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Level 25, 55 Collins Street
Melbourne VIC 3000

18 February 2022

Project/File: N186960

Mr. Nik Wheeler
Urbis
Angel Place
Level 8, 123 Pitt Street
Sydney NSW 2000

Dear Nik,

Reference: Planning Proposal Bankstown Central Shopping Centre (SYD21/01120/01)

A Planning Proposal was submitted on behalf of Vicinity Centres (VCX) to Canterbury-Bankstown Council (Council) to initiate an amendment to the Bankstown Local Environmental Plan (BLEP 2015) with respect to the Bankstown Central Shopping Centre site located at 1 North Terrace, Bankstown (the site).

It is understood that Council invited Transport for New South Wales (TfNSW) to review the Planning Proposal. Upon their review, TfNSW suggested that a *"comprehensive Transport Study be undertaken to assess the cumulative impacts of the planning proposal on existing and planned public transport infrastructure and regional road network".* The letter clarifies TfNSW's view that this is warranted *"given the significant scale of development proposed in the masterplan for the Bankstown Central Shopping Centre site associated with the LEP amendment, as well as the evolving character of the Bankstown City Centre*".

This letter has been prepared to respond to the TfNSW letter to provide additional information to Council regarding the transport impact assessment report previously prepared by GTA (now Stantec) which was submitted with the Planning Proposal. The overarching conclusion of this letter is that whilst we consider that the comprehensive transport study requested by TfNSW has merit in guiding the delivery of transport infrastructure in the Bankstown CBD, it is not considered necessary or reasonable for completion as part of a Planning Proposal submission. This conclusion is held for the following reasons:

1. The transport assessment submitted with the Planning Proposal contains a robust assessment of the transport impacts of the anticipated future land use. In our view, the level of assessment provided in that report is consistent with typical requirements for a Planning Proposal. If there are any clarifications of assessment assumptions or a need for further assessment of development implications, we consider that it is reasonable that this occurs post-Gateway or for subsequent development applications when there is greater certainty regarding the land use and prevailing transport conditions.

2. The request from TfNSW appears to have limited regard to the extensive body of work that was completed by Council, including detailed traffic modelling, that informed Complete Streets for the Bankstown CBD. The Complete Streets documents sets out the future Year 2036 transport infrastructure proposed for the Bankstown CBD, which appears to be the principal outcome sought to be determined by the TfNSW requested study. It is further noted that the Planning Proposal has been prepared having regard to Complete Streets, including its recommended network of active travel linkages, and the accompanying transport report outlines the extent of any transport differences. Most notably, this includes the provision of bus bays on the future extension of Jacobs Street, rather than an off-street bus interchange on adjacent land.

3. The requested TfNSW study seeks to identify infrastructure works and determine a funding / cost apportionment mechanism for those works. This is not a body of work that can reasonably or effectively be led by a private sector property owner. Rather, it needs to be led by Council, in collaboration with key stakeholders (including, but not limited to, Vicinity Centres and TfNSW). This approach will be particularly important for the Bankstown CBD given projects like the extension of Jacobs Street (as proposed in Complete Streets) will not be "required" by the development of the Bankstown Central site, but will naturally be dependent on it occurring, and will have far broader benefits to the movement of people between the train station and Western Sydney University campus as it is proposed to allow the creation of shared zones along The Appian Way and Fetherstone Street. In this regard, it is recommended that the transport study sought by TfNSW is completed separate to the Planning Proposal process.

For completeness, a summary of how the transport assessment submitted with the Planning Proposal responds to and/or addresses the comments outlined in the TfNSW letter is contained in **Appendix 1** of this letter. Moreover, at Council's request, our recommendation as to how the broader transport study could best be completed separate to the Planning Proposal process is outlined in **Appendix 2**. This latter recommendation is provided for Council's consideration, and further discussion / agreement with Vicinity Centres.

Naturally, should you have any questions or comments regarding the above or attached, please do not hesitate to contact me.

Sincerely,

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Attachments: Appendix 1, Appendix 2

Appendix 1 - Detailed Commentary on TfNSW Letter

The TfNSW letter outlines a recommended methodology for the transport study.

The key elements of this methodology, including the extent to which they have been already assessed in the transport report that accompanied the Planning Proposal, is outlined as follows:

Existing conditions assessment

"Define the existing conditions of the transport system serving the master plan site, addressing the levels of performance for all transport modes, including walking, cycling and freight."

