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By email
19 December 2022

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Our ref 244326

Lourdes Retirement Village

Response to Submissions – Transport and Traffic

Arup has been commissioned by Levande to assess the transport and traffic impacts of the planning proposal for Lourdes Retirement Village. The planning proposal was exhibited in August and September 2022 and community and agency submissions were collated in October and November 2022.

This letter provides an overview of the changes to the master plan since exhibition of the planning proposal, proposed site-specific car parking rates and the responses to submissions for transport and traffic.

Amended master plan

Following exhibition, the master plan was amended to include the following changes. These changes are shown graphically in Figure 1.

- Loading and servicing vehicle access has been amended such that access is proposed via the eastern-most entry to the site, with a dedicated ramp to the loading dock. This change would minimise heavy vehicle movements within the site.
- The road layout has been adjusted to segregate vehicles accessing the aged care facility parking from vehicles accessing the independent living units (ILUs) parking and town houses parking. This change would reduce vehicle movements on the access road near the adjacent property at 91 Stanhope Road.

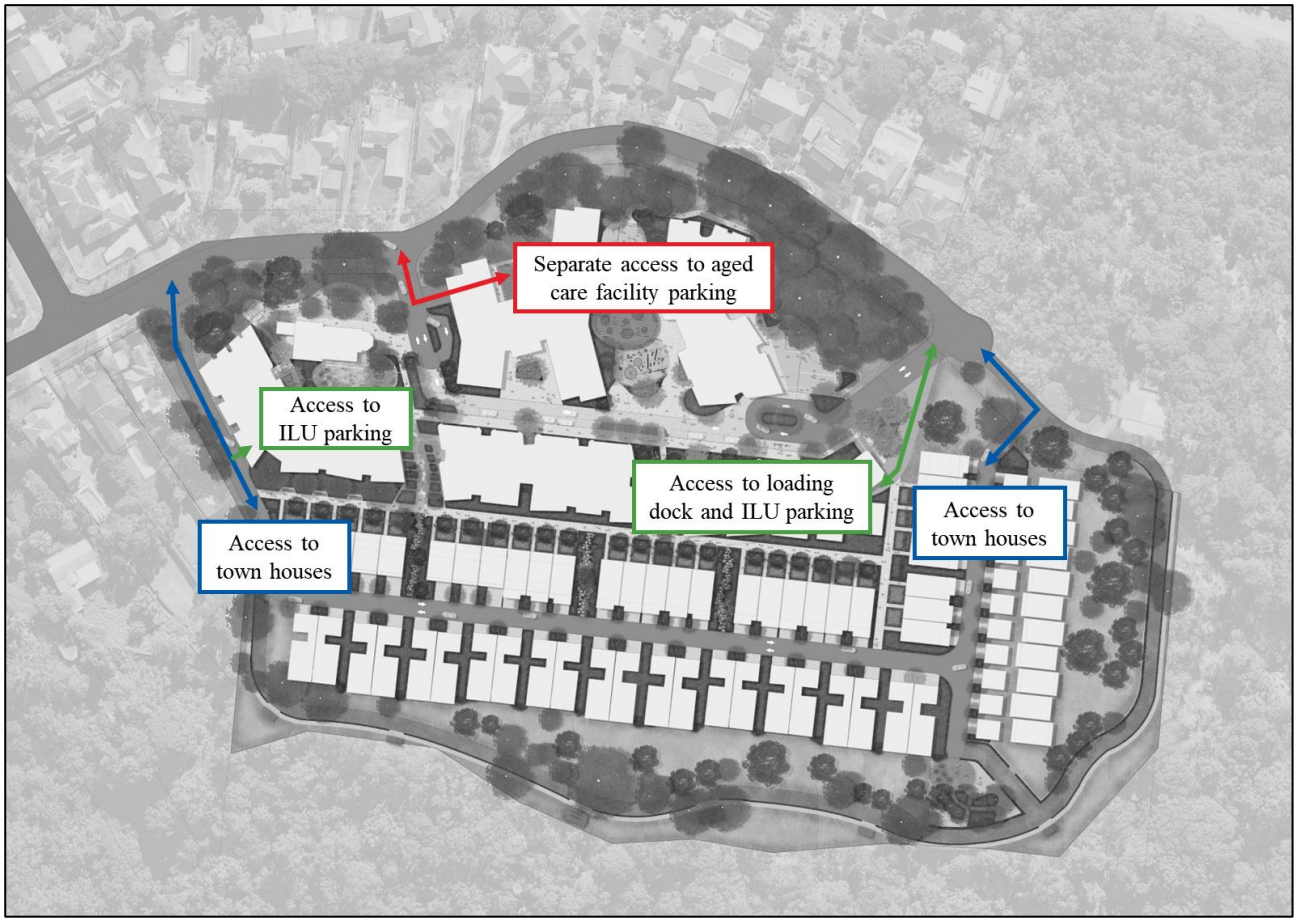

Figure 1 Revised access points in the amended master plan

Site-specific car parking rates

The site proposes to provide site-specific car parking rates as shown in Table 1. These rates provide additional parking over the minimum requirements outlined in Ku-ring-gai Council's (Council) Development Control Plan (DCP) and aim to incorporate community feedback to minimise the potential for parking impacts on surrounding streets.

It is noted that higher car parking rates generally correlate to higher car ownership and traffic generation. However, as noted in the Table 8 of the *Lourdes Retirement Village Transport Assessment*, the impacts on the surrounding road network are minimal and any additional impacts as a result of additional parking are also expected to be minimal. Furthermore, trips generated as a result of additional parking for aged housing are expected to generally occur outside of the network peak hours.

