

25 September 2015

Panel Secretariat Sydney East Joint Regional Planning Panel GPO Box 39 SYDNEY NSW 2001

Dear JRPP Panel Members,

32 Page Street, Banksmeadow (2014SYE062-DA 14/80) – Response to Determination Report by Botany Bay Council

On behalf of the applicant, TMG Capital Projects Botany Pty Ltd, we have now had the opportunity to review the Determination Report and Draft Conditions prepared by Botany Bay City Council, which was made available on 23 September 2015.

Firstly, we wanted to acknowledge and thank Council for their recommendation for approval of the application. As the Panel may be aware, this application was submitted by the applicant in April 2014, and has been under assessment for close to 18 months, with a number of matters subject to ongoing review and resolution, including a formal amendment to the scheme lodged in February 2015.

The applicant is supportive of the report and draft conditions, with the exception of the following key matters:

- Traffic Management There is a very detailed and relevant history with regard to traffic management issues relevant to the assessment of this development application. However, under the circumstances, we feel that there are a number of omissions in the determination report that require very urgent clarification. A statement prepared by the applicant's traffic consultant (Maclaren Traffic Engineering) is provided separately to this letter. In particular, we provide the following clarification:
 - The previous commercial component to the project (on the B7 zoned land portion) now no longer forms part of the application (as acknowledged in the Determination Report), which significantly reduces the traffic generation impact of the proposal. The reduced traffic generation has not been re-modelled by Council's traffic engineers.
 - A range of local traffic management measures have been proposed by the applicant prior to and during the assessment of the DA, such as a road closure on Holloway Street, to better manage rat-runs and separate heavy and light traffic adjacent to the public school. However, these initiatives were subject to criticism during public consultation and omitted in the amended scheme in lieu of contributions to a roundabout on Page and Holloway Street.
 - Section 6.2.1 of the Determination Report now states that the proposed roundabout will create new traffic impacts on the Page/Wentworth intersection that are unacceptable and not supported. Since the issue of the report, Maclaren Traffic Engineering have liaised with Council's traffic engineers, and feel that the best way to respond to Council's concerns is to implement prohibiting right turns from Holloway Street to Page Street which redirects development traffic (and existing traffic) to Baker Street which will be upgraded to signals as part of Council's adopted S.94 plan.



- Therefore, it is proposed that the conceptual roundabout provided by the undersigned and submitted to Council is no longer offered by the Applicant, as it is evident this local area management solution is not supported by Council.
- Further discussion is provided in the attached letter by Maclaren Traffic Engineering regarding the above
- Building Height Variation The applicant maintains that the proposed building height variation is reasonable under the circumstances and responds positively to the relevant considerations under Clause 4.6 of Botany LEP 2013. We therefore will appreciate the opportunity to take the JRPP through this matter at the Panel Meeting next week. In support of our variation, please find attached a massing study prepared by our project architects comparing the massing of the proposed scheme to that of a complying scheme which was sent to Council Officers recently.

We look forward to discussing these matters in further detail with the JRPP next week, but felt that it was relevant to provide this information in advance of the meeting.

Should you have any comments, please feel free to contact me on 8233 7606 or 0402 044 052.

Yours sincerely,

Andrew Harvey

Associate Director - Planning

A. Ramy

CC – Chris Mackey (Assessment Officer Botany Bay Council); Michael Lee (Traffic Officer Botany Bay Council)

Attachments:

- Traffic Letter from Maclaren Traffic Engineering
- Massing Comparison Study by Elenberg Fraser Architects

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Transport Planning, Traffic Impact Assessments, Road Safety Audits, Expert Witness

25th September 2015

Robert Magid C/o Urbis Lvl 23, Tower 2 Darling Park 201 Sussex Street, Sydney Attention: Andrew Harvey

> SUPPLEMENTARY TRAFFIC ADVICE OF MIXED USE DEVELOPMENT AT 32 PAGE STREET, PAGEWOOD

Dear Andrew,

With respect to the proposed development at 32 Page Street, Pagewood, it is relevant to note the chronological order of events with respect to discussions held in regard to the traffic and parking outcomes of the proposal.

