I am writing to object to the development modification to Pemulwuy Precinct 3 due to the significant increase it would cause in foot traffic in an already overcrowded area. The developer has provided flawed and misleading survey data and projections of pedestrian traffic to the Department of Planning and Environment and the development should not be approved until accurate projections are obtained and considered.

During the period of public consultation, community members raised concerns regarding increase in foot traffic and its impact on the surrounding streets. As there is no car parking in Precinct 3 and most of the movements to and from the site are expected to be on foot, a significant increase in foot traffic is inevitable and cannot be ignored. In response to this concern, the developer conducted a survey of foot traffic in the area and projected how this would increase if the development were to proceed.

The developer conducted a survey of foot traffic in what they described as the peak time: between 8.30 and 9.30 am on a day they describe as "during University semester". This survey concluded that the foot traffic on the south side of Lawson St was already over capacity, but that there was ample capacity on other footpaths in the area (such as the north side of Lawson St and along Caroline St) to accommodate the additional resident traffic based on their projections. This survey is deeply flawed, and likely to significantly underestimate both current peak foot traffic and future foot traffic from the Pemulwuy development. There are three main flaws:

1. The date the survey was not truly during university Semester

The survey of foot traffic was on 23 November 2017 – the second-last day of the final exam period for the year at the University of Sydney, at which time the campus is near-empty. Notre Dame was also at the second-last day of the exam period, and the UTS semester had finished. To characterise this as "during University semester" and thus a time of peak traffic is false. Rather, the report shows that, even at a very low period for foot traffic, one of the main streets servicing the development is already over capacity.

Conclusion: the survey is invalid and should be repeated on a date that is actually during university Semester in order to capture peak foot traffic. Discussion with the timetabling office at the University of Sydney would suggest that 25 February 2019 would be the earliest representative date that such a survey could be repeated.

2. The projected capacity of Caroline St seems unrealistic

With much of Lawson St already over capacity, pedestrian and cycling traffic would likely spill over onto Caroline St. The developer believes that Caroline St could comfortably accommodate 1,872 pedestrians per hour. Inspection of Caroline St makes it difficult to believe that this number is possible: the south side of Caroline St is barely passable to single file pedestrian traffic, and the north side has a number of narrow points at the western end around telegraph poles that make it difficult to fit two pedestrians abreast. Consequently, many pedestrians already walk

on the road, rather than the footpath, an issue that would only be exacerbated with further pedestrian traffic from the Pemulwuy developments. As the pedestrian pinch-points are at the western end of Caroline St, this would not be alleviated by the proposed shared-zone at the eastern end on Caroline St.

Conclusion: the developer should provide the details of how their capacity calculations are reached, particularly what value they are using for footpath breadth for the north and south sides of Caroline St and where these measurements were taken. Measurements should take into account obstructions to flow including garbage bins and telegraph poles on the southern side of Caroline St and the telegraph poles on the northern side of Caroline St at the western end.

3. Failure to account for foot traffic from the remainder of the Pemulwuy development

In the foot traffic projections, the developer projects that the only additional foot traffic in the area will stem from Precinct 3, without accounting for the additional traffic from the residential development in Precinct 1 or the childcare centre in Precinct 2 – both of which would be expected to significantly increase pedestrian flow at peak times, the latter including prams. Failure to account for this is a gross oversight.

Conclusion: footpath traffic projections should be amended to account for expected foot and pram traffic from other precincts within the development.

In summary, the data submitted to the department and upon which it is basing its approval is likely to underestimate current and future foot traffic, and may overestimate footpath capacity. The data is deeply flawed to the point of being unusable in predicting peak foot traffic, and only demonstrates that even at offpeak times some footpaths in the area are already over-capacity.

The development should not be allowed to proceed before adequate pedestrian traffic modelling has been done and its results considered. This would involve a repeat survey on a date that is actually during university semester, making realistic and independently verifiable capacity calculations for Caroline St, and modelling to include the increased foot traffic from the other precincts in the development.