

10th November

Canterbury Bankstown City Council

PO Box 8

Bankstown

NSW, 1885

Dear Council

1. Response to Reasons for Refusal – Traffic and Transport

Following submission of the Development Application (DA-1182/2024) for the redevelopment of the Altis Compass Centre in Bankstown, Canterbury Bankstown City Council (CBCC) have recommended refusal of the application.

Reasons for Refusal from CBCC are presented below in *italics* and resultant responses from **ptc.** as normal text.

Reason 9 – Vehicular Access

The surrounding road network is subject to future changes as part of Council's proposed 'Complete Streets' masterplan in the 'Bankstown Complete Streets CBD Transport and Place Plan' (refer to Figure 20 below). Featherstone Street is to become a two-way shared zone with access provided via The Mall (due to the conversion of the southern end of Featherstone Street to pedestrian only). Due to the location and configuration of the proposed site access driveways Featherstone Street, concern is raised regarding the potential traffic impacts associated with the significant increase in vehicle volumes within the shared zone, as well as impacts to pedestrian safety, in a shared zone environment where pedestrians have priority over vehicles.

Under the Complete Streets future scenario, Featherstone Street is the only available road frontage to serve the development site. Council and DRP have noted and previously advised that of the site's three street frontages, Appian Way and North Terrace are not suitable location for vehicle access driveways. Furthermore, the driveway access location onto Featherstone Street has been endorsed by DRP, complementing the Complete Streets design. As detailed in the previous RFI response, the existing buildings on the site have two driveways located in the same location on Featherstone Street as existing, and therefore the proposal is not increasing the number of driveways.

It should be highlighted that the proposed driveway configuration has been designed to ensure minimal vehicle intrusion into the future Featherstone Street Complete Streets environment, seeking to minimise driveway widths and ensuring that pedestrian crossing distances across driveways are reduced as far as possible. The proposal has been prepared on the basis of ensuring Featherstone Street is not a vehicle dominated environment, whereby the residential driveway has been located forwards the future pedestrian only zone and the loading dock / retail parking further north. It is the position of **ptc.** that this design principle is in line with the Complete Streets environment where Featherstone Street will become a shared zone and pedestrian only zone to the south of the development site, as duly highlighted by Council.

Further consideration of the potential traffic efficiency and pedestrian safety impacts of the proposed site access arrangements is required. Swept path analysis reflecting the street's future configuration should also be provided.

Swept path analysis has been provided within the submitted Traffic Impact Assessment (TIA) that demonstrated vehicles entering and exiting from the north as per the Complete Streets configuration, noting that Fetherstone Street is currently one-way northbound. For completeness, swept path analysis for the largest vehicle requiring access to the site (HRV – Council Waste Collection) for both the existing (dwg PTC-001a) and future Complete Streets configuration (dwg PTC-001) of Fetherstone Street is contained as Annex A.

The proposed access driveway locations on Fetherstone Street and configuration provide for an awkward arrangement whereby the loading (truck) access is situated between the retail entry and exit ramps. This arrangement is likely to cause confusion for drivers and impact traffic safety and efficiency within the future shared zone of Fetherstone Street. Furthermore, the swept paths for the retail and loading dock access ramps overlap and are considered unacceptable. It is recommended that the access ramps are separated by vehicle size.

As previously advised to Council, **ptc.** disagree that the proposed arrangement is ‘awkward’ and have provided an example to demonstrate where a similar arrangement is currently operating. The proposed arrangement seeks to minimise vehicle intrusion and vehicle dominance on Fetherstone Street, in line with Complete Streets, the creation of additional or separate car and truck accesses would be contrary to the Complete Streets vision.

HRV access is required for Council waste collection only which would occur a few times a week in the early morning outside of typical operating hours for non-residential users accessing the car park. HRV access will be managed through the adopted Loading Dock Management Plan that will be adopted.

It should also be noted that there is no overlap between MRV and HRV swept path analysis.

To confirm, a management strategy to reduce the occurrence of light vehicle and heavy vehicle (MRV & HRV) interactions, through a Safety Management Plan and a Loading Dock Management Plan as noted above. The Safety Management Plan will include a Boom Gate that will be installed and will be in operation to prevent light vehicles from moving through the shared driveway onto Fetherstone Street. As noted above, HRV access will be restricted during the development operation hours as will be detailed in the Loading Dock Management plan, notwithstanding this, the Safety Management Plan will allow for an abundance of caution and safety.

Fetherstone Street is set to become a no through route under Council’s Complete Street strategy, this will result in Fetherstone Street becoming a low traffic and low speed shared zone and this will further improve the vehicle safety and access strategy.

The inherent constraints of the site make it impossible to separate the building access ramps via vehicle size due to the existing library and residential apartments restricting the width and location of an access driveway, Council’s request will result in a worse outcome for pedestrians and public amenity.

