

# MEMO



26 April 2021

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(Via Email)

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Attn: Guy Smith

## RE: Oakdale West Estate Stage 3 Development (SSD-9794683) – Response to TfNSW RFI

Dear Guy,

I refer to the State Significant Development (SSD-9794683) in relation to the Lot 2A, 2C & 2D (the Site) at Oakdale West Industrial Estate, Kemps Creek (OWE), which is also referred as OWE Stage 3 Development. In this regard, Ason Group have reviewed the following documentations:

- TfNSW letter dated 18 March 2021 (*TfNSW reference: SYD20/01146/02*)

In this capacity, this letter has been prepared to address the relevant comments/recommendations included in the abovementioned RFI. Furthermore, a revised set of architect drawings has been developed to address those comments/recommendations and included as **Attachment 1**.

Accordingly, the following table provides a summary of relevant TfNSW's comments and Ason Group's responses.

**Table 1: TfNSW Comments (18/03/2021) and Ason Group Response**

Item No.	TfNSW Comment	Ason Group Response
<b>Active Transport Considerations</b>		
1	<p><b>Comments:</b></p> <p>Future Transport 2056 emphasises the importance of walking and cycling for short trips and reinforces the importance of walking and cycling to increase the catchment of public transport as part of the whole customer journey.</p> <p>Building Momentum - State Infrastructure Strategy 2018-2038 includes recommendations related to walking and cycling, including integrating transport with land use; managing travel demand; unlocking capacity in existing assets; and improving population health outcomes through more active transport.</p> <p>The Transport Assessment (TA) includes 20 bicycles spaces at Lot 2A and that the provision of bicycle parking facilities for Lots 2C and 2D does not currently form part of the proposal. Further, the TA does not mention the provision of any end of trip facilities for the three lots. The NSW Planning Guidelines for Walking and Cycling has been superseded by Cycling Aspects of Austroads Guides, 2017, which recommends that bicycle parking for all-day use on a regular basis should be expected to</p>	<p>Noted.</p> <p>Based on advice provided to us, the bicycle parking spaces for Lots 2C and 2D are located within the office site plans.</p> <p>In any event, it is expected that the provision of adequate bicycle parking and end of trip facilities will be readily satisfied as part of the Construction Certificate (CC) stage of the project and can be included as a suitable Condition of Consent (CoC).</p>

Item No.	TfNSW Comment	Ason Group Response
	<p>be combined with end-of-trip facilities such as showers, lockers etc.</p> <p><b><u>Recommendation:</u></b></p> <p>It is requested that prior to the issue of the Construction Certificate, the applicant be conditioned to provide bicycle parking and end of trip facilities for staff and visitors in accordance with Australian Standard AS1742.9:2018 Manual of Uniform Traffic Control Devices - Bicycle Facilities, and Cycling Aspects of Austroads Guides including:</p> <ul style="list-style-type: none"> <li>• Locate bicycle parking and storage facilities in secure, convenient, accessible areas.</li> <li>• close to the main entries incorporating adequate lighting and passive surveillance and in accordance with Austroads guidelines.</li> </ul>	
<b>Green Travel Plan</b>		
2	<p><b><u>Comments:</u></b></p> <p>The Transport Assessment includes a Preliminary Sustainable Travel Plan; however, it's considered that further inclusions are required in the plan. The recommendations below are provided to encourage the use of sustainable transport to the site, which will help reduce the use of single vehicle trips.</p> <p><b><u>Recommendation:</u></b></p> <p>It is requested that the applicant be conditioned to the following:</p> <ul style="list-style-type: none"> <li>• The applicant shall prepare a Green Travel Plan in consultation with TfNSW. The applicant shall submit a copy of the final plan to TfNSW for endorsement at development.sco@transport.nsw.gov.au, prior to the issue of the first occupation certificate. The Green Travel Plan should include, but not be limited to: <ul style="list-style-type: none"> <li>- be prepared by a suitably qualified traffic consultant;</li> <li>- include objectives and modes share targets (i.e. site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the GTP;</li> <li>- consideration of a staff travel survey and workforce data analysis to inform likely staff travel patterns and resultant travel plan strategies to / from the site;</li> <li>- implementation strategy that commits to specific actions (including operational procedures to be implemented along with timeframes) to encourage the use of sustainable transport and discourage the use of single occupant car travel to access the site;</li> <li>- details of bicycle parking and dedicated end of trip facilities including but not limited to lockers, showers and change rooms and e-bike charging station(s) for staff to support an increase in the non-car mode share for travel to and from the site;</li> <li>- a Transport Access Guide for staff and visitors providing information about the range of travel</li> </ul> </li> </ul>	<p>Noted.</p> <p>A detailed Green Travel Plan can be prepared as part of the Occupation Certificate (OC) stage of the project and can be included as a suitable Condition of Consent (CoC).</p>

