

Reference: 22.076r03v01

24 February 2023

ABA Estate Pty Ltd
C/- Mecone
Level 2, 3 Horwood Place
PARRAMATTA NSW 2150

Attention: Tyson Ek-Moller, Associate

**Re: 93-145 Hoxton Park Road, 51 Maryvale Avenue & 260 Memorial Avenue, Liverpool
Proposed Mixed-Use Development
RFI Traffic Responses**

Dear Tyson,

We refer to the subject property and proposed mixed-use development located at 93-145 Hoxton Park Road, 51 Maryvale Avenue & 260 Memorial Avenue, Liverpool. TRAFFIX has been forwarded comments from Liverpool City Council as contained in the letter dated 8 February 2023. TRAFFIX has reviewed all relevant traffic comments and has responded to each item below.

2a) Mode Split

The Traffic Impact Assessment Report utilises a vehicle trip rate of 0.19 vehicle trips per unit during the morning peak hour and 0.15 vehicle trips per unit during the evening peak hour. These current vehicle trip rates are inadequate, as they represent sites in close proximity to railway stations with car mode split between 18% and 23%.

The Traffic Impact Assessment Report is to be updated to reflect vehicle trip rates which accurately represent high-density sites located within the Liverpool Local Government Area. Any adopted mode share splits in traffic generation potential should be consistent with the adopted mode share targets in the provided Green Travel Plan.

➤ **TRAFFIX Response:**

Council's comments are appreciated and are valid for suburban residential areas (primarily low density residential) that have limited public transport options and/or undesirable / infrequent bus routes.

This is however not applicable to the subject site being currently zoned for R4 High Density Residential, located directly opposite the Liverpool-Parramatta Transitway, which was one of the first bus **rapid transit infrastructure** delivered in Sydney. The intent of rapid bus infrastructure is to support rail services and filling the gaps in city's transport puzzle to support growth throughout greater Sydney. It is unseemly for Council to discredit this key public transport link in their LGA.

It is emphasised the subject site is conveniently located within 150 metres (approx. 1 minute) walking distance to the Maxwells T-Way Bus Stop (ID: 2170591), providing access to Bus Route T80 connecting between Liverpool CBD and Parramatta CBD. Bus Route T80 operates at approximate 10-minute intervals during commuter peak periods, consistent with many suburban rail service frequencies and is only a short 10-minute commute to the Liverpool CBD and Liverpool Train Station where commuters can enjoy seamless transition to the rail network, if required.

Indeed, the application of the traffic generation rates provided within the *TfNSW Technical Direction (TDT 2013/04a)* is appropriate in this circumstance for the subject development and the following are also noteworthy:

- The use of the *TDT 2013/04a* as a guide to determine trip rates to apply to a development located within Greater Sydney is best industry practice. Generally, it is only in the case where a traffic generation rate is not specified for a type of development or for special cases, that other rates such as those based on surveys of similar developments or first principle methods are used.
- The *TDT 2013/04a* traffic generation rate is based on ten (10) surveys conducted in 2012 with all development being close to public transport, greater than six (6) storeys and almost exclusively residential in nature. The development is almost exclusively residential nature and consists of six (6) buildings, all six (6) storeys in height. It is located in proximity (within 400m) of the Transitway (T-way) and other bus stops which are serviced by a variety of bus services. Details of the surrounding public transport are detailed within the Traffic Impact Assessment (TIA) (Ref: 22.076r01v03 dated 10 June 2022) and the Green Travel Plan (Ref: 22.076r02v01 dated 5 May 2022). Therefore, the surveyed developments would be comparable to the subject development and the rates provided within the *TDT 2013/04a* are applicable.
- Council requested a Green Travel Plan to be submitted with the application to assist in achieving greater sustainable transport (including walking, cycling, as well as all forms of public transport not just trains) usage in this area, and therefore to assume higher than currently surveyed high density residential vehicle trip generation rate is contrary to Council's sustainable transport targets.
- It is not reasonable to burden the client to produce a land use trip generation study for the entire Liverpool Council Area when TfNSW has invested in producing industry guidelines and updating the trip generation rates in *TDT 2013/04* which is adopted all across Australia. Council is welcomed to undertake an independent review of various published transport planning guidelines including trip generation rates to challenge or refute industry standard guidelines, and produce LGA specific transport planning guidelines that accurately represents all types of developments in the Liverpool LGA to provide an unprejudiced requirement for all development applications in the Liverpool LGA.
- DA-118/2017 at 311-313 Hoxton Park Road, Cartwright located some 2km west of the subject site comprising 14 residential apartments was approved by Council on 29 July 2019. The approved traffic report prepared by NSA Consulting (dated December 2016, reference: 161041) adopted the "0.19 vehicle trips per unit during the morning peak hour and 0.15 vehicle trips per unit during the evening peak hour" in accordance with *TDT 2013/04a*.
- DA-1113/2015 at 46-50 Hoxton Park Road, Liverpool located some 1.1km east of the subject site comprising 30 residential apartments was approved by Council on 13 April 2017. The approved traffic report prepared by Parking & Traffic Consultants (dated 2 October 2015, reference: T2-1484) adopted the "0.19 vehicle trips per unit during the morning peak hour and 0.15 vehicle trips per unit during the evening peak hour" in accordance with *TDT 2013/04a*.
- The subject development is located in proximity between two (2) existing development approvals which adopted "0.19 vehicle trips per unit during the morning peak hour and 0.15 vehicle trips per unit during the evening peak hour" in accordance with *TDT 2013/04a* and therefore these traffic generation rates also appropriately apply to the subject development.

2b) Local Traffic Management and Access Arrangements

The proposed development is expected to generate approximately 170vph in AM and PM peak hours. A Traffic Management Plan is to be submitted to Council showing vehicle travelling routes to and from the subject site along the surrounding road network. This is to show the impacts of westbound traffic along Hoxton Park Road to and from the subject site, as main access to the site is via two key intersections on Hoxton Park Road at Memorial Avenue and Maryvale Avenue with left in/left out arrangements only.

The additional traffic will have a noticeable impact on Dale Avenue. Consideration is to be given to providing local traffic management and amenity improvement works along Dale Avenue to address additional traffic movements. These are to be indicated within the amended VPA including a Local traffic management scheme required below within this letter.

➤ **TRAFFIX Response:**

As the request for information relates to the trip generation rate that was applied to the development, this will have a direct impact on the submitted traffic study.

A Local Traffic Management and Access Plan can be prepared in response to a suitable condition of consent if required, once an agreement has been reached with Council regarding the trip generation rates applicable to the site.

On the basis of the above, the proposed development in our view is considered supportable on transport planning grounds. We trust the above is of assistance and please contact the undersigned should you have any queries. In the event that any concerns remain, we request an opportunity to discuss these with Council officers prior to any determination being made.

Yours faithfully,

Traffix



Thomas Yang
Senior Engineer