The order of events are:

- 1. At the time of commissioning to prepare a Traffic & Parking Impact Assessment (TPIA), it was advised that Botany Council wanted Holloway Street to be closed, such that there was separation between residential traffic and commercial traffic on the B7 land.
- 2. The first TPIA dated 10th April 2014 detailed the traffic outcomes as a result of Holloway Street being closed. Notably, the traffic surveys obtained a high level of 'rat-runs' travelling from Wentworth Avenue to Page Street via Baker Street & Holloway Street. The recorded number of 'rat-runs' was 76 vehicles in the morning and 131 vehicles in the evening. Additionally, the TPIA detailed no works to be undertaken at the Page Street & Holloway Street intersection; some proportion of funding to the upgrade of Wentworth Avenue & Baker Street intersection, funding for the Holloway Street road closure. The TPIA assessed a development scale of 262 residential townhouses / apartments and 3.066m² of commercial floor area.
- 3. Council provided feedback (email 12th September 2014) that the Holloway Street road closure would not be supported. Additionally, the undersigned was requested to meet with Pagewood Public School, as it was advised the school were the major objector to the road closure.
- 4. An on-site meeting was held on Friday 28th November 2014 between the Pagewood Public School principal, Ms Marella Hogan. An invitation to Botany Council was provided however Council declined to be involved.
- 5. During the on-site meeting with Pagewood Public School, a number of concerns were expressed to the undersigned. As a result of the expressed concerns, a number of mitigating measures where conceptually provided to the school and Council as a means to provide Local Area Traffic Management (LATM). The mitigating measures conceptually provided include traffic calming within Holloway Street to reduce speeds and deter "rat-run" vehicles, roundabout at Page Street & Holloway Street to provide improved circulation of the school and local area and a roundabout in Dalley Avenue to improve circulation around the school.
- 6. The on-site discussions and conceptual plans were provided in the revised D.A report dated 16th February 2015. The revised D.A report also reassessed the site with respect to no road closure, with

Reference: 13306.05FA



- and without the Page Street & Holloway Street roundabout as well as comments received by Council (12th September 2014) in respect to traffic generation and traffic assignment.
- 7. Botany Council advised they have an area wide traffic study provided by SMEC, which was dated 24th April 2015. Botany Council did not advise whether the conclusions and recommendation made by SMEC were accepted, nor did Council advise that the Page Street & Holloway Street roundabout was unsupported.
- 8. Botany Council's report to the Joint Regional Planning Report (JRPP) received 23RD September 2015 is the first correspondence that the Page Street & Holloway Street roundabout is not supported due to the SMEC findings.

Response to JRPP Report

With due consideration to Botany Council's report to the JRPP, further supplementary advice is provided to assist in the projects determination.

Figure 1 depicts the volume of 'rat-runs' recorded during the intersection surveys. The road closure that was previously proposed was to eliminate this such that vehicles are contained to the arterial road network of Wentworth Avenue and Page Street.



FIGURE 1: RAT-RUN VOLUMES

Figure 2 to Figure 4 is an extract of Botany Council's commissioned area wide traffic study undertaken by SMEC, dated 24th April 2015. The extract depicts the recommended works to be undertaken at the intersection of Wentworth Avenue & Page Street.



