



17 March 2021

The Secretary
Sydney Central City Planning Panel

Dear Sir/Madam,

PPSSCC-109 - Development Application DA 1611/2020/JP- Demolition of existing structures and construction of a 13 and 18 storey Residential Flat Building Development, containing 196 units, basement car parking and associated works - 6-18 Garthowen Crescent, Castle Hill

1. I refer to a proposed mixed use development at the above address. I act on behalf of a group of residents of Nos. 9 and 11-13 Garthowen Crescent, Castle Hill (Clients) who engaged me to carry out an independent assessment of the traffic and transport aspects of the proposal. The results of my assessment are outlined below.
2. I have reviewed the Traffic and Parking Assessment Report (TPAR) prepared by Varga Traffic Planning Pty Ltd and dated 8 May 2020. I have visited the site on Wednesday 10 March 2021 and observed traffic situation in Garthowen Crescent and at its two intersections with Old Castle Hills Road (referred to as "Garthowen Cr South" or "GCS" and "Garthowen Cr North" or "GCN" further in this report) during the morning commuter peak hour.
3. A median and a double centre line installed in Old Castle Hill Road at the GCS intersection prohibit right hand turns into and out of Garthowen Crescent. As a result, **all** vehicles approaching Garthowen Crescent from the south and **all** vehicles leaving to the north will have to use GSN. For this reason, about 60% of all traffic generated by the proposed development would have to travel around the northern part of Garthowen Crescent. The development traffic will therefore utilise the entire length of Garthowen Crescent.
4. The main concern with regard to this is the width of Garthowen Crescent (approximately 7.5 m to 8.0 m) which is not designed to carry this additional traffic. TPAR did not assess the cumulative impacts of the development's traffic and the existing traffic volumes on the street's capacity nor safety.
5. The traffic assessment in TPAR relies on the following road network improvements, proposed under Planning Proposal 24/2016/PLP:
 - a) a new roundabout at the intersection of Garthowen Crescent (north) and Old Castle Hill Road
 - b) land dedication at the eastern end of Garthowen Crescent, allowing the widening of the road carriageway by 2m-3m
 - c) restricting access at the Garthowen Crescent (south) and Old Castle Hills Road to left in/ left-out only
 - d) provision of an additional lane on the Old Castle Hill Road south approach.
6. However, in relation to item b) it appears that local widening will not resolve capacity and safety concerns, as full two way carriageway and thus road widening will be required for the entire length of Garthowen Crescent before the proposed development is completed. The need for the full widening is identified in Council's report on Castle Hill North Planning Proposal and recommended amendments to The Hills DCP 2012, as shown in **Figure 1** overleaf.
7. Similarly, improvements a), c) and d) will need to be completed before the proposed development.
8. The timing of the above network improvements, however, is not certain.
9. If the development is proposed to proceed before the above improvements take place, then TPAR is deficient in this regard, as it does not contain any assessment of the total traffic volumes and their effects on the capacity and safety of Garthowen Crescent in its current condition. As noted before, currently Garthowen Crescent is not designed to carry additional traffic due to its narrow carriageway.

TRAFFIC & PARKING STUDIES
AND MANAGEMENT

TRAFFIC IMPACT
ASSESSMENTS

INTERSECTION AND NETWORK
MODELLING

ENVIRONMENTAL IMPACT
ASSESSMENT OF ROADS,
TRAFFIC AND TRANSPORT
OPERATIONS

ROAD AND TRAFFIC NOISE

ROAD SAFETY STUDIES

TRAFFIC & PARKING SURVEYS

CAR PARK DESIGN

INTERSECTION DESIGN

TRAFFIC ACCIDENT
INVESTIGATION

TRAFFIC ACCIDENT
RECONSTRUCTION

RESEARCH AND DEVELOPMENT

EXPERT WITNESSES

10. TPAR does not contain any assessment of the impact on operation and safety of GCS and GCN intersections with their current layouts.

