

RE-REFERRAL RESPONSE – TRAFFIC

FILE NO: Development Applications: 413/2024/1
ADDRESS: 488-492 Old South Head Road ROSE BAY
PROPOSAL: Demolition of the existing buildings and construction of a new four storey mixed use building comprising a Woolworths supermarket at Ground floor and Level 1 and 13 residential apartments at Levels 1-3, three levels of basement car parking and associated services; site remediation; earthworks; landscaping; signage and siteworks.
FROM: Ms E Fang
TO: Ms L Samuels

I refer to the memo from the Planning Department dated 24 April 2025 requesting comments in relation to the above.

1. ISSUES

Nil.

2. DOCUMENTATION

I refer to the following documents received for this report:

- Traffic Statement, unreferenced 2147, prepared by JMT Consulting, dated 15 April 2025.

3. ASSESSMENT

Parking provision have been previously assessed and is considered generally acceptable, subject to conditions to ensure compliant provision.

Updated traffic letter did not address the issues raised in relation to traffic modelling and future traffic performance at the intersection of Old South Head Road and Albemarle Lane, Rose Bay. It is however considered this can be addressed by way of conditions and request deferred commencement to update operational plans and provide traffic controls to the satisfaction of Council's Engineering Services Department.

Specifically, the applicant is required to:

- 1) Allocate sufficient parking spaces to future staff to minimise additional parking pressure on surrounding road network;
- 2) Incorporate car share parking and car share scheme;
- 3) Update Green Travel Plan with goals and measures accordingly to achieve these goals to be consistent with onsite parking provision;
- 4) Update Plan of Management to:
 - a. place cap on the number of customers for direct-to-boot services at peak hours to be consistent with queuing analysis in the traffic statement, dated 15 April 2025;
 - b. request all oversized vehicles, including deliveries and service vehicles, to access and exit the site from and to Old South Head Road before turning into Albemarle Lane to minimise adverse impacts on local roads; and

- c. request all oversized vehicles, including deliveries and service vehicles, to access the site outside of peak hours, including school peak hours, to reduce delays and queues.
- 5) Provide Construction Traffic Management Plan to request all oversized vehicles accessing and exiting the site using the existing access off Old South Head Road; other vehicles accessing the site via Albemarle Avenue may only be supported outside of school peak hours.
- 6) Liaise with TfNSW, Woollahra Council and Waverly Council on the additional parking restrictions to improve traffic performance and reduce queues approaching the intersection of Old South Head Road and Albemarle Avenue, Rose Bay.

4. RECOMMENDATION

Council's Traffic Engineer has reviewed the application and recommend that the development is satisfactory, subject to the following conditions:

A. GENERAL CONDITIONS

A.3 Deferred Commencement - (section 4.16(3) of the Act, clause 76 of the Regulation)

Development consent is granted subject that this consent is not to operate until the Applicant satisfies the Council, in accordance with the Regulations, as to all matters specified in this condition:

- a) A Green Travel Plan (GTP) be submitted, to Council's Traffic & Transport Engineers' satisfaction, as per E1.12 of Council's DCP. GTP should take the form of a control document to be implemented in the ongoing operation of the site, and must provide information including but not limited to:
 - Targets and goals of plan to be consistent with onsite parking provision and minimise adverse impacts on surrounding road network in terms of parking implications and traffic flow performance.
 - Strategies and measures to achieve proposed targets and goals.
 - The implementation of plan, including measures intended to take and representative responsible for implementing and enforcing the plan, with a yearly review for at least five years from the operation date to assess the effectiveness of the plan and provide adjustment and improvement measures, if applicable.
- b) An updated Plan of Management (POM), to the satisfaction of Council's Engineering Services Department, to provide efficient and safe environment for Direct-To-Boot customers and service vehicles accessing/egressing the site, including but not limited to:
 - A maximum of 20 Direct-To-Boot customers can be permitted to book the service and attend the site within an hour window.
 - All oversized vehicles (longer than 7.5m or heavier than 4.5T) accessing/egressing the site must travel from and to Old South Head Road before turning into Albemarle Avenue to minimise impact on local roads.
 - All oversized vehicles (longer than 7.5m or heavier than 4.5T) attending the site must only access/egress the site outside of peak hours, including school peak hours, to reduce traffic delays and queues.
- c) Incorporate car share scheme and provide a minimum of two (2) designated car share parking spaces, to the satisfaction of Council's Traffic & Transport Engineers, to reduce reliance on private vehicles and facilitate sustainable development. The car share parking spaces must be accessible to the general public.

- d) Liaise with Transport for NSW, Woollahra Council and Waverly Council, on any additional parking restrictions and/or other traffic improvement measures, to mitigate the adverse impacts on the traffic performance approaching the intersection of Old South Head Road, Albemarle Avenue and Liverpool Street. All costs associated with these changes must be borne by the applicant.

