17 August 2022

asongroup

Altis and Frasers JV
(Via Email)

Attn: Stephen O'Connor; Project Director

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Sydney, NSW 2000
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RE: Lot 10, 657-769 Mamre Road, Kemps Creek – Request for Additional Information – Transport Statement

Dear Stephen,

Reference has been made to the Department of Planning and Environment's (DPE's) and Transport for NSW's (TfNSW's) response in relation to the abovementioned project provided on 22 December 2021. It is noted that relevant traffic and transport matters have been included in our original Transport Assessment submission dated 5 November 2021. Furthermore, we provided detailed response to the TfNSW Response to Submission (RtS) dated 22 December 2021 including below comments on 18 January 2022.

In this regard, the Altis and Frasers Joint Venture (the JV) has requested Ason Group to provide further information, specifically relating to three of the comments outlined below in **Table 1**.

TABLE 1: RESPONSE TO TFNSW'S COMMENTS – DATED 22 DEC 2021

Item	TfNSW's Comments	Ason Group's Response
Modelling		
1	Comment: Section 6.1 – TfNSW raises concerns to the DPIE with regard to the adopted daily trip generation rate. The adopted trip generation rate for this development of 2.64 vehicles per day per 100m^2 of GFA is considered very low. The following Peak rates are included in the assessment: • AM Rate: 0.247 trips per 100m^2 of GFA; and • PM Rate: 0.182 trips per 100m^2 of GFA. The various land-use changes within the Western Sydney Employment Area (WSEA) has meant that the current adopted daily trip generation rate is 2.91 per 100sqm GFA, which is a higher than what has been used to assess this development. In addition it should be noted that the PM trip rate of 0.182 trips per 100m^2 of GFA and considerably lower than the than the agreed WSEA rate of 0.24 trips per 100m^2 of GFA. This trip generation rate has been used to consider all developments within the Mamre Road Precinct. If an assessment is not completed based on the current adopted figure then there might be unknown adverse impacts on the network in future in the PM peak. Recommendation: The daily and AM & PM Peak trip rates used for this report are to be updated to be consistent with the agreed WSEA daily trip generation rate of 2.91 per 100sqm GFA and the AM 0.23 & PM 0.24 peak trips per 100m^2 of GFA.	**Responses presented in our original letter (unchanged)** *To begin with, it is noted that the approved SSD-9522 and approved Modification 1 (MOD 1) applications include the following peak and daily traffic generation rates for the assessment:* • *AM Rate: 0.247 trips per 100m^2 of GFA;* • *PM Rate: 0.182 trips per 100m^2 of GFA; and* • *Daily Rate: 2.64 trips per 100m^2 of GFA.* *These rates were applied to the indicative 'ultimate built-form' with the following Gross Floor Areas (GFAs) at the respective sequences:* • *Approved Sequence 1A: 421,820m^2 of GFA with 20,000m^2 Southern Lots' GFA* • *Sequences 2 and 3: 421,820m^2 of GFA with 20,000m^2 Southern Lots' GFA* *No changes to the above rates have been made for the current SSD-25725029 application. As these rates have already been approved in subsequent applications, it is noted that TfNSW's rates are considered conservative.* *Furthermore, Ason Group has referenced the surveyed rates for vehicle trips during adjacent road AM and PM peak periods for the following three (3) industrial sites:* • *Site 1: Erskine Park Industrial Estate, Erskine Park;* • *Site 3: Wonderland Business Park, Eastern Creek; and* • *Site 4: Riverwood Business Park, Riverwood.* *These Sydney sites all exhibit similar attributes to those proposed for this SSD, including land-use and size of development.* *The approved Mamre West Precinct – known as First Estate – TIA adopted the trip generation rates surveyed for Site 1 (Erskine Park Industrial Estate) which was entirely reasonable given that the First*

Estate lies directly opposite the Erskine Park Industrial Estate. The rates surveyed at the Erskine Park Industrial Estate (and applied to the MWP) are:

- *AM Rate 0.134 trip per 100m^2 of GFA; and*
- *PM Rate 0.139 trip per 100m^2 of GFA.*

While it would be equally appropriate to apply these same rates to the MSP assessment, for the purposes of a worst-case assessment, this SSD has adopted rates which reflect the average rate of the 3 Sydney industrial sites.

