

Reference: 22.182r01v01

16 May 2022

Rose Bay Action Group
c/- 17 Albemarle Avenue
Rose Bay NSW 2029

Attention: John Beck

**Re: 488-492 Old South Head Road, Rose Bay
Proposed Temporary Woolworths Neighbourhood Supermarket
Council Reference: Application No. 140/2022**

Dear John,

We refer to the subject development application and advise that we have been engaged by Rose Bay Action Group (RBAG) to review the proposed development from a traffic engineering and transport planning perspective.

In this regard, it is emphasised that we have agreed to undertake such a review on the basis that we do so in the context of an independent peer review, with no expectations that we could advance the concerns of RBAG.

Accordingly, we have reviewed the available documentation, including the architectural plans, the Statement of Environmental Effects (SEE), and the Transport Assessment prepared by JMT Consulting (herein referred to as 'traffic report').

The traffic engineering and transport planning issues that arise from the application are discussed separately below and represent our submission to Council on behalf of RBAG.

➤ Road Network and Site Context

The development site is located at the northern corner of the Old South Head Road / Albemarle Avenue / Liverpool Street intersection. The site presently comprises a decommissioned service station.

Old South Head Road is a classified State Road under the care and maintenance of Transport for NSW (TfNSW). Albemarle Avenue and Liverpool Street are local roads under the care and maintenance of Woollahra Municipal Council (herein referred to as 'Council').

A review of the traffic report has identified a number of key site parameters have been omitted, these include:

- Site area;
- Length of street frontages; and
- Area of the former service station and convenience store.

➤ Existing Traffic Conditions

The traffic report undertook a review of the historical operational data provided by Caltex between March 2019 to November 2019 and identified the former service station would attract 1,000 to 1,200 vehicles per day based on the number of customers using petrol bowsers.

The traffic report made further assumptions that these would equate to some 80-90 vehicles per hour entering the site or 160-180 vehicle movements entering and exiting the site.

It is in our view that there is a lack of justification for the assumed peak hour traffic flows and these historical operational data are not verifiable.

Furthermore, it is understood traffic counts were undertaken in November 2021 at the Old South Head Road / Albemarle Avenue intersection for weekday morning and afternoon peak periods as well as the Saturday lunchtime peak period to form the base case modelling scenario.

Sydney was only released from COVID lockdown on 11 October 2021 and would still be recovering in November 2021 with businesses and general population continuing to undertake a conservative approach during this time, and many people were still working from home in accordance with Government guidelines.

RBAG has also provided email correspondence from Rose Bay Public School instructing parents the existing staggered pick-up and drop-off arrangement will remain in place after Monday 8 November 2021 for the rest of Term 4 and continue to spread out the traffic to meet safe social distancing guidelines, in turn, this would have substantially reduced peak hour traffic flows. The relevant email correspondence is reproduced in **Attachment 1**.

Accordingly, we recommend updated traffic surveys to be undertaken to reflect actual traffic conditions in the locality as premises in the site's vicinity have recently started trading again and school pick-up / drop-off has returned to normal.

➤ Overview of the Development Proposal

The traffic report specifies the Development Application (DA) is to facilitate the site to be used for Woolworths pick up orders with six (6) customer 'direct to boot' parking spaces plus a further three (3) parking spaces for drivers to pick up orders.

The above DA description is inconsistent with the those provided in the SEE and is silent on repurposing of the former service station Starmart convenience store for change of use to a 'neighbourhood supermarket'.

The traffic report also does not specifically mention this temporary use is only proposed for a period of up to 5 years.

➤ Off-Street Parking Provision

Off-Street Car Parking

The car parking assessment in the traffic report omits the proposal seeking to repurpose the former service station Starmart convenience store to a Woolworths supermarket.

Accordingly, the traffic report will need to be revised to take into account of the proposed Woolworths supermarket in accordance with Woollahra Development Control Plan 2015 (DCP), which requires supermarkets to provide a minimum of 3.5 car spaces per 100m².

In addition, surveys of a comparable Woolworths site with 'direct to boot' parking bays / driver pick-up bays needs to be undertaken by an independent third party to verify the parking, turnaround times and queueing capacity to determine sufficient levels of on-site parking / queueing.

The submitted plans for the proposed development also do not show how additional parking could be adequately provided on the site if required. Therefore the proposal would unreasonably burden already limited on-street parking opportunities in the site's vicinity, and potentially contribute to an unsafe and congested road environment during peak school pick-up / drop-off periods. In this regard, comprehensive full-day parking accumulation surveys should be undertaken within at least a 400m radius of the site if the proposal seeks approval for any shortfall in off-street car parking.

