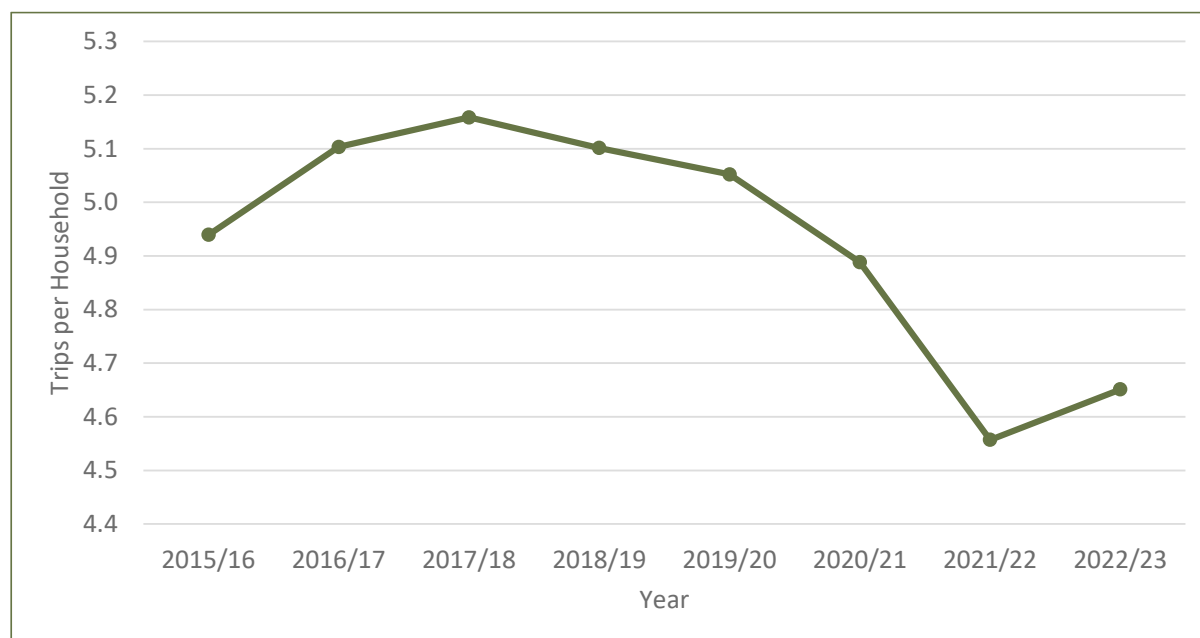


Figure 2 shows an approx. 1.5-2% increase post-Covid for the proportion of trips made as a vehicle driver. The majority of this increase is based on a reduction in public transport use.



It is SLR's position that the increase in private vehicle mode share is more than offset by the significant increase in work-from-home and the associated lower number of trips. This is illustrated by **Figure 3** which shows the number of trips per household as vehicle driver.

Figure 3 Number of Trips per Household Made by Vehicle as Driver



It is clear from **Figure 3** that households are making fewer vehicle trips post-Covid. The trend started in 2016/17 and accelerated during and post-Covid. The increase shown between 2021/22 and 2022/23 is the result of an error in the HTS data which assumes the number of dwellings did not change between 2021/2022 and 2022/23.

This finding of lower household trips is supported by other research investigating the pre- and post-Covid work-from-home dynamic².

The HTS data indicates that post-Covid changes in travel behaviour are not significant with respect to the already completed SLR Assessment. While short-term Covid effects were significant, the traffic and modelling assumptions made as part of the SLR Assessment remain relevant.

Accordingly, an update of the AIMSUN remodelling is not warranted. Any future development application/s subsequent to the Planning Proposal will be required to examine traffic impacts and mitigation strategies on the external network.

5.2.2 Westfield Eastgardens Vehicle Demand

The changing pre- and post-Covid travel behaviours discussed above for metropolitan Sydney are also relevant to the retail, recreation and employment trips made to/from the Westfield Eastgardens site.

The SLR Assessment forecasted the incremental traffic demand generated by the Planning Proposal using the following approach:

- **Step 1:** Establish Base traffic generation by surveys undertaken December 2017.

² <https://www.statista.com/statistics/1341056/australia-average-working-days-and-wfh-days-by-state/>