Condition Reason: To ensure all parties are aware this consent does not operate until the Council is satisfied all relevant matters specified in this condition are addressed.

A.5 Approved Plans and Supporting Documents

Those with the benefit of this consent must carry out all work and maintain the use and works in accordance with both the architectural plans to which is affixed a Council stamp "Approved" and supporting documents listed below unless modified by any following condition.

Where the plans relate to alterations or additions only those works shown in colour or highlighted are approved.

Reference	Description	Author	Date
Unreferenced	Traffic Statement	JMT Consulting	15 April 2025

Notes:

Warning to Principal Certifier – You must always insist on sighting the original Council stamped approved plans. You must not rely solely upon the plan reference numbers in this condition. Should the Applicant not be able to provide you with the original copy Council will provide you with access to its files so you may review our original copy of the approved plans.

These plans and supporting documentation may be subject to conditions imposed under section 4.17(1)(g) of the Act modifying or amending the development.

Condition Reason: To ensure all parties are aware of the approved plans and supporting documentation that applies to the development.

B. BEFORE DEMOLITION WORK COMMENCES

B.20 Construction Traffic Management Plan

Before any site work commences, and as a result of the site constraints, limited space and access, a Construction Traffic Management Plan (CTMP) is to be submitted to Council for approval. Also, due to lack of on-street parking a Work Zone may be required during construction.

An application for the CTMP must be submitted for approval, and all associated application fees must be paid.

The CTMP must be submitted as a self-contained document that outlines the nature of the construction project and as applicable, include the following information:

- a) Detail the scope of the works to be completed including details of the various stages, e.g. demolition, excavation, construction etc. and the duration of each stage.

- b) Identify local traffic routes to be used by construction vehicles and state that the existing access in Old South Head Road will be maintained and will be utilised as the main access for construction vehicles. All oversized vehicles (longer than 7.5m or heavier than 4.5T) must only access/egress the site from and to Old South Head Road.
- c) Identify ways to manage construction works to address impacts on local traffic routes.
- d) Identify other developments that may be occurring in the area and identify ways to minimise the cumulative traffic impact of these developments. Should other developments be occurring in close proximity (500m or in the same street) to the subject site, the developer/builder is to liaise fortnightly with the other developers/builders undertaking work in the area in order to minimise the cumulative traffic and parking impacts of the developments.
- e) Detail how construction workers will travel to and from the site and parking arrangements for those that drive.
- f) Identify any proposed road closures, temporary traffic routes, loss of pedestrian or cyclist access, or reversing manoeuvres onto a public road, and provide Traffic Guidance Schemes (TGSs) prepared by an accredited SafeWork NSW Control Work Training Card holder to manage these temporary changes.
- g) Detail the size (including dimensions), numbers and frequency of arrival of the construction vehicles that will service the site for each stage of works.
- h) Provide for the standing of vehicles during construction.
- i) If construction vehicles are to be accommodated on the site, provide a scaled drawing showing where these vehicles will stand and the vehicle swept path to show that these vehicles can access and egress the site in a forward direction (including dimensions and all adjacent traffic control devices, such as parking restrictions, pedestrian facilities, kerb extensions, etc.).
- j) If trucks are to be accommodated on Council property, provide a scaled drawing showing the location of any proposed Works Zone (including dimensions and all adjacent traffic control devices, such as parking restrictions, pedestrian facilities, kerb extensions, etc.).
- k) Show the location of any site sheds and any anticipated use of cranes and concrete pumps and identify the relevant permits that will be required.
- l) If a crane/s are to be accommodated on site, detail how the crane/s will be erected and removed, including the location, number and size of vehicles involved in the erection/removal of the crane/s, the duration of the operation and the proposed day and times, any full or partial road closures required to erect or remove the crane/s and appropriate Traffic Guidance Schemes (TGSs) prepared by an approved SafeWork NSW Control Work Training Card holder.
- m) Make provision for all materials, plant, etc. to be stored within the development site at all times during construction.
- n) State that any oversized vehicles proposed to operate on Council property (including Council approved Works Zones) will attain a Permit to Stand Plant on each occasion (Note: oversized vehicles are vehicles longer than 7.5m or heavier than 4.5T.)
- o) Show the location of any proposed excavation and estimated volumes.
- p) When demolition, excavation and construction works are to be undertaken on school days, all vehicular movements accessing/egressing from and to Albemarle Avenue must only be undertaken between the hours of 9.30am and 2.30pm, in order to minimise disruption to the traffic network during school pick up and drop off times.
- q) Show the location of all Tree Protection (Exclusion) zones (Note: storage of building materials or access through Reserve will not be permitted without prior approval by Council).