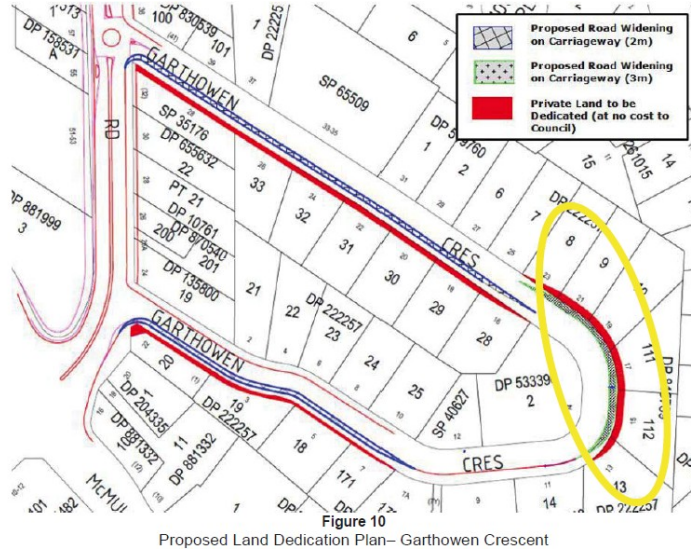


Figure 1. Extract from Council’s report dated 27 November 2018.

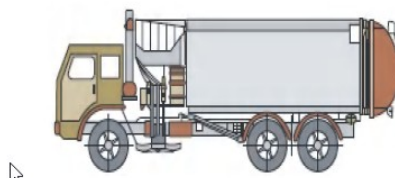
- a) It must be noted that although right hand turns from Garthowen Crescent are prohibited, some drivers do attempt these turns, at a high risk. This is evidenced by a screenshot from a recent video record in **Figure 2** below, which shows a near miss situation. With the additional traffic generated by the proposed development, the number of such dangerous movements is likely to increase, resulting in an increased risk of crashes. No assessment of this situation (or any safety assessment) has been provided in TPAR and no solutions have been proposed.



Figure 2. A near miss due to a prohibited right hand turn at GCS.

- b) No assessment of delays, Levels of Service and potential safety issues associated with additional development traffic have been reported in TPAR for the GCN intersection. Again, TPAR relies on a future roundabout at this location. Before this improvement occurs, this intersection is a Give Way only, with high traffic volumes on the main road and resulting delays for traffic exiting Garthowen Crescent. The TPAR does not provide any analysis of the impacts on the existing situation and therefore does not provide sufficient information for the authorities to make an informed decision.
- TPAR fails to assess the impact of the development's traffic generation on the adjacent Kinda-Mindi Early Learning Centre. This child care centre is licensed for 72 children and as a result is a high level traffic generator. The proposed access driveway in close proximity to the child care centre will result in increased conflicts with the existing turning movements into and out of the child care centre. This is a significant safety concern. During the site inspection, it was noted that vehicles entering and leaving the child care tend to travel in the middle of the road.
 - The proposed waste collection arrangements rely on the loading dock designed for the use by a Medium Rigid Vehicle (MRV, 8.8 m long). It must be noted that AS 2890.2:2018 defines MRV as "the common service truck having a load of 8 t, and typically having a single rear axle and dual tyres".
 - The waste collection vehicles typically used in the Hills Shire are larger than 8.8 m. This is defined, firstly, in Council's "Information For Waste Management in Multi Unit Dwelling Developments" which requires provisions to be made for the following vehicle.

Garbage Collection Vehicle Specification



Vehicle	Length	Width	Height	Servicing Height	Weight (Loaded)	Turning Circle
Garbage- HRV	9211mm	2400mm	3546mm	3700mm	22.5 t	19.8m
Garbage (Bulk)	9977mm	2400mm	3545mm	3545mm	22.5 t	22m
Recycling - HRV	9359mm	2400mm	3700mm	3700mm	15 t	19.8m
Organics - HRV	9211mm	2400mm	3546mm	3700mm	22.5 t	19.8m

- Secondly, a Google search for waste collection vehicles used in The Hills Shire returns the following results:



Bin collections in The Hills Shire will ...
thehills.nsw.gov.au



Cleanaway contract with The Hills Sh...
wastemanagementreview.com.au



Hills Shire Council Garbage Collection ...

- All of the above vehicles have double axles and are significantly larger than an MRV. I conclude that TPAR does not provide the design assessment consistent with the actual waste collection requirements for a larger vehicle.

Conclusion

- In summary, the TPAR for the proposal does not provide sufficient and reliable information to enable a robust



assessment of the proposal. The proposal should not be approved due to this deficiency.

Please do not hesitate to contact the undersigned should you require further information.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Oleg I. Sannikov'. The signature is written in a cursive, flowing style.

Oleg I. Sannikov
Director, TEF Consulting
MEngSc (Traffic Engineering)
MIEAust PEng
FAITPM
President, NSW/ACT Branch of AITPM