Accordingly, the results of the assessments presented in this SSD are more conservative than what was undertaken for First Estate. This conservative approach provides flexibility for later developments to reflect minor changes that may occur over the life of the MSP.

Therefore, it is our opinion that the TfNSW suggested MRP trip generation rates are considered even more conservative than the above rates and exceed the surveyed trip generation rates. Therefore, the above rates are more suitable for the purpose of this assessment.

Notwithstanding, with the adoption of the 0.247 trip rate during the AM peak hour, the resulting traffic generation of 1,091 veh/hr is greater than the traffic generation for the MRP suggested rate of 0.23 and 0.24 veh/hr. Therefore, traffic modelling done with these rates already suggests a level of conservativeness that is beyond the suggested MRP rates. Hence, Ason Group has justified that additional SIDRA modelling is not required.

Additional Information (As Part of this Updated Letter)

1- Surveys of Similar Sites

The Mamre Road Precinct Study included reference surveys for six industrial sites with generally similar functionality to the MSP. Surveys were conducted in 2020 for the first 5 sites and in 2018 for the sixth site. The surveys found the road network peak hours and an average trip generation rate of:

- AM Peak: 0.18 trips per 100m2 GFA;
- PM Peak: 0.16 trips per 100m2 GFA; and
- Daily: 2.43 trips per 100m2 GFA.

Further to this, studies conducted for the 579 Mamre Road & 14A Distribution Drive, Orchard Hills found the following trip generation for the Mamre West Precinct Stage 1 (also known as First Estate Precinct). These surveyed rates are less than those established in the Mamre Road Precinct Study and highlight the suitability of the APPROVED Kemps Creek SSD-9522 rates also adopted for this Ardex SSD.

- 2020 survey
  - AM Peak: 0.15 trips per 100m^2 GFA; and
  - PM Peak: 0.11 trips per 100m^2 GFA.
- 2021 survey
  - AM Peak: 0.14 trips per 100m^2 GFA; and
  - PM Peak: 0.15 trips per 100m^2 GFA.

Accordingly, the above evidence of similar sites suggests that the adopted APPROVED trip rates for the Kemps Creek SSD-9522 is deemed acceptable and as such the Ardex SSD traffic generation review is **supportable**. The above surveys confirm that similar large-format industrial development traffic generation rates are lower than TfNSW recommended rates as well as the adopted rates for the current SSD-25725029 application.

We again emphasise that the APPROVED SSD-9522 already included traffic from Lot 10 (Ardex) and no additional assessment is therefore deemed relevant.

2- Revised MSP Masterplan GFA

Since original approval of SSD-9522 on 21/12/2020, the Project Team have updated the Master Plan through several Modifications (the latest approval being MOD 2). As such we have now attached the revised and latest Master Plan in **Appendix A.** According to the latest Master Plan, the overall GFA of the Kemps Creek Estate has reduced from the original 421,820m^2 assessed under SSD-9522 to a sum of 344,281m^2.

This means that the overall GFA has reduced by 77,539m^2.

We have therefore, undertaken a review of the traffic generation analysis based on the approved SSD-9522 masterplan GFA and the revised Master Plan with 344,281m^2 GFA.

Currently, the traffic modelling approved as part of the original SSD-9522 submission forms the following approved vehicular trip threshold for the entire estate (based on 421,820m^2):

- AM Peak Hour = 1,042veh/hr,
- PM Peak Hour = 768veh/hr, and
- Daily = 11,136veh/day

The revised Master Plan no longer seek 421,820m^2. Refer Appendix A which suggests the overall GFA for Estate is 278,927m^2 plus a sum of 65,354m^2 for the Data Centre (subject to SSD-10101987) totalling 344,281m^2.

The table below provides a comparison between the approved traffic generation threshold (under SSD-9522) and the estimated traffic generation based on TfNSW recommended rates for the overall estate under revised Master Plan.

