



14 August 2019

SF2019/150307; WST19/00172/01

General Manager
Orange City Council
PO Box 35
ORANGE NSW 2800

Dear Sir

**Orange LEP 2011 Amendment 13: Lot 15 DP 6694; Leeds Parade, Orange
Rezoning of RU1 and IN1 land to rural residential (R5 and E4) with nominal yield of 450 lots**

Thank you for the email dated 12 July 2019 referring the above planning proposal to Roads and Maritime Services for comment.

From review of the information provided, Roads and Maritime understands that:

- The proposal is to rezone a total of 291 hectares of land partly comprising the former abattoir site, north of Leeds Parade and Northern Distributor Road, and immediately east of the Main Western Railway.
- Some 35 ha of existing zoned IN1 General Industrial land and the balance of existing RU1 Primary Production will be reclassified into 275 ha of rural residential land (zoned a mixture of R5 Large Lot Residential and E4 Environmental Living) with a minimum lot size of 4000-8000 m², and the balance becoming RE1 Public Recreation. A master plan depicts an ultimate developed yield of 450 rural residential lots.
- Council circulated (*July 2019*) the planning proposal to interested government agencies and infrastructure authorities and is now preparing for public exhibition and consultation as required by the *Environmental Planning & Assessment Act*.

Roads and Maritime has also been involved in various reviews in this locality as part of its statutory roles (specifically in relation to speed zone reviews and as the authority for traffic signals). As such, Roads and Maritime has the following comments for Council as the Road Authority in their consideration as the rezoning proceeds:

- Noteworthy to Roads and Maritime is that the Northern Distributor Road plays a significant role in distributing traffic between land uses and classified roads in the local area and as such the broader context of the traffic impacts of the proposal should be duly identified and considered.

Roads and Maritime Services

- Any road safety or efficiency measures identified from the rezoning process should be addressed in conjunction with the rezoning, for example by amending Council's contributions plan to allocate responsibilities for funding and construction. Deferral until assessment of the development application may not allow adequate time to draft, exhibit and adopt proposed changes.
- In regard to the Traffic Impact Assessment (TIA undertaken by Geolyse, 2016), it is recommended that further consideration be given to the following:
 - The TIA relies on 2013 data (T&TPA for Bunnings) and does not consider more recent data (Stantec, *Orange Strategic Transport Model Update Report*, 2018) which generally represent a higher traffic baseline for both the 2018 and 2028 forecast scenarios. The findings of the TIA are therefore likely to significantly underestimate the impacts of the rezoning on traffic volumes and Level of Service (LOS). For example, the Stantec report identifies 750-1500 vehicles per hour and LOS C for 2018 traffic (eastbound in the AM peak and westbound in the PM peak) along Northern Distributor Road between Clergate Road and Leeds Parade. This suggests the road segment and roundabout may already be performing near capacity, noting that the current TIA (Geolyse) has calculated the Northern Distributor Road's capacity at 1200 vehicles per hour.
 - The analysis (including SIDRA modelling) has combined the impacts of previously approved developments (Bunnings and the highway service centre) with this proposal, and the incremental increase attributable to this development alone is not readily apparent. The peak hourly periods of Bunnings, the service centre and the proposed development may not coincide, leading to the TIA having underestimated the impact of the proposed development, as the baseline traffic may be lower than stated.
 - In the TIA section 3.2.3 the proportions of additional and passing traffic allocated to and from the Highway Service Centre from each leg of the roundabout are given (25% equally). It is considered that the actual allocation of trips should be in proportion to the Annual Average Daily Traffic (AADT) counts on each leg.
 - The TIA concludes that the roundabout is operating at existing LOS B (LOS C at Hanrahan Place, and overall Degree of Saturation 0.217) and that after completion of the development this will improve to LOS A (LOS C at Hanrahan Place, and overall Degree of Saturation 0.330) due to more even distribution of traffic causing the roundabout to function more efficiently. This is a significant improvement given the substantial increase in traffic proposed. The SIDRA parameters and modelling that underpin the conclusions made in the TIA should be independently checked by an experienced SIDRA practitioner.
 - The TIA has not considered the effects of a staged release or forecast take-up rate of lots by the market over time. Interim traffic scenarios for each stage between now and completion of the development should be analysed.
 - The TIA has not explained to what extent public transport will likely be provided between the subdivision and the city centre, and how the built environment will be designed to promote take-up by residents.
- The TIA proposes sole public road access via Leeds Parade and notes (at Section 1.1) that 'an access to Pearce Lane [Clergate Road] has been considered but discounted at this time due to the costs associated with upgrading...' The proposal has not adequately weighed the economic costs against the benefits of provision of an additional road link", which would include:

- Provision of a redundant road link for emergency management, for example in the event of a fire, spill, mass evacuation, or road crash severing or limiting access along any part of Leeds Parade. The subdivision has potential to accommodate around 1,000 occupants and so the likelihood of such an incident occurring should not be underestimated. This objective is reinforced in the publication *Planning for Bushfire Protection 2006*.
- Provision of a route between residences and the nearest local shopping precinct on Talopea Way (via Clergate Road and Farrell Road to the west) avoiding any use of Northern Distributor Road. Resident access to supermarkets and fast food retailers is a significant contributor to traffic demand, especially during the evening peak period. This is further clarified below in regard to the Northern Distributor Road / Talopea Way intersection:
 - Provision of a relief route for traffic during peak periods when the intersection of Leeds Parade with Northern Distributor Road is congested.
 - The possibility that residents may make their own access ways to Pearce Lane or across the rail corridor, unsafely and/or without approval, in their attempt to solve the above issues.
- At the signalised intersection of Northern Distributor Road with Talopea Way, traffic demand connected with the shopping precinct regularly results in queuing of the westbound right turn into Talopea Way, which has been the subject of previous traffic signal phasing review by Roads and Maritime.
 - The planning proposal will add nominally 450 new residences within this retail catchment, which will significantly add to the performance issues and queue lengths experienced at this intersection.
 - Queuing generally already extends beyond the length of the existing right turn lane, across the nearby intersection with Anson Street, and over the chevron-marked median.
 - A previous road safety funding submission was also initiated by Council to install a concrete raised median in the shape of the Chevron along the Northern Distributor road, preventing vehicles queuing across the Anson Street Intersection. The proposal also included augmentation of the existing linemarking.
 - It is suggested that analysis of traffic impacts at this intersection should be considered within the scope of the planning proposal. Any potential changes to phasing of traffic signals are to be reviewed by Roads and Maritime.
- A formal speed zone review by Roads and Maritime is currently underway along Leeds Parade at the request of Council in connection with traffic generated by the Bunnings development. Noting the possibility of cumulative traffic impacts resulting from the proposal, a Road Safety Audit should be performed from Northern Distributor Road to the site of the rezoning, to ensure any required road safety upgrades can be formally identified.
- Specific concerns in this regard include the interactions between existing geometry and operating speeds, narrow pavement widths, hazards within the roadside clear zone, and absence of centre / edge lines and delineation devices. Extension of connectivity for pedestrians and cyclists to the existing shared path along Leeds Parade is supported.

Thank you for the opportunity to comment on the proposal. Should you wish to discuss the matter further please contact Ainsley Bruem, A/Manager Land Use Assessment on (02) 6861 1449.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Dane Hendry', with a stylized, sweeping flourish extending to the right.

Dane Hendry
Senior Manager, Regional Customer Services
Western Region