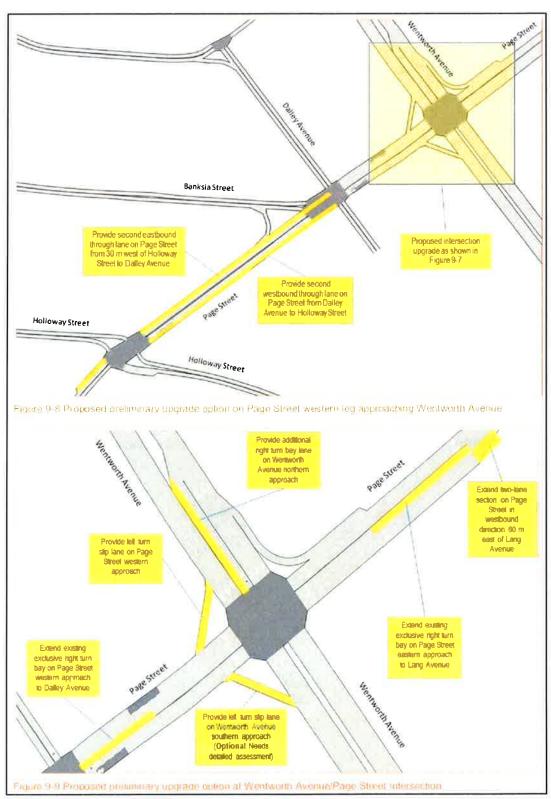


FIGURE 2: SMEC RECOMMENDATIONS



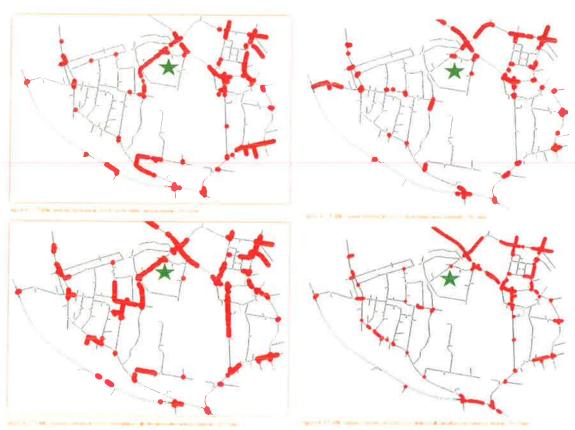


FIGURE 3: SMEC QUEUE OUTPUTS FOR CUMULATIVE DEVELOPMENT

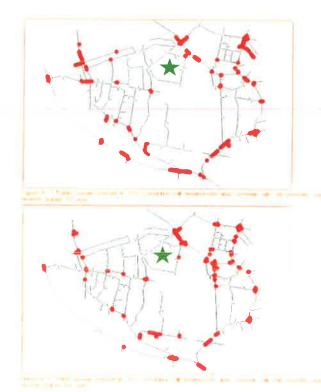


FIGURE 4: SMEC QUEUE OUTPUTS FOR CUMULATIVE DEVELOPMENT WITH RECOMMENDATIONS



Figure 5 is an extract from the SMEC study identifying the level the intersection performances at the intersections with Wentworth Avenue at Baker Street and Page Street, as well as the intersection of Page Street & Holloway Street.

Table 9-1 2024 Future Intersection LoS Forecast -All scenarios, AM Peak

			2024 base case		2024 site 1		2024 site 2		2024 site 3 and site 4		2024 cumulative	
ID	Road names	Road	Ave. delay [s]	LoS	Ave. delay [s]	LoS	Ave. delay [s]	LoS	Ave. delay [s]	LoS	Ave. delay [s]	LoS
1-2	Wentworth Avenue / Page Street	State/ regional	72	F	80	F	93	F	91	F	94	F
I -24	Wentworth Avenue /Baker Street	State /local	18	В	17	В	17	В	65	E' see note	89	F* see note
I-25	Page Street / Holloway Street	Regional/ local	>120	F' see note	>120	F* see note	>120	F' see note	>120	F' see note	> 120	F* see note

Table 9-2 2024 future intersection LoS forecast -all scenarios. PM peak

	Road names	Road	2024 base case		2024 site 1		2024 site 2		2024 site 3 and site 4		2024 cumulative	
ID			Ave. delay [s]	LoS	Ave. delay [s]	LoS	Ave. delay [s]	LoS	Ave. delay [s]	LoS	Ave. delay [s]	LoS
1-2	Wentworth Avenue / Page Street	State/ regional	50	D	63	Е	68	Е	61	Е	73	F
1-24	Wentworth Avenue /Baker Street	State /local	16	В	16	В	16	В	16	В	71	F* see note
1-25	Page Street / Holloway Street	Regional /local	26	В	69	E	33	С	>120	F' see note	> 120	F' see note

Fable 9-5 2024 future intersection LoS forecast – cumulative all sites with proposed network upgrade options, AM, PM and Saturday peak periods

				AM Peak		PM peak		Saturday peak	
ID	Road names	Road classification	Control type	Overall ave. delays [s]	LoS	Overall ave. delays [s]	LoS	Overall ave. delays [s]	LoS
1-2	Wentworth Avenue / Page Street	State/regional	Signal	52	D	47	D	51	D
1-24	Wentworth Avenue/ Baker Street	State/local	Priority	37	С	20	В	13	Α
1-25	Page Street / Holloway Street	Regional/local	Priority	19	В	43	D	31	С

FIGURE 5: SMEC INTERSECTION PERFORMANCES

It is evident, based on the cumulative assessment, incorporating the intersection works at Wentworth Avenue & Page Street as recommended and modelled by SMEC, alleviates pressure along Page Street and associated intersections.

