

13 March 2025

TfNSW Reference: SYD24-00897/03
Council's Reference: DA-2024/56 (CNR-68577)

Ms Meredith Wallace
General Manager
Bayside Council
PO Box 21
ROCKDALE NSW 2216

Attention: Marta Gonzalez-Valdes

**CONSOLIDATION OF 16 LOTS TO CONSTRUCT FIVE COMMERCIAL TOWERS ABOVE PARKING PODIUM
7-9, 14-21 CHALMERS CRESCENT, MASCOT**

Dear Ms Wallace,

Reference is made to Council's referral regarding the abovementioned Development Application (DA) which was referred to Transport for NSW (**TfNSW**) for comment in accordance with Section 2.122 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* and in accordance with EP&A Regulation 2021, s38 (Amendment of development application).

TfNSW has reviewed the material submitted and does not support the DA in its current form due to the reasons listed in **TAB A**. To reconsider the DA, TfNSW requires additional information as detailed in **Tab B**.

It is acknowledged that the Traffic Impact Assessment (TIA) prepared by WSP dated 10 February 2025 submitted with the DA recommends the transport impact of the proposed development at the Project site be reassessed.

It has also been identified by TfNSW that no transport or traffic amelioration measures are proposed by the Applicant to reduce the safety and network efficiency impact of the proposed development on the surrounding transport network.

As such, TfNSW recommends that the Applicant investigate and propose appropriate transport mitigation measures to reduce the delay and associated safety impact of the proposed development on the classified road network to address TfNSW comments in **TAB A**. It is also recommended that the Applicant appropriately assess the impact on the nearby transport network.

Following receipt of updated information that addresses the comments in **TAB A** and the additional information required provided in **Tab B**, TfNSW will review the material and respond accordingly.

TfNSW would welcome an opportunity to discuss this matter with Council and the Applicant to address the matters raised in **TAB A**. If you have any further queries regarding this matter, please contact Matthew Houlden, Land Use Planner via email at development.sydney@transport.nsw.gov.au.

Yours sincerely,



Andrew Lissenden
A/Senior Land Use Planner – Eastern
Land Use Network & Place Planning
Transport Planning | Planning, Integration and Passenger

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TAB A

TfNSW offers the following comments in respect of public and active transport:

1. The previous TfNSW letter provided to Council dated 29 May 2024 stated that *“the Proponent also needs to assess/investigate the following:*
 - a. *The impacts of the proposed development on the capacity and adequacy of active transport and public transport facilities in the vicinity of the site and measures to ensure a satisfactory outcome for people walking to and from nearby public transport.*
 - b. *Measures to minimise private vehicle use and maximise use of active and public transport to/from the proposed development, including consideration of travel demand management measures and appropriate levels of on-site parking.”*

The information requested above has not been provided in the material submitted.

2. To provide a sense of scale of the proposed development, the following is provided for consideration:
 - a. Based on an area of 48,645m² GFA and an estimated 20m² GFA per person, the proposed development may potentially cater for up to approximately 2,430 people on-site at any one time (or more depending on the site configuration and tenancies).
 - b. If there are 608 car parking spaces on-site, then that could potentially cater for 668 people, assuming a ratio of 1.1 people per car.
 - c. A total of approximately 1,762 people would likely utilise buses, trains and active transport to access the site.
 - d. One reference to active transport within the TIA notes *“footpaths along side streets including Kent Road and Chalmers Crescent present outstanding wear including cracks and uneven surfaces”*.
3. No information has been provided to assess whether there is adequate capacity in the nearby public transport network or active transport network to cater for the anticipated number of people accessing the proposed development.
4. It is noted that the Statement of Environmental Effects prepared by City Planning Works dated 21 February 2024 (SEE) states that *“a green travel plan will be prepared at the DA stage. However, much of the content of a green travel plan is mandatory under the provisions of the DCP.”*
5. The previous TfNSW letter provided to Council dated 29 May 2024 stated *“a preliminary Green Travel Plan (GTP) is to be submitted for review as part of any future Development Application. The NSW Government provides a range of resources to help in the development of a GTP at www.mysydney.nsw.gov.au/travelchoices/tdm#support”*

TfNSW offers the following comments in respect of road-based transport:

1. The traffic assessment that concludes recommending that additional assessment is required is noted.
2. Based on the conclusions of the TIA, a preliminary review of the SIDRA models by TfNSW has identified that there were some large outflows between intersections. For example, between I-03 and I-01 there is an outflow of 322 vehicles during the existing PM peak hour. Large inflows and outflows should be explained as part of any future modelling reports.

Based on the foregoing, TfNSW is amenable to a revised transport assessment as recommended by the TIA and provides the following comments in response to the TIA's conclusions as summarised in **Table 1**.