Item No.	TfNSW Comment	Ason Group Response
	<p>modes, access arrangements and supporting facilities that service the site;</p> <ul style="list-style-type: none"> <li>- a communication strategy for engaging with staff and visitors regarding public and active transport use to the site and the promotion of the health and wellbeing benefits of active and non-car travel to the site;</li> <li>- include a mechanism to monitor the effectiveness of the measures of the plan; and</li> <li>- the appointment of a Travel Plan Coordinator responsible for implementing the plan and its ongoing monitoring and review, including the delivery of actions and associated mode share targets.</li> <li>• The plan shall be reviewed annually for at least the first five years and involve surveys, evaluation and review.</li> <li>• The plan (and any updates to the plan), shall be implemented and adhered to at all times by the applicant following the issue of the first occupation certificate.</li> </ul>	
<b>Heavy Vehicle Consideration</b>		
3	<p><b><u>Comment:</u></b></p> <p>All warehouses have been designed to accommodate 26m B-Doubles.</p> <p><b><u>Recommendation:</u></b></p> <p>The proponent should consider PBS2B vehicles as the design vehicle. While the performance between 26m B-Doubles and PBS2B is similar, the issue will be the storage length e.g. bay and swept path.</p>	<p>Swept paths analysis on the revised site plans for Lot 2A have been undertaken for 30 metres Super B-Doubles, as included in <b>Attachment 2</b>.</p>
4	<p><b><u>Comment:</u></b></p> <p>The Internal road is not designed for a one-way flow. Heavy vehicles will be required to manoeuvre within the estate road and may cross path with opposing trucks.</p> <p><b><u>Recommendation:</u></b></p> <p>The proponent should consider making internal roads one way to avoid conflicting movements.</p>	<p>Site Plan for Building 2A has been updated to allow for continuous two-way flow of 30 metres super B-doubles to avoid any potential conflicting movements.</p> <p>Based on the advice provided to us, due to the size and configuration of Buildings 2C and 2D, provision of a one-way traffic flow is deemed unfeasible.</p> <p>Furthermore, the heavy vehicle traffic generation of the proposed Buildings 2C &amp; 2D is estimated to be approximately 9 veh/hr during peak periods (assuming 30% of all vehicles), which is considered minimal hence it is not anticipated to have significant conflict between these vehicles in such a slow speed environment.</p> <p>It is also considered that the GFA and layout of Buildings 2C and 2D developments have readily been approved as part of the <a href="#">MOD 6</a> and they are generally consistent with buildings 1B and 1C layout.</p>

