

Our Ref: 21101

19 August 2022

Department of Planning and Environment
Level 17, 4 Parramatta Square
Parramatta NSW 2150

Attention: Mr Rowan McKay

Dear Rowan,

**RE: REDEVELOPMENT OF PRESIDENT PRIVATE HOSPITAL (SSD-10320)
PEER REVIEW OF TRAFFIC & TRANSPORT ASSESSMENT
COMMENTS ON APPLICANT'S FURTHER RESPONSE TO SUBMISSIONS**

As requested, please find herein the findings of The Transport Planning Partnership's (TTPP) review of the traffic and transport related aspects associated with the proposed redevelopment of the President Private Hospital located at 369-381 President Ave 61-65 Hotham Rd, 2-4 Bidurgal, Kirrawee.

It is noted that TTPP has provided traffic and transport related advice to Department of Planning and Environment (DPE) during the assessment stage of the proposed development (SSD-10320).

This advice has been utilised by DPE in identifying key transport related issues and requesting further information from the applicant during the assessment process.

The findings of TTPP's review provided herein have been prepared with consideration of responses provided by the applicant to matters raised in TTPP's initial review of the EIS documentation¹ and associated requests for further information issued by DPE.

This includes consideration of further information provided by the applicant in correspondence dated 3 June 2022.

¹ *Redevelopment of President Private Hospital (SSD-10320) - Peer Review of Traffic & Transport Assessment* (TTPP, 25 January 2022)

The findings of the review provided herein, has identified the following key traffic and transport related issues:

- Suitability of vehicle access via a classified road
- Design of vehicle access on a classified road
- Traffic assessment
- Car parking provisions
- Access to public transport and Green Travel Plan (GTP) measures

Suitability of Vehicle Access via a Classified Regional Road

At the proposed President Hospital redevelopment site, President Avenue is a classified "Regional" road (Road No. 2075).

The proposed redevelopment of the President Private Hospital includes works within the classified road reserve and classified roadway associated with modified vehicle access to on-site parking via President Avenue.

The development site has multiple road frontages, namely:

- President Avenue;
- Hotham Road; and
- Bidurgal Avenue

Where development is proposed on a site with frontage to a classified road State Environmental Planning Policy (Transport and Infrastructure) 2021 states that the consent authority must not grant consent unless it is satisfied that there is not a practicable and safe alternative to vehicle access via the classified road AND the safety, efficiency and ongoing operation of the classified road network will not be adversely affected by the proposed development².

The proposed redevelopment site has road frontages to two local roads which could provide alternate vehicle access to and from the site rather than the classified road (ie. President Avenue).

It is noted that vehicle access is also proposed to be provided to the redevelopment site via Hotham Road.

² State Environmental Planning Policy (Transport and Infrastructure) 2021, Chapter 2 Part 2.3 Division 17 Section 2.119.

Thus, TTPP would suggest that as there is the potential for a viable alternate vehicle access to the site and its car parking area via a local road.

Based on the architectural plans and response to submission (March 2022) it is understood that each of the total proposed 168 on-site parking spaces can be access from either the Hotham Road and President Avenue via the internal ramp connection connect between main basement parking area and the 18 spaces located at the ground level at the President Avenue access. That is, it is possible to access the main basement car parking area via the President Avenue access and the ground floor at President Avenue via Hotham Road.

The provision of a vehicle access which potentially services 168 car parking spaces is considered to potentially impact on the safe and efficient operation of the classified road as envisaged by State Environmental Planning Policy (Transport and Infrastructure) 2021.

Having regard to the proposed design of the vehicle access at President Avenue and car parking arrangements, TTPP would recommend that:

- The proposed vehicle access via President Avenue be removed from the development proposed and all vehicle access provided via Hotham Road; or
- A deceleration lane (slip lane) be provided for the left turn entry movements from President Avenue into the site (see details in following section); or
- Barriers or similar design modifications be installed such that the proposed vehicle link be between the ground level car parking area fronting President Avenue and the main basement parking area be disconnected.

President Avenue Vehicle Access – Appropriateness of Proposed Access Design

Notwithstanding the above issue of concurrence, if the consent authority was minded to approve the development with a vehicle access at President Avenue, TTPP has considered the appropriateness of the modified proposed vehicle access arrangements at President Avenue as presented in the applicant's response to submissions.

