

22 June 2022

TfNSW Reference: SYD22/00290/02
Council Reference: PP2022/0003

Mr Peter J Fitzgerald
General Manager
Cumberland City Council
16 Memorial Avenue, Merrylands NSW 2160
PO Box 42, Merrylands NSW 2160

Dear Mr Fitzgerald,

RE: PLANNING PROPOSAL FOR NEW HOTEL/MOTEL AND CAFÉ/RESTAURANT AT NO 245 GREAT WESTERN HIGHWAY, SOUTH WENTWORTHVILLE

Transport for NSW (TfNSW) appreciates the opportunity to provide further comment on the above proposal, which was referred to us by Council in correspondence dated 17 June 2022. We note that the proponent's additional traffic advice by Stantec dated 28 April 2022 intends to address TfNSW's concerns stated within our previous correspondence dated 4 April 2022 (Reference: SYD22/00290/01).

TfNSW has reviewed the planning proposal and supporting studies. We note that the proposal for the site seeks to amend the Cumberland Local Environmental Plan 2021 (the LEP) to:

- Amend the **Maximum Building Height (HOB)** control for the residential land (zoned R2) from 9 metres to 21 metres.
- Amend **Schedule 1 - Additional permitted uses** to the Cumberland LEP 2021 to add 'hotel or motel accommodation' and 'food and drink premises' as permitted uses for the site, by inserting the following clause at the end of the schedule:

"Use of certain land at 245 Great Western Highway, South Wentworthville

(1) This clause applies to Lot 100, DP 878926, 245 Great Western Highway, South Wentworthville, shown as "28" on the Additional Permitted Uses Map.

(2) Development for the purposes of hotel or motel accommodation and food and drink premises is permitted with development consent".

TfNSW's detailed comments are provided at **Attachment A**. It is requested that the comments provided are satisfactorily addressed and/or considered by Council in its assessment report on the Planning Proposal *prior* to any amendments to the *Cumberland Local Environmental Plan 2021* proceeding.

Should you have any questions or further enquiries in relation to this matter, please don't hesitate to contact Senior Land Use Planner – Andrew Popoff on 0413 459 225 or via email: Andrew.Popoff@transport.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read "Carina Gregory".

Carina Gregory
Senior Manager Strategic Land Use
Land Use, Network & Place Planning, Greater Sydney Division

**Attachment A: TfNSW comments on the Planning Proposal at No 245 Great Western Highway, South
Wentworthville**
(22 June 2022)

Comment - Vehicle Access and safety:

- Concerns are raised relating to the safety of the proposed entry access arrangements to the site noting its proximity to the adjacent traffic signals. Due to the size of the proposed development and the location of the proposed entry access being both near a slight bend and the adjacent traffic signals there is the potential for multiple vehicles to be briefly queued upon entry to the site. This is evidenced by the fact that the access road from the property leading to the basement car park and the café is only one lane wide. What this means is that when a vehicle is waiting to access the basement, the café/restaurant traffic could be forced to queue behind such vehicles. This may have the potential to impact road safety at this point along the Great Western Highway not just for westbound motorists but also for buses.

Furthermore, considering the location of the site on the Great Western Highway and the concerns raised within our previous correspondence dated 4th April 2022 (Ref: SYD22/00290/01), TfNSW's preferred solution would be for the proponent to provide a deceleration/storage lane (in accordance with Austroads Guide to Road Design Part 4a requirements) fronting the site and by relocating the entry/exit driveway access as close as possible to the western edge of the property boundary to the site as part of any future Development Application (DA).

However, should there prove to be feasibility design challenges for the development resulting in the inability to provide for a deceleration lane / revised access arrangements, then then the internal driveway area between the property boundary (i.e. at the location of the current proposed vehicle entrance) up to and including all entrances to the Basement and at-grade carpark needs to be designed to ensure a minimum width of 6.0m so that vehicles can pass another vehicle queued back. In addition, the potential lack of adequate parking provided for the restaurant is likely to also create a queuing effect and widening of this access road will assist in storing of vehicles onsite without having the risk of queuing back out of the property.

- The submitted plans illustrate that there are no provisions within the property for a turnaround facility to exit in a forward direction in case a vehicle turns into the site and doesn't want to enter the motel car park area.

Recommendation:

- Should the planning proposal be approved then any future Development Application (DA) for this site must provide supporting details associated with mitigation and/or management measures which ensure appropriate on-site manoeuvring, adequate vehicle turnaround facilities, and wayfinding signage to ensure vehicle travel paths are clear.