Notes:

A minimum of eight weeks will be required for assessment. Site work must not commence until the Construction Traffic Management Plan is approved. Failure to comply with this condition may result in fines and proceedings to stop work. Council and NSW Police approval is required prior to a partial or full temporary road closure. If you are seeking a partial or full temporary road closure you must comply with the relevant conditions of this consent and you must also gain the approval of the Eastern Suburbs Police Area Command.

If you partial or full close a road without compliance with Council and NSW Police requirements Council Rangers or the Police can issue Penalty Infringement Notices or Court Attendance Notices leading to prosecution.

Traffic Supervisors at the Eastern Suburbs Police Area Command can be contacted on eastsubtraffic@police.nsw.gov

Condition Reason: To facilitate the efficient operation of construction projects, minimise traffic disruption, and protect the public, and the surrounding environment, during site works and construction.

(Autotext 20B)

B.21 Works (Construction) Zone – Approval and Implementation

If the Construction Management Plan relies upon a Works Zone, before any site work commences, a Works Zone application must be made.

If the works zone is approved, all fees for the Works Zone must be paid before it can be installed.

All Works Zone signs must have been erected by Council to permit enforcement of the Works Zone by Council's Rangers and NSW Police before commencement of any site work. Signs are not erected until full payment of Works Zone fees is made.

Notes:

A minimum of four to six weeks must be allowed (for routine applications) from the date of making an application to the Traffic Committee (Woollahra Local Traffic Committee) constituted under clause 20 of the Transport Administration (General) Regulation 2018 to exercise those functions delegated by Transport for New South Wales under section 31(3) of the Transport Administration Act 1988.

The enforcement of the Works Zone is at the discretion of Council's Rangers and the NSW Police Service. Any breach of the Works Zone must be reported to either Council or the NSW Police Service.

Condition Reason: To facilitate the efficient operation of construction projects and to minimise traffic disruption.

C. ON COMPLETION OF REMEDIATION WORK

Nil.

D. BEFORE THE ISSUE OF A CONSTRUCTION CERTIFICATE

D.4 Modification of Details of the Development (section 4.17(1)(g) of the Act

Before the issue of any construction certificate, the approved plans and the construction certificate plans and specification, required to be submitted to the Principal Certifier under clause 7 of the Development Certification and Fire Safety Regulations, must detail the following amendments:

- a) A minimum of ten (10) retail parking spaces be reallocated to staff parking and must be clearly depicted on the architectural drawings.
- b) A minimum of two (2) retail parking spaces be reallocated to designated car share parking spaces and must be clearly depicted on the architectural drawings.
- c) A yellow epoxy zebra crossing be provided at both vehicle access points to minimise any conflicts and improve pedestrian safety.

Notes:

Clause 20 of the Development Certification and Fire Safety Regulations prohibits the issue of any construction certificate subject to this condition unless the Principal Certifier is satisfied that the condition has been complied with.

Clause 19 of the Development Certification and Fire Safety Regulations prohibits the issue of any construction certificate that is inconsistent with this consent.

Condition Reason: To require design changes and/or further information to be provided to address specific issues identified during the assessment under section 4.15 of the Act.

D.13 Road and Public Domain Works

Before the issue of any construction certificate, a separate application under Section 138 of the Roads Act 1993 is to be made to, and be approved by Council, for the following infrastructure works. The infrastructure works must be carried out at the applicant's expense:

- a) The removal of the existing vehicular crossing including layback and gutter and the construction of a new 7.0 metres wide vehicular crossing for the northern driveway and a 9.5 metres wide vehicular crossing for the loading dock in accordance with Council's Crossing Specification, standard driveway drawing RF2_D and to the satisfaction of Council's Assets Engineers. The new vehicular crossings must be constructed at a right angle to the street kerb in plain concrete where the centreline of the new crossings must align with the centreline of the internal driveways at the property boundary. Design longitudinal surface profiles along each side/edge for the proposed driveway, starting from the road centreline to the parking slab must be submitted for assessment.

b) Other conditions imposed by Development Engineers.

Condition Reason: To ensure the design of the road, footpaths, driveway crossings and public stormwater drainage works are detailed and approved under section 138 of the Roads Act 1993 and to ensure the works are completed to Council's satisfaction.

D.45 Parking Facilities

Before the issue of any construction certificate, the construction certificate plans and specifications required under clause 7 of the Development Certification and Fire Safety Regulation, must include detailed plans and specifications for all bicycle, car and commercial vehicle parking in compliance with AS2890.3: Parking Facilities - Bicycle Parking Facilities, AS 2890.6: Parking facilities - Off-street parking for people with

disabilities, AS/NZS 2890.1: Parking Facilities - Off-Street Car Parking and AS 2890.2: Off-Street Parking: Commercial Vehicle Facilities respectively.

