

20 November 2023

TfNSW Reference: SYD23/01152/01

Ms Kiersten Fishburn
Secretary
NSW Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

RE: EXPLORER STREET, EVELEIGH – REZONING PROPOSAL

Attention: Cameron Brooks

Dear Mr Brooks

Transport for NSW (TfNSW) appreciates the opportunity to provide comments on the rezoning proposal for the subject site at Explorer Street, Eveleigh which was referred to us through your email dated 13 October 2023.

TfNSW has reviewed the submitted documentation and notes that the rezoning proposal seeks to include the site under Sydney Local Environmental Plan 2012 (SLEP 2012) to:

- Rezone the land to R1 General Residential and RE1 Public Recreation.
- Increase building height limits between 3m and RL60.7m (13 storeys).
- Increase the floor space ratio to 2.94:1.
- Include a requirement of 20% of floor space be used as affordable housing and 30% of floor space as social housing.

The proposed rezoning would allow for redevelopment of the site to:

- Deliver up to 400 new homes including 30% social housing and 20% affordable housing
- Renew South Sydney Rotary Park and maintain the existing 655m² Council owned pocket park on Station Place
- Maintain and upgrade the existing streets, Explorer Street, Aurora Place with new kerbs, footpaths, and street trees to provide welcoming accessible public spaces.

TfNSW has reviewed the submitted documentation and provides comments in **Attachment A** for DPE's further consideration prior to finalisation of the rezoning proposal.

Thank you for the opportunity to provide comments on the subject rezoning proposal. Should you have any questions or further enquiries in relation to this matter, please contact Ashish Tamhane via email: development.sydney@transport.nsw.gov.au.

Yours sincerely,



Carina Gregory
Senior Manager Strategic Land Use (Eastern)
Land Use, Network & Place Planning

Attachment A –Comments on Rezoning Proposal Explorer Street, Eveleigh

Traffic Impact

- The Traffic Impact Assessment report hasn't included the impact of the proposed development on the intersection of Erskineville Road / Swanson Street / Railway Parade and Henderson Road / Day Road / Mitchell Road. TfNSW recently implemented right and left turn restrictions at the intersection of Erskineville Road / Swanson Street / Railway Parade. As the future development of site is likely to increase traffic volumes along Henderson Road, further assessment should be undertaken to ensure increase in traffic volumes does not impact on the operational performance of these two intersections.
- The demand to access the Railway Pde/Henderson Road is likely to increase with the future development of site, which may impact on the signalised mid-block crossing (TCS 1926) on Swanson Street. As Swanson Street is a State road, further assessment is warranted at development application stage to ensure that there is no major impact on the traffic flow on Swanson Street as result of the increased pedestrian demand resulting in delays and queues.

Traffic Modelling

- The Traffic Impact Assessment has used trips per parking space to estimate traffic generation for the site and not trips per unit as per the standard practice. Though, the trip generation rates used (0.15 AM and 0.12 PM) are in accordance with the TfNSW Technical Direction (TDT2013/04a), consideration should be given to use trips per unit rate to estimate traffic generation for the subject site.
- It is proposed to deliver up to 400 new homes. However, no SIDRA modelling analysis has been undertaken at Henderson Road / Alexander Street and Henderson Road / Day Road / Mitchell Road intersections which are approximately 200m and 400m from the proposed development site.
- TfNSW notes that no future year traffic model / analysis was included in the Traffic Impact Assessment report to determine the impact of the proposed development on surrounding road network.
- The Traffic Impact Assessment report has neither documented calibration / validation undertaken for the base case SIDRA model nor the justification for not undertaking it.
- It stated in the Traffic Impact Assessment report that "*Rather than driving to Sydney, people will likely walk, cycle or use public transport.*" which suggests that Sydney is the only destination, but in reality, trips will be to a wide variety of locations, not all of which will be well serviced by public transport. Similarly, some trips may not be conducive to public transport.
- The proposed development (394 units; 245 car spaces) replaces existing 46 dwellings and 95 spaces (i.e., approx. 2 spaces/unit). The Traffic Impact Assessment report states that the existing site is already generating trips, but there is no evidence of any traffic survey that shows the existing trip behaviour. This evidence would have been useful in deriving a credible estimate for the future trip-making behaviour, given the reduced supply of parking.
- TfNSW notes that Henderson Road and all local streets have been modelled with the incorrect speed limit of 60km/h. Posted speed limit on Henderson Road is 40km/h.