If revised access arrangements are feasible (i.e. deceleration/storage lane) fronting the site and relocating the entry/exit driveway access as close as possible to the western edge of the property boundary to the site, then the following recommendations apply:

- To ensure that an Austroads Guide to Road Design Part 4a compliant deceleration lane is provided by the proponent as a supporting piece of infrastructure which would be delivered as part of any future DA approval, TfNSW requires that suitable satisfactory arrangements are made.

To ensure compliance with the above recommendation it is suggested that a concurrence clause should be implemented within Part 6 Additional Local Provisions of the Cumberland LEP for this site regarding the provision of such infrastructure to ensure development consent cannot be granted for development on this property unless suitable concurrence is obtained.

Note: For Council's information, the following weblinks are provided to several examples of such a clause implemented within The Hills LEP 2019 for two Planning Proposals:

<https://legislation.nsw.gov.au/view/html/inforce/current/epi-2019-0596#sec.7.16>

<https://legislation.nsw.gov.au/view/html/inforce/current/epi-2019-0596#sec.7.23>

If revised access arrangements listed above are not feasible, then the following alternative recommendations apply:

- Any future Development Application (DA) for this site must ensure that the internal driveway area between the property boundary (i.e. at the location of the current proposed vehicle entrance) up to and including all entrances to the Basement and at-grade carpark needs to be designed to ensure a minimum width of 6.0m so that vehicles can pass another vehicle queued back.
- Any future Development Application (DA) for this site must ensure that no boom gates, or other access restrictions will be provided for this site to ensure that vehicles do not start to queue back onto the Great Western Highway and that vehicles can use the basement area to exit in a forward direction.

Comment – Worst Case Traffic and Parking impacts:

- Our previous correspondence dated 4 April 2022 raised concerns relating to:
 - The lack of clarity regarding whether the proposed gym, conference hall, etc could be also used by non-hotel/motel patrons or whether it would be limited exclusively to hotel/motel patrons only.
 - Concerns that the Traffic and Transport Assessment hasn't examined the worst-case traffic and parking impacts of the proposal if it is assumed that non hotel/motel patrons can also use facilities such as a gym, conference hall, health and wellbeing centre; and
 - Confusion over the ultimate number of rooms that the revised planning controls will allow (i.e. the Traffic and Transport (T&T) Assessment suggests up to a 100 room hotel/motel but the T&T Assessment was based on 76 rooms).

However, the additional information now provided by the proponent indicates that:

- The proposed hotel/ motel facilities such as the conference room, gymnasium and roof terrace are intended as ancillary to the main hotel/ motel use.

- The areas are small and consistent with the moderate scale of the development with use of all facilities intended to be for hotel/ motel patrons only, and as such, no additional traffic would be generated by these facilities.
- The development includes a 76 room hotel/ motel, not 100 rooms.
- Noting that the proposed café/restaurant will be ancillary to the proposed hotel/motel it is understood that it will also be open to the public. Therefore, TfNSW does not support the Traffic and Transport's recommendation of applying a 75% discount to parking requirements. As this will be open to the public, the parking provision for the proposed café/restaurant must ensure that an adequate number of parking spaces can be provided on-site. The discount to parking requirements has the potential to create parking issues that would trigger overflow parking onto the Great Western Highway which is of concern to TfNSW due to the location of the site.

However, we note that the additional information provided by the proponent indicates that such details can be confirmed as part of any future development application noting that there may be opportunity, if necessary to provide an additional level of basement parking.

- It is noted that the café/restaurant provides for about 6 car parking spaces and at grade loading bays for smaller vehicles. The applicant will need to address how deliveries for larger trucks (i.e. greater than vans) are managed. Where are these trucks going to be parked? If all the parking spaces for the café/restaurant are full then the vehicle would need to reverse back and use the basement carpark and exit onto the Great Western Highway.

Recommendation:

We note that some of our concerns listed above could be addressed at the Development Application stage. However, due to the concerns raised above, TfNSW recommends the following:

- Ensuring that within Part 6 Additional Local Provisions of the Cumberland LEP for this site that planning controls are implemented that:
 - Cap the number of hotel/motel rooms to no more than 76 rooms.
 - Ensure that minimum parking requirements are provided in accordance with the Cumberland DCP 2021, particularly for the café/restaurant.
- Any future Development Application (DA) for this site must ensure that a delivery management plan will be developed/provided by the proponents for both the Motel and the Café/Restaurant to ensure that deliveries for both sites occur outside the peak periods (in particular for the café/restaurant, there can be no deliveries to the site from 5pm to 9pm when all the parking spaces associated with the restaurant are likely to be occupied).