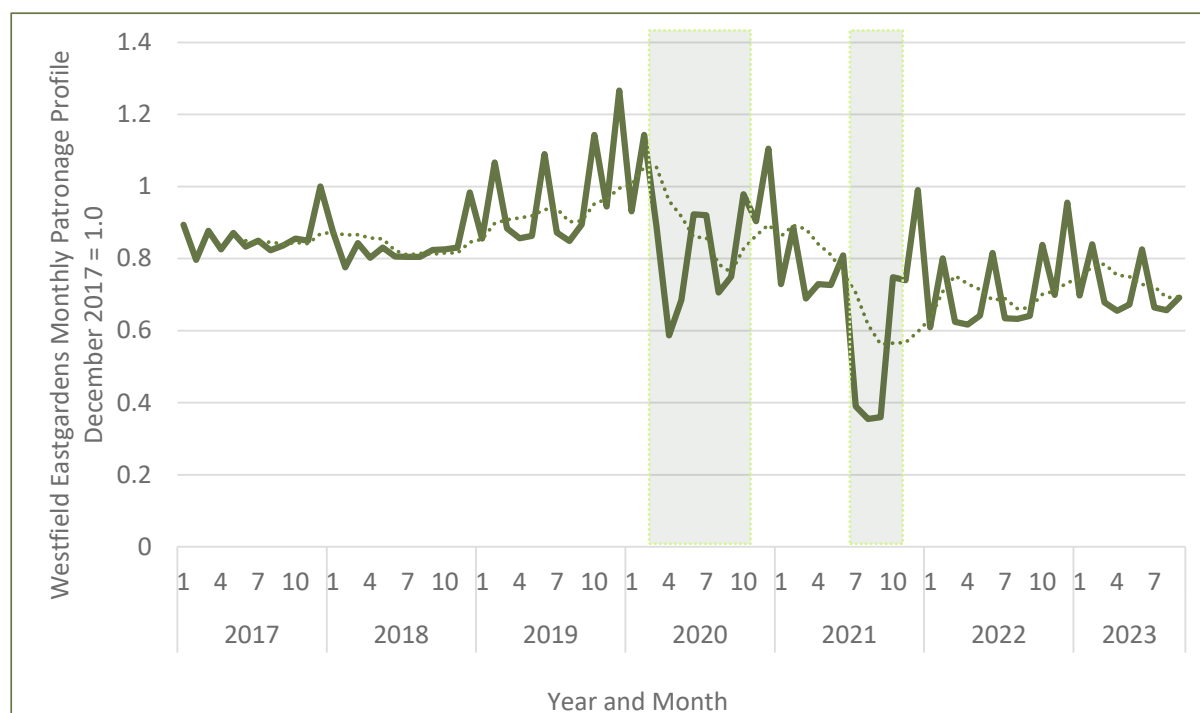
- **Step 2:** Determine the centre patronage on the surveyed day/s and rank this compared to the most-recent 12-month period.
- **Step 3:** Determine the patronage demand for a representative 85th percentile trading day in the 12-month period.
- **Step 4:** Determine the percentage difference between the surveyed day/s and 85th percentile design day and factor the surveyed traffic generation accordingly.

This approach is conservative and relies on the relationship between persons attending the centre and the resultant vehicle trip that is generated.

5.2.2.1 Door Count Data Analysis

The SLR Assessment referenced pedestrian door count data collected throughout 2017. This dataset has been expanded (**Figure 4**) to include more recent data for 2018-2023. As before, the y-axis is a normalised value for commercial reasons.

Figure 4 Westfield Eastgardens Monthly Patronage Data (Baselined to 12/2017)



It is clear from **Figure 4** that centre patronage is lower post-Covid. The six (6)-month moving average indicates post-Covid patronage is approx. 70% of that observed in December 2017 which informed the SLR Assessment.

Based on this data and the documented relationship between patronage and traffic generation, the SLR Assessment is conservative and likely overestimates the forecast Planning Proposal traffic generation.

The Scentre Group data indicates that post-Covid changes in travel behaviour are not significant with respect to the already completed SLR Assessment. While short-term Covid effects were significant, the traffic and modelling assumptions made as part of the SLR Assessment remain relevant.



Accordingly, an update of the AIMSUN remodelling is not warranted. Any future development application/s subsequent to the Planning Proposal will be required to examine traffic impacts and mitigation strategies on the external network.

5.3 Item 1e)iii) Active Travel

Future improvements to active transport infrastructure were considered as part of the SLR Assessments and various other Planning Proposal inputs including the Urban Context Report (Architectus, 2019).

Existing constraints and future opportunities were investigated and the Planning Proposal design including the bus interchange and public plaza were developed to address some of these existing issues.

Any future development application should consider end-of-trip facilities and site-based travel management plans to promote sustainable modes of travel. Other application information should include directional signage.

The Planning Proposal does not prejudice future possible improvements to the active travel infrastructure like upgraded paths or new site connections, nor does it propose a fixed arrangement.

Any future development application/s subsequent to the Planning Proposal will be required to examine active travel networks and determine an appropriate infrastructure solution.



5.4 TfNSW Matters

The TfNSW comments are reproduced in *italics* with corresponding SLR responses.