Item No.	TfNSW Comment	Ason Group Response
5	<p><b><u>Comment:</u></b></p> <p>There are no details on driver facility or staging area that will be provided in OWE.</p> <p><b><u>Recommendation:</u></b></p> <p>It is requested the proponent provide details of any driver facilities or staging areas that will be provided in OWE.</p>	<p>Based on the advice provided by AT&amp;L, it is noted that there are no staging areas within the estate. All staging is to be undertaken on the development lots.</p> <p>In this regard, for Building 2A we have proposed an unhitching area (refer to Attachment 2) with swept paths analysis undertaken for super B-doubles.</p> <p>It is noted that for Building 2C and 2D, the unhitching area has been nominated; however, attendance of larger trucks such as B-doubles / super B-doubles as necessary shall be subject to operational management plan to facilitate these movements.</p> <p>It is expected that the operational management plan will be prepared as part of the OC stage of the project and can be included as a suitable CoC.</p>
6	<p><b><u>Comment:</u></b></p> <p>It is unclear from Figure 7 provided in the TA whether Building 2D parking area will be accessed by both heavy vehicles and cars via the same driveway, or separately.</p> <p><b><u>Recommendation:</u></b></p> <p>The proponent should confirm whether there will be separate car/heavy vehicle access for Building 2D and provide justification if there is not. Sharing the access road will result in light vehicles mixing with a large amount of heavy vehicles.</p>	<p>Proposed Building 2D will provide only 55 on-site car parking spaces within a dedicated car parking area completely separated from the commercial areas and operational loading bays.</p> <p>It is noted that traffic generation of the proposed Building 2D car parking area is mainly related to the staff who will have detailed onsite briefing and inductions prior to the operation of the site. Same principle applies to the truck drivers attending Building 2D whom will be provided with a Code of Conduct and will be made aware of any possible conflict with the light vehicle movements.</p> <p>In any event the traffic generation of the proposed Building 2D in accordance with the traffic report now on exhibition has been estimated to be 9 veh/hr (light and heavy vehicle combined), which is considered minimal hence it is not anticipated to have significant conflict between these vehicles in such a slow speed environment.</p> <p>Having regard to the above, while the light and heavy vehicles will share the access, this will be managed to ensure safety of users.</p>
<b>West North South Link Road (WNSL)</b>		
7	<p><b><u>Comment:</u></b></p> <p>It is noted that the WNSLR and Estate Road 01 and Lockwood Road are expected be delivered prior to construction of this SSD. This development application is dependent on the construction of these roads, it is therefore important to understand the timeline for the delivery of these road connections. Should the construction of these lots begin prior to the completion of these roads, what is the alternative access arrangements?</p> <p><b><u>Recommendation:</u></b></p> <p>It suggested that timelines for the completion of the abovementioned roads be provided. In addition, in the event that these roads are not complete prior to</p>	<p>The WNSLR (now Compass Drive) is already constructed and other relevant Estate Roads will also be constructed prior to the operation of these warehouses.</p> <p>Construction traffic and access will be appropriately considered in the CTMP for the development. This considers safe construction traffic routes.</p>

Item No.	TfNSW Comment	Ason Group Response
	construction of these lots an alternative arrangement be provided.	
<b>SSD 7348 Mod 6 Approval</b>		
8	<p><b><u>Comment:</u></b></p> <p>TfNSW notes that the increase in this development applications yield relies on the approval of SSD 7348 Mod 6. The approval will affect the proposed building height and ridge height for Building 2.</p> <p><b><u>Recommendation:</u></b></p> <p>It is therefore advised that approval must be sort for SSD 7348 Mod 6 prior to any consent being provide for this development.</p>	Noted. Mod 6 has already been approved.
<b>Trip Generation Rate</b>		
9	<p><b><u>Comment:</u></b></p> <p>TfNSW raises concerns to the Department with regard to the adopted trip generation rate. The adopted trip generation rate for this development of 1.892 vehicles per day per 100m<sup>2</sup> of GFA is considered very low. The various land-use changes within the Western Sydney Employment Area (WSEA) have meant that the current adopted trip generation rate is 2.91, which is a much higher than what has been used to assess this development. If an assessment is not completed based on the current adopted figure, then there might be unknown adverse impacts on the network in future.</p> <p><b><u>Recommendation:</u></b></p> <p>It is therefore recommended that a model comparison of the traffic generation from this development application with the current adopted rate of 2.91 is undertaken to indicate if the model adopted is sufficiently calibrated to be fit for purpose. Justification and evidence should be provided to substantiate the adopted daily traffic generation.</p>	<p>As discussed in Item 8, the SSD 7348 Mod 6 has been approved including the latest changes relating to the OWE Stage 3 DA i.e. GFAs for Lots 2A, 2C and 2D.</p> <p>Furthermore, it is noted that the Mamre Road Precinct Study within WSEA is not yet finalised and is still subject to further reviews / consultations with both TfNSW and DPIE, hence not publicly available. In this regard, adoption of the previously approved traffic generation rates should be acceptable for this SSD.</p> <p>More importantly, there will be an Operational Traffic Management Plan (OTMP) prepared for this SSD which sets out mechanism to limit the traffic generation of all these three buildings to the approved threshold adopted by the SSD traffic report. This can be achieved via a CoC requesting an OTMP at OC.</p>
<b>Vehicular Access and internal road network</b>		
10	<p><b><u>Comment:</u></b></p> <p>The access for vehicular parking for building 2C is located in the centre of the development Lot (approximately 90m from the future SLR). Ideally the location of the vehicular access should be provided for away from intersections of major roads.</p> <p><b><u>Recommendation:</u></b></p> <p>Relocate the access for vehicular parking for building 2C north away further from the intersection of SLR.</p>	<p>Based on SIDRA modelling undertaken at the intersection of Estate Road 03 and future SLR as part of the OWE MOD 3 assessment, the maximum queue length from the future SLR is approximately 62 metres at Estate Road 03 during road peak hours (during peak season).</p> <p>Therefore, it is considered that the proposed location of access for vehicular parking for Building 2C provides sufficient queuing storage for the intersection of Estate Road 03 and future SLR</p>