An existing conditions assessment of transport modes is contained in the Colston Budd Rogers & Kafes (CBRK) Transport Impact Assessment Report (dated March 2019). This report provided a preliminary assessment which was followed by a more detailed Transport Impact Assessment Report (dated July 2020) prepared by Stantec (then GTA); hereafter referred to as the July 2020 TIA. This includes an assessment of the pedestrian network, cycling network, public transport network and car parking.

In addition, it is noted that the existing transport network was comprehensively assessed in Complete Streets, including within the technical appendices. These appendices included a Transport Issues and Opportunities (Appendix A) and Traffic Modelling Report (Appendix C).

In combination, these documents are considered to provide an extremely thorough overview of existing transport conditions in the Bankstown CBD.

Connections

Assess the impacts and opportunities arising from the master plan proposal on travel demands and operation of the rail and bus networks and future Metro.

The July 2020 TIA contains extensive discussion on the impacts and opportunities with respect to the bus network, including (most notably) the construction of the Jacobs Street extension to provide an on-street bus interchange.

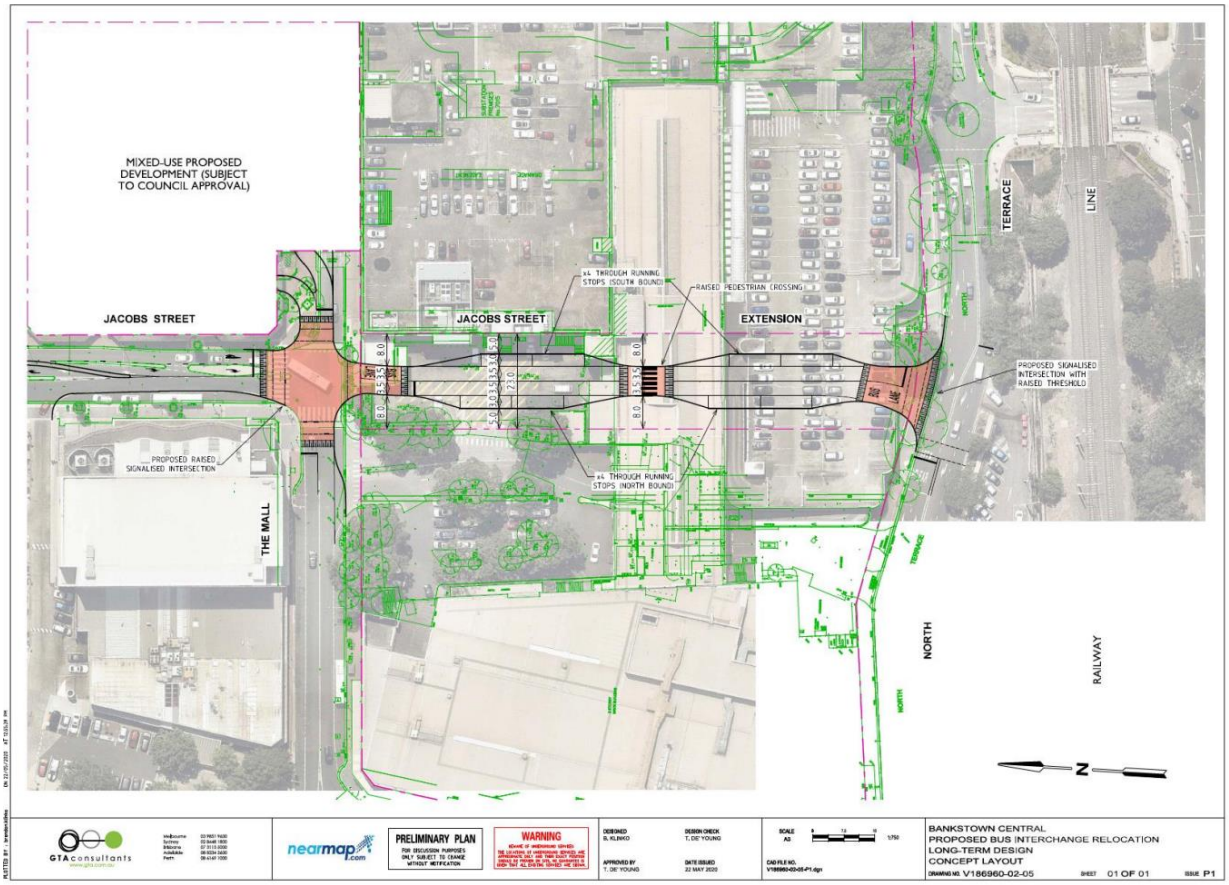
Specifically, the TIA includes a concept layout plan for the on-street bus interchange with the provision of 8 on-street bus bays. This concept layout is reproduced below in Figure 1 for reference. It is noted that the provision of 8 bus stops is consistent with the arrangements recently approved by Council and TfNSW for the relocation of the existing bus interchange off the Bankstown Central site. The relocation will see two bus stops provided on Bankstown Central land (together with 10 layover bays), two bus stops located on Jacobs Street north of The Mall, and four bus stops located on The Mall west of Jacobs Street. This arrangement is anticipated up to the delivery of the long-term solution.