The plans must satisfy the following requirement(s):

- a) A 2m x 2.5m driveway sightline splay be provided, clear of sight obstruction, along exit side of the northern driveway and along both sides of the driveway for the loading dock to ensure visibility between vehicles leaving the site and traffic on the frontage road, including pedestrians on the frontage road footpath. This should be clearly depicted on the architectural plans.
- b) Sight distance requirements must comply with Clause 3.2.4 and Figure 3.3 of AS2890.1:2004.
- c) Concrete median island be provided for the northern driveway to allow separate and independent operations for ingress and egress traffic.
- d) 'STOP' sign and line marking be provided, wholly within the site, for vehicles exiting the site from both driveways.
- e) Signage and/or line marking be provided to ensure compliant allocation of parking spaces to retail and residential uses. A minimum of ten (10) parking spaces must be allocated for staff parking to minimise parking pressure on surrounding streets.
- f) Signage and line marking be provided within the basement car park to clearly guide the traffic flow to allow efficient movements. Convex mirrors should be provided at turning points to assist with visibility and avoid traffic conflicts.
- g) Yellow epoxy zebra crossing be provided within the basement car park to allow pedestrians to walk safely to and from the parking spaces, trolley areas and the lift.
- h) Accessible parking space and the adjacent shared space must be designed to comply with parking configurations stipulated in AS 2890.6.
- i) **Other conditions imposed by Development Engineers.**

Access levels and grades must comply with access levels and grades required by Council under the Roads Act 1993.

The Principal Certifier has no discretion to reduce or increase the number or area of car parking or commercial parking spaces required to be provided and maintained by this consent.

Condition Reason: To ensure parking facilities are designed in accordance with the Australian Standard.

D.70 Woollahra Local Traffic Committee Approval

Before the issue of a construction certificate, the applicant is to liaise with Council's Traffic and Transport Department for any required adjustment of parking restrictions. This matter must be referred to the Woollahra Local Traffic Committee for review and approval.

Notes:

This process can take up to 8 weeks.

All works associated with the signage changes shall be carried out at the full cost to the applicant.

Condition Reason: To ensure the approval of the Woollahra Local Traffic Committee is obtained.

E. BEFORE BUILDING WORK COMMENCES

Nil.

F. DURING BUILDING WORK

F.3 Compliance with Construction Traffic Management Plan

While site work is being carried out, all development activities and traffic movements must be carried out in accordance with the approved Construction Traffic Management Plan (CTMP). All controls in the CTMP must be maintained at all times. A copy of the CTMP must be kept on-site at all times and made available to the Principal Certifier on request.

Notes:

Irrespective of the provisions of the Construction Traffic Management Plan the provisions of traffic and parking legislation prevails.

Condition Reason: To ensure compliance with the Construction Traffic Management Plan.

G. BEFORE THE ISSUE OF AN OCCUPATION CERTIFICATE

G.36 Positive Covenant for Mechanical Parking Installation & Work-As-Executed Certification of Mechanical Systems

Before the issue of any occupation certificate for the whole of the building, mechanical parking installations are to be certified by a professional engineer with works-as-executed drawings supplied to the Principal Certifier detailing:

- a) Compliance with conditions of development consent relating to mechanical parking installation including turntable for the loading dock.
- b) That the works have been constructed in accordance with the approved design.
- c) A positive covenant pursuant to Section 88E of the Conveyancing Act 1919 must be created on the title of the subject property, providing for the indemnification of Council from any claims or actions and for the on-going maintenance of the turntable incorporated in the development. The wording of the Instrument must be in accordance with Council's standard format and the Instrument must be registered at the Land and Property Information NSW.

Notes:

The PCA must supply a copy of the WAE Plans to Council together with the occupation certificate for the whole of the building.

The occupation certificate for the whole of the building must not be issued until this condition has been satisfied.

H. OCCUPATION AND ONGOING USE

H.21 Provision of Off-street Public and Visitor Parking

During the occupation and ongoing use, in compliance with AS2890.3: Parking Facilities - Bicycle Parking Facilities, AS 2890.6: Parking facilities - Off-street parking for people with disabilities and AS/NZS 2890.1: Parking Facilities - Off-Street Car

Parking and AS 2890.2: Off-Street Parking: Commercial Vehicle Facilities, unimpeded public access to off-street parking must be maintained as follows:

Use	Number of spaces
Car parking (resident)	19 (including 2 accessible)
Car parking (residential visitor)	3
Car parking (car wash)	1
Car parking (direct to boot)	5
Car parking (staff)	10
Car parking (car share)	2
Car parking (retail)	53 (including 2 accessible)
Bicycle parking (residential)	15 (within storage cage)
Bicycle parking (visitor)	30 (bike racks)
Motorbike parking	9

Notes:

Where there is a potential for the trespass of private motor vehicles upon private parking servicing the owner of the site may seek to enter into a free parking area agreement with Council. Council may under such agreement enforce parking restrictions under section 650 of the Local Government Act 1993.