In response to the matters raised above, the Applicant submitted additional information including a Traffic Statement prepared by PTC and further swept path diagrams. The Traffic Statement provides further justification of the proposed site access arrangements, including a reference to a similar access arrangement at the Royal Randwick Shopping Centre and the following additional traffic safety measures:

- *a flashing light system or rotating beacon to provide priority to trucks accessing the loading dock; and*
- *signage to indicate accesses for both cars and trucks.*

The proposed driveway location and configuration on Fetherstone Street remains unchanged and Council’s Traffic Engineer has confirmed that the concerns regarding the proposed site access remain outstanding. Specifically:

- *Based on the number of spaces accessed via the Hotel/Residential Car Park and Retail Car Park, both driveway accesses need to be a Category 3 access driveway as per AS2890.1 Table 3.1. This comprises of a 6m entry and 4-6m exit with 1-3m separation. The plans need to be amended to show this. The Traffic Statement states that the “creation of Category 3 access driveways would be contrary to the Complete Streets Vision”. This is false, Bankstown Complete Streets does not recommend for the Australian Standards to be disregarded.*

To confirm, **ptc.** are not requesting that Council disregard the Australian Standards but are requesting that Council employ a holistic view of what measures and design will create a pedestrian focused, inclusive environment as per the Complete Streets vision. It is the view of **ptc.** that with rigid application of Australian Standards, Council will not achieve the Complete Streets vision and therefore a more considered and forward-thinking approach is needed to create the desired outcomes. This approach is adopted by many Council's where the strict application of AS2890 conflicts with priority design outcomes. AS2890.2 requires generous driveway widths for commercial vehicles that are not desirable, or often not feasible, within town centre and CBD environments.

Whilst **ptc.** acknowledge Council's requirement for a Category 3 access driveway, **ptc.** would draw Council's attention to clause 3.2.3 (b) (iv) of AS2890.1 which states the following:

'Driveway Categories 3 and 4 shall not be located –

(iv) where there is heavy and constant pedestrian movement along the footpath unless this can be adequately catered for by some form of positive control e.g. traffic signals'.

AS2890.1 confirms that Category 3 driveways are not the preferred option in areas where pedestrian footfall is expected to be high as pedestrian safety is compromised and is only permissible with a traffic signal or similar arrangement. Whilst the use of traffic signals is highlighted, it must be considered that given pedestrian behaviour and (for example) extensive and widespread use of mobile devices since AS2890.1 was approved in 2004 whether potentially compromising pedestrian amenity from the outset is appropriate.

ptc. would question whether designing for a category 3 driveway given the Complete Streets vision and future configuration of Featherstone Street to be a shared zone and pedestrian only south of the site is entirely appropriate given expected significant pedestrian footfall connecting to the Metro and the wider Bankstown City Centre.

ptc. would request again that Council employ a holistic view of the desired outcomes and ensure that a considered approach is undertaken and a full appreciation of Australian Standards.

As the largest vehicle accessing the loading dock is a HRV (Heavy Rigid Vehicle) the access driveway needs to be at least 12.5m wide as per Figure 3.1 of AS2890.2. The plans need to be amended to reflect this.

To create a driveway to a width of 12.5m would be to the detriment of pedestrian amenity and safety on Featherstone Street and contrary to the principles of Complete Streets. **ptc.** would request that Council are consistent with their approach to requirements to coordinate with a future Complete Streets scenario. HRV access is for Council waste collection only. This movement will only occur a few times a week and in the early morning outside of the operating hours of other uses, as will also be confirmed in the Loading Dock Management Plan for the development.

The direction of the swept paths do not reflect the current direction of traffic which is one way northbound.

The swept path analysis has been completed based on the future scenario whereby cars and trucks would enter and exit the site from the North. Annex A presents both scenarios for ease.

Royal Randwick Shopping Centre opened in 1990, while this has been historically approved, it should not set a precedence for a non-compliant future access arrangement. This outdated, unsafe and non-compliant arrangement should not be used as a basis for new development. Creating narrower and non-compliant driveways where there is conflict with heavy and light vehicles as well as pedestrians further compromises safety for all road users.