On the above basis, the internal queuing assessment in the traffic report cannot be relied upon until a satisfactory plan layout is developed in the first instance showing adequate off-street car parking can be provided on the site for the proposed development.

Accessible Parking

The traffic report is silent on accessible parking requirements for the development, and none are provided on the submitted plans.

This is a clear regression compared to the existing site conditions in which one (1) accessible parking space is provided.

In any event, people with disabilities must be considered and adequate accessible parking spaces shall be provided.

Bicycle and Motorcycle Parking

The traffic report will need to specifically address provision for bicycle parking and end-of-trip facilities as well as motorcycle parking requirements for all proposed land uses on the site in accordance with Woollahra DCP.

Servicing and Loading

The traffic report specifies the design accommodates loading for an 8.8m Medium Rigid Vehicle (MRV).

There are no dedicated loading bays marked on the submitted plans, and the stopped truck position obstruct vehicle paths to a total of six (6) delivery and 'direct to boot' parking bays.

The traffic report has not sufficiently demonstrated how an 8.8m MRV is sufficient to service a Woolworth supermarket which typically use 12.5m Heavy Rigid Vehicles (HRVs) and up to 19m Articulated Vehicles (AVs).

Council's DCP also specifies that supermarkets are required to provide a minimum of one (1) dedicated loading bay.

Accordingly, revised plans should be prepared demonstrating provision of adequate loading / servicing facilities in accordance with Council requirements and satisfying the operation of the proposed development, which must not obstruct internal vehicle circulation.

➤ Traffic Impacts

Trip Generation

The traffic report has relied on data provided by Woolworths stating the site is expected to generate 80 and 100 vehicles per day and assumed this will equate to approximately 10 to 15 vehicles per hour during the morning and afternoon peak period.

However, our understanding of the proposed operation of the facility is to allow a car to drive into the site and an on-site staff will directly load the pre-packaged grocery into the vehicle without the need for the driver to get out of the car or stop the engine, all of which should be able to be completed in less than 5 minutes. Accordingly, the nine (9) pick-up bays on site are capable of generating a total of 108 vehicle trips per hour during peak periods, some tenfold of what has been assumed in the traffic report.

It is therefore in our view the trip assessment in the traffic report could be substantially less than what the proposal is capable of generating, and surveys of a comparable Woolworths site with 'direct to boot' parking bays / driver pick-up bays needs to be undertaken by an independent third party to verify the traffic generation potential of the proposed development.

Traffic Modelling

The traffic report undertook traffic modelling at the Old South Head Road / Albemarle Avenue intersection.

We note that the traffic report has not provided any supporting statements that the intersection has been modelled in accordance with TfNSW's TCS plan and SCATS data, and there is also no evidence that the model has been validated and calibrated to existing road conditions.

The traffic report has also not provided any information on how the traffic has been distributed and on what basis, a clear diagram needs to be provided clearly demonstrating how the traffic generated from the proposed development has been distributed onto the surrounding road network.

Furthermore, a close examination of the SIDRA modelling results identified Old South Head Road / Albemarle Avenue intersection operates at LoS B across all scenarios with overall average delay of 20.1s to 26.2s, however, there are multiple scenarios where individual approaches exceed an average delay of more than 60s. It is noted in this regard that TfNSW's Guide to Traffic Generating Developments specify that:

"An overall average delay for intersection of 25 seconds might not be satisfactory if the average delay on one movement is 60 seconds"

Accordingly, further justification should be provided why the intersection is deemed to operate satisfactorily when there are individual approaches exceeding 60s delay which will only be exacerbated by the additional traffic generated by the proposed development.

Modelling should also be revised and updated to a SIDRA network model inclusive of all proposed site access / egress driveways and Old South Head Road / Albemarle Avenue intersection to appropriately assess traffic impacts of the development proposal and provide mitigation measures where required.

Further to the above, we note the substantial 95th percentile queue informed by the traffic models is generally consistent with RBAG's observations provided in **Attachment 2**.

Residential Amenity Impacts

Albemarle Avenue is a local, residential street serving multiple residential dwellings. TfNSW Guidelines specify a maximum peak hour volume of 300 vehicles per hour for local streets, with an environmental goal of 200 vehicles per hour.

The submitted traffic surveys indicate Albemarle Avenue currently carries 317 vehicles per hour during the AM peak period, and 237 vehicles per hour during the PM peak period. Whilst the existing traffic volumes already exceed TfNSW's environmental goal in the PM peak period and maximum environmental capacity in the AM peak period, the traffic assessment still needs to address further exacerbation of existing conditions to Council's satisfaction.