5.4.1 Comment / Recommendation - Proposed Bus Interchange

TfNSW does not support the design of the bus interchange that has been currently proposed by the proponent but would like to collaboratively work with the proponent to resolve our concerns. The current design does not satisfy the operational requirements for this location. Council is advised that TfNSW has recently arranged to meet with the proponent (Scentre Group) very shortly to provide further information on a modified design. The following points below provide some additional information and context on what TfNSW is aiming for the proposed Bus Interchange to address:

- *Envisaged and planned improvements to bus service levels across the Eastern Suburbs and to the site will require an upgrade and expansion of capacity of the bus interchange at Eastgardens. The existing bus interchange is inadequate in terms of operational and customer capacity, functionality, accessibility and amenity. Current infrastructure arrangements have over time precluded the use of higher-capacity buses at the interchange, necessary to meet passenger demand and travel needs.*
- *Any upgrades to the interchange will need to be sensitively designed in consultation with TfNSW to support a functional, practical and efficient bus operational environment that minimises delays and excessive bus circulation around terminal movements; and ensures safety and reliability by minimising conflict and friction between buses, pedestrians, cyclists and general traffic.*
- *Quick, direct and efficient bus route paths into, through and out of the interchange will need to support higher quality bus services expected by the community. This includes consideration of bus turns, movements, site entries and exits to and from the surrounding road network.*
- *Estimates of future space requirements for bus stops, bus parking (layover) and customer waiting areas need to be considered together with the functional layouts of these spaces. Consultation with TfNSW will be needed to ensure a robust, future-proofed and space-efficient design that meets the needs of future users accessing the site, bus operators and interchanging travellers.*

Council is advised that TfNSW are also looking at preliminary estimates of future bus space needs. However, these really depend on future modified layout(s) provided from the proponent.

SLR Response

The TfNSW comments are noted. Scentre Group welcomes TfNSW input to the future design of the bus interchange. An engagement process has already commenced with the first meeting held 13 December 2023 during which SLR presented a number of preliminary bus interchange options (**Appendix B**).

The layouts investigate the constraints and opportunities associated with a number of options including, one-way clockwise, one-way counterclockwise, and one-way north to south.

It was agreed during the meeting that TfNSW would review the SLR layouts and provide feedback and input so the interchange design could be progressed and resolved before the Planning Proposal is finalised in 2024.



5.4.2 Comment / Recommendation – Transport Review Report – Aimsun Future Year and Development Options Traffic Assessment

TfNSW has reviewed the submitted SLR Consulting - Transport Review Report – Aimsun Future Year and Development Options Traffic Assessment and highlights the following concerns / issues below. Resolution of these issues will require these reports and the AIMSUN modelling to be significantly updated / revised:

- *Concerns with the validity of this Report / Modelling Assessment and need to revisit a number of assumptions, such as:*
 - *Growth trends post-COVID (including background traffic growth);*
 - *Travel patterns;*
 - *Weekend and Thursday peaks will need to be re-examined – because the area has deteriorated further since 2018 (although noting that several interventions have now been implemented);*
 - *Noticeable increase in occupied dwellings within Eastgardens over the past 5 years;*
 - *Current higher propensity for car usage at the expense of public transport usage (post covid);*
 - *The access into Westfield from Banks Avenue is dangerous and problematic and needs further consideration;*
 - *Existing Public Transport Services; The Bus services referred to within this Report have changed substantially since 2019, post-COVID and due to the Light Rail opening. Most of these services identified within the SLR Consulting report do not exist anymore nor do they run through Eastgardens.*

In addition, TfNSW does not agree with the statement within the SLR Consulting report that states: "Westfield Eastgardens has excellent existing access to public transport" noting that this is no longer valid.

SLR Response

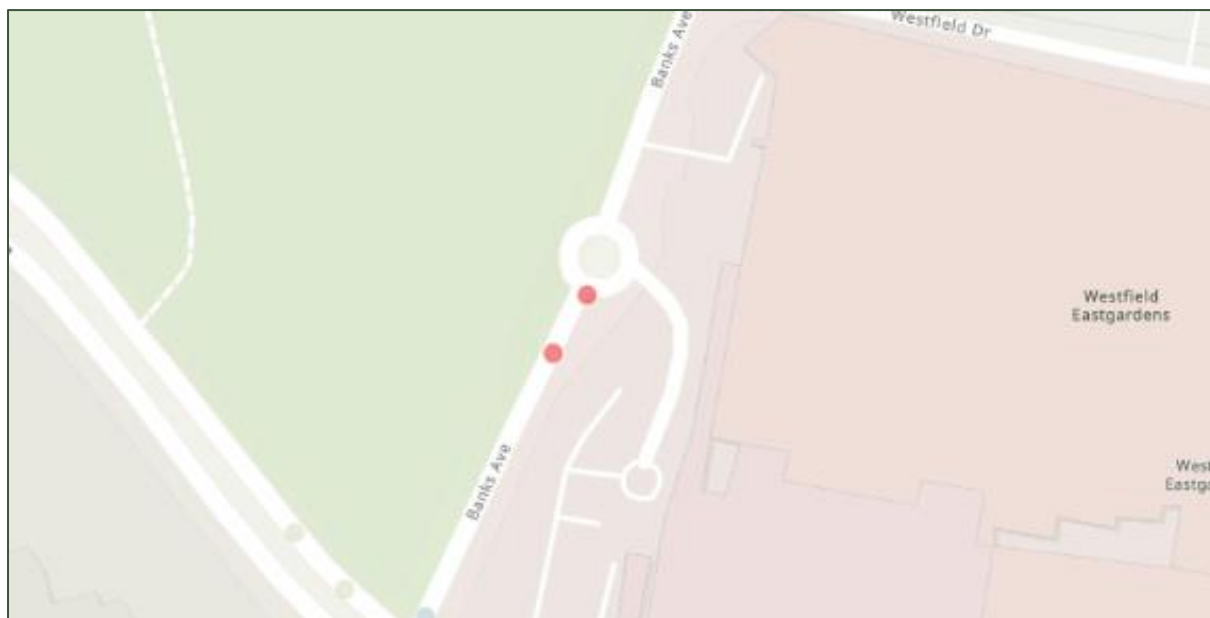
Most of these matters (growth trends, Covid effects, travel patterns, mode share changes, and bus services are addressed in **Section 5.1** and **Section 5.2** herein. A short summary response to each of the seven (7) dot-points is provided below for clarity:

- 1 The long-term background traffic growth and the 2031 demand forecast as part of the SLR Assessment remains valid and no change or modelling addendum is required.
- 2 Post-Covid changes in travel patterns have resulted in centre patronage reducing compared to that adopted as part the SLR Assessment.
- 3 Increasing traffic flows and the associated increased traffic congestion were assessed as part of the SLR Assessment.
- 4 The Meriton Pagewood development traffic was included in the SLR Assessment.
- 5 There has been a 1.5-2% increase in the proportion of trips made by vehicle as driver post-Covid; however, with respect to the Planning Proposal, this is offset by the lower centre patronage and the very high private vehicle mode share adopted as part of the SLR Assessment. Any shift from public transport is therefore minor.
- 7 Bus services have changed since 2017; however, the number of services and origins/destinations are sufficiently similar that they would not impact the previously modelled very low public transport mode share.



Regarding the sixth (6th) dot-point, it is unclear what TfNSW means by “...dangerous and problematic...”. According to TfNSW data³, only two crashes have been reported at the Banks Avenue site access roundabout intersection in the most recent five-year period (2018-2022 inclusive) as per **Figure 5** and **Table 3**.

Figure 5 TfNSW Reported Road Crashes (Map)



Source: TfNSW (accessed November 2023)

Table 3 TfNSW Reported Road Crashes (Table)

Crash Year	Crash ID	Crash Type	Injury Severity
2018	1174912	47 – Emerging from driveway	Non-casualty (towaway)
2021	1277485	30 – Rear end	Non-casualty (towaway)

The two reported crashes do not indicate a crash cluster or existing deficiency that warrants ongoing review or would preclude evaluation of the Planning Proposal from continuing.

It is also noted that the Planning Proposal does not propose any significant change or upgrade at this location compared to the existing arrangements. Furthermore, the centre of the roundabout is located approximately 120m from Wentworth Avenue, and hence is considered a Council matter.

Regardless, any future development application/s subsequent to the Planning Proposal will be required to examine traffic safety and possible mitigation strategies.

³ <https://www.transport.nsw.gov.au/roadsafety/statistics/interactive-crash-statistics/lga-view-crashes-map>



- TfNSW raises concerns regarding several modelled intersection upgrades listed below;

Wentworth Avenue / Denison Street / Westfield Access (proposed upgrade)

Feasibility is questionable based on the layout depicted within the SLR Consulting report. The proposal introduces new movements into the development at this intersection. The increase in significance of access into the site at this intersection should be discouraged. The proposed turn bay to cater for the introduced additional access is at a lesser standard to that depicted at the adjacent Wentworth Ave / Banks Ave intersection, which could become challenging in the long term.

Three lanes out of the development could also be an issue as currently the right turn from Denison Street runs a filter whilst vehicles are egressing from the Westfield Access (i.e. current Phase C). If the future year modelling has modelled this proposed upgrade utilising a single phase to simultaneously discharge traffic out of Denison Street – Westfield Access then TfNSW sees this as introducing a safety risk and problem to the network.

Ideally, access into Westfield should be encouraged via Banks Ave and not from Wentworth Avenue. However, this will require the proponent to address the safety and capacity of the access into Westfield from Banks Avenue.

Bunnerong Road / Meriton Blvd (now known as Tingwell Blvd) – Future signalised T intersection

TfNSW does not support signalisation of this intersection. This should be retained as left-in / left-out only as it would encourage an unwelcomed movement through the Meriton Site and potentially impact the Bunnerong Road corridor (a rapid bus route).