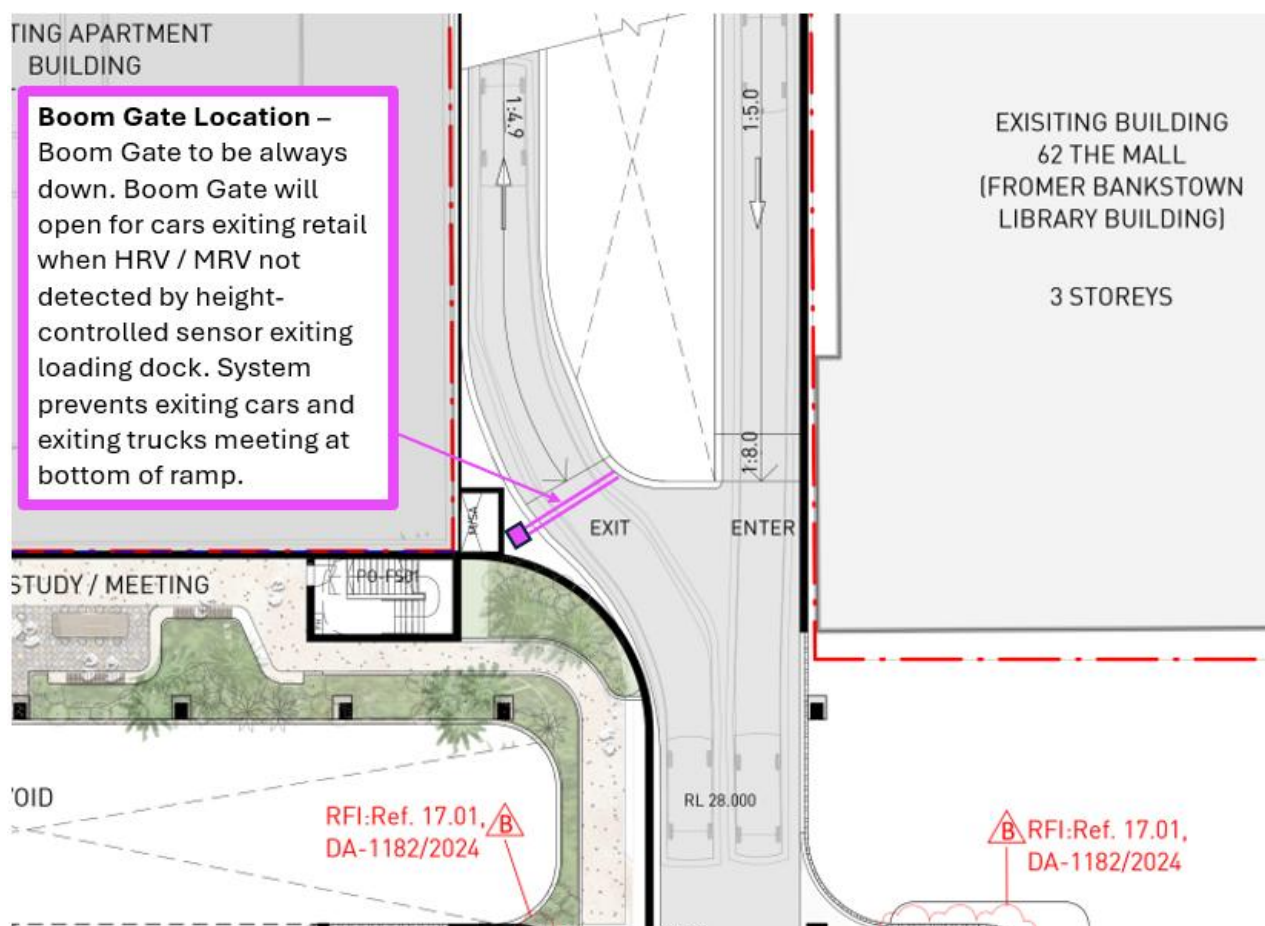
Royal Randwick Shopping Centre was presented as an example, working within a constrained location, which Council acknowledges has been open and operating since 1990. **ptc.** would request justification from Council that this arrangement is 'unsafe' given its operation for circa 35 years. It should also be noted that Royal

Randwick Shopping Centre is accessed directly from Avoca Street, which has much higher traffic flows than the future lightly trafficked arrangement for Fetherstone Street.

Flashing lights are an inadequate solution for addressing the non-compliant design.

It is proposed to provide Boom Gates at the top of the car ramp for the retail and loading dock access as part of a Safety Management Plan and Loading Dock Management Plan. The Boom Gate will always be down and only raise when a truck (HRV or MRV) is not detected (by breaking a height-controlled laser) departing from the loading dock. This proposal will prevent cars driving down the ramp and potentially conflicting with a truck departing the loading dock. A schematic of this arrangement is presented below.

It should be noted that HRV access to the loading dock is required for Council waste (residential) collection only, a weekly out of hours collection, before retail units are open and therefore attracting customers, on this basis the likelihood of any conflict between exiting HRVs and retail customers in their cars is extremely limited, notwithstanding this a Boom Gate will be provided as detailed above. A Loading Dock Management Plan (LDMP) will be prepared in due course which will set out a comprehensive strategy to cater for service vehicles accessing the loading dock.



A shared driveway for retail entry and exit with the loading access in between will be confusing for drivers. This also raises safety concerns if drivers enter the wrong access ramp. Furthermore, the NSW Child Care Planning Guidelines state that for mixed use developments the driveway access for the facility is to be separate to parking and manoeuvring areas used by trucks. The driveways for light and heavy vehicles are to be separated.

A shared driveway is not confusing, as Council are aware there are examples (as **ptc.** have presented) of where this arrangement currently operates.

The proposed childcare parking is on the podium level; any truck manoeuvring will occur in the loading dock within the basement. There are no instances where trucks interact with children exiting or entering vehicles.

The Traffic Statement assumes that a car and truck will not be at the same location on the driveway. The worst-case scenario needs to be accounted for where trucks and vehicles are entering and exiting at the same time. The previous concerns remain, whereby vehicles exiting the retail parking will need to swerve in front of the loading dock access conflicting with heavy vehicles entering/exiting the loading dock.

As described above, Boom Gates are proposed on the retail access ramp to prevent cars and trucks meeting before entering Fetherstone Street. The Loading Dock Management Plan (LDMP) will provide a comprehensive strategy to manage vehicle access, movements and numbers to ensure the highest efficiency and safety standards are maintained.

On entry, **ptc.** would question how a car and truck can conflict, given all traffic will enter the retail / loading dock access from the north, and given this is one lane, a truck could only follow a car into the driveway (or vice versa) – any other scenario could not occur.

