

22 February 2022

Jaryd Fulcher-Collin
FDC
22 – 24 Junction Street,
Forest Lodge NSW 2037
jarydf@fdcbuilding.com.au
0434 563 858

Dear Jaryd,

65 HUNTINGWOOD DRIVE, HUNTINGWOOD – TRAFFIC RESPONSE TO SUBMISSIONS

The Department of Planning Industry and Environment (DPIE) and Transport for New South Wales (TfNSW) have raised traffic and transport-related concerns regarding the expansion of the existing processing facility located at 65 Huntingwood Drive Huntingwood.

The response below is broken into two sections. The first section is a response to the traffic-related matters contained within the formal RFI letter issued by DPIE on 2 December 2021. The second section outlines a response to some of the comments for consideration issued by TfNSW to DPIE on the 17 of November 2021.

1. RESPONSE TO COMMENTS FROM DPIE

- 1. Confirm the unloading locations for the existing and proposed silo buildings and the new smaller processing building. If the unloading locations are located in areas utilised for through traffic movements, it will need to be explained how the interaction between parked and transiting heavy vehicles will operate in practice.*

Urbis response – All heavy vehicles associated with the unloading of raw materials into the new processing facility designated HW2 is detailed in Section 4.2 and Section 4.7 of the Transport Impact Assessment (TIA) prepared by Urbis. The route paths of these vehicles are outlined in Figure 16 of the TIA. A further plan detailing the location of the loading areas for the silo buildings and smaller processing building is provided at **Appendix A**.

Loading for “Proposed Silo 1” will occur from the existing bulk ingredients in the unloading area associated with HW1. This is located in the existing hardstand area in the northeast corner of the site and adjacent to the northernmost existing internal roadway. This hardstand area measures 13m wide and 38m long.

Loading for “Proposed Silo 2” will be via the proposed service road wrapping around HW2. Loading of this silo will be managed as to ensure no heavy vehicles are using this road at the time of loading. This is possible as a maximum of one heavy vehicle per hour will be accessing the proposed loading dock and vehicle access around HW2 will be restricted to one-way.

Loading of the proposed smaller processing building, located to the south-east of the site will be from the existing hardstand area surrounding this building which provides ample space for a small van to load and unload. Access and loading arrangements are indicated in Section 4.2 and Section 4.7 of the Urbis TIA.

2. *Table 11 (TIA) – Total vehicle entries and exits for Huntingwood 1 are not equal. Huntingwood 2 is movements are equal.*

Urbis response – We confirm there was an error in Table 11 of the TIA (and Table 9 of the EIS). An updated table is provided below, with the correction highlighted in yellow.

Table 11 Estimated traffic generation by staff

Facility	Shift	Time	Vehicle Entries	Vehicle Exits
Huntingwood 1 (existing)	Day shift changeover	6:30-7:00 AM	174	0
		7:00-7:30 AM	0	109
	Afternoon shift changeover	2:30-3:00 PM	77	0
		3:00-3:30 PM	0	174
	Night shift changeover	10:30-11:00	109	0
		11:00-11:30	0	77
Huntingwood 2 (proposed)	Day shift changeover	5:30-6:00 AM	110	0
		6:00-6:30 AM	0	69
	Afternoon shift changeover	1:30-2:00 PM	94	0
		2:00-3:00 PM	0	110
	Night shift changeover	9:30-10:00	69	0
		10:00-10:30	0	94

Source: Arnott's

3. **DPIE matter 3 – In accordance with the submission made by Transport for NSW, the intersection performance of Brabham Drive and Great Western Highway shall be assessed.**

Urbis response – Discussions between Graham McCabe of Urbis and Felix Liu of TfNSW were undertaken on 13 December 2021. It was discussed and agreed that if sufficient justification could be provided to demonstrate that modelling of the intersection was not required, then it would not be necessary. Please refer to the below justification.

