

Colston Budd Rogers & Kafes Pty Ltd

as Trustee for C & B Unit Trust
ABN 27 623 918 759

Our Ref: JH/11658/jh

16 May, 2022

Anka Property Group
PO Box 727
EDGECLIFF NSW 2027

Attention: Dennis Meyer
Email: dennism@ankaproperty.com

Transport Planning
Traffic Studies
Parking Studies

Dear Sir,

RE: PLANNING PROPOSAL FOR 136-158 NEW SOUTH HEAD ROAD, EDGECLIFF

1. As requested, we are writing regarding traffic matters raised Woollahra Local Planning Panel report of 22 April 2022 in relation to the planning proposal for the above site. We have previously prepared reports^{1,2} which were submitted with the planning proposal and subsequent letters of 25 August and 15 December 2021.
2. The panel minutes include the following:

The Panel has considered the planning proposal, and advises Council that it is premature to proceed at this stage to Gateway prior to the adoption of the Draft Edgecliff Commercial Centre Planning and Urban Design Strategy (ECC Strategy). In particular, there remain a number of unresolved strategic issues in relation to the capacity of the surrounding road network...
3. With regards to this matter, the ECC Strategy includes a series of planning and urban design studies which have previously been publicly exhibited. Two of the studies are transport assessments^{3,4}.

¹ Transport Aspects of Planning Proposal for Proposed Mixed Use Residential Development, 136-148 New South Head Road, Edgecliff, December 2020.

² Supplementary Traffic Information for Planning Proposal for Proposed Mixed Use Development, 136-148 New South Head Road, Edgecliff, May 2021.

³ "Edgecliff Commercial Centre Transport Study Final Report." Prepared for Woollahra Municipal Council by SCT Consulting Pty Ltd, 7 August 2019.

⁴ "Edgecliff Commercial Centre Study Transport Assessment." Prepared for Woollahra Municipal Council by GTA Consultants (NSW) Pty Ltd, 9 November 2017.

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4. The SCT study was undertaken subsequent to the GTA study, to identify measures to accommodate the increase in development in the centre. The measures recommended in the SCT study include:
- banning the right turn from Darling Point Road to New South Head Road and diverting traffic to Mona Street (either time limited or permanent ban);
 - introducing dual right turn lanes on Mona Road and removing the western pedestrian crossing on New South Head Road;
 - widening New South Head Road using land on the southern side, to increase the length of the right turn bay into New McLean Street;
 - providing a signalized crossing for pedestrians on the left slip lane from New South Head Road to New Beach Road;
 - relocating on-street parking on Darling Point Road from the western side to the eastern side;
 - realigning the pedestrian crossing across New McLean Street;
 - introducing a signalized crossing for pedestrians crossing the bus access east of Ocean Street;
 - improving the configuration of Glenmore Road for pedestrian safety;
 - encouraging mixed use development to reduce the need for external travel;
 - reducing parking requirements for studios and one bedroom apartments, and exempting new residential flat buildings from resident parking schemes;
 - limiting parking in the commercial core to no more than currently;
 - requiring travel plans for new developments;
 - requiring parking to be allocated to share vehicles in new developments;
 - investigating the use of car share schemes for developments not eligible for resident parking schemes; and
 - preparing a pedestrian wayfinding strategy for the centre.

5. These measures have therefore been identified by the council's consultants to accommodate the increase in development envisaged in the ECC Strategy. They therefore address the *strategic issues in relation to the capacity of the surrounding road network* identified by the panel above.
6. The panel minutes also include:
 - B. *THAT should Council resolve that the planning proposal for 136-148 New South Head Road, Edgecliff should proceed to a Gateway determination, the Woollahra Local Planning Panel advises Council that:*
 - I. *It does not support the site specific amendments to increase the Height of Buildings to 46m and the Floor Space Ratio to 5:1 without further urban design and traffic analysis including:*
 - ...
 - c. *the cumulative traffic and transport implications of the proposal and measures that are to be undertaken to mitigate impacts e.g. reduced car parking provision.*
7. With regards to this matter, we note that:
 - the SCT report considers a development scenario for the ECC with a traffic generation of some 200 vehicles per hour during weekday morning and afternoon peak hours. By comparison, the traffic generation of the subject development would be some 20 to 30 vehicles per hour two-way;
 - measures have been identified to accommodate the scale of development identified in the ECC Strategy, as discussed above;
 - the intersection of New South Head Road with New McLean Street would operate at a satisfactory level of service with the additional traffic from the subject development, as noted in our previous reports;
 - the low traffic generation of the subject development would not alter the conclusions drawn in the SCT report or result in the need for any additional road or transport works; and
 - our previous documents discuss measures to limit traffic generation of the subject development, including the potential to reduce car parking provision. We therefore agree with the panel in this regard.
8. Therefore, the subject planning proposal is not contingent on whether the ECC Strategy proceeds, and could proceed independently of the ECC strategy.
9. The detailed traffic matters raised in the WLPP report, and our responses, are set out below.