Wentworth Avenue / Page Street (Upgrade) which includes proposed removal of kerbside parking along Wentworth Avenue near the intersection

Removal of parking along the Wentworth Avenue corridor would improve the efficiency of the corridor. However, majority of land use along this section of the road is low density residential and the impact of parking removal on adjacent properties (including community engagement) will need to be further evaluated by the developer and/or Bayside Council TfNSW understands that Council have previously generally opposed the removal of this parking. Therefore, to address this uncertainty the modelling may need to conduct some sensitivity analysis (with / without kerbside parking).

SLR Response

Wentworth Avenue / Denison Street / Westfield Access (proposed upgrade)

By “lesser standard”, SLR assumes TfNSW is referencing the number and/or length of the right turn auxiliary lanes. A comparison to the Wentworth Ave/Banks Ave intersection is not relevant given the different intersecting road functions and traffic demands at both locations.

The modelling conducted as part of the SLR Assessment concluded that the proposed right turn lane (east) with 105m storage was sufficient at the 10-year design horizon. The 105m distance could accommodate 15-17 passenger vehicles which is at the upper range of what can be cleared during a typical right turn phase.

The proposed three development egress lanes (north) opposite Denison Street would require a change to the existing Denison Street (Phase C) filtering movement. It is SLR's opinion that this existing filtered movement by large trucks across a multi-lane road is already undesirable regardless of the proposed new lanes.

The SLR Assessment modelled the development egress (north) and Denison Street (south) approaches with separate phases and no filtered movements.



A concept plan for the nominated intersection upgrade has been prepared by Robert Bird Group. Feasibility and design investigations are ongoing. These concept plans will be issued as an addendum response as soon as they are resolved.

Bunnerong Road / Meriton Blvd (now known as Tingwell Blvd) – Future signalised T intersection

The signalisation of this intersection is not proposed as part of the Scentre Group Planning Proposal, nor was it nominated by SLR to mitigate Scentre Group Planning Proposal traffic impacts.

At the time that the SLR Assessment was prepared in 2018, it was understood that signalisation was proposed as part of the Meriton Pagewood Planning Proposal in negotiation with TfNSW. Accordingly, the signalisation was adopted as part of the Base modelled road network.

A review of subsequent traffic reporting prepared by Arup in 2018 indicates that signalisation is no longer proposed.

Retaining the existing left in/left out (unsignalised) arrangement would minimise network delay along the Bunnerong Road and would improve traffic flow to/from the subject site.

Wentworth Avenue / Page Street (Upgrade) which includes proposed removal of kerbside parking along Wentworth Avenue

The signalisation of this intersection is not proposed as part of the Scentre Group Planning Proposal, nor was it nominated by SLR to mitigate Scentre Group Planning Proposal traffic impacts.

The Arup traffic reporting noted that the modifications were “*approved*” in association with “*the approved concept masterplan at 130-150 Bunnerong Road. These include funded upgrades....at....Wentworth Avenue and Page Street.*” (128 and 130-150 Bunnerong Road Pagewood Transport Impact Assessment, Arup 2018).

Accordingly, the modifications were adopted as part of the Base modelled road network.

5.4.3 Proposed Intersection Upgrades

Any proposed intersection upgrades identified to mitigate the impacts of the proposed development uplift need to be developed to a concept stage in order to demonstrate feasibility and be referenced within the supporting Transport Review Report - Aimsun Future Year and Development Options Traffic Assessment.

SLR Response

Concept plans for the nominated intersection upgrades have been prepared by Robert Bird Group. Feasibility and design investigations are ongoing. These designs should be progressed and resolved before the Planning Proposal is finalised in 2024.

The plans relate to the nominated works documented in the SLR Assessment:

- 1 **Wentworth Avenue/Banks Avenue/Cornish Circuit** – additional turn lanes on the northern and eastern intersection approaches.
- 2 **Wentworth Avenue/Denison St/Site** – additional turn lanes on eastern and western Wentworth Avenue approaches and reconfiguration of site egress to provide two-way traffic movement.



- 3 **Wentworth Avenue/Bunnerong Road** – addition turn lane on the northern intersection approach.
- 4 **Bunnerong Road/Westfield Drive** – additional turn lane on the northern intersection approach and improvements to the existing site approach/departure to increase queue storage and reduce weaving conflicts.

6.0 Summary

SLR has been engaged by Scentre Group to provide traffic and transport input in relation to the Planning Proposal. This advice relates specifically to the traffic and transport matters documented in the Department of Planning and Environment Gateway Determination dated 4 October 2023.