The location of the proposed taxi and coach drop-off and pick-up zone conflicts with on-street traffic, the existing taxi stand located on the northern side of North Terrace and the bus zone on the southern side of North Terrace, respectively. This will give rise to unreasonable traffic safety and efficiency impacts.

The location of the proposed taxi and coach drop-off is as per the existing arrangement and as per the Complete Streets future strategy. It is unclear how the use of a dedicated area, by the vehicles that are permitted to use the area, can cause a traffic safety issue. It should be noted that there are two pedestrian crossings that allow people to cross to the north side of North Terrace safely and conveniently. For the avoidance of doubt, due to the one-way nature of North Terrace, a right-hand drive bus or coach (with the passenger door on the left of the vehicle) can only allow passengers to alight on the left-hand side of the road, otherwise passengers will alight into a live traffic lane, **ptc.** nor Council would accept this is a viable arrangement.

Reason 11 – Likely Impacts

Traffic generation

Assessment of the application by Council's Traffic Engineer identifies that the traffic generation assessment undertaken by the Applicant is inadequate for the following reasons:

- *The calculation of traffic generation rates associated with the proposed retail tenancies and medical suites is not in accordance with the Roads and Traffic Authority (RTA) Guide to Traffic Generating Developments, dated October 2002.*

Chapter 6 of the submitted TIA, presents a comprehensive analysis and assessment of the potential traffic generation of the site, including a net impact assessment, with all trip rates derived from Guide to Traffic Generating Developments. It is unclear what concern Council have regarding this methodology and why this concern was not raised during earlier RFIs.

As Council are aware, specific rates for medical suites are not provided within Guide to Traffic Generating Developments and therefore, entirely reasonably, a first principles assessment has been completed.

Traffic generation associated with Retail uses has been completed based on the permitted or proposed retail floor space, an entirely reasonable approach and in line with Guide to Traffic Generating Developments.

- *The submitted Traffic Impact Assessment prepared by PTC assumes that Evidence to support the assumptions has not been provided.*

Accordingly, it is considered that the traffic assessment does not adequately calculate the traffic generated by the development and insufficient information is provided to properly assess and determine the associated traffic impacts of the proposal.

ptc. would dispute this position and would encourage Council to present a specific point to clarify how the assessment completed by **ptc.** is considered inadequate.

On-site manoeuvring

Assessment of the original application by Council's Development Engineer identified a range issues regarding on-site manoeuvring including driveway ramp widths, intersection and car park design and associated compliance with the relevant Australian Standards (AS2890.1).

In response, the Applicant a Traffic Statement, to further justify the proposed ramp, intersection and car park design, however, the internal access arrangement was not amended. On this basis, Council's development Engineer has identified that the following issues remain outstanding:

Ramp and intersection design

- *While the submitted Traffic Statement confirms that the ramp design is for two cars to pass safely (i.e. two-way roadway), assessment of those ramps concludes that compliance with minimum cross-sections design requirement in accordance with Clause 2.5.2 Figure 2.8 (b) is not achieved. Therefore, proposed ramp leading into basement 01 from hotel/residential car park entry off Fetherstone Street, as well as all internal ramps connecting the three podium levels must be designed in accordance with Clause 2.5.2 Figure 2.8 (b) where a minimum 600mm separator is to be designed with a height between 125mm and 150mm.*

ptc. would request that Council review their position on this item.

Clause 2.5.2 Figure 2.8 (b) of AS2890.1 refers to two 'Parallel Roadways' requiring the 600mm separator – Parallel Roadways assume that two traffic lanes are going in the same direction (side by side). There is nowhere within the development proposal that proposes such an arrangement and therefore it is unclear why a 600mm separator would be required. Parramatta Square has a two-way basement car park that is provided without a median, (extract below) and this is not an uncommon occurrence in Sydney.



Source: Google image

- *In relation to intersection areas, Clause 2.5.2 (c) where two cars are expected to pass each other, the design is required to accommodate B99 & B85 single swept path manoeuvre with the correct clearances,*

especially for design B99 vehicle. In this regard, 600mm clearances along the outside curvature of the swept path are required in accordance with B3.1 (a) of AS2890.1.

- *In addition to the above, if the boundary of the intersection area is an obstruction such as a wall, barrier or kerb higher than 150mm, AS2890.1 requires further clearances of 300mm where the swept path approaches the obstruction.*

A 300mm clearance from all B85 / B99 swept path analysis has been presented within the submitted TIA.

To confirm, AS2890.1 requires 300mm of clearance from the vehicle (car) body on either side, which has been presented within the submitted TIA swept path analysis. **ptc.** completed a conservative assessment demonstrating the manoeuvring requirements with two B99 vehicles passing each other, an unlikely scenario and therefore should be reviewed as such with design modifications completed where possible, acknowledging the development constraints.

