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Sent: 13/03/2025 8:53:20 PM
To: DA Submission Mailbox
Subject: TRIMMED: Online Submission

13/03/2025

RE: DA2025/0132 - 37 Roseberry Street BALGOWLAH NSW 2093

To Claire

I strongly object to the MacDonald's for three main reasons.

1. Oppose 24/7 Operating Hours

Operating 24/7 is not appropriate on a residential street. Approving this sets a precedent for other multi-national corporations to create nightlife precincts in residential areas. All other NB Macdonalds have footprint on a main road, or are in a solely industrial area / business park which are more appropriate settings.

2. Traffic impacts

The traffic report has flaws which understate the impact. I have reviewed it with a transport engineer and found significant issues listed below*. Macdonald's will increase traffic through the biggest pinch point in this area, and they are already asking for changes to our streets to accomodate them. These will not be enough, especially with the rezoning of Manly Vale, and it's local rate payers who will have to foot the bill to fix the traffic issues.

Further evidence to the traffic impacts is that residents from Freshwater, North Manly, Manly, Fairlight and beyond have written submissions based on the traffic issues. The traffic impacts will be far reaching.

3. Pedestrian Safety impacts

As a pedestrian who regularly crossed the Kenneth and Roseberry intersection, it often doesn't feel safe with frustrated drivers who have been queuing extensively 'rushing' to make it through without looking out for myself, other pedestrians including many school children and parents with young infants. I worry about the safety impacts of further queuing and delays.

Significantly increasing traffic through this round about will make this worse, and put pedestrians at risk.

*Issues with Transport Impact Assessment

As mentioned, I have consulted a Transport Engineer who reviewed the Transport Impact

Assessment and provided their view on the assessment.

(1) Traffic generation rates used in TIA are not appropriate

Traffic generation rates have been based on the Transport for NSW Trip Generation and Parking Demand Surveys of Fast Food Outlets (2016). Section 7.3 of the report states "The linear regression and multiple regression showed no statistically significant relationships that described trip generation." Further, the sites surveyed, including Liverpool, Northmead, Rosehill, Stanmore, and Haberfield, have different transport contexts to site. The traffic generation rates applied based on the Transport for NSW 2016 report are not appropriate.

To estimate traffic generation for the site, the applicant should complete traffic and parking surveys of existing McDonald's sites with similar site context's, including but not limited to McDonald's Brookvale and McDonald's Cremorne. This should include surveys of the drive-through queue facility to understand back of queue characteristics.

(2) Proposed mitigation measures are not appropriate

The TIA suggests two mitigation options to ensure the vehicle access, located 30 metres south of Kenneth Street. Both options are not suitable as they are not expected to resolve the traffic management issues arising from the development for the following reasons:

- option 1 - recommends provision of a median along Rosebery Street, accommodated through removal of parking along the eastern side of the street. This would also result in a high proportion of u-turning movements, as vehicles arrive from the north and use adjacent driveways to turn around and approach the site, creating unnecessary pedestrian, cyclist and vehicle hazards along Rosebery Street. Further, any removal of parking is approved outside of the DA process, as part of Local Pedestrian Cycling and Traffic Calming Committee, and the applicant cannot guarantee this would be approved.
- option 2 - recommends provision of "no queueing" line marking along Rosebery Street. This line marking is highly unusual and typically only used for critical infrastructure, such as ambulance station egresses, rather than private development. This is therefore not a viable option. Further, the option recommends removal of parking along the eastern side of the street to accommodate a secondary "through lane". Similar to commentary provided on option 1, this is not approved through DA process and therefore the applicant cannot guarantee this would be approved.

(3) Concerns on SIDRA model development

The Transport Engineer agreed with Council's findings, and have raised the following additional comments with regards to the SIDRA model development.

(3A) SIDRA model has not been calibrated and validated to reflect existing conditions.

