



2 October 2020

TfNSW Reference: SYD13/01267/13

Catherine Van Laeren
Executive Director, Central River City and Western Parkland City
Greater Sydney, Place and Infrastructure
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001
Attention: Thomas Holmes

Dear Ms Van Laeren,

PUBLIC EXHIBITION OF REVISED CARTER STREET PRECINCT MASTER PLAN

Transport for NSW (TfNSW) appreciates the opportunity to provide comment on the above proposal which was referred to us by correspondence dated 1 September 2020.

We note that the Department of Planning, Industry and Environment (the Department) has further revised the Carter Street Precinct Master Plan from the earlier version exhibited in 2018, in response to the recently announced Sydney Metro West station at Sydney Olympic Park, and community and stakeholder feedback received during the 2018 exhibition. The amendments will be implemented through a proposed State Environmental Planning Policy (SEPP) to amend the Auburn Local Environmental Plan 2010 (Auburn LEP 2010).

Once made, the draft Development Framework is intended to replace the City of Parramatta Council Carter Street Precinct Development Control Plan 2016, to be read in conjunction with the Auburn LEP 2010, with development within the precinct having regard to both plans.

It is understood that the revised planning controls will provide a total development capacity of approximately 6,200 dwellings (previously rezoned to permit 5,500 dwellings) and maintain up to 12,000m² of retail floor space and up to 30,000m² of commercial space across the Precinct. TfNSW has reviewed the exhibition documents and provides comments at **Attachment A** for the Department's consideration, and we would be happy to work with you on amendments to address the key points raised.

Thank you for the opportunity to provide advice on the subject plan. Should you have any questions or further enquiries in relation to this matter, Rachel Davis would be pleased to take your call on phone (02) 8849 2702 or email: development.sydney@transport.nsw.gov.au

Yours sincerely,



Cheramie Marsden
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Attachment A: TfNSW Detailed Comments on Revised Carter Street Master Plan

TfNSW provides the following comments on the revised Master Plan as described in the Explanation of Intended Effect, and the Carter Street Precinct draft Development Framework (Aug 2020):

Hill Road Pedestrian crossing:

1. The movement network section on p8 of the draft Development Framework, talks about having clear pedestrian legibility and pedestrian crossings at key locations and intersections. It also mentions road upgrade to Hill Road. The Structure Plan represented in Figure 3 then shows the East-West pedestrian spine crossing Hill Road (broken purple line). Objective O.4. (p14) further talks about incorporating the Hill Road upgrade into the Precinct and allowing for pedestrian crossings at key locations - however, the current Hill Road upgrade scope does not include a pedestrian crossing facility at the specified location (Hill Road/east west spine intersection).

Section 7 Figure 19 in the draft Development Framework indicates a pedestrian/cycle link crossing Hill Road and then a separate 'Proposed pedestrian crossing at signalised intersection' crossing Hill Road at the East-West spine location. While other figures note that 'future design [is] subject to RMS requirements', in relation to Hill Road, while TfNSW understands the underlying intent and supports legible active transport, as advised in previous correspondence, an at-grade signalised pedestrian crossing at Hill Road at the East-West spine location is not supported. This is due to significant road safety and network efficiency concerns with the proposed at-grade mid-block pedestrian crossing at this location due to the close proximity to the M4 eastbound off ramp exit as well as the five lane cross section. Currently in peak periods, large volumes of traffic including freight vehicles use the M4/Hill Road offload ramp to access Sydney Olympic Park, Wentworth Point and Carter Street, which can result in significant queuing back to the M4.

This traffic demand and queueing is expected to increase with the significant growth planned in the area. Adding any additional signals on Hill Road at this location would further increase these queues and is not supported by TfNSW due to the potential for increased high speed/severity crashes.

We recognise the need for a safe pedestrian connection of Hill Road to the north of the M4 as part of the pedestrian spine within the precinct. Within the Framework, this should be referenced as a 'suitable pedestrian crossing facility subject to further investigation'. A potential grade separated facility should be investigated for a safer option for pedestrians, and better place amenities outcome for road users. As detailed in our previous submission to the 2018 Master Plan, we recommend that a pedestrian bridge is investigated for this purpose with any land required to be identified and reserved to ensure its future delivery, to be negotiated through suitable mechanisms by Council/the Department. We request that relevant sections of the draft Development Framework are amended to address this.

While details of the bridge can't yet be determined (i.e. type of bridge, maintenance requirements, vertical and horizontal clearance requirements), from the documents there seems to be sufficient land available on the western side of Hill Road for the land components for the bridge landings without impacting the development area.

Transport Networks

2. The Page 15 bottom note refers to the continuation of the Creek Edge Street to John Ian Wing Parade and "*Further consultation with Sydney Olympic Park Authority and TfNSW*

is required". Noting Creek Edge Street, as with John Ian Wing Parade, will be a local road under the care and control of Council, the City of Parramatta Council will need to be consulted.

