



10 October 2018

Chair of Sydney Eastern City Planning Panel
Regional Panels Secretariat
320 Pitt Street
SYDNEY NSW 2000

Via email: enquiry@planningpanels.nsw.gov.au

**2017SCL027 – INNER WEST COUNCIL – DA201700185
728 PRINCES HIGHWAY TEMPE
APPLICANT SUBMISSION IN RESPONSE TO ASSESSMENT REPORT**

Dear Mr Scully,

On behalf of the applicant I confirm that we have read the assessment report and Bunnings contends that the report, insofar as it relates to on-street parking and traffic matters, is unbalanced and incomplete report thus warrants the following submission "in reply".

Furthermore the applicant considers the recommendation and reasons for refusal nominated, represent a complete mis allocation of the weight to be afforded to the matter of on-street parking, places determinative weight on a "traffic" issue raised in a traffic committee meeting 12 months ago but never clarified in its extent nor scope by either RMS or Council officers, and dismissive of the substantive merit of a development which is:

- Consistent with the land use and type of development expected in the B6 zone, being an employment generating development
- A development which is compliant with relevant LEP and DCP requirements, including development standards such as FSR, height, parking
- A development which restores and conserves a significant historical element of the Princes Highway streetscape
- A development which will manage contamination & archaeological matters appropriately
- A development that provides an appropriate traffic outcome for a large development fronting the Princes Highway, whose current use as a warehouse and distribution centre (and decades of past use as industrial and warehousing purposes) has substantial heavy vehicle use and

potential for ongoing use in that manner if the Bunnings proposal was not to proceed

- Makes economic use of a large and underutilized site
- Carefully sited building massing which affords a significant setback (over 20m) for the upper floor level in relation to Smith Street

We request the panel have due regard to the applicant's summary table of responses to the two key issues referred to in the assessment report (attached). Further we request the panel consider the detailed response from our traffic consultants *Transport and Traffic Planning Associates* to traffic and parking matters (also attached).

In light of the additional information provided to the panel which we consider is relevant to the accurate consideration of issues applicable to this development, we respectfully request the Panel resolve to approve the Bunnings application subject to conditions.

Myself and our key traffic and parking consultant will be present at the Panel meeting scheduled 18th October and will be available to answer questions.

Yours faithfully,



Philip Drew
Development Approvals Manager
Bunnings Group Ltd

Issues:

Loss of on-street parking

Traffic impacts

Issue	Response
Loss of on-street parking	<p>Bunnings consultants have provided assessments of impact upon on-street parking on the northern side of Smith Street on 3 occasions (11/12/17, 15/5/18, and 28/8/18). On each occasion the conclusion included diagrams and/or measurements which ultimately conclude that a length of 42 metres (7 car spaces) will remain for on-street parking on the north side of Smith Street.</p> <p>It has been observed and reported by Bunnings' traffic consultants that the current high demand use of on-street parking on the northern side of Smith Street is largely a weekday occurrence, with much lesser usage observed during weekends (when nearby industrial businesses are closed).</p> <p>The proposed development provides ample (424) on-site parking to accommodate its future parking demand, and this is concurred in the Council's officers report (page 26 of officer's report)</p> <p>Draft condition 55 nominates that alternative provision (on or off site) be explored to compensate for lost on-street parking</p>
Traffic	<p>Impacts relate to network issues and amenity issues. Networks assessments have been undertaken and submitted to Council and RMS during 2017, ultimately leading to RMS issuing its letter of support on 11 December 2017.</p> <p>Bunnings submissions have addressed issues of waste management, truck queuing, swept paths entering or leaving the Smith Street driveway.</p> <p>For an application submitted 17 months ago, Bunnings to date is unclear as to the exact basis for the officer's purported concerns regarding "insufficient" information regarding traffic impacts. The response from the Council's Traffic Section on 17/4/18 did not flag any warrant for comprehensive traffic studies relating to local residential streets. Yet the officer's report to the Panel recounts that a "comprehensive traffic study" was requested in October 2017 by "a committee member". RMS supported the application in December 2017, and Council's traffic section have not required nor quantified the warrant or scope for such a study in any correspondence during 2018.</p>