The following key conclusions are made based on the responses herein:

- The SLR Assessment prepared in 2018 is still relevant. The findings and conclusions that the Planning Proposal can be accommodated with a suite of road network modifications is still valid.
- Revisions to the SLR Assessment to reflect the matters raised by the Department and TfNSW are not warranted. The 2018 assessment is sufficiently robust to inform a decision regarding the Planning Proposal.
- Irrespective, any future development application/s subsequent to the Planning Proposal will be required to examine traffic impacts and mitigation strategies on the external network.
- The number of bus routes and movements servicing the Eastgardens site are lower in 2023 compared to that previously assessed from 2017. The Planning Proposal does not prejudice future possible improvements to the bus interchange, nor does it propose a fixed arrangement. Engagement with TfNSW to progress and refine the interchange design have already commenced and the concept design should be progressed and resolved before the Planning Proposal is finalised in 2024.
- Post-Covid changes in travel behaviour are minor with respect to the traffic and modelling assumptions made as part of the SLR Assessment. Current TfNSW Household Travel Survey data and Scentre Group trading data indicate post-Covid traffic and patron demands are lower than 2018; hence, the SLR Assessment is conservative.
- The Planning Proposal traffic and urban design material considered active travel. Infrastructure improvements should be reviewed and resolved as part of the Development Control Plan (**DCP**) that Council has conditioned. Any future development application/s subsequent to the Planning Proposal will be required to examine active travel networks and determine an appropriate infrastructure solution.
- Concept plans for the nominated intersection upgrades have been prepared by Robert Bird Group. Feasibility and design investigations are ongoing. These concept plans will be issued as an addendum response as soon as they are available. These designs should be reviewed, refined and resolved subsequent to engagement with TfNSW and Council before the Planning Proposal is finalised.



Please contact the undersigned if you have any queries in relation to this advice.

Regards,

SLR Consulting Australia

A handwritten signature in black ink, appearing to read 'K Stone', is positioned above the printed name and title.

Kris Stone, BEng, CPEng, RPEQ (24687)
Principal Consultant – Transport Advisory

Attachments

Appendix A – Notice of Determination and TfNSW Correspondence

Appendix B – Bus Interchange Preliminary Concept Options



Appendix A

Notice of Determination and TfNSW Correspondence



Gateway Determination

Planning proposal (Department Ref: PP-2022-1337): Increase the maximum height of building and floor space ratio at 152 Bunnerong Road, Eastgardens.

I, the Executive Director of Metro East and South at the Department of Planning and Environment, as delegate of the Minister for Planning and Public Spaces, have determined under section 3.34(2) of the *Environmental Planning and Assessment Act 1979* (the Act) that an amendment to the *Bayside Local Environmental Plan 2021* to increase the maximum height of building and floor space ratio at 152 Bunnerong Road, Eastgardens should proceed subject to the following conditions:

The Council as planning proposal authority is not authorised to exercise the functions of the local plan-making authority.

The LEP should be completed on or before 31 July 2024.

Gateway Conditions

1. Prior to consultation the planning proposal is to be amended to;
 - a) Include the proposal to add the site to the Design Excellence Map in the explanation of provisions and proposed LEP maps
 - b) Include additional strategic justification currently provided in the addendum provided to the Rezoning Review dated 3 April 2023
 - c) Address Ministerial Direction 4.1 Flooding and provide a flood impact assessment. Consideration should be given to the recommendations of the 2022 NSW Flood Inquiry and the NSW Flood Risk Management Manual 2023;
 - d) Update all figures showing the development scheme to include labels which clearly separate the current proposed LEP amendments from the future parts of the scheme;
 - e) Include a revised traffic assessment which has been updated to:
 - i) Reflect changes to bus services since 2018 and consider potential implications for the proposal and proposed bus interchange upgrades
 - ii) review the data to identify how traffic conditions may have changed in post-COVID conditions and consider the potential implications for the proposal
 - iii) address matters raised by TfNSW in scoping advice
 - iv) consider how active transport and walking can be facilitated.
 - f) Include an updated urban design assessment that:
 - i) Provides further solar access and overshadowing analysis for dwellings at 224 and 226 Wentworth Avenue.
 - ii) Provide a plain English explanation of how the proposed built form achieves a reasonable balance between activating the corner and streetscape whilst providing an appropriate transition to the residential area. This should include a comparison with the height transition to the residential area adopted by the Pagewood Green development to the north.

2. The planning proposal should be updated prior to the LEP being made to:

- a) address consistency with Ministerial Direction 5.1 Integrating Land Use and Transport and include the outcome of consultation with TfNSW and any refinements to the proposal that may have resulted. This should include, but not be limited to:
 - i) information on any agreement with TfNSW and Council in relation to a Reference Design for the bus interchange
 - ii) proposed mitigation measures surrounding intersection upgrades be developed into a concept stage to demonstrate feasibility
 - b) address consistency with Ministerial Direction 5.3 Development near Regulated Airports and Defence Airfields and the outcome of consultation, including requirements for approvals from the relevant Commonwealth department.
 - c) Include a complete set of draft LEP maps.
3. Public exhibition is required under section 3.34(2)(c) and clause 4 of Schedule 1 to the Act as follows:
- (a) the planning proposal is categorised as standard as described in the *Local Environmental Plan Making Guideline* (Department of Planning and Environment, August 2023) and must be made publicly available for a minimum of 20 working days; and
 - (b) the planning proposal authority must comply with the notice requirements for public exhibition of planning proposals and the specifications for material that must be made publicly available along with planning proposals as identified in *Local Environmental Plan Making Guideline* (Department of Planning and Environment, August 2023).