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11	<p><b><u>Comment:</u></b></p> <p>The swept path plans for Building 2A indicate that simultaneous entry/exit cannot be achieved with the largest vehicles. This can lead to conflict points at the access to the lots where 2 opposing vehicles are attempting to use these accesses at the same time.</p> <p><b><u>Recommendation:</u></b></p> <p>The design of the access points should allow for simultaneous entry/exit movements of the largest vehicle. The swept path of the longest vehicle entering and exiting the subject site, shall be in accordance with AUSTRROADS and to the satisfaction of Council.</p>	<p>Site access for Building 2A has been widened to allow for simultaneous entry/exit movements of super B-doubles. It now provides separate entry and exit points with 2 metres median for pedestrian refuge.</p> <p>Relevant swept path analysis is included in Attachment 2.</p> <p>It is noted that, in order to provide this separate entry and exit at Building 2A, the revised scheme has resulted in a total reduction of 8 car parking spaces, which indicates a deficit of 7 car parking spaces.</p> <p>In general, staff arrival / departure time of warehouses are scheduled staggered; therefore, it is expected that the proposed car parking provision can still sufficiently accommodate on-site parking demand.</p> <p>Furthermore, additional car parking spaces can be provided as provisional spaces within hardstand area based on actual on-site parking demand of future tenant, if required.</p>
12	<p><b><u>Comment:</u></b></p> <p>In addition to the above point, it is noted that the design of the internal road network within Building 2A does not allow for continuous 2-way flow.</p> <p><b><u>Recommendation:</u></b></p> <p>The design should be updated to allow for the continual 2-way flow along the main access road, in particular on the corners where there is restricted sight distance to the satisfaction of Council.</p>	<p>Site Plan for Building 2A has been updated to allow for continuous 2-way flow of super B-doubles.</p> <p>Relevant swept path analysis is included in Attachment 2.</p>

We trust the above is of assistance and please the undersigned or Ali Rasouli should you have any queries or require further information in relation to the above.