Council, in their submission, has raised safety, efficiency and operational issues associated with the proposed President Avenue access and have, like they did with DA09/0929, requested that a slip lane be constructed for vehicles entering the site via the President Avenue access.

TTPP raised the same concerns regarding the proposed access arrangements in our review of the EIS documentation.

It is noted that in response to submissions, the applicant is proposing some modifications to the President Avenue access arrangements.

These modifications are understood to include a wider entry splay to the proposed President Avenue access as shown in Figure 23 of the Response to Submissions (March 2022).

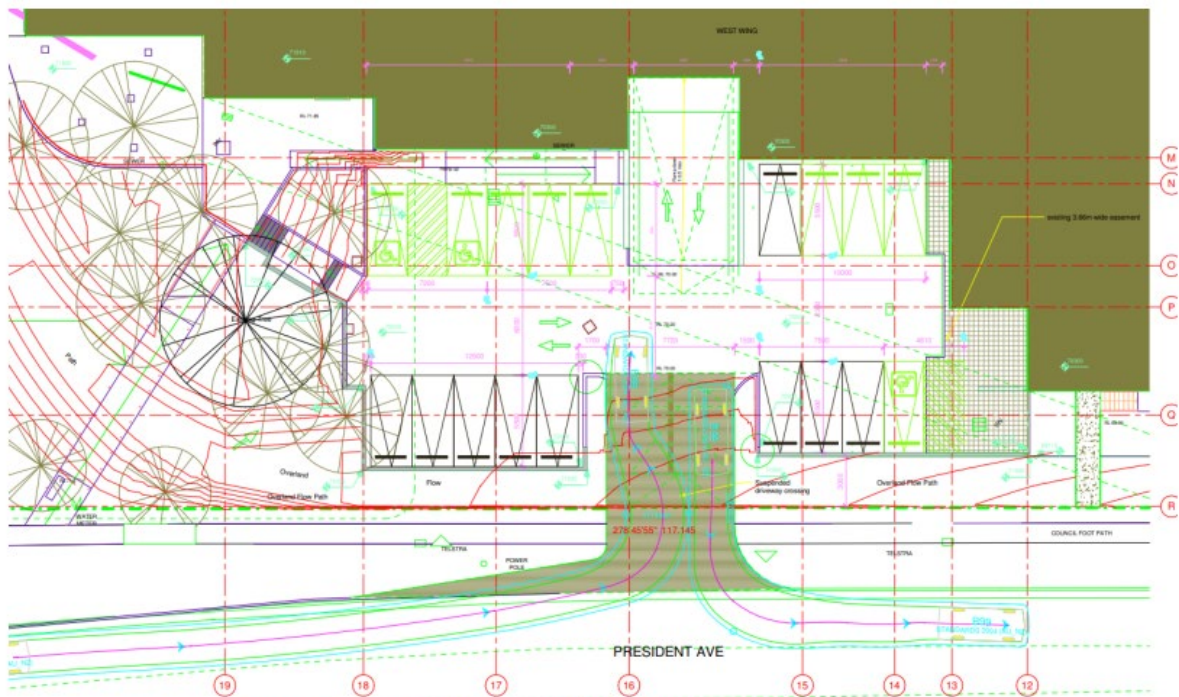


Figure 23: Swept path detail shown for the wider access driveway to President Ave.

The location of the proposed President Avenue driveway has been retained as per the EIS documentation.

With regard to the proposed President Avenue access arrangements, the *Response to Submissions Report* prepared by Imagescape Design Studios (March 2022) makes a number of conclusions based on the updated Traffic Assessment Report prepared by ML Traffic Engineers (February 2022) and the Slip Lane Assessment prepared by Greys Australia Pty Ltd (23 February 2022).

TTPP provides the following comments:

- Contrary to the comments in the Greys Australia document (23 February 2022), AS2890.1-2004 Clause 3.2.3 (a) states that at signalised intersections, the minimum distance “shall be increased as necessary to locate access driveways beyond the influence of normal queue lengths at the intersection.” The standard does allow for driveways within the queue lengths where it is not practical to do so with various measures. For the proposed development there is considered to be a practical alternative access (ie. Hotham Road).