Council's Traffic and Transport officers have commented on the applicant's Traffic and Parking Assessment (Colston Budd Rogers & Kafes May 2021) as follows.

Traffic generation

The request would generate 41-53 vehicle trips per hour during peak (calculated using a GFA-based generation rate rather than a parking-space-based rate). The request would significantly increase traffic off Darling Point Road access and may cause congestion during peak hours. At the detailed design stage, Council's Traffic Engineers would request the developer design and construct a concrete centre median in Darling Point Road (upper section), at the intersection with New South Head Road, with associated signs and line markings, near the proposed development frontage, to discourage motorists from turning right in or out of the driveway access. This traffic calming measure will improve safety near the intersection and ease congestion. A left-in-left-out access to site will be required. The required median strip and access/egress arrangements can be included in a site-specific DCP should the planning proposal proceed.

10. A median in Darling Point Road could be implemented. It would be most appropriate to consider this measure at the development application stage.

Intersection Performance

The SIDRA analysis should be revised using the correct traffic generation rate (noted above). Given the location of the driveway and its impact on Darling Point Road that intersects with New South Head Road, Transport for NSW should also be referred.

11. We agree that TfNSW would be consulted as part of statutory consultation during the Gateway process.
12. With regards to traffic generation, as noted in our letter of 15 December 2021, the TfNSW technical direction TDT 2013/04a includes traffic generation survey data for commercial developments during on-road peak hours. This data, from pages 12 and 13 of TDT 2013/04a, is summarised in Table 1.

Location	Size (m²)	AM peak hour	PM peak hour
North Sydney	31,400	51	44
Chatswood	10,214	47	36
Hurstville	3,254	65	60
Macquarie Park	5,748	119	72
Parramatta	27,000	185	75
Liverpool	2,817	57	46
Norwest	1,200	30	10
Newcastle	12,182	126	137
Wollongong	12,291	123	100
Total	106,736	803	580
Trip generation rate (veh/hr/100m²)		0.75	0.54

13. Table I shows that the on-road peak hour traffic generation rates are 0.75 and 0.54 vehicles per hour per 100m² during the morning and afternoon respectively. TDT 2014/04a includes residential morning and afternoon traffic generation rates of 0.19 and 0.15 vehicles per hour per apartment two-way.
14. The current plans for the planning proposal provide for a scale of development of some 2,851m² commercial plus some 41 residential apartments.
15. The development envisaged in the planning proposal would therefore generate some 29 vehicles in the morning peak hour and some 21 vehicles in the afternoon peak hour, rather than the 41 – 53 vehicles per hour noted in the council report. With this traffic, there would be no change to the existing level of service at the New South Head Road/Darling Point Road intersection.

Public Safety

Noting the New South Head Road corridor consists of a number of residential and commercial high rise properties, and that there is Edgecliff Station and Ascham School are in proximity, widening of the existing footpath should be considered to improve pedestrian amenity. Council's Traffic and Transport Engineers would like the applicant to explore, where possible, any potential widening of the footpath and the site setback capability, to provide adequate space for a highly pedestrianised area and for potential use of other transport modes (potential cycle path). This could be incorporated into a planning agreement to secure additional community infrastructure.

16. This matter is being addressed by the project architect. We note that the ability to widen the footpath is limited by the heritage constraints of the existing building.

Parking

The request would yield a maximum requirement of 53 car parking spaces for residential uses and a minimum requirement of 43 parking spaces for non-residential uses, as per Council's DCP. The proposed provision of 77 parking spaces (53 residential and 24 retail/commercial), would result in a shortfall of 19 spaces for commercial/retail. Whilst parking provision for residential development is capped by a maximum rate, provision should not be substantially below the maximum. Concerns are raised for the increase of parking pressures on the surrounding road network.

Parking rates in relation to the request can be refined, should the planning proposal proceed. The draft ECC strategy recommends reduced rates for residential and capping at current provision for non-residential on the Edgecliff Centre, and this option (or a variation) could be explored for the site.

