

YANDINA AND DISTRICT COMMUNITY ASSOCIATION

13 April 2021

Dear

It is unfortunate that it is up to the applicant to provide evidence about the impacts of the proposed development. They clearly have a vested interest in the outcome as would any consultant who wanted future work with the applicant.

The current assessment methodology relies very heavily on the applicant's consultants inputting accurate data to provide evidence about the impacts the proposed development will have on the current operating conditions of the State controlled road.

The onus is then on SARA to be rigorous in its appraisal of the applicant's evidence.

I am concerned that inappropriate data and incorrect claims have been used in the Traffic Study prepared by (traffic engineers) TTM Group to argue that a Traffic Impact Assessment is not required. It appears SARA accepted this argument as the applicant has not been asked to prepare a Traffic Impact Assessment.

Firstly, to ascertain the traffic volume of Farrell Street the TTM study uses *2019 Traffic Data Average by Hour* from traffic count site 20526 between Steggalls Road and Ninderry Road. That site, on the northern outskirts of Yandina, is not indicative of the traffic in the centre of town. All of Yandina's residential and industrial areas and rural areas east, south and west of town would not be counted at site 20526 between Steggalls Road and Ninderry Road.

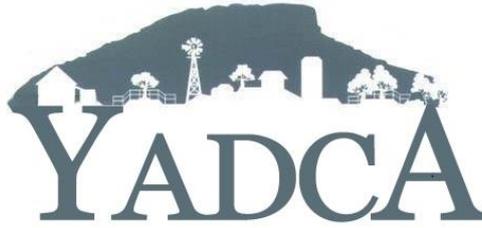
The proposed service station site is on the main intersection in the middle of town not far from the post office, bakery, cafes, take away food shops, bottle shop, fruit and veg shop, butcher, dress shops, hairdressers, tattoo parlour, School of Arts where many classes are held and a child care centre. Pedestrian and vehicle traffic is concentrated in this area.

Site 21225 at James Low bridge would give more representative town data. The annual average daily traffic count there is 8,450 compared to 4,478 at site 20526 between Steggalls Road and Ninderry Road, but even that is not accurate for the Farrell and Stevens streets intersection.

The data is two years old and in that time Yandina has experienced a building boom with several new subdivisions west of Farrell Street, a proposed 265 lot subdivision at south west Yandina and expansion of the Yandina east industrial estate.

The consultant argues that 60 per cent of service station customers will come from the south and yet he uses the lower traffic data from the north of town to argue that "additional traffic from the development site will have a negligible impact on the operation of Farrell Street." (TTM, December 2020, page18)

Secondly, the Traffic Report wrongly claims "*a parking lane is provided on both sides of Stevens Road (sic) ..... allowing a vehicle to pass a stopped right-turning vehicle at the intersection*". (Page 20) The two photos attached show Stevens Street at the intersection with Farrell Street. The first image is looking north across Stevens Street towards the proposed service station site; the second image is looking east towards Farrell Street. There is **no** parking lane. There is also no data on traffic volumes on Stevens Street.



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With regard to queuing, there is no consideration given to the type or length of vehicles likely to use the service station. The consultant has allowed for three vehicles queuing but, as I have mentioned in a previous email, there are many more trucks and vehicles with trailers at the BP service station in town than you would expect in an urban setting. This will impact on queuing, so needs proper assessment.

The TTR Traffic Report argues that, based on the (inappropriate) traffic data from a site north of town and the (incorrect) claim that both sides of Stevens Street have parking lanes that would allow for a vehicle to pass a stopped right turning vehicle, the applicant should not be required to do a Traffic Impact Assessment. This is based on a false premise.

The applicant wants to add a **new** entry/exit onto Farrell Street just 18.4 metres from a major intersection and increase the volume of turning traffic at that intersection in the middle of town. It will certainly have an impact on the operation of Farrell Street and on the safety of pedestrians, cyclists and drivers.

An accurate, up to date, Traffic Impact Assessment should be required.

Data should be collected on site, over an acceptable period of time and not confined to a desk top analysis.

Yours sincerely,

Marie Reeve  
Vice President