Although not explicitly clear within the SMEC report, the level of traffic generated by the development and distributed onto Wentworth Avenue is summarised in **Table 1** below, based on Section 5.8 of the SMEC assessment.



TABLE 1: WENTWORTH AVENUE TRAFFIC

Movement to from Wentworth Avenue	Assigned Percentage	Cumulative Assessment Generation	32 Page Street Generation	Percentage of 32 Page Street compared to Cumulative Assessment ⁽³⁾	
		1,808(1)	145		
SMEC Inbound Distribution	27 ⁽¹⁾	488	43 to 47 ⁽²⁾		
SMEC Outbound Distribution	21 ⁽¹⁾	380	47 to 55 ⁽²⁾	10.4 to 11.8%	

Notes: (1) based on SMEC report

Discussions held with Mr Michael Lee on 23rd September 2015 indicated that the recommended improvements at Wentworth Avenue & Page Street require land acquisition, and until such time as acquisition can be determined, there is no certainty over the provision of the improvements.

Council's concern over the traffic generation impacts appear to be related to the development of the site, including the commercial B7 land. The progression of the application has resulted in the D.A being for the residential only, with the commercial B7 land not being assessed. With respect to the February 2015 report, this removes a significant portion of development traffic from the assessment as it includes both the residential and commercial development. Additionally, in order to appease Council concerns over traffic impact on the surrounding road network, it was discussed with Mr Lee alternative inbound / outbound routes can be adopted through restricted signage could alleviate Council concerns over the pressure along Page Street.

Critical to the intersection performance of Page Street & Holloway Street is the right turn movement from Holloway Street to Page Street and the level of traffic through the Wentworth Avenue & Page Street intersection.

The traffic generation of the site, as provided in the February 2015 assessment is reiterated below in **Table 2**. **TABLE 2: DEVELOPMENT TRAFFIC GENERATION**

Component	Traffic Generation	Percentage Contribution	Percentage Through Hollo Interse	way & Page	Percentage of Total Through Wentworth & Page Intersection		
			AM	PM	AM	PM	
Residential	82	57%	57%	57%	41%	41%	
Commercial	61	43%	43%	43%	30%	30%	
Total	143	100%	100%	100%	71%	71%	

Removing the commercial traffic generation from the assessment, as the application is only for the residential units, the short term result will see a 30% of traffic generation potential removed from the Wentworth Avenue & Page Street intersection.

Turn restrictions ("No Right Turn") can be placed upon the intersection of Page Street & Holloway Street until such time that additional capacity is achieved within the network, namely Wentworth Avenue & Page Street. It is recommended that the right turn from Holloway Street into Page Street be prohibited during peak hours. The alternate route would require development traffic (and existing traffic), to turn left onto Baker Street and either left or right onto Wentworth Avenue at the Baker Street intersection. This intersection will be upgraded to a signalised intersection as identified in Council S.94 Contributions Plan.

⁽²⁾ based on MTE February 2015 report

⁽³⁾ excludes existing and background growth, which if included would further reduce the percentage contribution of 32 Page Street



If "No Right Turn" was implemented from Holloway Street to Page Street, the redirected vehicles will utilise Baker Street to access Wentworth Avenue, which will be upgraded to a signalised intersection. It is very likely that once this intersection is upgraded, it will become a more attractive route to travel north and east if Page Street improvements are not undertaken by Council.