17. We also note that the location of the site in the centre of Edgecliff, immediately adjacent to the railway station and bus interchange, means that it is readily accessible by modes of travel other than private car.
18. It would therefore be desirable to provide reduced rates of car parking, particularly for the non-residential uses, having regard to the location of the site adjacent to Edgecliff railway station, bus services along New South Head Road and the close proximity of the site to bicycle routes and taxi facilities.
19. The Eastern City District Plan, in which Edgecliff is located, identifies Edgecliff as a local centre. There are a number of important features identified for local centres, which are relevant to the subject planning proposal, including:
 - local centres have an important role in providing local employment;
 - where local centres include public transport and transport interchanges, they are an important part of the '30 minute city' – where most people live within 30 minutes of their employment, services and other facilities;
 - they should protect and expand retail and commercial floor space;
 - local centres should deliver transit-oriented development and collocate facilities;
 - they should protect and expand employment opportunities; and
 - parking should be provided that is adaptable to future uses and takes account of access to public transport, walking and cycling connections.
20. Commercial parking should therefore be provided in the context of these objectives, and the location of the site immediately adjacent to excellent public transport services. The Edgecliff study also recommends reduced rates of parking for studios and one bedroom apartments and limiting parking for commercial development. By limiting parking provision, the proposed development will satisfy the objectives of the Eastern City District Plan and the Edgecliff centre study.
21. Chapter EI of the Woollahra Development Control Plan 2015 includes the following parking requirements:
 - 0.5 spaces per studio or one bedroom apartment;
 - one space per two bedroom apartment;
 - 1.5 spaces per apartment with three or more bedrooms;
 - one space per five apartments for visitors;
 - 2.5 spaces per 100m² for office and business premises; and
 - 3.3 spaces per 100m² for retail premises.
22. The parking rates for the residential components are maximum rates and the rates for non-residential uses are minimum rates.

23. There is also a parking multiplier for Edgecliff of 0.6. This effectively reduces the minimum parking requirements for the non-residential uses to 1.5 and 1.98 per 100m² for office and retail respectively.

24. Based on:

- 2,696m² office;
- 155m² retail;
- nine x one bedroom, 18 x two bedroom and 14 apartments with three or more bedrooms;

the development would require:

- a maximum of 44 resident spaces and eight resident visitor spaces;
- a minimum of 44 spaces for the commercial and retail uses.

25. A provision of some 77 spaces will therefore meet these requirements. We understand that this is the maximum parking which could be provided in the development, due to site constraints. As noted above, it may be desirable to reduce parking provision, consistent with the objectives of the Eastern City District Plan and the Edgecliff centre study.

26. We trust the above provides the information you require. Finally, if you should have any queries, please do not hesitate to contact us.

Yours faithfully,
COLSTON BUDD ROGERS & KAFES PTY LTD



J Hollis
Director

From: Joshua Hollis <joshua.hollis@cbrk.com.au>
Sent: Monday, 16 May 2022 2:45 PM
To: Dennis Meyer <DennisM@ankaproperty.com>
Subject: Edgecliff - amended letter

Hi Dennis,

Letter attached with amendments, as discussed.

With a relatively small component of commercial (2,891m²), the traffic generation is not sensitive to a calculation based on floor area. However, for the all-commercial option, it is more appropriate to estimate traffic generation based on parking provision, as discussed below.

As you have noted, the traffic generation of an 8,730m² commercial development would be 47-65 vehicles per hour, based on rates of 0.54 to 0.75 vehicles per hour per 100m². However, in practice, a parking provision of 77 parking spaces would generate less traffic than this.

The proposed parking provision for this development has been restricted to a maximum of one space per 113m² (8,730m²/77 spaces) which will reduce traffic generation. However, applying a fixed traffic generation rate per 100m² of floor area does not reflect the reduction in parking provision.

This approach (based on floor space) will estimate the same traffic generation regardless of the parking provision and whether parking has been restricted. It will overestimate traffic generation when parking provision is restricted. It is therefore appropriate to estimate traffic generation based on parking provision.

The floor areas, parking provision and traffic generations of the Sydney commercial buildings in TDT 2013/04a are provided in Table 1 below.

Location	Size (m ²)	Parking spaces	Traffic generation during on-road peak	
			AM	PM
North Sydney	31,400	136	51	44
Chatswood	10,214	150	47	36
Hurstville	3,254	66	65	60
Macquarie Park	5,748	269	119	72
Parramatta	27,000	402	185	75
Liverpool	2,817	28	57	46
Norwest	1,200	83	30	10
Total	81,633	1,134	554	343

The average parking provision for all of the buildings in Table 1 is one space per 72m². This is significantly higher than the provision in the proposed development at Edgecliff, which will have a maximum parking provision of one space per 113m².

The average traffic generations for all of the buildings in Table 1 are 0.49 and 0.3 vehicles per hour per parking space for the morning and afternoon respectively. Based on these rates, the proposed development in Edgecliff would have a traffic generation of some 23 to 38 vehicles per hour two-way.

The development in Chatswood from Table 1 is probably the most similar to your proposed development, being of a similar size and having a similar level of public transport accessibility. However, we note that it also has a much higher parking provision (one space per 68m²) than proposed at Edgecliff (one space per 113m²). Traffic generation of the Chatswood development is some 0.31 and 0.24 vehicles per hour per space during morning and afternoon peak hours. Based on these rates, the proposed development at Edgecliff would have a traffic generation of some 18 to 24 vehicles per hour two-way.

As noted in our letter, we have assessed a traffic generation of 21 to 29 vehicles for the mixed use (residential/commercial) development. The traffic generation for the commercial-only building would therefore be similar to that of a mixed residential-commercial development.

We trust this is of assistance.

Please contact us if you have any queries.

Regards,



Joshua Hollis

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