- The approach angle of the proposed splayed driveway would be greater than a potential slip lane for the left turn entry vehicle movement. Thus the speed of vehicles making the left turn into the site and across the footpath would not be significantly different if not slightly lower with a well designed slip lane. A splayed driveway would not provide the traffic efficiency benefits of a slip lane.
- TTPP notes that consideration of existing accident history has been undertaken. While the existing accident history indicates a relatively low accident rate at the President Avenue / Hotham Road intersection, TTPP notes that the existing use of the President Avenue driveway does not represent the future conditions with a substantial intensification of traffic using the President Avenue access. It is noted that the existing driveway provides access to some 10 - 20 informal parking spaces whereas with the proposed development the driveway would access all 168 on site parking spaces.
- Notwithstanding the commentary regarding the design of a potential vehicle access on President Avenue, it is noted that no formal Road Safety Audit has yet been undertaken. Thus it is recommended that should the development consent be granted, then appropriate conditions shall include a requirement for detailed design plans of the access to be prepared. A Road Safety Audit of the detailed design shall be undertaken and recommendations of measures to address identified issues incorporated into the design.

In summary, it is TTPP's opinion that if a vehicle access is permitted at President Avenue, then the proposed development shall be amended such that:

- There is no vehicle connection provided to the main basement car park via the President Avenue access. The President Avenue access is to only service the 18 ground level spaces. It is envisaged these 18 parking spaces accessed via President Avenue would be allocated as staff parking and not a public car park. Appropriate signage and controls measures would be required to ensure public parking occurs in the main basement parking area accessed via Hotham Road; or
- A slip lane (deceleration) be incorporated into the President Avenue vehicle access design to reflect a main access providing access to 168 parking spaces and to maintain safe and efficient access which does not adversely impact on classified road operation.

Traffic Modelling / Traffic Generation Implications

With regard to the updated Sidra modelling, TTPP notes that the assessment process has not, in TTPP's opinion, been adequately documented to allow a comprehensive review of the assessment assumptions, methodology and data inputs to the modelling.

Notwithstanding the above, based on TTPP's experience and knowledge of the location, it is TTPP's expectation that with the exception of a potential vehicle access at President Avenue, the proposed development traffic generation is unlikely to have a significant impact on the

operation of the broader surrounding road network and specifically the operation of the President Avenue / Hotham Rod / N W Arm Road.

Car Parking Provisions

It is noted that with regard to car parking requirements, DPE requested that parking surveys of similar sized hospitals be undertaken to support the proposed on-site parking provisions.

Section 3.10 of the RfS document references the Kareena Private hospital as suitable comparison site.

While it is agreed that the Kareena Private hospital is a likely similar project, the comparison was based on the approved parking rates. No surveys of actual parking demand have been provided in the RfS.

Parking surveys of actual demand would be required to determine if the car parking rates approved or proposed are appropriate for application to the proposed development.

It is recommended that parking surveys of actual demand be undertaken to enable an assessment of the adequacy of the proposed parking provisions.

Public Transport and Green Travel Planning

It is also noted that the preliminary Green Travel Plan submitted with the EIS has not been updated as part of the RfS as requested by DPE.

Notwithstanding the above, it is recommended that the requirement to prepare a detailed Green Travel Plan can be appropriately conditioned as set out in the submission to the EIS (see discussion on conditions of consent in following sections of this review).

Potential Conditions of Consent for DPE Consideration

This review has identified a number of issues associated with the traffic and transport aspects of the proposed development.

TTPP recommends that the following potential conditions of consent would address the identified issues.

Condition A – Modify Design of President Avenue Access

The proposed vehicle access at President Avenue shall be modified as follows:

- The proposed vehicle access via President Avenue be removed from the development proposed and all vehicle access provided via Hotham Road; or
- A deceleration lane (slip lane) be provided for the left turn entry movements from President Avenue into the site (see details in following section); or
- Barriers or similar design modifications be installed such that the proposed vehicle link between the ground level car parking area fronting President Avenue and the main basement parking area be disconnected.

The modified design of the President Avenue access shall comply with the relevant AUSTROAD and Australian Standard (AS2890) design requirements.