Parking rates

- Adoption of current low parking rates in the Traffic Impact Assessment report are supported. Further reduction should be encouraged given the proximity of public and active transport options as outlined in the Eastern City District Plan (p.52 *ensuring parking availability takes into account the level of access to public transport*).

Existing Road Furniture

- The TIA report prepared by SCT Consulting states that "*The footpaths are generally wide and able to accommodate this additional volume.*". The proposed demolition of the existing 46 social housing dwellings and construction of approximately 394 residential one, two and three-bedroom apartments will result in much greater use of footpaths for both cycling and walking.

Current footpaths are approximately 2.0m wide or may be less. These footpaths often accommodate garbage bins, trees, lighting and signposting poles and other street furniture. The footpaths are kerbed with a mountable type kerbing in many locations thus encouraging motorists to partially park on the footpath. Therefore, a greater emphasis should be placed on active transport modes within the area and to nearby destinations and footpaths with non-mountable kerb and gutter should be provided (Refer to SCT TIA Fig 5.5) that link to nearby destinations with sufficient width to accommodate proposed increase in pedestrian volume.

Active Transport

- Proposed future development of the site should prioritise place, walking and cycling as outlined in the Eastern City District Plan (p. 47 *Streets as places – which maximising opportunities for walking, safe cycling and social interaction is a priority and requires allocation of road space between footpaths, cycleways, public transport and vehicles that considers people’s safety needs and balances movement and place functions in response to the type of street and local conditions*) and various government policies. TfNSW note the following specific opportunities:
 - As proposed, Aurora Place doesn’t include footpaths. Therefore, consideration should be given in the future development of the area to include footpaths or a shared zone in accordance with the Network Planning in Precincts Guide (p. 55 *Provide dedicated footpaths on both sides of streets*).
 - Other footpaths should have widths that match the Walking Space Guide, include tree planting and be free of clutter.
 - Use of the smallest possible design vehicle as this will enable street corner radii to be kept low.
- The development should give consideration to providing or contributing towards the following active transport connections outside the development area to support sustainable travel in accordance with Eastern City District Plan (p. 36 *housing supply must be coordinated with local infrastructure to create liveable, walkable neighbourhoods with direct, safe and universally designed pedestrian and cycling connections to shops, services and public transport*):
 - A new cycle way on Henderson Road, to the south of the subject land. A cycling link should be provided between the western end of Explorer Street and the Henderson Road cycleway via the western end of South Sydney Rotary Park.
 - An active transport bridge across the rail corridor (as outlined in the Redfern Waterloo Authority Development Contributions Plan).
 - Providing additional prioritised crossing for walkers and riders across Progress Road and Henderson Road.

- A detailed plan would need to be submitted demonstrating how the design of the current cycleway along Railway Pde/ Henderson Road is impacted by the proposed vehicular access arrangements to and from site via Progress Road as part of a future development application.
- The site is located within a short walking distance of two major rail stations, Redfern (800m) and Erskineville (500m) stations and the future Waterloo Metro station which will be operational in 2024. While the number of bus stops are within a short walking distance of the development site are limited, the large coverage of destinations including employment, that is available from the site will drive public transport as the primary mode of travel for the employment purpose. This will mean more demand on buses. It will also mean greater need for high quality and safe footpaths and road crossings. There may be a need to widen signalised crossings in the area to accommodate this greater demand for example, the signalised crossings at the intersection of Henderson Rd / Raglan St / Botany Road may need augmentation to accommodate the extra demand. Further investigations should be undertaken to identify any mitigation / upgrade works (if required).

Travel Plans

- TfNSW is generally supportive of this rezoning proposal near significant public transport infrastructure and near employment zones. However, there will be a tendency for residents at the site to use personal vehicles. This may have an impact on the local street parking and will have an impact on the performance of road network surrounding the site. Therefore, consideration should be given to implement measures to reducing the reliability on car usage for residential units in areas well serviced by public transport options such as the location of the subject site.
- It is, therefore, necessary that travel plans, which have the potential to educate the individuals who currently drive to work from / to the site, are effectively developed by the proponent. The travel plans should form part of the conditions of consent for future development of the site and its occupants.

Construction and Traffic Management Plan (CTMP)

- A Construction Pedestrian Traffic Management Plan (CPTMP) detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to TfNSW for review and endorsement prior to the issue of a construction certificate.