Redistributed traffic as a result of the "No Right Turn" will likely see 27 to 32 vehicles turn left onto Wentworth Avenue (18 to 22% of the total traffic generated) and 20 to 23 vehicles turn right onto Wentworth Avenue from Baker Street (14 to 16% of the total traffic generated). This includes commercial traffic, which as discussed is not part of the application, such that the short term traffic generation through Baker Street as a result of the turn restriction on Holloway Street will be further reduced.

As provided in Annexure F of the February 2015 assessment and reproduced in **Annexure A** of this letter, the proposed development is likely to add 47 vehicles to the right turn (47 residential movements) during the morning and 55 vehicles in the afternoon (12 residential; 43 commercial).

Turn restrictions can be placed upon the intersection of Page Street & Holloway Street until such time that additional capacity is achieved within the network, namely Wentworth Avenue & Page Street. It is recommended that the right turn from Holloway Street into Page Street be prohibited. The alternate route would require development traffic (and existing traffic), to turn left onto Baker Street and either left or right onto Wentworth Avenue at the Baker Street intersection. This intersection will be upgraded to a signalised intersection as identified in Council S.94 Contributions Plan.

Concluding Remarks

As part of the February 2015 report, the undersigned has continued to work with Council in ameliorating concerns raised by Council. Meetings held with Council and the Pagewood Public School has resulted in conceptual recommendations for a local area solution, with only recent information provide by Council firmly stating their position that the roundabout is an unacceptable treatment. A considerable period of time has passed since conceptual plans and recommendations where tabled with Council leading the September 2015 report to the JRPP.

Again, to appease Council concerns with respect to the development traffic generation, further recommendations can be implemented by prohibiting right turns from Holloway Street to Page Street which redirects development traffic (and existing traffic) to Baker Street which will be upgraded to signals as part of Council's adopted S.94 plan. The conceptual roundabout provided by the undersigned and submitted to Council is no longer offered by the Applicant, as it is evident this local area management solution is not supported by Council.

Please contact the undersigned should you require further information or assistance.

Yours faithfully

McLaren Traffic Engineering

Craig M^CLaren

Director

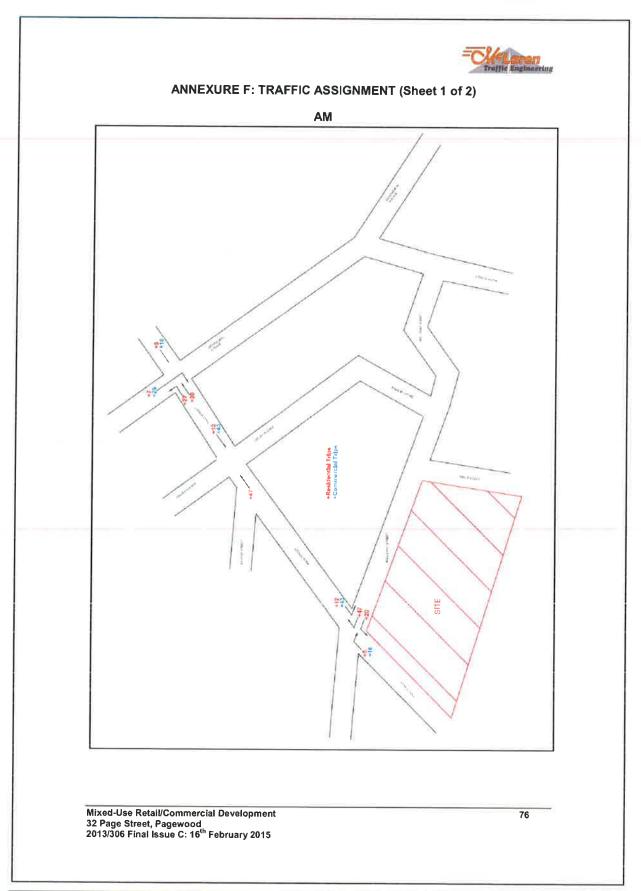
BE Civil. Graduate Diploma (Transport Eng) MAITPM MITE [1985]

RMS Accredited Level 3 Road Safety Auditor

RMS Accredited Traffic Control Planner, Auditor & Certifier (Orange Card)