Table 1: Summary of TIA Conclusions and TfNSW Response

TIA Conclusions	TfNSW Comment
<i>"A reduced traffic generation rate could be applied across the study area, given its proximity to extensive public transport options including rail and bus services"</i>	While this is considered satisfactory in-principle, this needs to consider the number of car parking spaces provided on-site and how that relates to traffic generation rates within the TfNSW Guide to Transport Impact Assessment (2024) or other similar sites.
<i>"The Project site is anticipated to operate 24 hours a day with multiple staff shifts, meaning workforce arrivals and departures will likely occur outside the typical 9 AM to 5 PM working hours. This factor should be considered when assessing travel behaviour, parking demand, and potential traffic impacts beyond traditional peak hours."</i>	Evidence needs to be provided to justify a departure from the typical traffic generation rates contained within the TfNSW Guide to Transport Impact Assessment.
<i>"The additional GFA of the Project site, exceeding an FSR of 3.0:1 and consistent with other approvals, is not expected to have a measurable or significant impact on the traffic modelling results."</i>	Although the FSR may be similar, the critical factor will be the number of car parking spaces provided and how these car parking spaces will be used.
<i>"Conducting surveys of existing traffic movements at nearby commercial developments could provide more accurate trip generation rates for the study area. For example, Site 5 (1-5 Chalmers Crescent, Mascot), which has been recently completed and is 70% occupied according to its website (https://onechalmers.com.au/), was projected to generate 148 and 106 vehicle movements during the AM and PM peak hours, respectively, based on standard TfNSW rates. However, a recent traffic survey at the site recorded approximately 80 and 70 vehicle movements during these periods, highlighting that actual traffic generation is lower than expected, even with 70% occupancy. This discrepancy underscores the need to re-evaluate trip generation assumptions and engage further with Bayside Council and TfNSW."</i>	TfNSW is amenable to accepting adjusted traffic generation rates for the proposed development with satisfactory evidence and reasoning.

Tab B – Additional Information Required

1. Active and Public Transport

- a) The Applicant is to provide additional evidence regarding the maximum number of people anticipated to be accommodated on-site at any one time, their likely travel to and from the site and whether there is sufficient capacity in each transport network to cater for them and whether mitigation measures are required. Questions to consider include, but are not limited to:
- i. Are the footpaths of adequate width to cater for the additional people that may walk to the proposed development to and from the nearby public transport facilities?
 - ii. Are there sufficient facilities to allow people to ride to the proposed development?
 - iii. Are the bus stops and bus routes of adequate capacity?
 - iv. Is there sufficient capacity on the trains at Mascot Station during peak times to cater for the proposed additional people that will access the proposed development?
 - v. Is there an opportunity to create a through-site link via the adjoining property to the north, direct to Coward Street or the east to Bourke Road?

2. Road-Based Transport

- a) A project to remove the left turn slip lane from Bourke Road to Coward Street is proposed. As such, all future development modelling scenarios must include this slip lane removal.
- b) The impact of the proposed development appears to be obscured by the background growth on the road network and other projects nearby. Considering this, TfNSW recommends the following additional modelling scenarios be undertaken to better ascertain the impact of the proposed development and how it relates to the amount of background growth on wider road network:
- i. Existing (including slip lane removal) + Development.
 - ii. Existing (including slip lane removal) + 2036 base STFM.
 - iii. Existing (including slip lane removal) + 2036 base STFM + development.
 - iv. Existing (including slip lane removal) + 2036 base STFM + development + mitigation measures (for example, removal of parking at peak times, extension of a turn bay etc).
 - v. Existing (including slip lane removal) + 2036 base + approved nearby developments above that in the Strategic Model.
 - vi. Existing (including slip lane removal) + 2036 base + approved nearby developments above that in the Strategic Model + mitigation measures (for example, removal of parking at peak times, extension of a turn bay etc).

Please note that for scenarios v. and vi. above, additional information has been sought from the TfNSW Advanced Analytics and Insights team to confirm whether there has been any “double counting” of traffic movements for approved developments that are already included with the STFM output plots and whether the impact of the new western Sydney airport has been considered. This information will be provided to Council as soon as it is available.

Appropriate evidence and justification is to be provided for the traffic generation rates used as well as the inbound and outbound distribution of traffic movements (refer to the TfNSW comments in Table 1). It is noted that the standard office traffic distribution rates in the AM peak hour are likely closer to 90%/10% compared to 80%/20% relied upon in this assessment. In this regard, appropriate evidence/justification is required.

3. Green Travel Plan (GTP)

- a) A GTP is to be submitted for review before the DA’s determination. This will need to address the comments in Point 1 above. The NSW Government provides a range of resources to help in the development of a GTP at www.mysydney.nsw.gov.au/travelchoices/tdm#support.