3. The cycle path along Carter Street presents road safety concerns regarding the potential conflicts with heavy vehicles accessing industrial and enterprise uses along Carter Street. This portion of the precinct is to retain B6 Enterprise Corridor zoning which permits a range of light industrial and enterprise uses with heavy vehicle demands. Note also Carter Street is a 25/26m B-double approved route.
4. As the Department is aware, the execution of the VPA and transfer of land for road works (at no cost to TfNSW) is essential for the commencement of the Hill Road project.
5. Figure 23 - the overland flow paths noted in the Public Open Space Network plan appear to be a new inclusion. The drainage strategy was dealt with in the median areas and verges of Green Spine in earlier versions of the Master Plan. The design of the stub (80 metres long) from John Ian Wing Parade to Green Spine doesn't cater for this direction of flow. The location of the detention basin may also affect the size of the available public open space.
6. Regarding treatment of residual land adjoining the Hill Road upgrade, we note an area of residual land (location indicated in **Attachment B**) could be shown as future open space/landscaping in the Public Open Space Network.
7. In relation to the Public Transport Network proposals, Bus Routes and frequencies are determined by the TfNSW Bus Planning team and new/changed services require TfNSW approval.

New/upgraded roads should take into consideration relevant bus capability design requirements. Guidance can be found in the TfNSW Guidelines for Public Transport Capable Infrastructure in Greenfield Sites, available at: <https://www.transport.nsw.gov.au/industry/transport-planning-resources>

8. Regarding section 6.3. Parramatta Light Rail, TfNSW requests further consultation prior to finalisation of the Framework.
9. Regarding the proposed Traffic Control Signals throughout, any proposed traffic signal sites will require prior approval of TfNSW (under clause 87 of the *Roads Act 1993*) and will need to meet warrants in accordance with the former RTA 'Traffic Signal Design Manual' and TfNSW design requirements. Modelling will also need to be provided to demonstrate acceptable operation of proposed signals and geometric requirements. Warrants do not necessarily mean traffic signals are the best option; all alternate treatments should be considered to identify the optimum solution. We request that the proposed signals sites are instead shown as 'controlled intersections' until the appropriate evidence base has been provided to demonstrate that traffic signals are acceptable and agreed in-principle. Please also note that proposals for multiple, closely spaced new traffic signal sites are not supported due to:
 - The road safety concerns with the potential 'see-through' effect of closely spaced intersections.
 - Insufficient storage capacity between the intersections resulting in queues extending back through the adjacent intersections and across pedestrian crossings creating pedestrian safety concerns.
 - Practicalities of providing a single traffic controller for intersections closely spaced.

Travel Demand Management Including Car Parking

10. As previously advised, TfNSW has no objection to the additional development uplift in-principle, on the basis that restrained maximum parking rates will be included in the planning controls for Carter Street to curtail reliance on private vehicle travel in an effort to offset the additional traffic generation potential. This is particularly important noting the enhanced accessibility being provided by the proposed Sydney Metro West, which will provide additional mass-transit services in the future allowing a substantial mode shift to public transport.

We note there is a proposed floor space incentive clause for sites Sites B, C and D, where restrained parking rates are required to be implemented. We also note that a site specific clause applying to Site A seeks to limit on site car parking provision.

While these travel demand management incentives are strongly supported, concern is raised that the default car parking requirements set out in the Development Framework in Table 3: Car Parking Rates are very generous and higher than the maximum rates identified for the neighbouring NSW Urban Growth Parramatta Road Corridor Urban Transformation Strategy (PRCUTS). The Department may wish to consider aligning the Table 3: Car Parking Rates with the neighbouring PRCUTS Precinct Transport Report (2016) rates (excerpt below):

Table 5 – Proposed maximum parking rates by category and development

CATEGORY	RESIDENTIAL (SPACES PER DWELLING)				OTHER (SPACES GFA)			
	STUDIO	1 BED	2 BED	3 BED	VISITOR	COMM.	RETAIL	IND.
1	0	0.3	0.7	1	0	150	100	150
2	0.3	0.5	0.9	1.2	0.1	100	70	120
3	0.6	0.9	1.2	1.5	0.2	70	50	100

11. The Department may wish to also consider non-residential incentive clauses for the provision of the retail/commercial development prior to or in conjunction with the additional residential yield to ensure that shops and services are delivered in a timely manner for current and future residents. This may further enhance the walkability of the Precinct and reduce the need for motorised trips.

Housekeeping Amendments

We note that the Explanation of Intended Effect details a proposed additional clause to provide for the acquisition and/or dedication of the Parramatta Light Rail (Stage 2) corridor should an investment decision be made.