ANNEXURE A: FEBRUARY 2015 TRAFFIC REPORT ASSIGNMENT



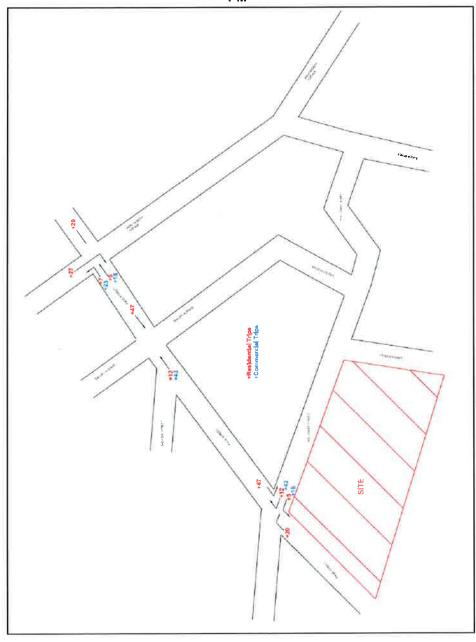


ANNEXURE A: FEBRUARY 2015 TRAFFIC REPORT ASSIGNMENT



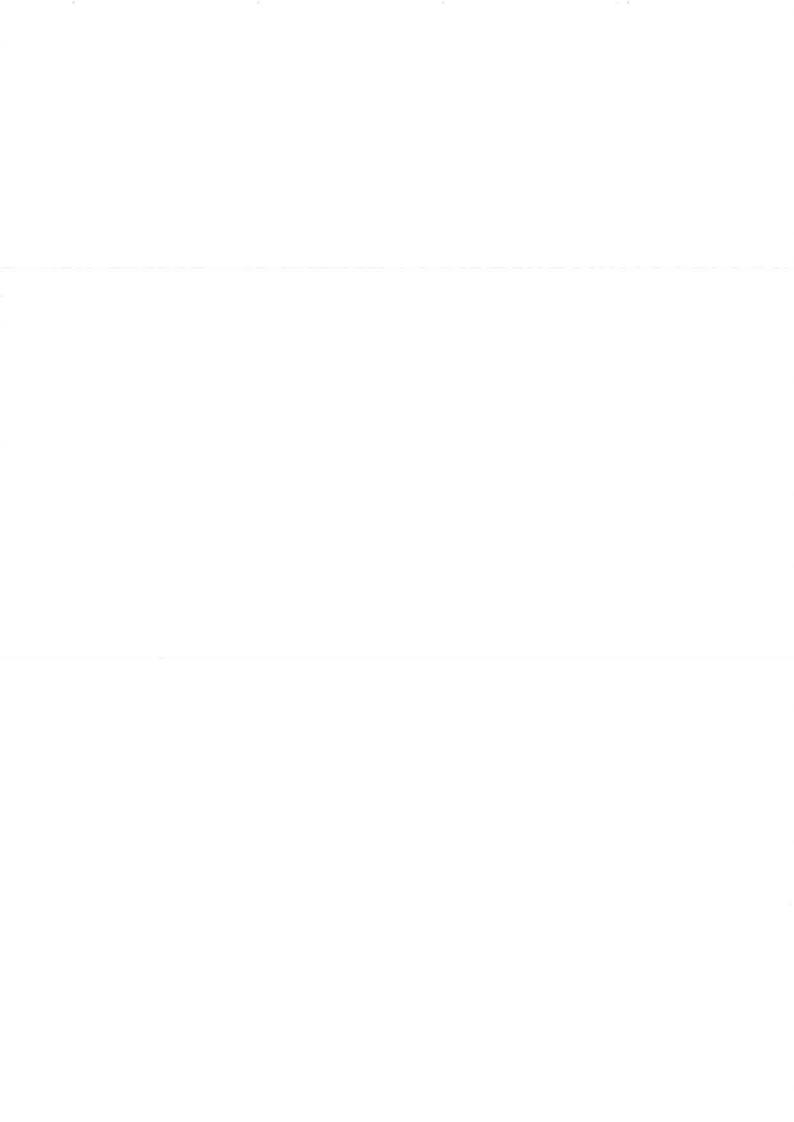
ANNEXURE F: TRAFFIC ASSIGNMENT (Sheet 2 of 2)