Exhibition must commence before 28 February 2024.

4. Consultation is required with the following public authorities and government agencies under section 3.34(2)(d) of the Act and/or to comply with the requirements of applicable directions of the Minister under section 9 of the Act:
- Transport for NSW
 - NSW Department of Planning and Environment's – Biodiversity and Conservation Division of the Environment Heritage Group
 - Greater Cities Commission
 - NSW State Emergency Service
 - Department of Infrastructure, Transport, Regional Development, Communications and the Arts
 - Civil Aviation Safety Authority
 - Sydney Airport Corporation
 - Relevant Service Providers, including Sydney Water and Ausgrid
 - Randwick Council.

Each public authority is to be provided with a copy of the planning proposal and any relevant supporting material via the NSW Planning Portal and given at least 30 working days to comment on the proposal.

5. A public hearing is not required to be held into the matter by any person or body under section 3.34(2)(e) of the Act. This does not discharge Council from any obligation it may otherwise have to conduct a public hearing (for example, in response to a submission or if reclassifying land).
6. This LEP should be completed on or before 24 July 2024.

Dated 4 October 2023



Amanda Harvey
Executive Director
Metro East and South
Department of Planning and Environment

Delegate of the Minister for Planning and
Public Spaces

30 November 2022

TfNSW Reference: SYD22/01301/01

Council Reference: PP-2022-1337

Meredith Wallace
General Manager
Bayside Council
Ground Floor, 444-446 Princes Highway
Rockdale NSW 2216

Dear Ms Wallace,

RE: PRE-PLANNING PROPOSAL, WESTFIELD EASTGARDENS, 152 BUNNERONG ROAD, EASTGARDENS

Transport for NSW (TfNSW) appreciates the opportunity to comment on the above proposal, which was referred to us by Council in correspondence dated 24 October 2022.

TfNSW has reviewed the Pre-Planning Proposal Rezoning Review and supporting studies. We note that the proposal for the site seeks to amend the *Bayside Local Environmental Plan 2021* (the LEP) to:

- Increase the maximum FSR from 1:1 to 1.8:1
- Increase the maximum building height from 25m to part 25m, part 34m, part 40m and part 59m
- Introduce a site-specific clause to implement the consideration of the Eastgardens Technical Note (December 2021).

It is understood that the Planning Proposal amendments would also be supported by a draft site specific DCP that would include further details and controls in relation to:

- Landscape strategy with the provision of canopy trees;
- Public domain interfaces and active street frontages;
- Car park screening;
- Maximum building length, maximum footprint area, building depths and articulation;
- Pedestrian connections;
- Building separation;
- Building height strategy; and
- Primary and secondary building setbacks.

TfNSW also notes that in June 2022, the Sydney Eastern City Planning Panel considered a Rezoning Review for this Planning Proposal. The Panel resolved to defer consideration for Gateway, pending the submission of additional information. One of the additional information requests was:

- The Council advise the Panel of the requirements of TfNSW for an upgraded bus interchange.

TfNSW's detailed comments are provided in **Attachment A**. It is requested that the comments provided are satisfactorily addressed and/or considered by Council and the Sydney Eastern City Planning Panel in undertaking the Rezoning Review.

Should you have any questions or further enquiries in relation to this matter, please don't hesitate to contact Senior Land Use Planner – Andrew Popoff on 0413 459 225 or via email: Andrew.Popoff@transport.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read "Carina Gregory".

Carina Gregory
Senior Manager Strategic Land Use
Land Use, Network & Place Planning, Greater Sydney Division

**Attachment A: TfNSW comments on the Pre-Planning Proposal, Westfield Eastgardens at 152
Bunnerong Road, Eastgardens**

(30 November 2022)

1. Comment / Recommendations – Proposed Bus Interchange:

TfNSW does not support the design of the bus interchange that has been currently proposed by the proponent but would like to collaboratively work with the proponent to resolve our concerns. The current design does not satisfy the operational requirements for this location. Council is advised that TfNSW has recently arranged to meet with the proponent (Scentre Group) very shortly to provide further information on a modified design. The following points below provide some additional information and context on what TfNSW is aiming for the proposed Bus Interchange to address:

- Envisaged and planned improvements to bus service levels across the Eastern Suburbs and to the site will require an upgrade and expansion of capacity of the bus interchange at Eastgardens. The existing bus interchange is inadequate in terms of operational and customer capacity, functionality, accessibility and amenity. Current infrastructure arrangements have over time precluded the use of higher-capacity buses at the interchange, necessary to meet passenger demand and travel needs.
- Any upgrades to the interchange will need to be sensitively designed in consultation with TfNSW to support a functional, practical and efficient bus operational environment that minimises delays and excessive bus circulation around terminal movements; and ensures safety and reliability by minimising conflict and friction between buses, pedestrians, cyclists and general traffic.
- Quick, direct and efficient bus route paths into, through and out of the interchange will need to support higher quality bus services expected by the community. This includes consideration of bus turns, movements, site entries and exits to and from the surrounding road network.
- Estimates of future space requirements for bus stops, bus parking (layover) and customer waiting areas need to be considered together with the functional layouts of these spaces. Consultation with TfNSW will be needed to ensure a robust, future-proofed and space-efficient design that meets the needs of future users accessing the site, bus operators and interchanging travellers.

Council is advised that TfNSW are also looking at preliminary estimates of future bus space needs. However, these really depend on future modified layout(s) provided from the proponent.

2. Comment / Recommendations – Transport Review Report - Aimsun Future Year and Development Options Traffic Assessment:

TfNSW has reviewed the submitted SLR Consulting - Transport Review Report – Aimsun Future Year and Development Options Traffic Assessment and highlights the following concerns / issues below. Resolution of these issues will require these reports and the AIMSUN modelling to be significantly updated / revised:

- **Concerns with the validity of this Report / Modelling Assessment and need to revisit a number of assumptions, such as:**
 - Growth trends post-COVID (including background traffic growth);

- Travel patterns;
- Weekend and Thursday peaks will need to be re-examined – because the area has deteriorated further since 2018 (although noting that several interventions have now been implemented);
- Noticeable increase in occupied dwellings within Eastgardens over the past 5 years;
- Current higher propensity for car usage at the expense of public transport usage (post covid);
- The access into Westfield from Banks Avenue is dangerous and problematic and needs further consideration;
- Existing Public Transport Services;
The Bus services referred to within this Report have changed substantially since 2019, post-COVID and due to the Light Rail opening. Most of these services identified within the SLR Consulting report do not exist anymore nor do they run through Eastgardens.

In addition, TfNSW does not agree with the statement within the SLR Consulting report that states: *"Westfield Eastgardens has excellent existing access to public transport"* noting that this is no longer valid.

- TfNSW raises concerns regarding several modelled intersection upgrades listed below;
 - Wentworth Avenue / Denison Street / Westfield Access (proposed upgrade)

Feasibility is questionable based on the layout depicted within the SLR Consulting report. The proposal introduces new movements into the development at this intersection. The increase in significance of access into the site at this intersection should be discouraged. The proposed turn bay to cater for the introduced additional access is at a lesser standard to that depicted at the adjacent Wentworth Ave / Banks Ave intersection, which could become challenging in the long term.

Three lanes out of the development could also be an issue as currently the right turn from Denison Street runs a filter whilst vehicles are egressing from the Westfield Access (i.e. current Phase C). If the future year modelling has modelled this proposed upgrade utilising a single phase to simultaneously discharge traffic out of Denison Street – Westfield Access then TfNSW sees this as introducing a safety risk and problem to the network.

Ideally, access into Westfield should be encouraged via Banks Ave and not from Wentworth Avenue. However, this will require the proponent to address the safety and capacity of the access into Westfield from Banks Avenue.

- Bunnerong Road / Meriton Blvd (now known as Tingwell Blvd) – Future signalled T intersection

TfNSW does not support signalisation of this intersection. This should be retained as left-in / left-out only as it would encourage an unwelcomed movement through the Meriton Site and potentially impact the Bunnerong Road corridor (a rapid bus route).

- Wentworth Avenue / Page Street (Upgrade) which includes proposed removal of kerbside parking along Wentworth Avenue near the intersection

Removal of parking along the Wentworth Avenue corridor would improve the efficiency of the corridor. However, majority of land use along this section of the road is low density residential and the impact of parking removal on adjacent properties (including community engagement) will need to be further evaluated by the developer and/or Bayside Council. TfNSW understands that Council have previously generally opposed the removal of this parking. Therefore, to address this uncertainty the modelling may need to conduct some sensitivity analysis (with / without kerbside parking).

3. Proposed intersection upgrades:

- Any proposed intersection upgrades identified to mitigate the impacts of the proposed development uplift need to be developed to a concept stage in order to demonstrate feasibility and be referenced within the supporting Transport Review Report - Aimsun Future Year and Development Options Traffic Assessment.

If this site is given a Gateway Determination to proceed in the future, TfNSW requests the inclusion of a Gateway Condition requiring the proponent to further consult with TfNSW to address the key issues raised, particularly as they relate to the design of the proposed bus interchange, transport review report and proposed intersection upgrades, prior to public exhibition of the planning proposal.

Appendix B

Bus Interchange Preliminary Concept Options [SLR]