As outlined in the TIA, the new processing facility will operate according to the following shifts to avoid peak hour times (in particular 7 AM to 9 AM) and will be:

- Day shift – 6 AM to 2 PM
- Afternoon shift – 2 PM to 10 PM
- Night shift – 10 PM to 6 AM.

The only staff members that will be accessing / egressing the site during the network peak period will be the 16 additional office staff who work a typical 9 AM to 5 PM day and two additional heavy vehicles. The impacts of this have been assessed at a high level. Data from 2012 at the TfNSW counting station on the Great Western Highway 50m east of Rudders Lane was used for this assessment as this was the most recent relevant data available.

Assuming that new vehicles were distributed 50 / 50 eastbound and westbound along the Great Western Highway and all office staff drove, traffic generated by the site accounts for:

- 0.5 per cent of eastbound traffic in the AM peak.
- 1.4 per cent of westbound traffic in the AM peak.
- 0.8 per cent eastbound traffic in the PM peak.
- 0.43 per cent of westbound traffic in the PM peak.

This amount of additional generated traffic will have a negligible impact on the intersections concerned and will not need to be modelled.

2. RESPONSE TO TfNSW SUBMISSION

1. **Transport for NSW (Roads) has previously acquired a strip of land (known as Lots 7 and 8 DP 244378) for road along the Brabham Drive frontage of the subject property, as shown by the blue colour on the attached Aerial – “X”. TfNSW has also previously resumed and dedicated a strip of land as road along the Brabham Drive frontage of the subject property, as shown by the grey colour on the attached Aerial – “X”.**

The subject property also abuts a Declared Motorway (M4 Western Motorway) as shown by the blue colour and green hatching on attached Aerial – “Y”. Access is denied across this boundary.

All buildings and structures, together with any improvements integral to the future use of the site are wholly within the freehold property (unlimited in height or depth), along the M4 Western Motorway boundary

Urbitis response – The proposed development does not involve any new vehicle access or alterations to the existing vehicle access along Brabham Drive. In addition, no access is proposed from the M4 and all buildings and structures will be contained within the boundaries of the site.

2. ***TfNSW comment 2 – Prior to the issue of the first Occupation Certificate, the applicant should prepare an updated Green Travel Plan in consultation with and endorsed by TfNSW. The Green Travel Plan should be submitted to development.ctmp.cjp@transport.nsw.gov.au.***

Urbitis response – A Green Travel Plan (GTP) will be prepared before the issue of an occupancy certificate and will be in accordance with TfNSW requirements. This can be addressed by a Condition of Consent.

Notwithstanding the above, TfNSW recommends that the GTP adopt mode share targets for sustainable transport active and public transport that are unrealistic given the nature of the development. Car-pooling and shuttle bus services to and from train stations have been recommended by TfNSW as follows:

Figure 1 TfNSW proposed mode share for the site

Mode type – Proposed	Current mode share	TfNSW proposed mode share
Private vehicle as driver	90%	70%
Car as passenger	4.4%	10%
Bus + train	0%	10%
Shuttle bus	0%	10%

Source: TfNSW

Introducing a shuttle bus to provide connection between the site and local train stations will be an impractical solution due to:

- The time of shift changeovers (particularly 6 AM and 10 PM).
- The nature of work being undertaken at the site.

Few workers would be incentivised by the shuttle bus to take them to train stations, particularly late at night when services are reduced, and natural lighting is minimal. The following mode share is therefore proposed:

- 75 per cent private vehicle as driver.
- 15 per cent private vehicle as passenger.
- 10 per cent bus plus train.

Increasing carpooling to 15 per cent is a much more practical solution for reducing the dependence on staff driving alone to and from the site. Increasing public transport mode share by more than 10 per cent is also not a practical solution to offset the reduction of the shuttle bus as the existing public transport services are infrequent and indirect and unlikely to attract more than 10 per cent of workers to use the service.