PM



Mixed-Use Retail/Commercial Development 32 Page Street, Pagewood 2013/306 Final Issue C: 16th February 2015

7



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04 05 06 07

01_View from Holloway Street looking West

01.1 Current proposal 01.2 Level 07 removed 01.5 Reduction in Level 07 to date 01.4 Botany LBP/DGP height overlay

08 00 11 11

02_View from Page Street looking South
02.1_Current proposal
02.2_Level 07 removed
02.3_Reduction in Level 07 to date
02.4_Bolany L.B.P/DCP height overlay

15 15 15

05-View from Holloway & Page Street looking Southeast
05.1_Current proposal
05.2_Level O7 removed
05.5_Reduction in Level 07 to date
05.4_Botany LEP/DCP height overlay

16 17 19

04. View from Page Street looking Northeast 04.1. Current proposal 04.2. Lovel 07 removed 04.3. Reduction in Lovel 07 to date 04.4. Botany LEP/DCP height overlay

20

05_Stage 1 DA contextual render images
05.1_View looking toward corner of Page and
11olloway Strects
05.2_View looking toward corner of Green
and Holloway Streets

22

01.01_VIEW FROM HOLLOWAY STREET LOOKING WEST_CURRENT PROPOSAL

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LEVEL 07 MASSING COMPARISON REPORT 5

02.01_VIEW FROM PAGE STREET LOOKING SOUTH_CURRENT PROPOSAL



02.01_VIEW FROM PAGE STREET LOOKING SOUTH_REDUCTION IN LEVEL 07 SINCE STAGE 1 DA LODGEMENT

02.01_VIEW FROM PAGE STREET LOOKING SOUTH_BOTANY LEP / DCP 2013 OVERLAY

03.01_VIEW FROM HOLLOWAY & PAGE STREET LOOKING SOUTH EAST_CURRENT PROPOSAL

LEVEL 07 MASSING COMPARISON REPORT 15

LEVEL 07 MASSING COMPARISON REPORT 15

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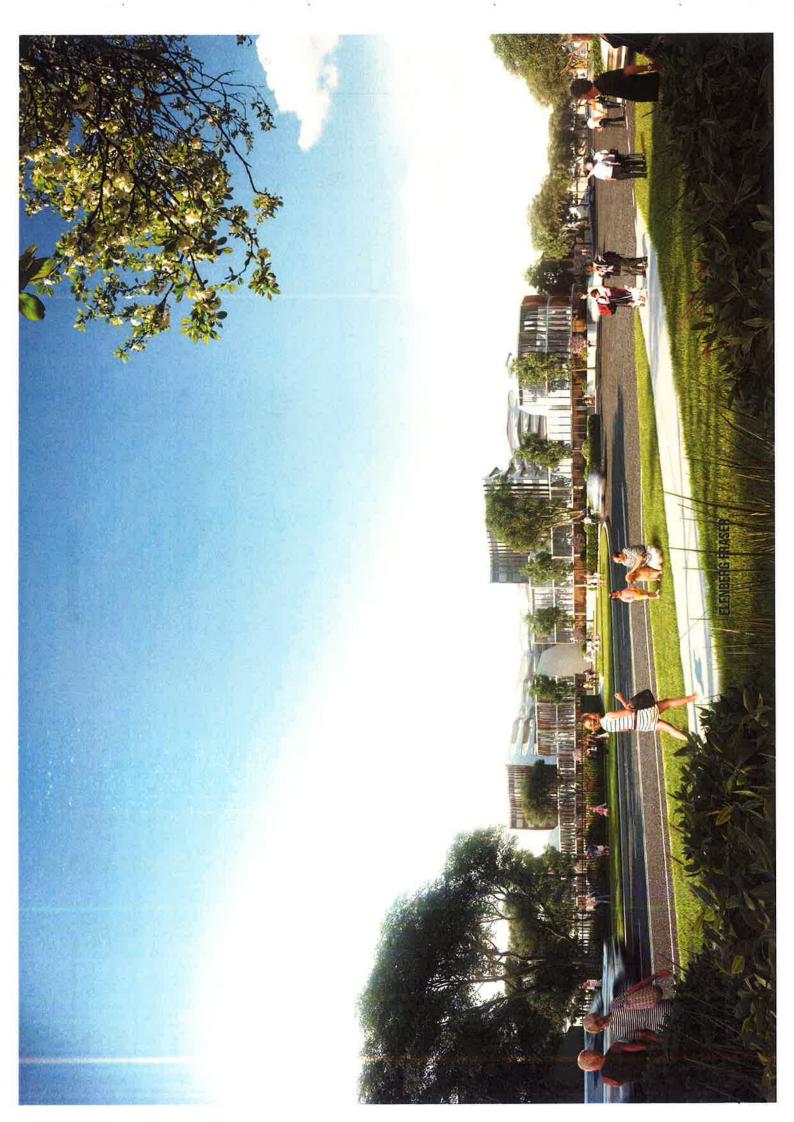
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LEVEL 07 MASSING COMPARISON REPORT 17