	<p>It is long standing RMS main road policy to rely entirely on a road other than a main road to provide safe access and egress from Highway frontage sites. In this case RMS have considered the proposal on merit, and agree that a certain proportion of the Bunnings traffic can be safely managed via direct access from the Highway.</p> <p>The approved DA on this site for bulky goods development (DA201300385) includes 100% of its traffic going to and from Smith Street, whereas the current Bunnings' DA proposal allows approximately 25% of expected traffic movements (and half of all truck movements) to enter and egress the site directly to the Highway.</p> <p>It is impractical and contrary to RMS policy, to restrict vehicle access to this site solely from the Highway.</p> <p>Smith Street contains industrial and residential development, and an estimated 177 heavy vehicle movements per day (source: <i>Inner West Council Traffic Committee Report 7 August 2018</i>). Bunnings proposes between 20-30 truck movements on weekdays only.</p> <p>Bunnings supports that its egressing customers (to Smith Street) should be directed right towards the Highway. Draft condition 55 (f) addresses this issue.</p> <p>The Smith Street intersection is being upgraded to 3 egress lanes at its Highway intersection, in lieu of the current 2, to improve capacity at this intersection.</p>
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10 October 2018
Ref: 17053

Mr Philip Drew
Development Approvals Manager
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E: pdrew@bunnings.com.au

Dear Phil

Proposed Bunnings Tempe

Issues Raised, Discussed and Resolved with RMS

- **Traffic Modelling**

RMS requested detail traffic modelling for numerous development/treatment scenarios and identified very specific parameters for this modelling including interaction of the Smith Street intersection with other intersections along the highway.

RMS has advised their acceptance and concurrence to the traffic assessment for the development and the traffic modelling undertaken.

- **Provision of the Proposed Supplementary Site Access on the Princes Highway**

This proposal was developed in consultation with RMS and an independent Road Safety Audit has concurred with this proposal.

- **Provision of Traffic Signal Control on the Supplementary Access**

It was mistakenly understood that RMS required this traffic signal control when the arrangement was agreed. Traffic modelling has been accepted by RMS for the proposed access arrangement without traffic signals.

- **Closure of the Median Island in the Highway Opposite Foreman Street**

RMS supports this proposal.

- **Retention of Right Turn Movement into Smith Street without provision of a separate bay or removal of parking along the western side of the Highway**

RMS have advised their concurrence to this outcome.

- **Development Concurrence**

By letter of 11.12.17 RMS advised Council of their concurrence to the proposed Development Application.

Issues Raised, Discussed and Resolved with Council

- **Provision of Bicycle Parking**

Council has agreed to the proposed provision of 20 bicycle spaces.

- **Provision of Car Share Parking**

Council has agreed to the proposed provision of 4 car share parking spaces.

- **Provision of Shared Path Along the Highway and Smith Street Frontages**

Council has agreed with the proposed provision of the Shared Path.

- **Provision of Service Vehicle Parking**

Council has agreed to the demonstrated provision of 5 truck parking/queuing spaces.

- **Queuing in Smith Street**

Traffic modelling has demonstrated that the queuing in Smith Street will be no greater than the existing circumstance and this will be significantly reduced when WestConnex is completed and the traffic volumes reduced on the Highway.

- **Waste Removal/Recycling**

Council has agreed with the proposed provisions for waste removal/recycling.

- **Increased Future Traffic with WestConnex**

Council was advised that RMS studies conclude that future traffic flows along this section of the highway will reduce by up to 57% (2031) as a result of the construction of the WestConnex tunnel under the Highway.

Outstanding Council Issues

- **Reduction of Parking Spaces in Smith Street**

The TTPA report of 20.5.18 received by Council on 29.5.18 identified that:

- Some 9 on-street parking spaces along the northern side of Smith Street would need to be deleted due to the provision for large trucks to turn into Smith Street and the proposal to provide 3 egress lanes.
- It was apparent that the occupation of parking spaces along the northern side of Smith Street very largely comprised of workers from the Bunnings site and that the occupation at night and on weekends (i.e. by residents) was very limited.