Car park design

- *The submitted Traffic Statement identifies that the “example of Uses” in Table 1.1 of AS2890.1 are not exhaustive however, other user scenarios, such as child care centres should be considered.*
- *The car parking area comprising the child care centre car spaces located on Level 3 is required to be designed to user classification 3A due to the duration of stay (i.e., less than 10 minutes for parent drop-off and pickup) and the associated high turnover of vehicles accessing the car park. This will require the proposed aisle widths throughout the child centre car park to be increased.*
- *It is considered that the 3A user class provides the most appropriate design outcome for traffic and pedestrian safety, visibility, functionality as well as satisfy AS2890.1 Table 1.1 in terms of ease of access in and out of parent drop-off and pick up car spaces.*

Whilst it is noted Council’s preference for user classification 3A parking for the childcare centre, **ptc.** would reiterate there is no absolute requirement for this provision and there is no evidence to suggest that user class 3 parking would lead to an unsafe or undesirable outcome.

Notwithstanding this, it is also noted that this DA does not seek detailed consent for the use and fit out of the childcare centre, with this to be addressed as part of a future DA.

Construction impacts

The likely construction related impacts in terms of noise and traffic are not addressed in the application. Therefore, the application in its current form does not adequately demonstrate that the associated construction impacts can be appropriately managed and minimised.

A Preliminary Construction Traffic Management Plan (PCTMP) will be prepared for Council review.

Waste

Council’s Resource Recovery Officer has reviewed the application and identified that insufficient information has been provided to enable a proper assessment of the proposed waste management. Specifically, the following details have not been provided:

system to rotate bins in the basement chute rooms at the base of the chute (i.e., a linear track system or a carousel system);

provision of waste and recycling infrastructure for Level 3 residents;

provision of a HRV path of travel to the waste loading dock with a 4.5m clearance floor to ceiling in accordance with Australian Standard 2890.2.

A detailed response will be prepared by the Waste Consultant, however, for information swept path analysis demonstrating that a HRV can enter and exit the site in a forward gear is presented within Annex A. Drawings prepared by PTW demonstrate that 4.5m vertical clearance can be achieved.

Source: Google Images

2. Summary & Conclusion

This letter responds to the reasons for refusal set out in the assessment report for DA-1182/2024 in relation to the Compass Centre in Bankstown.

ptc. wish to engage with Council to seek a collaborative solution to the reasons for refusal, it is the view of **ptc.** that a number of reasons for refusal could be addressed swiftly following a more detailed and reasoned discussion with Council.