The TIA also includes discussion regarding bus layover and how this ought to be located outside of the CBD in the fullness of time. (The TIA includes discussion how the bus infrastructure can be staged to achieve this outcome.) As such, the concept layout does not show layover bays as they are not expected to be accommodated in the Bankstown CBD in the long term.

The TIA does not include an assessment of the implications on the rail network as it is considered beyond the reasonable expectations of a report submitted for a Planning Proposal. However, it is assumed that the planning for the rail network has considered the likely uplift from the future development of the site.

Reference: **Planning Proposal Bankstown Central Shopping Centre (SYD21/01120/01)**

Figure 1: Proposed Jacobs Street Extension and Bus Interchange – Concept Design



Source: July 2020 TIA

Define a clear, permeable, and accessible precinct network of walking and cycling connections to help achieve a sustainable transport system to accommodate the master plan proposal.

The masterplan for the Bankstown Central site has been informed by Complete Street which outlines the proposed active travel network for the area.

The benefits to walking and cycling as a result of the infrastructure proposed within the masterplan has been documented within the TIA. This includes improvements to connectivity in both the east-west and north-south directions. In addition, it is understood that VCX submitted a Letter of Offer to Council with the Planning Proposal which will see it construct cycleways along Rickard Road and The Appian Way to the site frontages.

Investigate opportunities for a permanent bus interchange in consultation with TfNSW and Council.

As outlined above, the July 2020 TIA contains a discussion and concept layout plan showing the proposed location of the bus interchange on the Jacobs Street extension. It is understood that this arrangement is currently being assessed by TfNSW and can be progressed concurrently with, and thus not hold up, consideration of the Bankstown Central Planning Proposal.

Traffic generation rates

Traffic generation rates should be identified through empirical evidence (i.e., surveys of similar land uses with comparable characteristics) with consideration of cumulative impacts of other known traffic generating developments within the area of influence".

The July 2020 TIA contains a trip and traffic generation estimate which have principally been informed by data provided in the RMS Technical Direction (TDT 2013/04a). The TIA does not include an assessment of the generation of other development in the area as it is considered beyond the reasonable requirements for a Planning Proposal submission. Appendix 2 of this report outlines how the broader land use changes in the Bankstown CBD can be assessed.

Transport Modelling

The following three stage modelling approach should be considered:

1. ***Strategic transport modelling using existing model resources (i.e., STM and STFM) to identify travel demands, patterns and mode splits. Critically review the strategic modelling outputs to ensure that they adequately reflect future travel behaviours, including travel patterns and travel demands.***
2. ***Appropriate modelling software that considers route choice based on travel time delay and dynamic/coordinated traffic signal operations (i.e. microsimulation, hybrid model, or mesoscopic model).***
3. ***Intersection modelling (incorporating network-based signal operations) - based on the flows from the above modelling exercise.***

The above modelling approach should include a base year model, future years base case (without development), and a separate model with full development and background traffic growth. Consultation should be undertaken with TfNSW and Council to agree on the year the future base should be modelled.

The applicant's traffic consultant should collaborate with TfNSW and Council to identify and agree on the geographical boundary/extent of the model study area which will be based on the output from the strategic models (Item #1 above), key travel links to measure impacts of development traffic on travel time and intersections to be modelled.

The July 2020 TIA includes an assessment of the operation of the surrounding road network with consideration of the Planning Proposal. This assessment was completed using the AIMSUN traffic model prepared by Stantec (then GTA) that tested the appropriateness / impacts of the transport network changes proposed in Complete Streets for Year 2036 conditions.

Specifically, the TIA includes results for two scenarios: "future base with complete streets" (which is the 2036 land use yield as assumed within Complete Streets plus the transport network changes) and a "post development with complete streets" (which adds the development yield associated with the Planning Proposal). Using the terminology used by TfNSW, the two scenarios considered within the TIAR equates to a 'future years without development' and 'future years with development' scenarios.