The TTPA report of August 2018 ("*Response to Council's Report for Traffic Committee Consideration*") was presented at the August Traffic Committee meeting with a very clear and detailed diagram showing the number of existing parking spaces and the proposed loss of 7 spaces. It also contained the results of a parking occupation survey and the aerial images confirming the worker

parking and low non business hours occupation yet the Traffic Committee report still refers to the need for a detailed plan and the SECPP report still states that *"to date this information is yet to be provided"*.

The comment is also made in the SECPP report that up to 16 car spaces could be lost on the northern side and that spaces may be lost on the southern side of Smith Street as a result of the proposed signal configuration. Council has been advised on a number of occasions that the traffic modelling adopted the existing parking arrangements on the Smith Street approach (south side) and that there was no need or intention to change these arrangements.

- **Truck Turning Paths in Smith Street**

The TTPA report presented to the Traffic Committee provides the Truck Turning assessment diagrams from the DA Traffic Study which are the relevant diagrams as there has been no change to the development circumstances in this regard.

Yet the SECPP report states that *"no updated swept path diagrams for trucks entering the site have been supplied"* when the Traffic Committee was clearly advised that there was no need for updated diagrams and that the request was mistaken.

A copy of the TTPA report presented to the Traffic Committee is attached.

- **Pedestrian Access Arrangements at the Smith Street intersection**

The Council letter of 7.11.17 recommended deletion of the proposed triangular island with retention of "single phase" pedestrian crossings.

The SECPP report states that there will be no change to pedestrian access. However, the proposed provision of the triangular island presents a significant beneficial change where:

- pedestrian crossing distances will be significantly reduced

- conflict between pedestrians and turning vehicles will be eliminated

- **Relocation of Bus Stop**

The SECPP report states that the proposed relocation is “*not supported on traffic grounds*” and that approval of State Transit Authority will be required. Yet the minutes of the October Traffic Community Meeting document that the “service provider” specifically stated his support for the proposed relocation.

- **Insignificant Information Provided to Assess the Potential Traffic Impact on the Local Road Network**

The assessment provided in the DA Traffic Report (TTPA October 2017) specifies a generalised projected traffic distribution of additional generated traffic (i.e. additional to the existing site generation which is significant).

- North 45%
- South 45%
- Other 10%

However, some 28% of traffic will be “passing trade” being existing traffic travelling along the highway.

The projected traffic distribution to the west includes portion to the North (e.g. Railway Road etc) and South (M5 and Forest Road etc) and the minor distribution to Union Street and Gannon Street has regard for the existing Bunnings at Kingsgrove with a catchment that extends to Bardwell Park and Eastwood.

All of this was set out in a TTPA letter responding to Council’s concerns in December 2015. The use of South Street for vehicle access is very “obscure” and presents a significantly longer, speed hump controlled and indirect route than Smith Street.

The assessment was made in the 2015 response to Council that some 5% of the "additional generated traffic" would use Union Street to depart the site. Although this could possibly be slightly more but this would be no more than for the previously approved bulky goods development. The assessment advice to Council was that there could be a "minor leakage" to South Street and Holbeach Avenue including to/from that local residential catchment.

In summary, the implications previously identified to Council are:

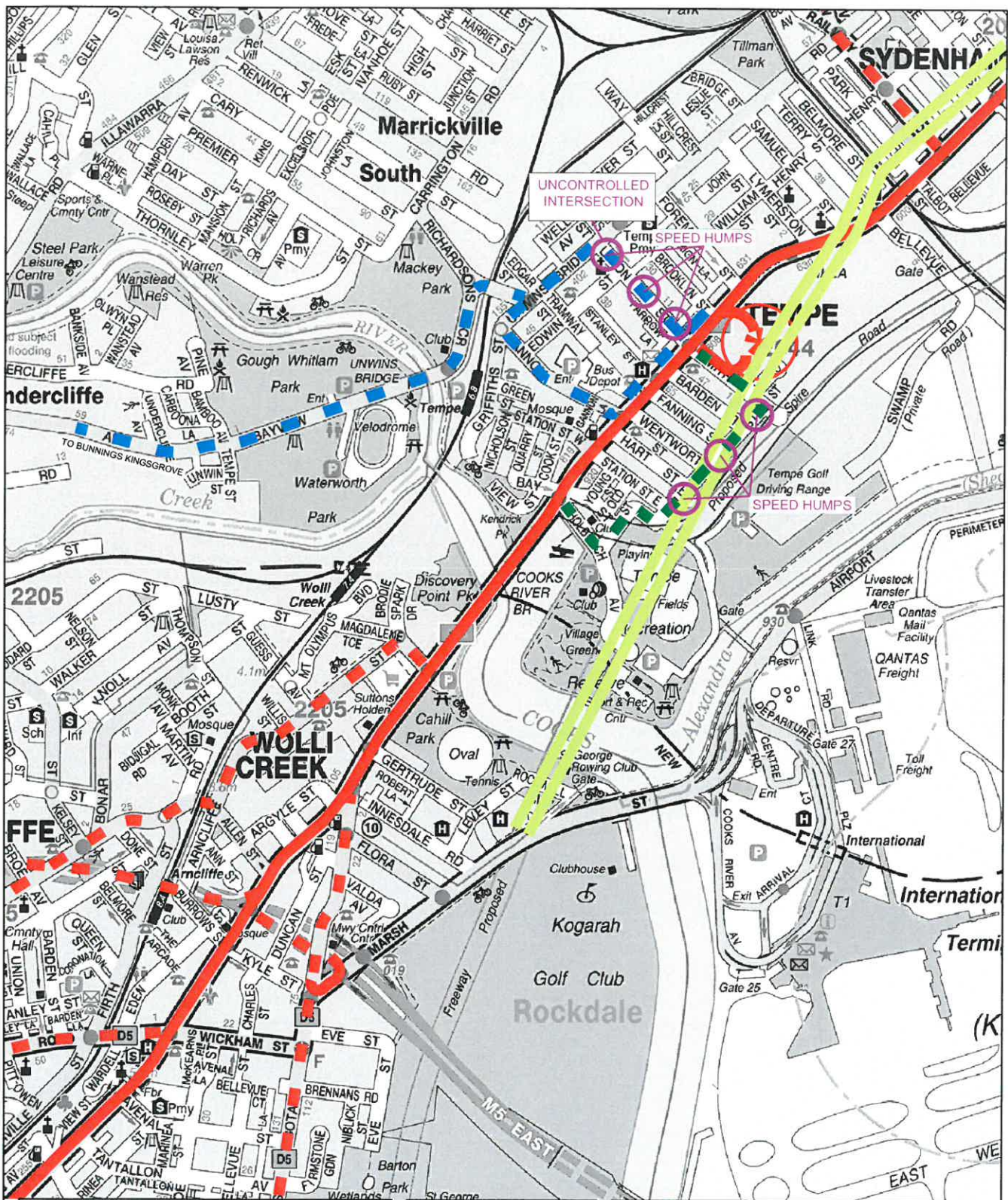
- **Union Street**
5% of generated egress movements
- **South Street**
Minor leakage < 5% of generated access movements
- **Foreman Street**
Nil increase as median island is to be closed.

The attached diagram identifies the relevant road, access and traffic distribution considerations as well as the inevitable impact of WestConnex on reducing traffic movements along the Highway.

Yours faithfully



Ross Nettle
Director
Transport and Traffic Planning Associates



LEGEND

- MAJOR ACCESS ROUTE
- - - SECONDARY ACCESS ROUTE
- POTENTIAL MINOR ACCESS ROUTE
- POTENTIAL INDIRECT 'LEAKAGE' ROUTE
- FUTURE WESTCONNEX ROUTE



ROAD ACCESS AND TRAFFIC DISTRIBUTION