Yours faithfully



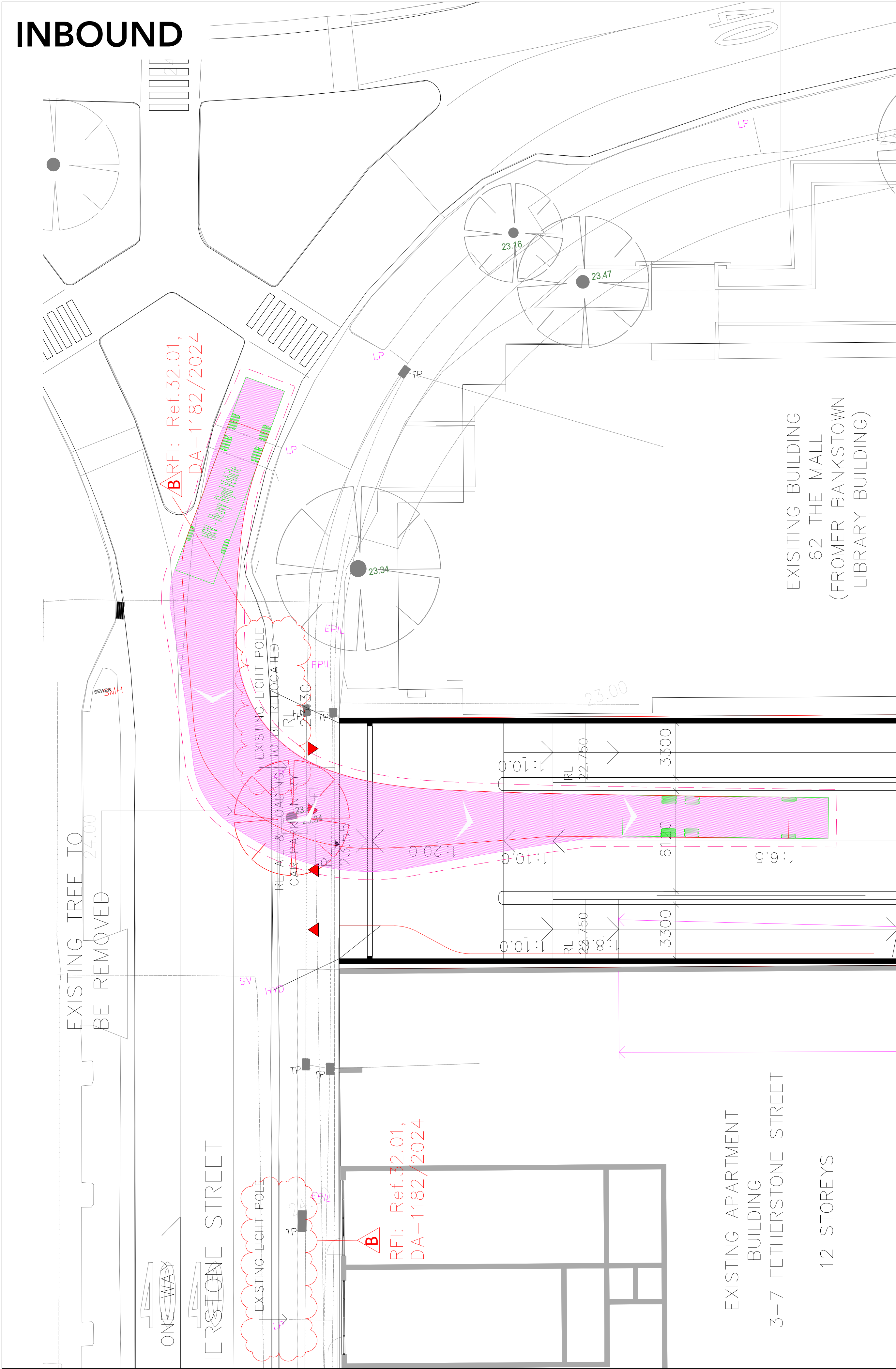
Dan Palmer

Traffic Project Director

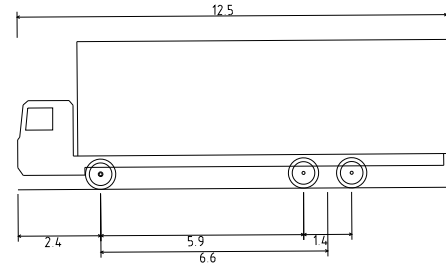
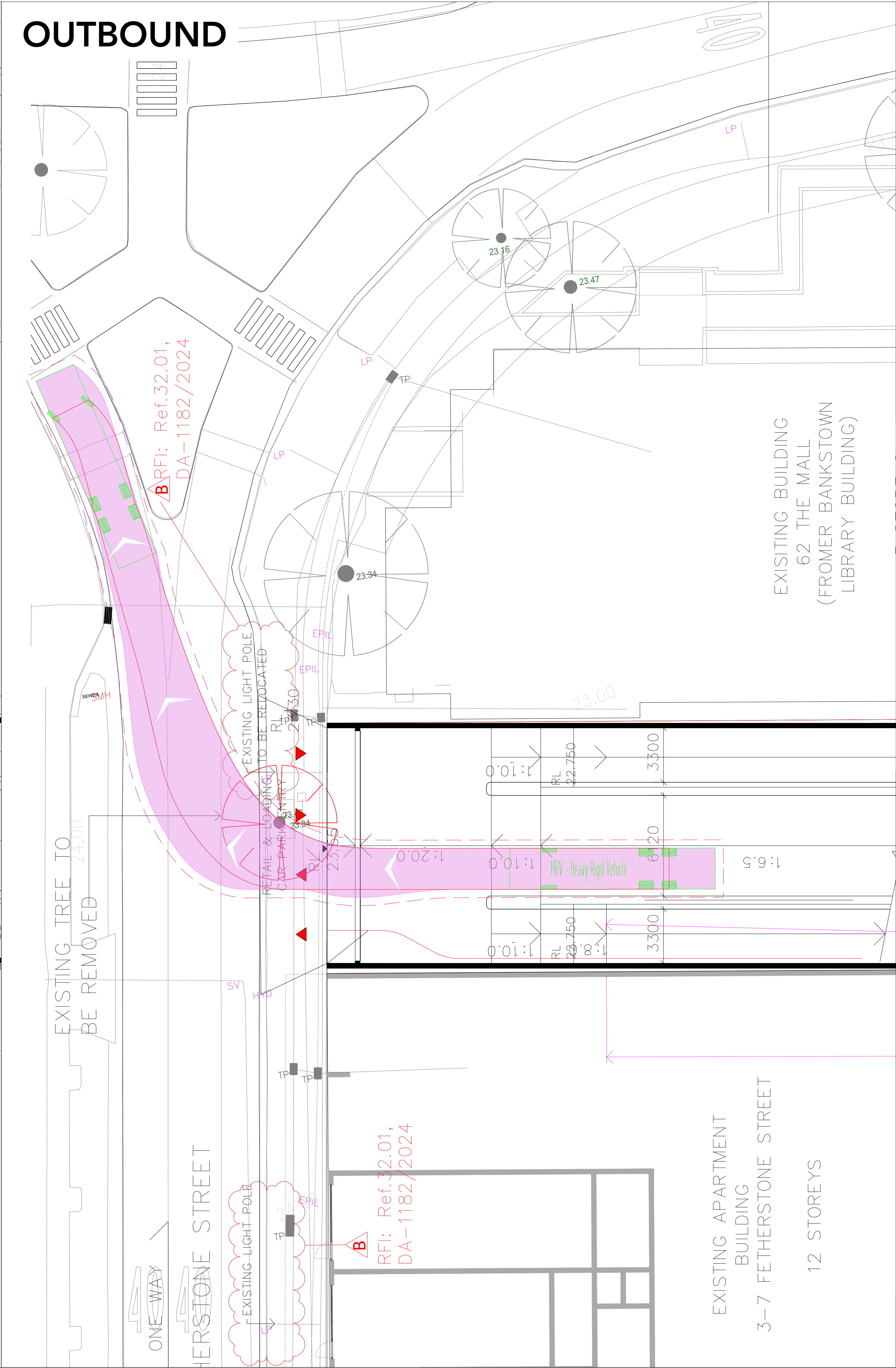
Document Control: Prepared by *DP* on 10 November 2025. Reviewed by *AM* on 10 November 2025.