Table 1 Site-specific car parking rates

Land use	DCP minimum parking rate	Proposed site-specific parking rate
Independent living unit (ILU)	Resident funded development: 2 spaces per 3 units (equivalent to 0.67 spaces per unit) Visitor parking: 1 space per 5 units	Studio unit: 0.5 spaces per unit 1-bedroom: 1 space per unit 2-bedroom: 1.25 spaces per unit 3-bedroom: 2 spaces per unit Visitor parking: 1 space per 4 units
Town house	1-bedroom: 1 space per unit 2-bedroom: 1.25 spaces per unit 3-bedroom: 1.5 spaces per unit Visitor parking: 1 space per 4 units	1-bedroom: 1 space per unit 2-bedroom: 1.5 spaces per unit 3-bedroom: 2 spaces per unit Visitor parking: 1 space per 4 units
Residential aged care	1 space per 10 beds for visitors 1.5 spaces per 2 employees 1 space per ambulance	

Response to submissions

The response to community submissions is shown in Table 2. The response to Transport for NSW (TfNSW) and Council submissions is shown in Table 3.

Table 2 Response to community submissions

Issue raised		Response
Traffic congestion and road network	The road infrastructure cannot accommodate the increase in traffic	Traffic modelling has been undertaken as part of the Transport Assessment. The traffic modelling identifies that the key Werona Avenue / Stanhope Road intersection is expected to operate satisfactorily with traffic generated by the proposal. TfNSW has also reviewed the proposal and has noted that *'traffic generated by the proposal is relatively minor in nature'* with reduced impacts on the local and regional road network (refer to Appendix A).
	The traffic assessment has focused on key intersections and do not consider local implications on Stanhope Road and Roseberry Road adjacent to the site.	As shown in Table 6 of the Transport Assessment, the proposal is expected to generate an additional 44 trips in the weekday AM peak, 39 trips in the weekday PM peak and 63 additional trips in the weekend peak. This equates to less than one additional vehicular trip per minute in the weekday peaks, and approximately one additional vehicular trip per minute in the weekend peak. Therefore, the increase in traffic is not expected to have a significant impact on Stanhope Road and Rosebery Road. TfNSW has also reviewed the proposal and has noted that *'traffic generated by the proposal is relatively minor in nature'* with