If additional traffic modelling is required for the CBD (including considerations for additional development and/or the staged delivery of transport infrastructure), we contend that this work would be best completed separate from the Bankstown Central Planning Proposal and form part of a broader review of transport infrastructure and stage for the Bankstown CBD. A recommended methodology for this broader review is in Appendix 2.

Identified Road and Transport Infrastructure

Based on the above modelling outputs, identify transport and road infrastructure requirements to support the proposed increase in floor space and changes to land use. Staging based on trigger points linked to GFA/masterplan stages should be identified.

The applicant's traffic consultant will be required to work in collaboration with Council and TfNSW to develop a precinct network of walking and cycling connections linked to the master plan site to help achieve a sustainable transport system.

The identification of transport and road infrastructure requirements to support Bankstown CBD has already been documented in Complete Streets which we understand has previously been reviewed and supported by TfNSW.

For the Planning Proposal, the masterplan and July 2020 TIA have been prepared on the basis that the future transport network outlined in Complete Streets represents the desired transport network. This includes the extension of Jacobs Street, which is discussed in depth in the TIA.

If the configuration of this network requires further testing including consideration of how its best staged / delivered over time, we would contend its best completed by Council, and effectively as an addendum to Complete Streets (rather than as a requirement of the Planning Proposal), using the methodology presented in Appendix 2.

Funding of transport and road network infrastructure

High level strategic/concept engineering plans overlayed on an aerial to scale should be developed to determine feasibility including any third-party land components.

Strategic cost estimates of any identified walking, cycling, and road infrastructure required in support of the planning proposal should be prepared. These costs should align with the NSW Global Rates. In consultation with Council, DPIE and TfNSW, identify a planning/funding mechanism to deliver the identified transport infrastructure".

The completion of this scope item is not reasonable nor appropriate to be led by a private sector party given they would ultimately also be contributing to the works through identified mechanism.

Appendix 2 - Recommended Methodology for TfNSW Requested Transport Study

It is recommended that the approach for the transport study is tailored to best achieve the objectives sought by TfNSW whilst maintaining a high level of collaboration between the stakeholders (particularly Council and VCX).

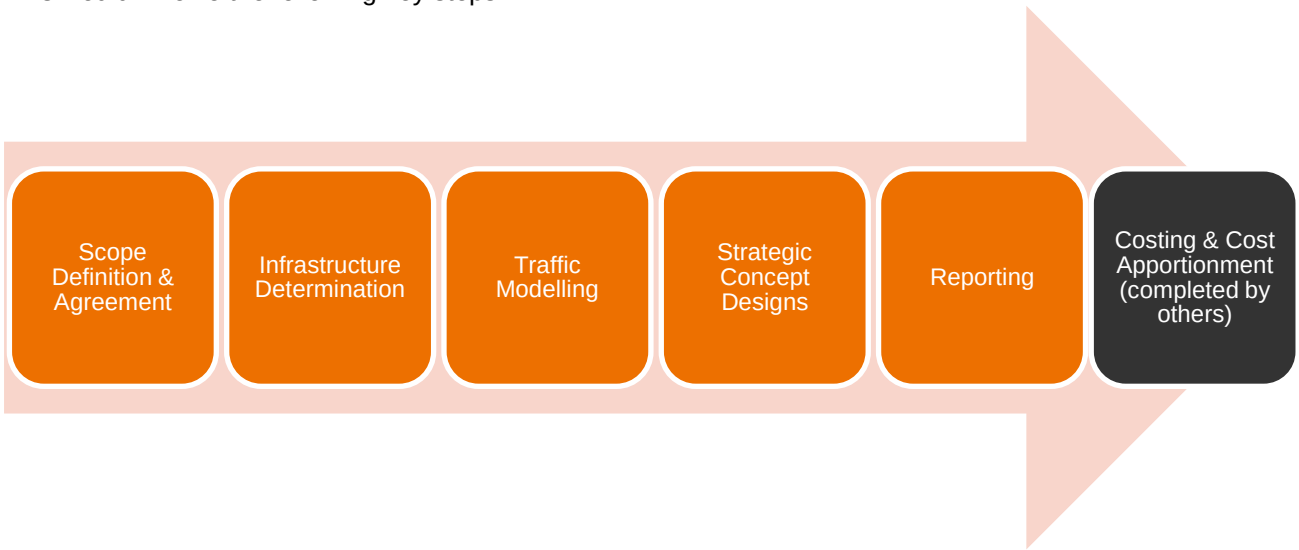
In the absence of this collaboration or without an approach that deals with likely conflicts and differences of opinion at an early stage, we expect that the transport study may have limited benefit, as key inputs, assumptions, and/or modelling outputs may become debated amongst the stakeholders.