Further information can be obtained from Council's Compliance Team by calling 9391 7000 or from the Office of Local Government at www.olg.nsw.gov.au or call 4428 4100.

Condition Reason: To ensure adequate on-site parking is maintained.

H.23 Provision of Off-street Commercial Vehicle Facilities

During the occupation and ongoing use, in compliance with AS 2890.2: Parking facilities - Off-street commercial vehicle facilities, unimpeded access to off-street parking must be maintained as follows:

Use	Number of spaces
Loading Dock	1 (including a turntable with a minimum clearance of 11m)

All deliveries to and dispatch from the site, excluding retail sales, must occur within the curtilage of the development and within the commercial vehicle parking facilities required to be maintained by this condition.

Notes:

Where there is a potential for the trespass of private motor vehicles upon private parking servicing the owner of the site may seek to enter into a free parking area agreement with Council. Council may under such agreement enforce parking restrictions under section 650 of the Local Government Act 1993.

Further information can be obtained from Council's Compliance Team by calling 9391 7000 or from the Office of Local Government at www.olg.nsw.gov.au or call 4428 4100.

Condition Reason: To ensure that commercial vehicles use loading facilities within the site to reduce impacts on the neighbourhood including noise and parking impacts.

H.62 On-going Maintenance of the Mechanical Parking Installations

During the occupation and ongoing use, the Owner must ensure the ongoing maintenance of the mechanical parking installations in accordance with this condition and any positive covenant. The Owner must:

- a) keep the system clean and free of silt rubbish and debris;
- b) maintain renew and repair as reasonably required from time to time the whole of the system so that it functions in a safe and efficient manner;
- c) carry out the matters referred to in paragraphs (a) and (b) at the Owners expense;
- d) not make any alterations to the system or elements thereof without prior consent in writing of the Council and not interfere with the system or by its act or omission cause it to be interfered with so that it does not function or operate properly;
- e) permit the Council or its authorised agents from time to time upon giving reasonable notice (but at any time and without notice in the case of an emergency) to enter and inspect the land with regard to compliance with the requirements of this covenant;
- f) comply with the terms of any written notice issued by Council in respect to the requirements of this clause within the time stated in the notice; and
- g) where the Owner fails to comply with the Owner's obligations under this covenant, permit the Council or its agents at all times and on reasonable notice at the Owner's cost to enter the land with equipment, machinery or otherwise to carry out the works required by those obligations.

The Owner

- a) indemnifies the Council from and against all claims, demands, suits, proceedings or actions in respect of any injury, damage, loss, cost, or liability (Claims) that may be sustained, suffered, or made against the Council arising in connection with the performance of the Owner's obligations under this covenant; and
- b) releases the Council from any Claim it may have against the Council arising in connection with the performance of the Owner's obligations under this covenant.

Notes:

This condition is supplementary to the owner(s) obligations and Council's rights under any positive covenant.

Condition Reason: To ensure the ongoing maintenance of the mechanical parking installations.

H.63 Operation in Accordance with Green Travel Plan (GTP) and Plan of Management (POM)

During the occupation and ongoing use:

- a) The operation and management of the premises shall be in accordance with the approved GTP/POM.
- b) The GTP/POM cannot be altered without the written consent of Council.
- c) Monitoring annual reports must be submitted for a minimum of 5 years post occupation.

Condition Reason: To maximise road safety and performance.

I. BEFORE ISSUE OF A SUBDIVISION WORKS CERTIFICATE

Nil.

J. BEFORE SUBDIVISION WORK COMMENCES

Nil.

K. BEFORE ISSUE OF A SUBDIVISION CERTIFICATE (subdivision works)

Nil.

L. BEFORE ISSUE OF A SUBDIVISION CERTIFICATE (no subdivision works)

Nil.

M. BEFORE ISSUE OF A STRATA CERTIFICATE

Nil.

Ever Fang
Traffic & Transport Team Leader

27/6/2025
Completion Date

ORIGINAL REFERRAL RESPONSE – TRAFFIC

FILE NO: Development Applications: 413/2024/1
ADDRESS: 488-492 Old South Head Road ROSE BAY
PROPOSAL: Demolition of the existing buildings and construction of a new four storey mixed use building comprising a Woolworths supermarket at Ground floor and Level 1 and 13 residential apartments at Levels 1-3, three levels of basement car parking and associated services; site remediation; earthworks; landscaping; signage and siteworks.
FROM: Ms E Fang
TO: Ms L Samuels

I refer to the memo from the Planning Department dated 6 October 2024 requesting comments in relation to the above.

5. ISSUES

Nil.

6. DOCUMENTATION

I refer to the following documents received for this report:

- Statement of Environment Effects, referenced 2240289, prepared by Ethos Urban, dated 4 October 2024.
- Plan of Management, unreferenced, prepared by Woolworths, dated October 2024.
- Transport Impact Assessment, referenced 2147, prepared by JMT Consulting, dated 13 September 2024.
- Referral Response from TfNSW, referenced SYD24-01904/01, dated 3 December 2024.
- Architectural Plans, Issue 3, referenced Project No. 2401, prepared by Pbd Architects, dated 26 September 2024.