Issue raised		Response
		reduced impacts on the local and regional road network (refer to Appendix A).
	Object to the proposal for a secondary traffic access to the east of the existing main access within a few metres of the turning point of the cul-de-sac. Instead the existing secondary access from the end of Stanhope Road should be used.	The eastern-most access facilitates connectivity to the town houses and segregates town house traffic from aged care facility traffic. The proposed location also allows for a larger traffic-free bushwalking area to the south-east of the site, when compared to using the existing secondary access from the end of Stanhope Road.
	The proposed new western entry/exit is too close to the existing awkward Rosebery / Stanhope Road intersection.	There are three proposed access points, spreading the traffic across three priority intersections. The western entry/exit is proposed to separate traffic associated with the townhouses and ILUs from traffic associated with the local centre and aged care facility. The western entry/exit is not expected to impact the performance of the Rosebery Road / Stanhope Road intersection as the proposal is expected to generate up to approximately one additional vehicle trip per minute during peak periods. TfNSW has also reviewed the proposal and has noted that *'traffic generated by the proposal is relatively minor in nature'* with reduced impacts on the local and regional road network (refer to Appendix A).
	Access was blocked to residents along Stanhope Road as a result of recent COVID testing at Dalcross Hospital.	This issue is outside of the scope of the Planning Proposal.
	The realignment of a major entry will impact on amenity of the adjacent dwelling as a result of headlights of exiting cars from the elevated platform on which the village is situated.	As shown in Section 2.6.4 of the Transport Assessment, based on traffic survey data, traffic movements exiting the site at night are anticipated to be minimal.
	Existing poor quality road surface and lack of kerb and gutter along Stanhope Road.	This is an existing issue and is a matter for Council. All developments are required to make contributions to the authority Council to be spent on local infrastructure. It is the responsibility of Council to allocate these funds.
Traffic safety and emergency access	Impacts on traffic safety within the retirement village as a result of increased traffic from the townhouses.	Traffic accessing the townhouses would use a separate internal road and access point (western access and eastern access) and would therefore be separated from the local centre.
	Increase traffic hazards and traffic noise on the steep sections of Stanhope Road, particularly through the narrow roadway between 74 Stanhope Road and the Swain Garden, and between 74 and 95 Stanhope Road.	This is an existing issue and is a matter for Council. All developments are required to make contributions to the authority Council to be spent on local infrastructure. It is the responsibility of Council to allocate these funds.
	Increased pedestrian conflicts between Redgum Avenue and Rosebery Road where there are no footpaths.	This is an existing issue and is a matter for Council. All developments are required to make contributions to the authority Council to be spent on local infrastructure. It is the responsibility of Council to allocate these funds.

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Public transport	Lack of bus services to the site which are infrequent.	The provision of bus services is managed by TfNSW and outside of the scope of the Planning Proposal. However, there is potential to liaise with TfNSW to consider additional bus services in the future.
Car parking	Surrounding streets would be impacted by increased parking demand. In particular, only 94 car parking spaces are proposed to be provided for 141 independent living units which will impact on street parking.	As discussed in Section 4.2.1 of the Transport Assessment, the proposal includes car parking that exceeds the minimum requirements outlined in Council's DCP requirements to minimise impacts on surrounding streets.
	Confirm whether onsite visitor and employee parking will be provided to ensure that there is not an increase in street parking.	As discussed in Section 4.2.1 of the Transport Assessment, the proposal includes car parking that exceeds the minimum requirements outlined in Council's DCP requirements to minimise impacts on surrounding streets.
Traffic report comments	Concern was raised that the traffic study is of not value as it states that: *the report should not be relied on by any party other than Stockland, and that the authors accept no responsibility to third parties – the report is therefore of no value in this process.*	This disclaimer notes that the report is intended to assess the Planning Proposal as required by the client and that it should not be relied upon by third parties for any other use.
	The traffic study was based on 2015 traffic surveys and therefore is not accurate.	Although the original traffic surveys were undertaken in 2015, a background growth rate of 3% was applied to uplift the traffic flows to 2021. This is considered to be robust as the surrounding land use if primarily low-density residential.
	The "traffic survey" undertaken in 2017 was taken when the occupancy of the village was already significantly reduced due to the developer's policy of neglect and de-occupation.	The original traffic surveys were undertaken in 2015. A background growth rate of 3% was applied to uplift the traffic flows to 2021. This is considered to be robust as the surrounding land use if primarily low-density residential.
	The traffic movement numbers quoted in the traffic report indicate that having entered Lourdes Retirement Village only about half of those vehicles leave (this would seem to be an interesting mathematical concept).	Section 2.6.2 of the Transport Assessment states that approximately an equal number of vehicles enter and exit the site each day.
	The statement in the Traffic Report that Kerbside parking on Stanhope Road is intermittent" is not correct.	On site and desktop assessments identified the kerbside parking to be intermittent at sections of Stanhope Road, such as near 75 Stanhope Road.
	The traffic assessment demonstrates that there will a significant increase in traffic along the narrow Stanhope Road. Frequently parked cars make the road effectively a single lane.	On site and desktop assessments identified that Stanhope Road generally is wide enough to accommodate two-way vehicle movements with parked cars.