In this instance, it is evident that the desired objective sought by TfNSW is the identification, scoping and costing of the transport infrastructure required in the Bankstown CBD over the next 10-20 years, having regard to both the network changes proposed by Complete Streets and the envisaged land use intensification on the Bankstown Central site (and broader CBD).

For the Bankstown CBD, it is evident that the majority of this work has already occurred, as the future Year 2036 transport network has already been identified through Complete Streets. This network was also tested using AIMSUN traffic modelling which informed the intersection and streetscape proposals outlined in Complete Streets.

In this context, we consider the best approach for the transport study is not to seek to determine through traffic modelling what transport infrastructure is required for the Bankstown Central Planning Proposal but rather seek to determine the impact of the developments within the CBD (including the Bankstown Central Planning Proposal) on the transport infrastructure that is proposed and can realistically be delivered per the aspirations of Complete Streets. ***In essence, we recommend a "vision and validation" approach, not a "predict and provide" approach, to this study.***

This would involve the following key steps:



1. **Scope Definition & Agreement** – This would be a twofold process whereby Council and VCX first agree on the proposed methodology that they deem most appropriate and achievable, and then secondly with TfNSW to seek their consent to that proposed methodology.

2. **Infrastructure Determination** – This would involve the identification of the Complete Street transport infrastructure including road network that can realistically be delivered for key timeframes (e.g., Years 2026, 2031 and ultimate 2036) given the constraints of land ownership and development staging of the Bankstown Central site. This would need to occur openly and collaboratively between Council and VCX, rather than being dictated by traffic modelling. Amongst other items, this would need to confirm the timing of the construction of the Jacobs Street extension and thus the implications for the timing of the creation of a shared zones on The Appian Way and Fetherstone Street.

3. **Traffic Modelling** – Following the collaborative determination of the transport / road network that will be delivered at each key timeframe and with input from VCX and Council on land use change for each timeframe, undertake traffic modelling using the three-stage approach recommended by TfNSW. This would include an assessment of the anticipated trip generation of the indicative land use to also allow consideration of other (non-vehicle) travel demands and implications. This would include scenario testing with and without the Bankstown Central Planning Proposal including consideration of whether infrastructure works above and beyond those contemplated in Complete Streets are required. For the without development scenario, it would also test and confirm intersection treatments as were proposed in Complete Streets.

4. **Strategic Concept Designs** – Based on the modelling outputs, strategic concept designs of the required transport infrastructure would be prepared. These designs would be prepared on aerial photograph bases. It is assumed that the landscape architecture plans prepared for and contained in Complete Streets would be provided to Stantec in a CAD format.

5. **Reporting** – The findings and recommendations from the above would be summarised in a standalone report. This would include the strategic concept designs to allow the costing and funding mechanisms to be determined as a separate stage of work by others. It is emphasised that the costing and funding mechanisms would not be completed or determined by Stantec, as we consider they ought to be completed by a consultant who is independent of the project.

In our view, whilst the study will undoubtedly be beneficial to all parties as it will provide greater certainty on the required transport infrastructure in the CBD (and presumably its equitable funding), we would contend that it is inappropriate to be led by the private sector or be directly linked to the Planning Proposal for the following reasons:

- The study seeks to identify CBD wide transport infrastructure works and then apportion costs for that transport infrastructure onto landowners, including VCX. This process would typically be led by Council (nor the private sector).

- The study needs to be directly linked to Complete Streets which has already identified the desired ultimate (Year 2036) transport / road network plan for the CBD. Importantly, it is noted that Complete Streets was also informed by AIMSUN traffic modelling.

- The study would be particularly challenging if led by a private sector party with the objective of identifying its own required mitigation. This latter approach would align more with the “predict and

provide" approach which is likely to lead to conflict over key transport infrastructure. (The most likely example is the new bus interchange, either on the Bankstown Central site as proposed in Complete Streets, or the extension of Jacobs Street as proposed in the Bankstown Central Planning Proposal. Putting aside its location (for now), this bus interchange will clearly serve a far broader benefit to the CBD than solely accommodating the increased travel demands of the Planning Proposal e.g., its provision will also allow for The Appian Way and Fetherstone Street to become pedestrian-focused shared zones, which have little need or nexus to the Bankstown Central Planning Proposal.)