Yours sincerely,



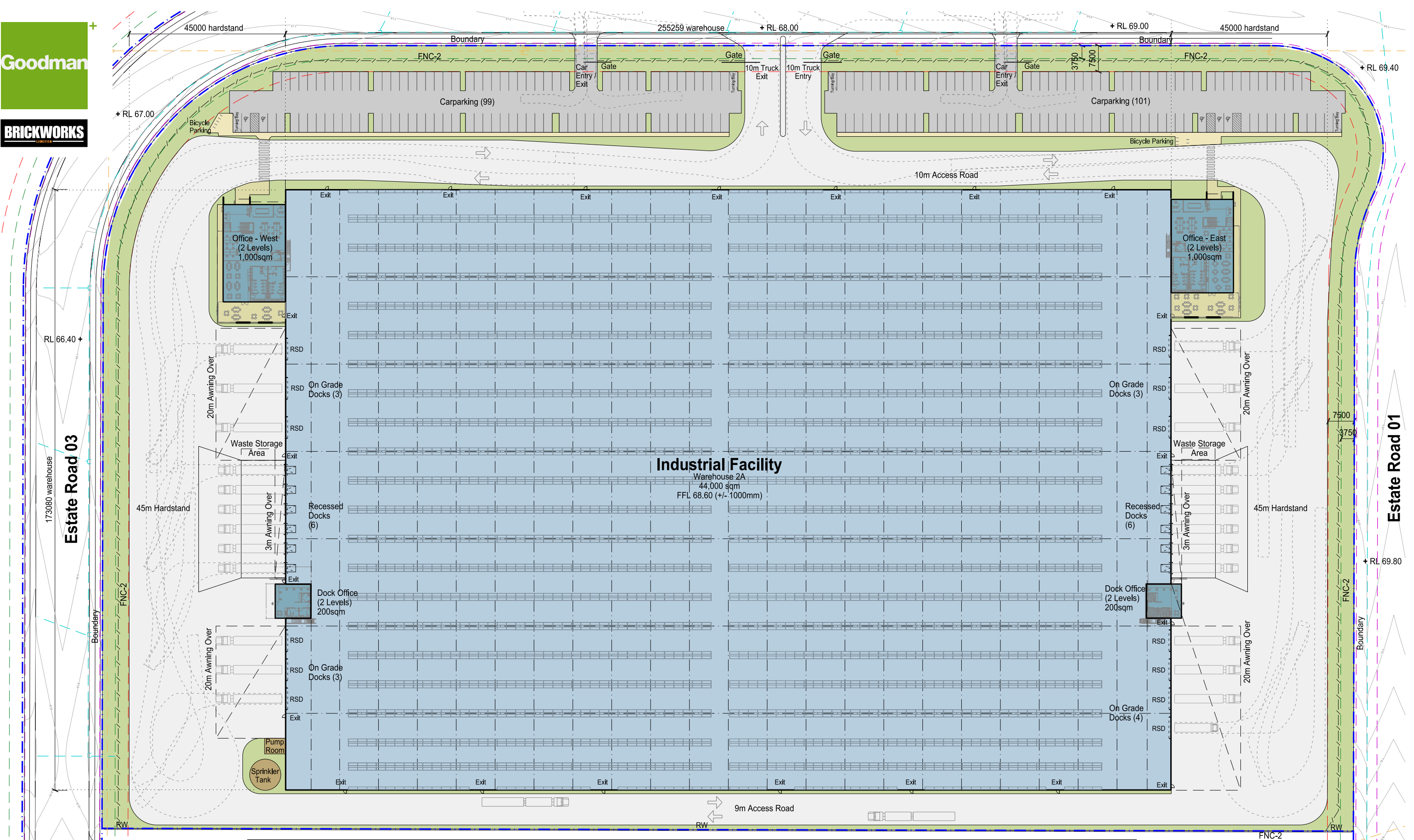
Sara Hu  
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**Attachments:** 1) Revised Site Plans  
 2) Swept Path Analysis

Attachment 1

Revised Site Plans





SERVICES LEGEND

Sewer

Stormwater

Electricity

Development Area Schedule					
Site Area	80,582	sqm	Office - West (2 Levels)	1,000	sqm
			Office - East (2 Levels)	1,000	sqm
			Dock Office West (2 Levels)	200	sqm
			Dock Office - East (2 Levels)	200	sqm
Warehouse	44,000	sqm	Total Building Area	46,400	sqm
			Awning	3,321	sqm
			Site Cover (exc. awning)	58	%
			Floor Space Ratio	0.58	: 1
			Hardstand Area	20,825	sqm
			Light Duty Area	5,100	sqm
			Carparking	200	
			(inclusive of 5 disabled spaces)		