3. *The Construction Traffic Management Plan (CTMP) detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be prepared and submitted to the Department for approval prior to the issue of a Construction Certificate. The CTMP must be in consultation with Council and be endorsed by Council and TfNSW. The document can be submitted to TfNSW via the email: development.ctmp.cjp@transport.nsw.gov.au.*

Urbis response – This can be addressed by way of Condition of Consent.

4. *The proposed “KEEP CLEAR” marking at the driveway does not meet the requirements set out in the Transport Delineation Guidelines, and should not be used for private driveway / access.*

Urbis response – The requirements set out in the Transport Delineation Guidelines are not mandatory and are to be used as a guide. All proposed markings are subject to Council approval.

5. *According to the construction staging plan, the existing staff car park would become unavailable during construction. Further parking study should be required to identify the potential parking shortfall during construction.*

Urbis response – Temporary car parking arrangements during construction is detailed in Section 3.3 and 3.4 of the TIA prepared by Urbis.

Peak car parking demand for the site for staff during construction will be:

- 323 if all staff drove.
- 290 if the current mode share (90 per cent) found in Section 2.4 of the TIA is applied.

Details as to whether the temporary parking arrangements can support the peak parking demand are outlined below:

- During the site remediation phase and Construction Stage 2, there will be sufficient car parking to support the maximum car parking demand in both peak scenarios listed above.
- During Construction Stage 1, there will be 281 car parking spaces available for staff to use (refer temporary parking layout provided at **Appendix B**) if car usage is assumed to be in line with the current mode share. **Appendix B** will be assessed against relevant council guidelines and Australian Standards prior to the issue of a construction certificate.
- Additional demand for spaces can be managed through the use of staggered arrival times during Construction Stage 1.
- The peak demand of 290 car parking spaces will not be for a long period of time, once staff members depart after the completion of a shift, demand is significantly reduced.

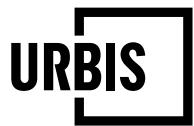
6. *It is understood that the traffic to and from the site mainly use the Great Western Highway intersections with Brabham Drive and Huntingwood Drive. Therefore, further assessment should be undertaken to gain the appreciation of the performance of these key intersections along Great Western Highway intersections and the impact of the proposed development on the classified road network.*

Urbis response – Refer to response under Section 1 above.

7. **The outbound construction vehicle haulage route in Figure 14 of the Transport Impact Assessment is incorrect. It should be noted that there is no southbound on-ramp from Great Western Highway into Westlink M7. The diagram should be updated with proper haulage route.**

Urbis response – We confirm there was an error in Figure 14 of the TIA. An updated Figure 14 is provided below.





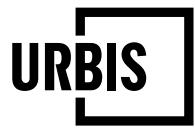
3. SUMMARY

We trust we have adequately responded to the traffic-related issues raised in the submissions from DPIE and TfNSW. Should you have any queries or require anything further please let me know.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Graham McCabe". The signature is fluid and cursive, with a small sketch of a road or bridge visible at the bottom right.