7. ASSESSMENT

7.1 Parking Provision

The parking provision for the proposed development has been assessed in accordance with Council's *DCP 2015 Chapter E1 Parking and Access*:

Table 1: Car Parking Provision

Residential Component	Quantity	DCP Maximum Requirement per Unit	DCP Maximum Permitted Parking	Proposed Provision
2 bedrooms	2	1	2	19
3 or more bedrooms	11	1.5	16.5 (17)	
Visitors	13	0.2	2.6 (3)	3
Total permitted			22	22
Non-Residential Component	Quantity	DCP Minimum Requirement per 100m² GFA*	DCP Minimum Required Parking	Proposed Provision
Supermarket	2022.8m ²	3.5	42.5 (43)	70
Total required			65	92

*Note: Parking multiplier of 0.6 applies to Rose Bay South MU1 zone

It is noted that majority of this site is zoned as MU1 which consists of a parking multiplier of 0.6 for non-residential use. It is also noted that a draft site specific DCP has been endorsed by Council where it stipulates that the parking multiplier for non-residential uses applies to the whole development site including 30 Albemarle Avenue, Rose Bay. Onsite parking requirement for this proposal is therefore calculated and shown in Table 1.

It is noted dimensions are not annotated for residential parking, however by measurement that parking area allocated to at least 9 units have the capacity to accommodate 1 more parking space than depicted in the architectural plans, totalling to a provision of 28 parking spaces for residential use. Such provision exceeds the maximum requirement however noting surrounding streets consist of unlimited parking, future parking demand generated from this site, if not accommodated onsite, are likely to pose more pressure on the kerbside parking. This proposal therefore is considered acceptable.

Table 2: Bicycle and Motorbike Parking Provision

BICYCLE				
	Quantity	DCP Minimum Requirement	DCP Minimum Required Parking	Proposed Provision
Residential Residents	13 dwellings	1 per dwelling	13	15 + storage for each residential unit
Residential Visitors	13 dwellings	1 per 10 dwellings	1.3 (1)	
Shop & restaurant employees	2022.8m ²	1 per 250m ²	8.1 (8)	14
Shop & restaurant customers	2022.8m ²	2 + 1 per 100m ² over 100m ² GFA	21.2 (21)	

Total required			43	29
MOTORBIKE				
	Quantity	DCP Minimum Requirement	DCP Minimum Required Parking	Proposed Provision
Car Spaces	64	1 per 10 car spaces	6.4 (6)	9
Total required			6	

It is clear from Table 2 that the proposal would result in a shortfall of 15 bicycle parking spaces for retail use. It is however noted that compliant provision can be readily made per the proposal car park layout. Revised architectural plans should be submitted to clearly depict sufficient onsite bicycle parking for further assessment, noting Green Travel Plan lists provision of sufficient bike parking in easily accessible and secure locations as one of the actions to promote sustainable travel and reduce private car use.

Staff Parking & Green Travel Plan

Insufficient information is provided in Plan of Management and Traffic report to demonstrate future staff parking, including number of staff expected to be onsite, parking generation rate of staff parking, number of parking spaces allocated to staff, etc. The Green Travel Plan does not specify goals/targets of future travel mode split, or measures to achieve the targeted level of alternative transport mode share.

It is requested that Plan of Management, Transport Impact Assessment and Green Travel Plan be updated to demonstrate the number of staff expected onsite, number of private car use, targets and measures taken to promote alternative transport modes which should be consistent with provision of onsite staff parking. Considering the existing parking conditions in this area, it is requested that sufficient onsite parking provided as well as a satisfactory Green Travel Plan be developed to ensure the proposal minimise adverse parking impacts on surrounding streets.

Accessible Parking

BCA requires Class 6 Buildings to provide one (1) accessible parking space for every 50 car parking spaces or part thereof. It is also noted that the proposal includes two (2) adaptable units which requires one (1) accessible parking space for each unit.

The proposed provision of two (2) accessible parking spaces for retail use and two (2) for residential use comply with the minimum requirement and is deemed satisfactory. The design of these parking spaces, including the shared area adjacent to the spaces, must comply with requirements stipulated in AS 2890.6 for disabled parking configurations.

Direct to Boot Parking

Parking generation rate for Direct to Boot (DBT) services is not stated in Council's *DCP 2015 Chapter E1 Parking and Access* or *RMS Guide to Traffic Generating Developments 2002*, and *RMS Guide to Traffic Generating Developments Updated traffic surveys TDT 2013/04a*. It is understood that approximately 80 to 120 vehicles will utilise the DBT service per day, equating to approximately 10 to 15 vehicles per hour.