LEGEND

Site Boundary

Lot Boundary

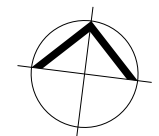
Building 7.5m Setback

Landscape 3.75m Setback

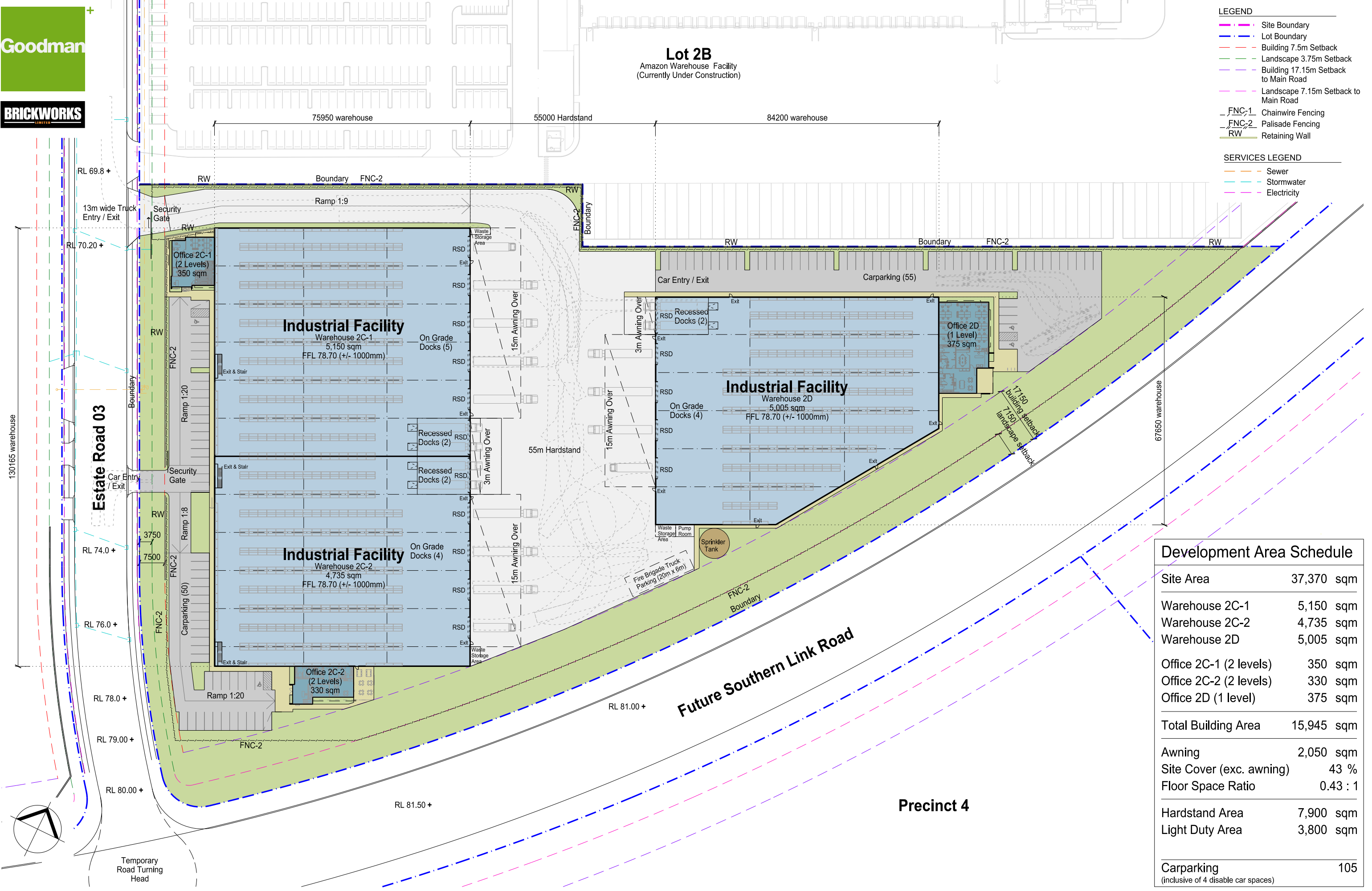
Chainwire Fencing

Palisade Fencing

Retaining Wall





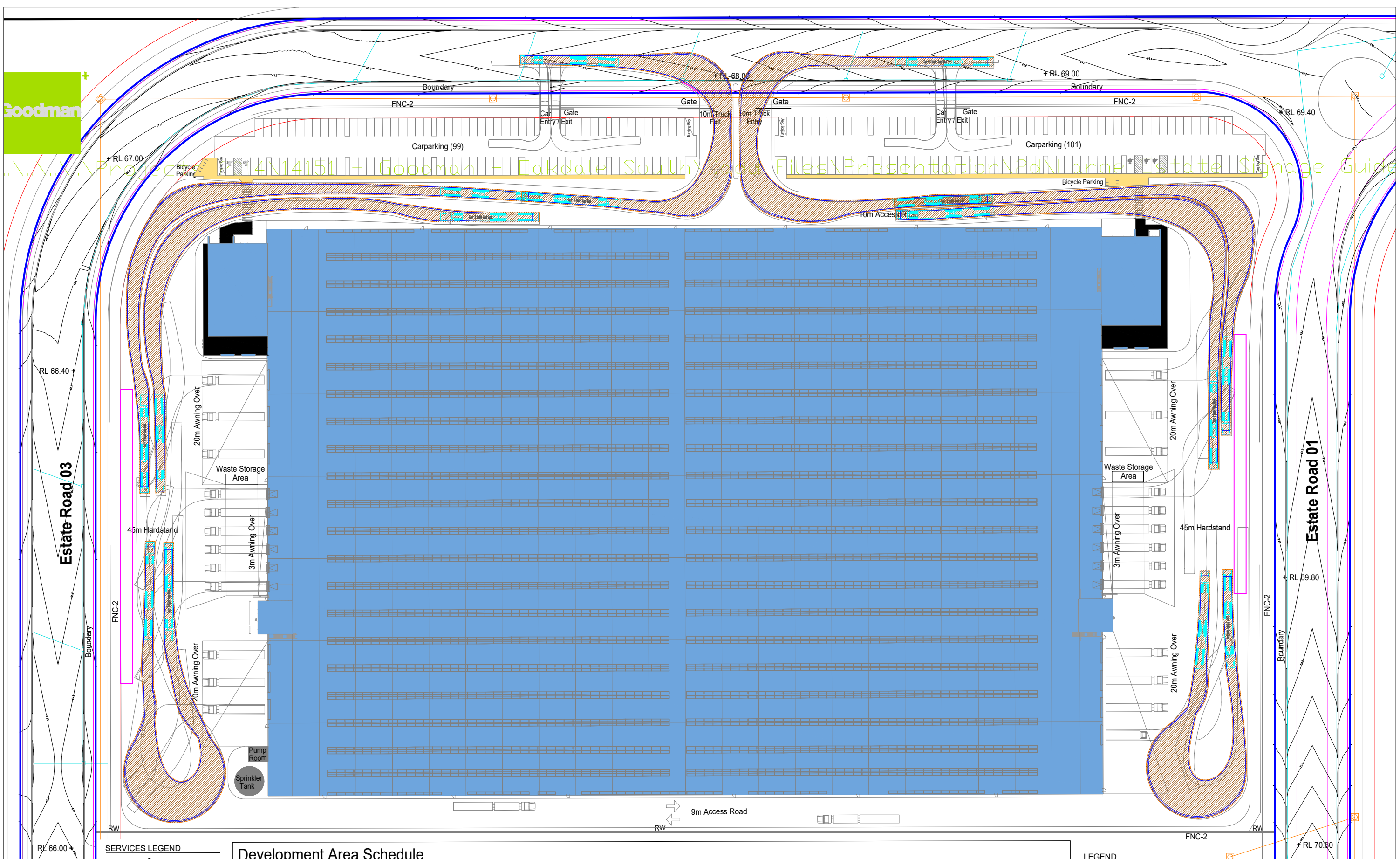


- LEGEND**
- Site Boundary
  - Lot Boundary
  - Building 7.5m Setback
  - Landscape 3.75m Setback
  - Building 17.15m Setback to Main Road
  - Landscape 7.15m Setback to Main Road
  - FNC-1 Chainwire Fencing
  - FNC-2 Palisade Fencing
  - RW Retaining Wall
- SERVICES LEGEND**
- Sewer
  - Stormwater
  - Electricity

Development Area Schedule	
Site Area	37,370 sqm
Warehouse 2C-1	5,150 sqm
Warehouse 2C-2	4,735 sqm
Warehouse 2D	5,005 sqm
Office 2C-1 (2 levels)	350 sqm
Office 2C-2 (2 levels)	330 sqm
Office 2D (1 level)	375 sqm
Total Building Area	15,945 sqm
Awning	2,050 sqm
Site Cover (exc. awning)	43 %
Floor Space Ratio	0.43 : 1
Hardstand Area	7,900 sqm
Light Duty Area	3,800 sqm
Carparking (inclusive of 4 disable car spaces)	105