Annex A – Waste Truck Swept Path Analysis

INBOUND



OUTBOUND



HRV - Heavy Rigid Vehicle
Overall Length 12.500m
Overall Width 2.500m
Overall Body Height 4.300m
Min Body Ground Clearance 0.417m
Track Width 2.500m
Lock-to-lock time 6.00s
Curb to curb Turning Radius 12.500m

DRAWING KEY

PT	06/11/25	FOR INFORMATION	MA	DP
REV	DATE	DESCRIPTION	DRAWN	REVIEWED

PROJECT
BANKSTOWN COMPASS
CENTRE

DRAWING TITLE
COMPLETE STREETS
ARRANGEMENT- WASTE
COLLECTION - 12.5m HRV

ptc.
Suite 502, 1 James Place
North Sydney NSW 2060
1 +61 2 8920 0800
ptcconsultants.co

CLIENT BARINGS

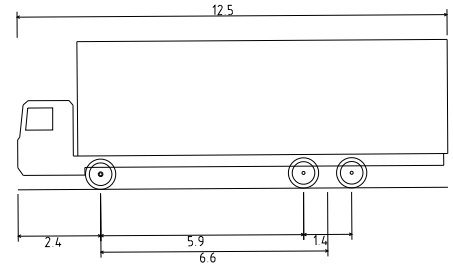
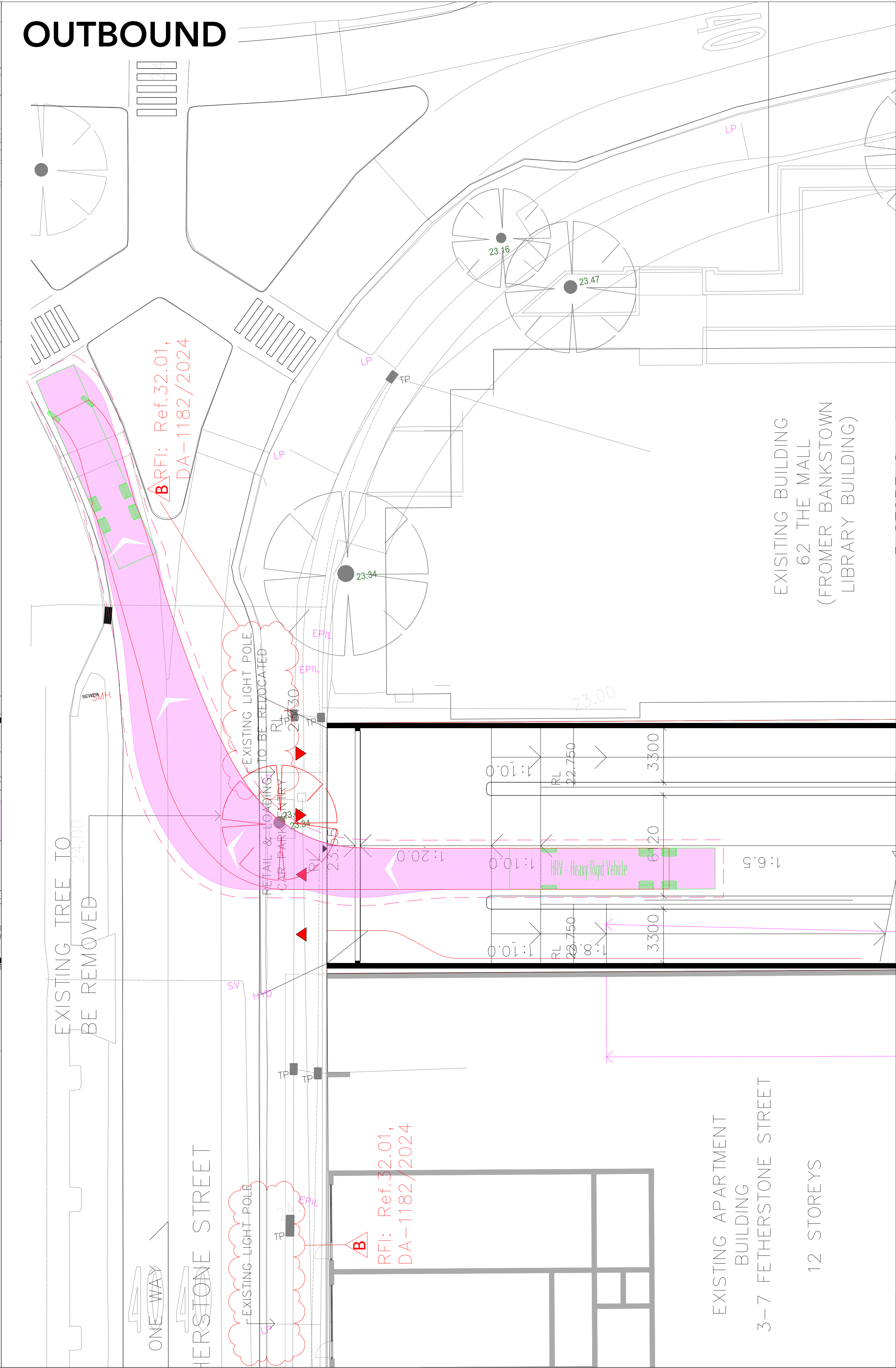
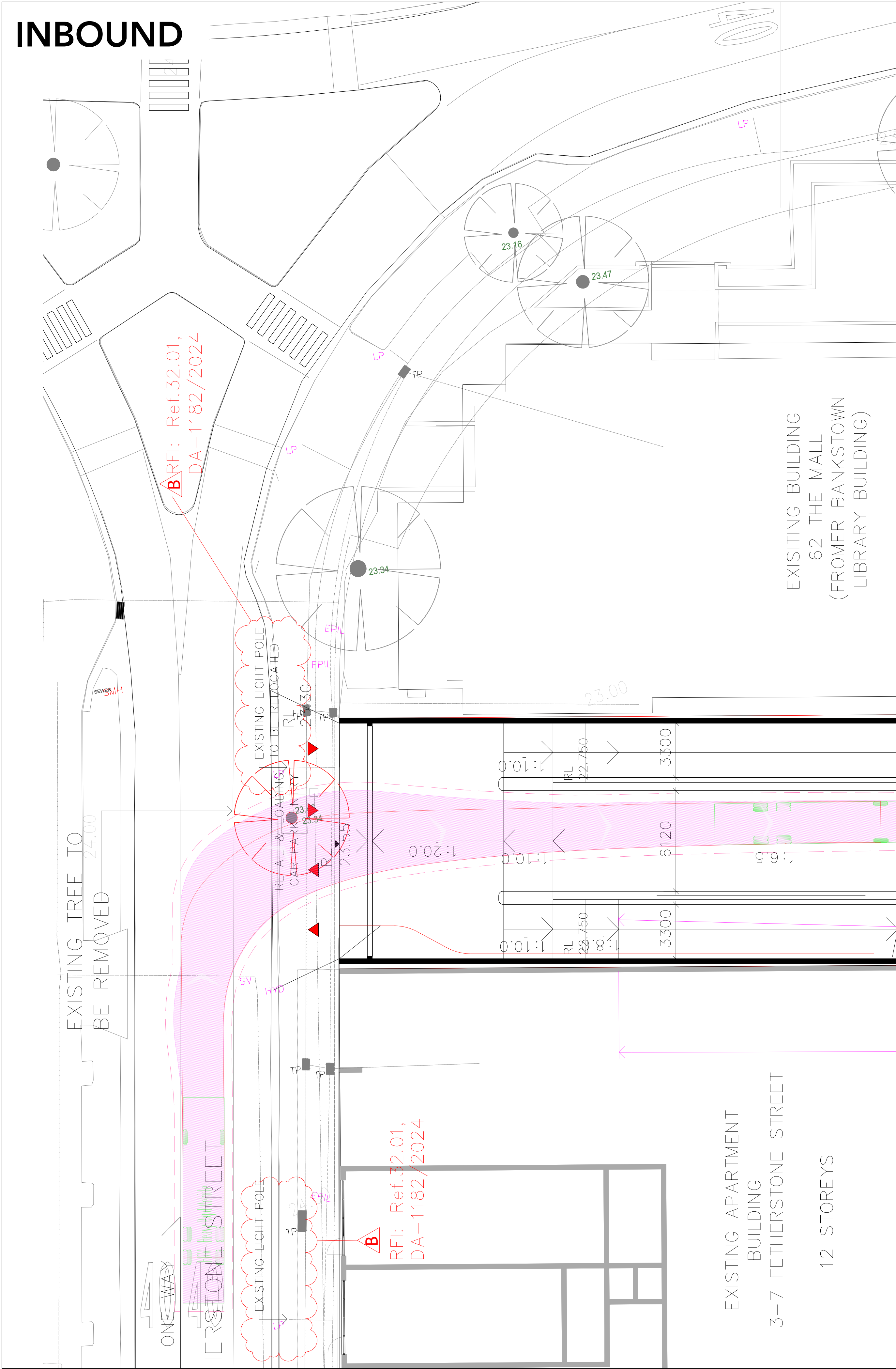
DRAWING # PTC - 001

PROJECT # 23-0601

SCALE 1 : 150 @ A3

PRELIMINARY

REV P7



HRV - Heavy Rigid Vehicle
Overall Length 12.500m
Overall Width 2.500m
Overall Body Height 4.300m
Min Body Ground Clearance 0.417m
Track Width 2.500m
Lock-to-lock time 6.00s
Curb to curb Turning Radius 12.500m

DRAWING KEY

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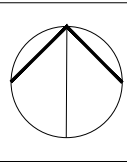
P7	06/11/25	FOR INFORMATION	MA	DP
REV	DATE	DESCRIPTION	DRAWN	REVIEWED

PROJECT
BANKSTOWN COMPASS
CENTRE

DRAWING TITLE
EXISTING ARRANGEMENT WASTE
COLLECTION - 12.5m HRV

ptc. Suite 502, 1 James Place
North Sydney NSW 2060
t +61 2 8920 0800
ptcconsultants.co

CLIENT	BARINGS
DRAWING #	PTC - 001a
PROJECT #	23-0601
SCALE	1 : 150 @ A3



PRELIMINARY

REV P7