Whilst it is indicated in the traffic report for DA2023/52/1 that average dwell time of DBT customers is approximately 4 minutes, other operation details for DBT services are not provided in the Plan of Management, including the number of orders capped per hour for

DBT services (if applicable), the number of vehicles expected to access the site for DBT during the busiest hour, operation hours for DBT services, etc. It is therefore requested that a queuing analysis be provided to demonstrate that the proposed five (5) DBT parking spaces have the capacity to accommodate 98th percentile queue at peak hours without additional onsite waiting bay/s.

EV Parking

It is stipulated in E1.11 of Council's DCP that 10% of car parking spaces, for both residential and non-residential use, should provide electric vehicle charging points to encourage and support the increased use of electric vehicles. It is therefore requested that the proposal be updated to include a minimum of two (2) electric vehicle parking spaces for residential use and seven (7) for retail use.

7.2 Traffic Generation

It is noted that traffic report calculates future retail traffic based on number of parking spaces provided. Reference is made to *RMS Guide to Traffic Generating Developments 2002*, *RMS Guide to Traffic Generating Developments Updated traffic surveys TDT 2013/04a*, *TfNSW Guide to Transport Impact Assessment (2024)* as well as *RMS Trip Generation Surveys NSW Small Suburban Shopping Centres Analysis Report (2018)*, to compare traffic generation results for the retail components using different calculation methods, as shown in the table below:

Table 3: Traffic Generation

Source		Traffic Generation (veh/h)					
		Weekday Traffic				Weekend Traffic	
		AM Rate	AM Traffic	PM Rate	PM Traffic	Weekend Rate	Weekend Traffic
RMS GTGD (2002)		-	-	12.5 per 100m ² GLFA	189.6	16.3 per 100m ² GLFA	247.3
TfNSW GTIA (2024)		126+6.6 per 100m ² GLFA	259.5	170+8.9 per 100m ² GLFA	350.0	186+9.7 per 100m ² GLFA	382.2
Suburban Shopping Centre Survey (2018)		129+6.8 per 100m ² GLFA	232.2	170+8.9 per 100m ² GLFA	305.0	186+9.7 per 100m ² GLFA	333.2
JMT Consulting	Parking Space Based Methods	1.6 per space	112	2.3 per space	161	2.5 per space	175
		≈ 7.4 per 100m ² GLFA		≈ 10.6 per 100m ² GLFA		≈ 11.5 per 100m ² GLFA	
	0.75 multiplier	84		120.8		131.2	

Whilst the method for traffic generation calculation based on existing sites are generally supported, it was requested that more information be provided during post-gateway stage, including sensitivity test to justify traffic generation and updated traffic modelling to factor in mode splits of future traffic, conflicts between crossing passengers and turning vehicle movements, traffic management on-site and near access points, etc. The required information has not been provided.

It is noted that the above calculation is used as input for SIDRA analysis to predict future traffic performance, however the below issues are identified for the analysis:

1. Significant lower traffic generation rate than TfNSW Guide

It should be noted that TfNSW GTIA (2024) supersedes the RMS GTGD 2002 and TDT 2013/04a on 4 November 2024 and applies to development applications lodged on or after 4 November 2024, therefore the traffic generation rates of RMS GTGD (2002) apply to this proposal. It should however be noted that TfNSW GTIA (2024) is based on more recent survey results which captures an increase of vehicles trips over the years.

Regardless, JMT Consulting adopted a significantly lower traffic generation rate even than RMS Guide (2002). No statistical evidence or sensitivity test has been provided to demonstrate that methods adopted by JMT Consulting based on car parking spaces could yield a more accurate result.

2. Unjustified discount rate for linked and multipurpose trips

It is noticed that JMT Consulting further adopts a multiplier of 0.75 as *'The RMS "Guide to Traffic Generating Developments" document suggests that some 25% of visits to retail centres are likely to be passing trade, i.e. customers who would have driven past the development regardless of their visit to the development.'*

Whilst it is acknowledged that linked and multi-purpose trips can reduce overall trip generation rates, where linked trips are defined as 'a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work' and 'multi-purpose trips' are 'where more than one shop or facility is visited', RMS GTGD also indicates that 'any trip discounts would apply differently in new free-standing centres and for new shops within existing centres.' Discounts of this nature should not apply without adequate substantiation.

In addition, the above discount rate applies to traffic generation of new shops within existing centres, whereas the calculation method used by JMT Consulting is based on traffic surveys on existing Woolworths sites. The assumption that linked traffic to Woolworths sites is at the same level as linked trips to an existing retail centre is not justified and is questioned.