A Stage 3 (Detailed Design) Road Safety Audit (RSA) shall be prepared in accordance with NSW Centre for Road Safety *Guidelines for Road Safety Auditing Practices* (<https://roadsafety.transport.nsw.gov.au/downloads/audit-practices.pdf>).

The RSA shall include but not be limited to signage and line-marking; and future site access for proposed driveway, superelevation, horizontal curve, design speed limit, minimum gap sight distance, absolute minimum sight distance, kerb and gutter and other geometric design considerations.

The RSA shall be undertaken by an accredited auditor who is independent of the design consultant.

The modified access design and the RSA shall be submitted to the consent authority (TfNSW / Council / DPE) for approval prior to the commencement of any works for the proposed development.

Condition B – Green Travel Plan

As set out in the TfNSW submission to the EIS, the following conditional shall be included in the consent.

It is recommended that prior to the commencement of any operations, a Green Travel Plan (GTP) be submitted to the satisfaction of the Certifier that promotes the use of sustainable transport modes and reduces dependence on single occupant car travel to the site, particularly for staff and visitors. The plan shall:

- be prepared by a suitably qualified traffic consultant and in consultation with TfNSW;
- include objectives and modes share targets (i.e. site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the GTP;
- include specific tools and actions to help achieve the objectives and mode share targets;
- include measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the GTP;
- provide analysis of existing workforce residential post code data to properly understand public transport and car parking demand and journey to work behaviours and develop effective strategies in response, as well as help to inform service planning considerations;
- include a staff travel survey and workforce data analysis for the existing President Hospital to inform likely staff travel patterns and resultant travel plan strategies to/from the Site;
- identify strategies for promoting higher mode share targets for sustainable transport use, particularly amongst day shift and administrative staff;
- identify a responsible party (or Committee) for the ongoing implementation of the Travel Plan and its initiatives;
- confirm the extent and nature of end of trip facilities and bike parking and how they will be promoted to staff;
- include the provision of a high quality Travel Access Guide (TAG) providing information to staff, patients and visitors travelling to the site;
- identify a communications strategy for conveying Travel Plan information to staff, patients and visitors, including for the TAG;
- consider car parking management strategies that may be required to encourage sustainable transport use/mode share targets such as pricing, reserving spots for patients and visitors, prioritisation for those that carpool, use of wait lists etc.;
- include a detailed action plan comprising specific tasks needed to complete the proposed actions, the person/s responsible for completion of the task, completion date and anticipated costs and an implementation checklist to achieve the proposed initiatives;
- consider alternative actions to undertake if targets are not achieved;
- include the set-up of a steering group or committee of relevant internal and external stakeholders to inform future targets and the ongoing monitoring and revision of the GTP for five years; and
- include details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the GTP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of users of the development.

Condition C – Parking Demand Survey and Parking Management Plan

A parking survey of actual parking demand shall be undertaken of a similar facility to determine an appropriate on-site parking rate for the redevelopment of the President Private Hospital.

If the parking demand survey indicates an under-provision of parking, a Parking Management Plan, shall be prepared to identify measure to control and manage parking demand on site.

The Parking Management Plan shall include measures to mitigate the potentially adverse implications of hospital parking demand to nearby on-street locations.

The Parking Management Plan shall be prepared in consultation with DPE and / or Council.

The findings of the Parking Demand Survey and the Parking Management Plan shall be provided to the consent authority (DPE / Council) for approval prior to the commencement of works.

Summary

This review has identified a number of traffic and transport related issues associated with proposed redevelopment of the President Private Hospital.

The key issue relates to the proposed vehicle access located at President Avenue.

Notwithstanding the matter of concurrence and compliance with State Environmental Planning Policy (Transport and Infrastructure) 2021, TTPP suggests that design modifications to the access can be incorporated into the proposed development to address these issues. These design modifications could be addressed by way of consent conditions as set out in this review.

Additionally, matters relating to parking and green travel planning still need to be resolved but could also be dealt with via conditions of consent.

We trust the above is to your satisfaction. Should you have any queries regarding the above or require further information, please do not hesitate to contact the undersigned on 8437 7800.

Yours sincerely,



Jason Rudd
Director