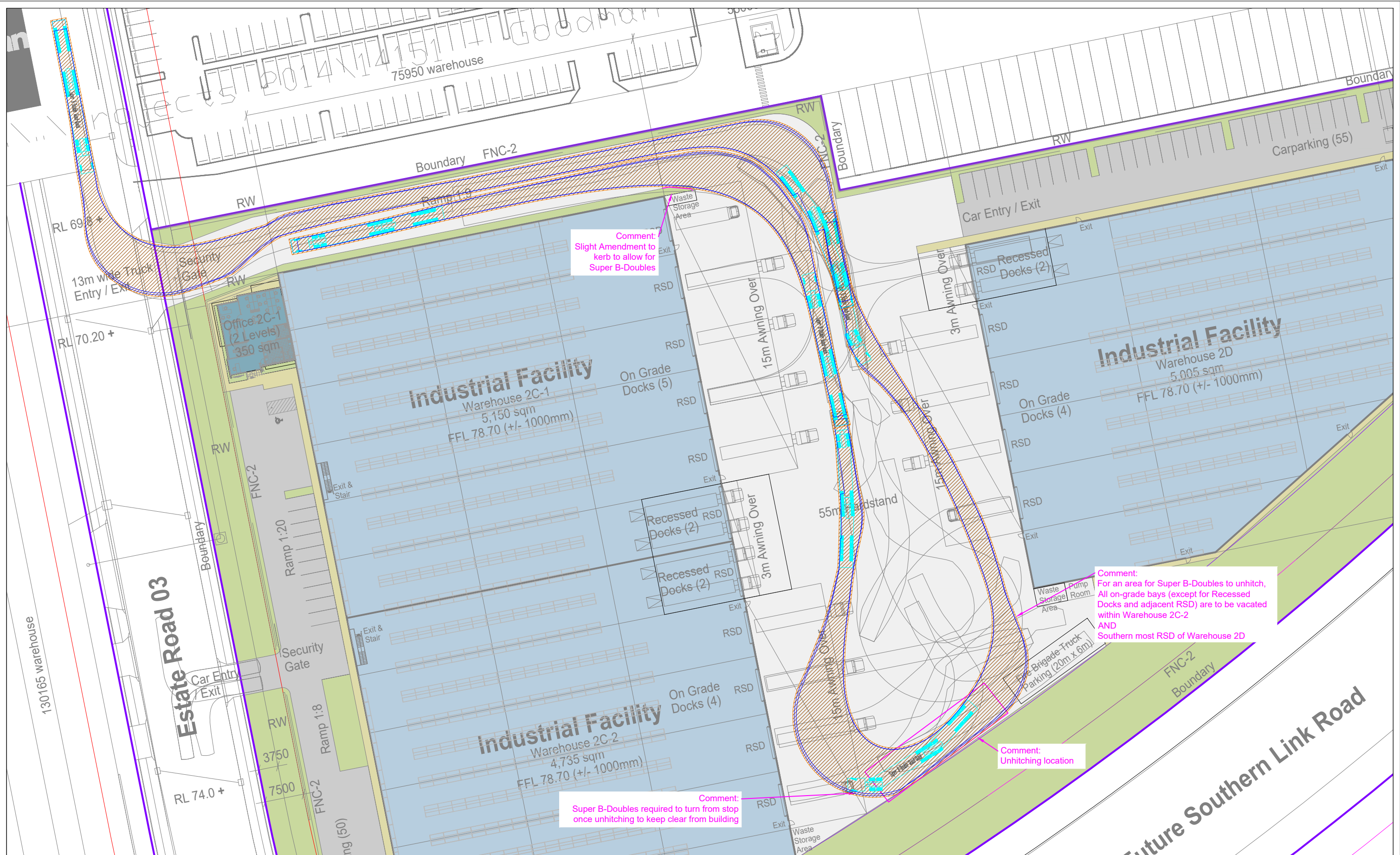
Attachment 2

Swept Path Analysis



<b>Notes:</b> This drawing is provided for information purposes only and should not be used for construction.		<b>Document Info:</b> Drawn by: JamesLaidler File name: 1518d01v5 Warehouse 2A.dwg		<b>Project:</b> 1518 OWE - Building 2A		<b>Date:</b> 26-Apr-21	
		<b>Client:</b> Goodman		<b>Drawing Title:</b> Continuous Two-way Flow 30.0m Super B-Double		<b>Scale @ A3:</b> [scale]	
						<b>Drawing Number:</b> AG.01	
						<b>asongroup</b> Suite 15.02, Level 5, 1 Castlereagh St Sydney NSW 2000 info@asongroup.com.au	





**Notes:**  
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**Document Info:**  
 Drawn by: JamesLaidler  
 File name: 1518d02v4 Warehouse 2C - 2E.dwg

**Client:**  
 Goodman

**Project:**  
 1518  
 OWE - 2C, 2D & 2E

**Drawing Title:**  
 Swept Path & Unhooking Location  
 30.0m Super B-Double

**Date:**  
 26-Apr-21

**Scale @ A3:**  
 [scale]

**Drawing Number:**  
 AG.07

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