We note that the proposed LEP 'Precinct Map' identifies this as "*Transport Investigation Area - Refer to Clause XX*" however it seems no further detail on the clause is provided. We request further information, consultation and agreement in relation to this proposed clause, prior to the SEPP and LEP amendment being made. We would like to get a better understanding of the implications of the proposed clause (noting also clause 10 of the Environmental Planning and Assessment Regulation 2000, requires public authority concurrence in proposed reservation of land by an LEP, should this be the intention of the clause).

Street Trees and Landscaping

Any street trees and awnings should be carefully located to ensure they do not obstruct driver sight lines to traffic signal lanterns and other critical road infrastructure and should be setback to allow for bus/heavy vehicle overhang (i.e. mirrors).

Relevant parts of the exhibited documents, including figures and objectives referring to pedestrian, cycle networks and Parramatta Light Rail 2, will need to be further discussed with TfNSW and amended where necessary to better reflect practicable transport infrastructure outcomes. This will help ensure that the infrastructure shown does not misinform community and developer expectations (if certain infrastructure items are unlikely to be feasible).

TfNSW is happy to meet to further discuss how we can work together to finalise the content of the plans.

8. Public Open Space Network

The Precinct's public open space network ensures quality spaces for both active and passive recreation, integrating with the regional public open space network, connecting into Sydney's Green Grid, and enhancing the ecological value of the natural environment.

Key views and vistas are maintained to public open space and landmarks, anchoring the public domain within the existing landscape to assist with way-finding. Long range view corridors define key public domain elements, and short-range views are to link public open spaces with the Precinct. Views at entry and gateway points connect the Precinct with the urban character of Sydney Olympic Park and the wider landscape character of the Millennium Parklands.

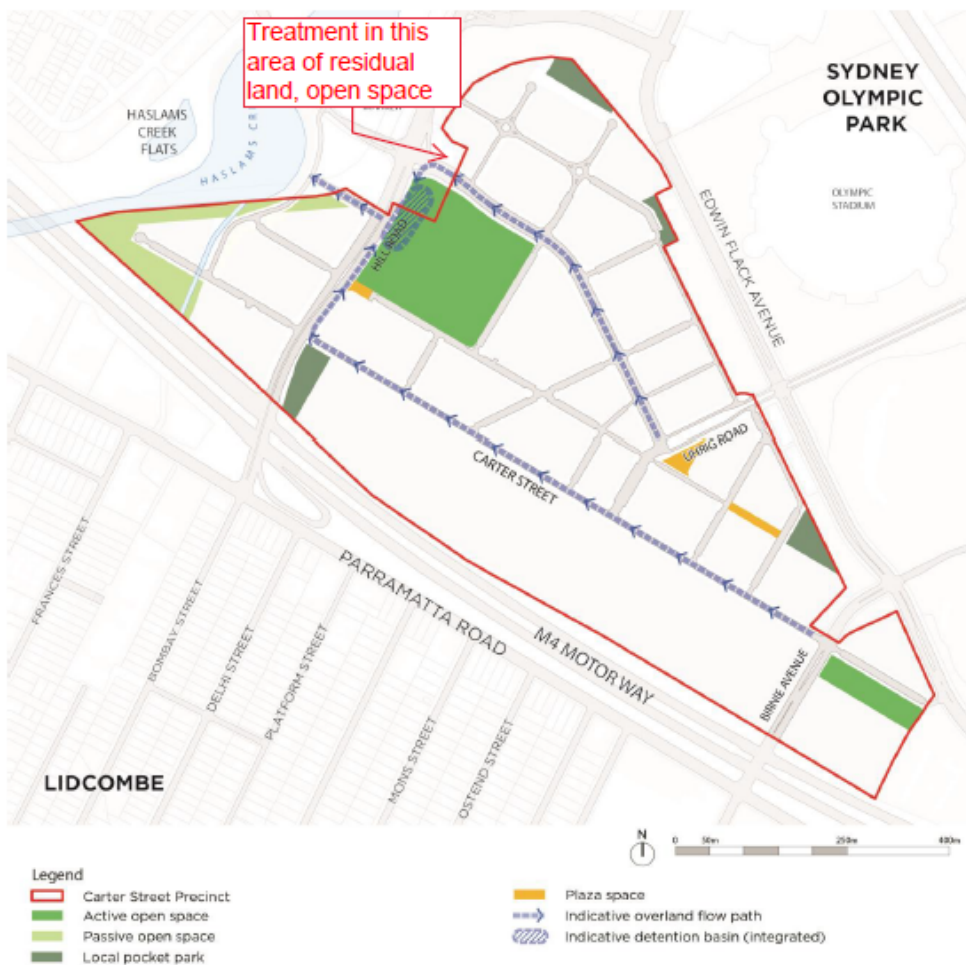


Figure 23: Public Open Space Network