The report does not include any details as to whether the existing base traffic models has been calibrated based on site observations. Further, no information has been provided to validate that the model results represent existing conditions. This means that the "existing conditions" results may not be representative of actual site conditions and post-development modelling results should not be relied upon to complete the traffic assessment and support the development proposal.

The lack of calibration and validation is evident based on the following factors:

- no information is included to show how onsite queue lengths align with the 95th percentile queues in SIDRA
- no information is included to show how the SIDRA calculated cycle time/ phase times (processed using the Optimal Cycle Time) align with the actual cycle time/ phase times or
- the existing condition outputs (in particular, average vehicle queueing) do not seem

consistent with actual conditions

- in the afternoon model (page 29 of the TIA) the Degree of Saturation (DOS) of the east approach right turn movement exceeds 1.00. In accordance with the Transport for NSW Traffic Modelling Guidelines (Feb 2013), existing conditions models must have a DOS less than 1.0 (i.e. given all the traffic input to the model are based on the quantum of traffic that actually passed through the intersection (s) on the day of the surveys, the model must be capable of accommodating the survey volumes otherwise it clearly does not appropriately represent actual on-site conditions)

- the report provides no calibration notes around whether pedestrian protection has been applied at the Condamine Street/ Kenneth Road intersection. This is critical given high pedestrian volumes at this location associated with the B-line bus. It is important that this is included in models as it will reduce the amount of green time provided for the left and right turn vehicle movements, enabling the SIDRA model outputs to represent the likely queue lengths of vehicles more accurately.

Recommended action: The existing conditions model must be recalibrated, and post development condition must subsequently be reassessed.

(3B) Post development SIDRA model must consider traffic growth from cumulative development in the area

In accordance with section 3.4 of Transport for NSW Guide to Transport Impact Assessments, TIAs supporting this scale of developments should assess the impact of the development at year of opening. No background traffic growth has been considered in the post development assessment, and hence the TIA has only assessed the impact of the development at the year of survey completion, 2024, rather than at year of opening and does not comply with Transport for NSW requirements.

Recommended action: Based on the above, the following SIDRA modelling scenarios should be run:

- Existing condition: appropriately calibrated and validated based on on-site conditions (and suitable evidence of the calibration/ validation process provided)
- Base year: year of opening, with background traffic growth and without development
- Post development: Base year with development
- Mitigation scenario (s): Post development with mitigation scenario to offset impact of development to surrounding road network

(3C) Consultant to provide evidence of data used to validate models

Consultant to provide evidence of queue length surveys undertaken during the survey period to be used to calibrate the existing condition model. Consultant to confirm they obtained SCATs phasing data to establish cycle and phase times for the signalised intersection model, or provide evidence that observations of phase/ cycle time represent existing conditions.

Recommended action: if evidence cannot be provided, new traffic survey data and corresponding cycle/ phase time and queue length surveys should be completed, with a revised existing condition SIDRA model produced.

(4) Roseberry street not recommended for high traffic generating development

Roseberry Street is not appropriate to accommodate a high traffic generating development for the following reasons:

- Roseberry Street is a critical local connector road that experiences high traffic volumes as it acts as both a cut through between Kenneth Road and Balgowlah and also services key retail and industrial land uses
- Roseberry Street experiences frequent queueing back from the Kenneth Road intersection (and past the site access point)

- proximate to site, it has one travel lane and one parking lane in each direction. It cannot accommodate the expected significant uplift of turning movements into / out of the site access point without adversely impacting traffic conditions along this critical local connector road
- The surrounding road network infrastructure already operates with significant congestion during peak periods, with no plans to improve road infrastructure to accommodate notable uplifts in traffic demand. The road network cannot accommodate the significant traffic expected to be generated by the proposed development.
- The proposed development is therefore not compatible with the surrounding transport environment.

(5) Recommend Vehicle access width is reduced due to impact on pedestrians

The vehicle site access should be reduced to avoid impacts to pedestrians walking along Rosebery Street. The current width is excessive and is clearly not required to accommodate the swept path of design vehicles, as detailed in the TIA.