Internal Design Aspects

Access

Clause 101-(2) of the Infrastructure State Environmental Planning Policy (Infrastructure) 2007 specifies that the consent authority must not grant consent to development on land that has a frontage to a classified road unless it is satisfied that:

- Where practicable, vehicular access to the land is provided by a road other than the classified road; and
- the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development as a result of:
 - the design of the vehicular access to the land, or
 - the emission of smoke or dust from the development, or
 - the nature, volume or frequency of vehicles using the classified road to gain access to the land; and
- The development is of a type that is not sensitive to traffic noise or vehicle emissions, or is appropriately located and designed, or includes measures, to ameliorate potential traffic noise or vehicle emissions within the site of the development arising from the adjacent classified road.

Should the above be enforced by TfNSW, the proposal will need to demonstrate how residential amenity impacts in Albemarle Avenue can be mitigated to Council's satisfaction.

It is also in our view that the access driveways in Albemarle Avenue should be consolidated, and staff should also exit onto Old South Head Road (if permitted by TfNSW).

Pedestrian Zebra Crossings

The submitted plans show an over provision of pedestrian zebra crossings throughout the site, giving pedestrians a false sense of security and cause them to be less alert of surrounding traffic.

The traffic report is to specifically address the appropriateness of the proposed provision for pedestrian crossings on the site and its compliance with relevant Australian Standards, Austroads Guide and TfNSW requirements to ensure the best safety outcome for pedestrians.

Car Park Layout

The traffic report is silent on the proposed site layout's compliance with AS2890.1 (2004) and AS2890.2 (2018).

The traffic report has failed to demonstrate satisfactory vehicle circulation and how a large B99 design vehicle could perform a U-turn from the central driveway to access the staff spaces.

Queuing Assessment

An M/M/ ∞ queue is a multi-server queueing model where every arrival experience immediate service and does not wait, essentially assuming there are infinitely many servers and in the context of the proposal, correspond to infinitely many pick-up bays.

The traffic report should reference the source of any queuing theory and formulae being adopted and explain its application in the context of the proposal.

The traffic report should also present formulae and calculation of any adopted queuing theories for Council to verify.

We generally agree with the adopted queuing assessment, however, the results are only as valid as its input, and we trust the assumed 10-15 vehicle trips per hour significantly underrepresents the actual traffic that that are capable of being generated by the proposed development.

➤ Construction Traffic Impacts

It is in our view a preliminary Construction Pedestrian Traffic Management needs to be prepared given the site's location, the conditions of the existing road network as well as its close proximity to a school to demonstrate how pedestrians and traffic can be safely managed during construction.

➤ Conclusion

In the view of the above we consider the current state of the Transport Assessment prepared by JMT Consulting does not adequately assess the traffic and parking impacts arising from the proposed development.

Accordingly, we recommend Council to consider the following matters when assessing the development application and request additional information where required:

- Existing site details including area, street frontages and areas for the former uses of the site should be provided;
- Updated traffic survey should be undertaken taking into account of premises that have recently started trading again and school pick-up / drop-off being reverted back to normal;
- Provision for off-street parking (cars, bicycles and motorcycles) as well as accessible parking needs to be assessed and provided in accordance with Woollahra DCP and surveys of comparable developments;

- A dedicated loading bay needs to be provided for the proposed development and not obstruct vehicle circulation through the site. The types of commercial vehicles and trucks to be accommodated on site needs to demonstrate that it is adequate to service the proposed development;
- An independent survey of a similar and comparable Woolworths site should be undertaken to verify the assumed traffic generation potential of the proposed development;
- Queuing assessment should be updated to include the actual traffic that is capable of being generated by the proposed development;
- The submitted traffic models need to be revised and updated to a SIDRA network model taking into account of all proposed vehicular access / egress driveways to adequately assess the traffic impacts arising from the proposed development;
- Mitigating measures should be provided where the average delay of individual approaches exceeds 60s in accordance with TfNSW Guide to Traffic Generation Developments requirements;
- Residential amenity impacts in Albemarle Avenue needs to be assessed and addressed;
- Provision of pedestrian zebra crossings needs to be in accordance with Australian Standards, Austroads Guide and TfNSW requirements to achieve the best safety outcome for pedestrians;
- A preliminary Construction Pedestrian Traffic Management Plan should be prepared to demonstrate how pedestrians and traffic can be safely managed during construction.

We trust the above is of assistance and request that you contact the undersigned should you have any queries or require any further information.