Graham McCabe
Director
+61 2 8233 7665
gmccabe@urbis.com.au



Appendix A

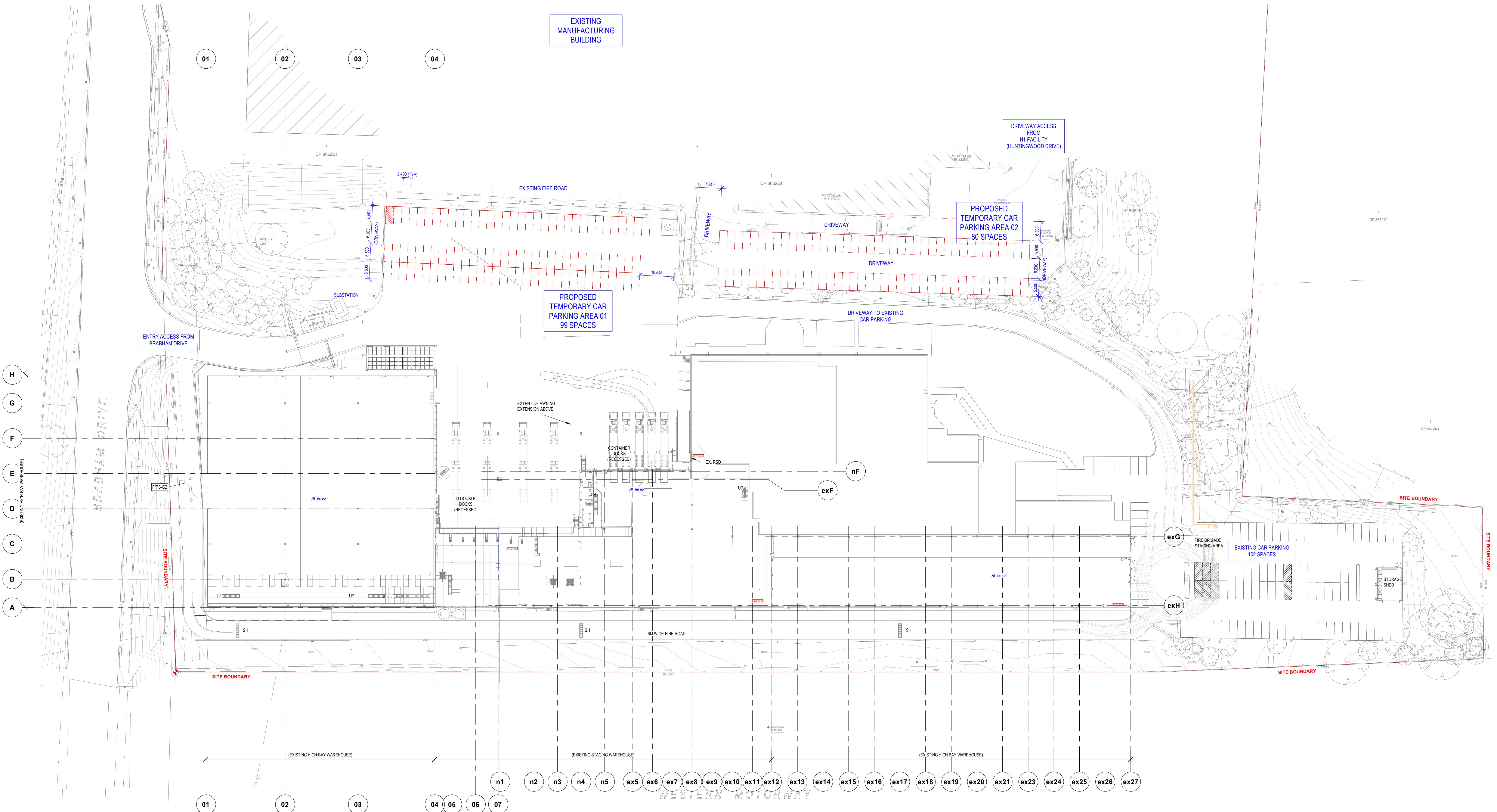
Figure showing loading areas for Silo Buildings and Smaller Processing Building



Appendix B

Temporary car parking arrangements during Construction Stage 1

Total Car Parking		
Type	Mark	Count
PK-CP	PK-CP1-5.5 x 2.4m - 90 deg	179
EXISTING	PK-CP1-5.5 x 2.5m - 90 deg	102



Temporary Car Parking Area Plan

ALL LEVELS ARE INDICATIVE ONLY AND SHOULD BE
READ IN CONJUNCTION WITH CIVIL ENGINEER'S
DRAWINGS FOR FINAL LEVELS OF ALL EARTHWORKS.

ALL LEVELS ARE TO BE +/-1000MM

DEVELOPMENT APPLICATION