Issue raised		Response
	The Traffic Study argues that "the Village occupants choose to avoid the road peak hours which occur before 9am and after 5pm" does not apply to the medium density housing.	Agreed. Accordingly, Section 4.3.1 of the Transport Assessment assumes that the peak hour of medium density housing is before 9am and after 5pm.
	The number of additional movements anticipated at peak times is underplayed in the Traffic Report which identifies additional movements that vary from double the existing levels for the 5pm to 6pm peak, to more than 4 times existing between 11:30am & 12:30pm.	The Transport Assessment assumes several conservative assumptions to develop the estimated number of additional traffic movements, including: • Section 4.3 – assuming a 3% annual growth rate for traffic since 2015, which is considered conservative given the surrounding land use is primarily residential. • Table 5 - assuming the higher 0.65 vehicles per peak hour for medium density residential flat buildings. • Section 4.3.1 – assuming that trips travelling to the site would leave the site within the same hour.

Table 3 Response to TfNSW and Council submissions

Issue raised	Response
TfNSW notes that the proposal will facilitate the renewal of an existing retirement village and deliver new seniors housing supply that aligns with Ku-ring-gai's Local Housing Strategy. The proposed renewal also provides an opportunity for improvements to active and public transport amenities, particularly pedestrian facilities within and external to the site. Traffic generated by the proposal is relatively minor in nature noting that vehicle trips generated by seniors housing (not employees of the village) generally occur outside of the morning and evening peak periods thereby reducing potential traffic impacts associated with the proposal on the local and regional road network.	Noted.
Access to services and facilities by residents is reliant on either private vehicle use or the limited service of the 556 bus. Given its limited frequency, particularly during off-peak times when, as identified in the transport assessment, residents are most likely to travel, the 556 bus service is unlikely to be attractive as a mode of travel for residents, employees or visitors.	The provision of bus services is managed by TfNSW and outside of the scope of the Planning Proposal. However, there is potential to liaise with TfNSW to consider additional bus services in the future.
Despite the location of this site on a bus route, the Planning Proposal will result in in the continued heavy reliance by residents on private vehicle use to access basic services and local facilities. This poses an issue for the ageing population. Unless residents have access to a private vehicle and remain able to drive as they age, the site location presents as a barrier isolating the ageing residents from the services, facilities and community groups that this ageing population might access.	The provision of bus services is managed by TfNSW and outside of the scope of the Planning Proposal. However, the site will continue to facilitate public bus services through the retirement village and will continue to provide private buses for seniors housing residents for excursions including shopping trips. There is potential to liaise with TfNSW to consider additional bus services in the future.