3. Faulty calibrations for SIDRA analysis

When modelling future traffic flow, JMT consulting suggests that traffic will be evenly distributed in three directions, including 33.3% from north and south of Old South Head Road and 33.3% from north of Albemarle Avenue, for both morning and afternoon peaks. Noting traffic assignment and travel pattern are largely impacted by the surrounding road network and the locality that would attract future customers to and from the site, the above even distribution is not validated.

It is also noted that the SIDRA analysis is inconsistent in vehicular traffic increase when comparing to calculations provided in the traffic report. A comparison of SIDRA analysis and traffic report calculations is tabled below:

Table 4: Traffic Increase

(veh/h)	SIDRA Analysis			Increase in Traffic Report
	Existing	Future	Increase	
Weekday AM Peak	1739	1820	81	84
Weekday PM Peak	1872	1979	107	120.8
Weekend Peak	1746	1862	116	131.2

Furthermore, SIDRA analysis assumes the same amount of pedestrian traffic in existing and future conditions. It should however be noted this proposal is anticipated to increase pedestrian activities in this area and crossing demand at the intersection of Old South Head Road and Albemarle Avenue, which may result in delays for turning vehicles within an effective 'green light period'.

4. Significant delay in Albemarle Avenue

Regardless of the above, SIDRA results suggest there will be significant delay in Albemarle Avenue, particularly for right-turn movements, where level of service will be decreased from 'E' to 'F'. The existing and future conditions of vehicles turning right at Albemarle Avenue are summarised below.

Table 5: Traffic Performance

		Existing	Future
Weekday AM peak	95 th queue length (m)	61.8	71.6
	Level of Service	E	F
	Average delay (s)	66.9	70.8
Weekday PM peak	95 th queue length (m)	81.5	99.6
	Level of Service	E	E
	Average delay (s)	59.1	67.8
Weekend peak	95 th queue length (m)	45.7	56.6
	Level of Service	E	E
	Average delay (s)	62.9	62.9

Noting the frontage of this site in Albemarle Avenue is approximately 70m in length, where the loading dock and the other vehicular access for customers and residents are proposed respectively 40m and 50m west of the intersection. The 95th percentile queue would therefore be beyond both vehicular accesses and result in vehicles waiting to enter or leave the site, which creates further traffic weaving and delay in Albemarle Avenue intersection.

7.3 Service Vehicles/Loading Dock Operations

The proposed loading dock consists of a turntable to allow operation of 8.8m MRVs and swept path analysis demonstrates successful turning movements from and to Old South Head Road and Albemarle Avenue.

It is also noted that deliveries are anticipated to occur 2 to 4 times with coordination that only one truck will access the site at a time. This is considered acceptable.

Should the development be approved, the loading dock management should be updated and submitted to Council for further assessment prior to obtainment of Occupation Certificate to ensure that deliveries will occur outside of peak hours, including school peak hours, to minimise disruptions to traffic along the frontage road.

7.4 TfNSW Referral

The frontage Road Old South Head Road is a state road under care and control of TfNSW. TfNSW has provided comments which raised concerns on traffic safety and efficiency, particularly in relation to right turn movements from Old South Head Road to Albemarle Avenue. It is noted that SIDRA results indicate an extension of further 66 metres queue on the northern approach in Old South Head Road in the afternoon peak period from 146 metre

queue under existing conditions to approximately 213 metres because of the proposed development.

It is also noted that TfNSW requires additional information be provided to mitigate the adverse impacts for further assessment.

8. RECOMMENDATION

Council's Traffic Engineer has determined that the proposal cannot be supported at this stage before the following issues, as detailed in the report above, are addressed:

1. Parking provision –
 - a. Plan of Management, Transport Impact Assessment and Green Travel Plan should be updated to demonstrate the number of staff expected onsite, number of private car use, targets and measures taken to promote alternative transport modes which should be consistent with provision of onsite staff parking.
 - b. A queuing analysis be provided to demonstrate that the proposed five (5) Direct to Boot parking spaces have the capacity to accommodate 98th percentile queue at peak hours without additional onsite waiting bay/s. Plan of management should be updated to include the maximum amount of orders permitted for each hour.
 - c. The proposal be updated to include a minimum of two (2) electric vehicle parking spaces for residential use and seven (7) for retail use, as per E1.11 of Council's DCP to encourage and support the increased use of electric vehicles.
2. Traffic Generation –
 - a. Significant lower traffic generation rate than TfNSW Guide
 - b. Unjustified discount rate for linked and multipurpose trips
 - c. Faulty calibrations for SIDRA analysis including unvalidated vehicular traffic flow distribution, inconsistent information in traffic increase in traffic report and SIDRA input, zero-increase of pedestrian flow
 - d. Significant delay in Albemarle Avenue
3. TfNSW referral – TfNSW identifies significant delay at the signalised intersection of Old South Head Road and Albemarle Avenue and requests mitigation methods be proposed for further assessment.

Ever Fang
Traffic & Transport Team Leader

14/2/2025
Completion Date