Yours faithfully,

Traffic



Thomas Yang
Senior Engineer

Encl: Attachment 1 – RBAG Photographic Record
Attachment 2 – Reduced Plans

ATTACHMENT 1

Email Correspondence from Rose Bay Public School

Thomas Yang

From: Rose Bay Public School <rosebay-p.school@det.nsw.edu.au>
Sent: Wednesday, 3 November 2021 10:23 AM
To: Rose Bay Public School
Subject: Rose Bay Public School
Attachments: term-4-roadmap.pdf

Dear Families,

I am pleased to advise that yesterday the Minister announced, from 8 November all NSW schools will move to updated Level 3 settings that bring school operations more in line with what is allowed in the community.

I would like to update you on the key changes that will be in place at our school from Monday 8 November and for the rest of Term 4.

Keeping us all safe on school grounds

A combination of layered COVID-safe plans and measures will allow us to prioritise student and staff safety and keep our school open. To do this, the following guidelines will be in place:

- Students, staff and visitors must not attend school if unwell, even with mild symptoms.
- All staff and adult visitors on the school site must be fully vaccinated and provide proof of vaccination.
- Masks are required indoors for all staff, adult visitors and students in and strongly recommended indoors for primary students. Masks can be removed when eating or exercising.
- All staff and visitors must check in when attending a school site or gathering.
- Adults should maintain 1.5 metres physical distancing wherever practicable.
- Activities and events should be held outdoors where practical.
- Indoor spaces will be well ventilated and as large as possible for the number of attendees - following square metre guidelines.
- Students should avoid mingling with other class and year groups when moving around the school.
- Students and staff will maintain good hand hygiene and schools will continue with enhanced cleaning, including high touch points.

From 8 November

Our school will operate on updated Level 3 settings for the rest of Term 4 2021, with the following activities allowed in a COVID-safe manner:

- Assemblies and presentations are allowed outdoors, with cohorts separated and physical distancing in place. Fully vaccinated visitors (including parents and carers) are only allowed to attend if completing a specific role (such as presenting) and at the invitation of the school.
- Community use is allowed outside of school hours (including P&C meetings) with COVID-safe plans in place – in line with public health requirements.
- Dancing, bands, ensembles and music classes will be allowed within cohorts. However, everyone must wear masks while playing instruments indoors. Other instruments that rely on breath or require a mask to be removed to be played, as well as singing and chanting, are not permitted in Term 4.
- Excursions are allowed outdoors (and indoors where sole use of the premises is available).
- Incursions are allowed indoors and outdoors where cohorts are kept separate.
- Graduations and formals are allowed within cohorts, either on school sites or at external venues – with COVID-safe plans in place and physical distancing adhered to.

- School sports are allowed.
- Transitions and orientations are allowed in a COVID-safe way that minimises mingling between students.

Under these guidelines, the current **drop off and staggered pick times up will not change**. These include:

Morning drop-off

Albemarle Avenue gate:

Crossing: **8:50am-9:05am** Students in Years 3-6 and siblings
9:05am – 9:20am all other students

Wilberforce Avenue gates:

Stair: **8:50am – 9:20am** Kindergarten students and their siblings
 Ramp: **8:50am-9:05am** Students in Years 3-6 and siblings
9:05am – 9:20am all other students

Staggered pickup times

3.10pm: Kindergarten to Year 2 and their siblings
3.20pm Year 3 – Year 6

Designated pick up gates

Albemarle Avenue gates:

Crossing gate: Year 2 [3:10pm]
 RBOOSH Stairs: Year 3 [3:20pm]

Wilberforce Avenue gates:

Stairs: Kindergarten [3:10pm]
 Ramp: Year 1 [3:10pm] and any student in the car pick up zone.

Years 4-6 to exit out any gate at 3.20pm

We encourage all families to use the pickup and drop off zone in Wilberforce Avenue. Please refer to the parking rules here: [Parking rules | NSW Government](#)

Please see the attached the Term 4 roadmap. Thank you again for your continued support during this school term.

Kind regards,

Cherie

Cherie Stone
Principal

Rose Bay Public School

Albemarle Avenue Rose Bay 2029

9371 4800 | rosebay-p.school@det.nsw.edu.au



Education

I acknowledge the homelands of all Aboriginal people and pay my respect to Country.

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ATTACHMENT 2

RBAG Photographic Records



RBAG Photographic Record 1



RBAG Photographic Record 2



RBAG Photographic Record 3



RBAG Photographic Record 4



RBAG Photographic Record 5