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It is Council's experience that whilst there is provision of onsite shuttle bus services, there are no mechanisms to mandate private services and often they are not realised or dwindle over time.	
Arup Transport Assessment (June 2022) estimates the traffic generation of the proposal. For the townhouses, the RTA traffic generation rate for medium density residential flat building was used (0.5-0.65 vehicle trips per hour in the peak hour) to derive total and peak hour traffic generation. While the building typology of the townhouses is that of medium density residential flat buildings, the location factor (>1.3km from transport and services/facilities) is likely to result in the townhouses generating traffic similar to low density residential dwellings (0.85 trips per dwelling during the peak hour), as townhouses are likely to be located in a "missing middle" configuration.	The RTA (now TfNSW) *Guide to Traffic Generating Developments* does not state that the rates for medium density residential flat buildings are based on sites located close to a retail/transport core. Therefore, we believe that the rates used are the most appropriate.
Given that there are 63 townhouses proposed, the traffic generation if considered to behave as low density residential dwellings, would be 54 trips in the peak hour (vs 41 trips per hour as medium density). While this is unlikely to have operational impacts to surrounding intersections, there would be implications for the neighbouring property at 91 Stanhope Road given the location of the proposed access driveway at the western end of the site. The western driveway access should be removed.	The *Guide to Traffic Generating Developments* provides guidance on the environmental capacity of roads for residential amenity. For a local access way at 25 km/h maximum speed, Section 4.3.5 of the guide suggests a maximum peak hour volume of 100 vehicles per hour. The overall traffic generation of the site is expected to be less than 100 vehicles per hour. Furthermore, access to parking for the aged care facility and apartments is split between two main access points, which would further reduce vehicles travelling adjacent to 91 Stanhope Road. The speed limit of the access road is expected to be low to discourage high speeds (such as 10 kilometres per hour in line with existing internal road speed limits). Therefore, the amenity impact of traffic on the western access road is expected to be low.
Access to the basement car park should be provided via the Main Street, and First Avenue (at the western end) should be connected to Main Street, to avoid the impacts to the adjoining low density residential land uses.	The *Guide to Traffic Generating Developments* provides guidance on the environmental capacity of roads for residential amenity. For a local access way at 25 km/h maximum speed, Section 4.3.5 of the guide suggests a maximum peak hour volume of 100 vehicles per hour. The overall traffic generation of the site is expected to be less than 100 vehicles per hour. Furthermore, access to parking for the aged care facility and apartments is split between two main access points, which would further reduce vehicles travelling adjacent to 91 Stanhope Road. The speed limit of the access road is expected to be low to discourage high speeds (such as 10 kilometres per hour in line with existing internal road speed limits). Therefore, the amenity impact of traffic on the western access road is expected to be low.
Vehicle movement counts are to be provided for new access points in/out of the site including service and visitor vehicles.	Table 6 of the Transport Assessment outlines the traffic generation of the site (including service and visitor

Issue raised	Response
	vehicles). For the peak period from 11:30am to 12:30pm, the site is expected to generate: • Aged care facility / apartments – 51 trips • Town houses – 41 trips These trips have been distributed amongst the access points shown in Figure 1. Assuming a 50/50 split between aged care facility and apartment traffic and a 75/25 split between the western and eastern access points, the following vehicle movements are expected at each access point: • Western ILU / town house access – 50 trips • Aged care facility access – 26 trips • Eastern ILU access – 6 trips • Eastern town house access – 10 trips

Appendix A – Transport for NSW submission

4 November 2022

TfNSW Reference: Syd22/00967

John McKee
General Manager
Ku-ring-gai
818 Pacific Highway
Gordon NSW 2072

Attention: Angela Smidmore

Dear Mr McKee,

PLANNING PROPOSAL PP-2022-658: REQUEST FOR AGENCY COMMENTS FOR LOURDES RETIREMENT VILLAGE – 95 STANHOPE ROAD, KILLARA

TfNSW appreciates the opportunity to provide comment on the above proposal as referred to Transport for NSW (TfNSW) via DPE's planning portal on 15 August 2022 and apologises for the delay in providing our response. We now note that the planning proposal received a Gateway Determination to proceed on 25 October 2022.

The submitted documentation has been reviewed and it is noted that the planning proposal seeks to amend Ku-ring-gai LEP as follows:

- Rezone the site from R2 Low Density Residential to R3 Medium Density Residential
- Amend the maximum height of buildings from 9.5m to heights ranging from 9.5m to 22m
- Amend the floor space ratio (FSR) control from 0.3:1 to 0.75:1.

TfNSW notes that the proposal will facilitate the renewal of an existing retirement village and deliver new seniors housing supply that aligns with Ku-ring-gai's Local Housing Strategy. The proposed renewal also provides an opportunity for improvements to active and public transport amenities, particularly pedestrian facilities within and external to the site. Traffic generated by the proposal is relatively minor in nature noting that vehicle trips generated by seniors housing (not employees of the village) generally occur outside of the morning and evening peak periods thereby reducing potential traffic impacts associated with the proposal on the local and regional road network.

Thank you for the opportunity to provide advice on the subject planning proposal. Should you have any questions or further enquiries in relation to this matter, Tricia Zapanta would be pleased to receive your email via development.sydney@transport.nsw.gov.au.

Yours sincerely

Carina Gregory
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Land Use, Network & Place Planning, Greater Sydney

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