LEVEL 07 MASSING COMPARISON REPORT 19

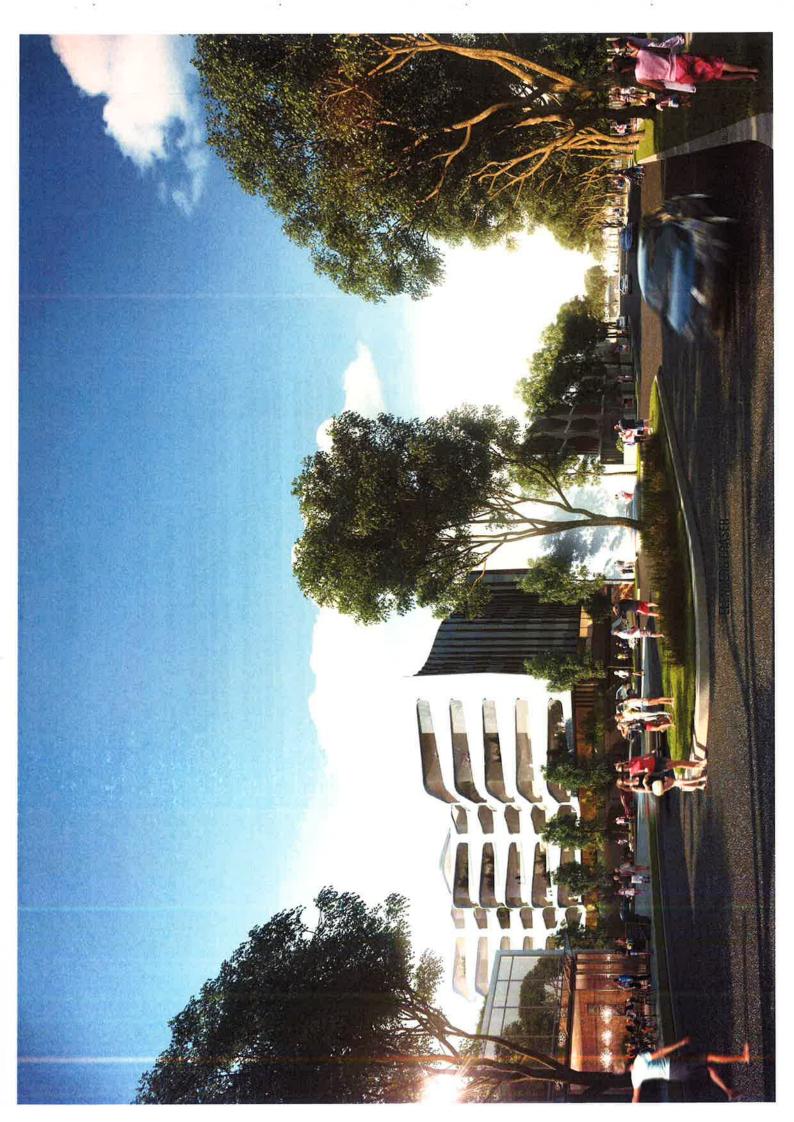


05.1_VIEW LOOKING TOWARD CORNER OF PAGE AND HOLLOWAY STREETS





05.2_VIEW LOOKING TOWARD CORNER OF GREEN AND HOLLOWAY STREETS



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