Comparison between Approved SSD-9522 Masterplan and Ultimate Masterplan Traffic Generation

Scenario	GFA (m2)	AM	PM	Daily
Revised Masterplan	344,281	792 (@ 0.23 trips per 100m^2)	826 (@ 0.24 trips per 100m^2)	10,019 (@ 2.91 trips per 100m^2)
Approved SSD-9522 Masterplan (APPROVED THRESHOLD)	421,820	1,042	768	11,136
Difference	(-)77,539	(-)250	+59	(-)1,117

When compared with the traffic generation of the revised Master Plan following application of TfNSW recommended rates, it is evident that 250 and 1,117 less vehicular trips are generated from the revised Master Plan during the AM peak hour and daily respectively, due to reduced overall GFA. Therefore, the traffic generation under the revised Master Plan scenario falls below the approved traffic generation threshold during AM peak and daily periods.

Further, only a moderate increase of 59 vehicular trips is generated during the PM peak hour when applying TfNSW recommended rates to the revised GFA. This means a moderate increase on PM peak hour from what has already been approved which is not expected to have any material traffic impact on approved Sequences 1A and 1B.

Hence, the theoretical total traffic generation for the estate is considered comparable between both scenarios due to decreased GFA.

Therefore, the adoption of TfNSW rates is not deemed necessary for the proposed Lot 10. Hence this SSD- 25725029 for Ardex is supportable.

3- Trip-Based Assessment

As mentioned above, the revised Master Plan with a total of 344,281m^2 GFA includes a large tenancy with 65,354m^2 for the

proposed Kemps Creek Data Centre (SSD- 10101987). This means that ~19% of the overall revised GFA does not really generate any material vehicular traffic. This is a nature of such developments and according to the ARUP report, 10 August 2021 (available on Major Project website) for SSD-10101987, the proposal for the Data Centre is likely to generate an operational traffic volume in the order of 50veh/hr and 10veh/hr during AM and PM peak hours and 258 trips per day.

This is a clear indication that the additional 59veh/hr in PM peak hour, as discussed above can be offset by reduced traffic associated with the Data Centre. Once more confirming that the assessment approved under SSD-9522 is conservative and does not require any additional modelling for this Ardex SSD.

4- Tenant-Specific Information

Most importantly, it is recognised that many of the warehouses within the estate are already **planned to have immediate tenants**, hence, the actual traffic generation of such lots is known and has been found to generate much less traffic than the approved traffic generation based on approved rates.

A summary of the actual traffic generation of each Lot with an immediate tenant is shown below in bold while Lots that are speculative have been applied with approved rates.

Actual Traffic Generation Based on Tenant Information and Approved Rates Applied to the revised Master Plan

Lot	Tenant	GFA (m^2)[1]	AM	PM	Daily
Lot 1	Speculative	3,657	9	7	97
Lot 2	**Symbion**	**29,220**	**60**	**39**	**357**
Lot 3	Speculative	10,651	26	20	281
Lot 4	Speculative	26,621	66	50	703
Lot 5	TTI	74,109	183	140	1,956
Lot 6a	Speculative	9,360	23	17	247
Lot 6b	**CSC**	**8,570**	**20**	**20**	**90**
Lot 7	N/A	N/A	N/A	N/A	N/A
Lot 8	Speculative	14,935	37	28	394
Lot 9	Speculative	16,743	42	31	442
Lot 10	N/A	N/A	N/A	N/A	N/A
Lot 11a	Speculative	10,225	25	19	270
Lot 11b	**Probiotec**	17,085	**4**	**4**	**324**
Lot 12	**Ardex**	27,285	**44**	**5**	**350**
Lot 13	**Cargoline**	**30,466**	**20**	**24**	**126**
Stage 1 Subdivided Lot 2	**Data Centre**	**65,354**[2]	**50**	**10**	**258**
TOTAL (actual)			609	415	5,895
TOTAL (approved)			1,042	768	11,136
Difference (actual – approved)			-433	-353	-5,241

Notes: 1) GFAs are based on the revised Master Plan.

2) GFA based on traffic report prepared by Arup.

Above table confirms that the actual anticipated traffic generation of the estate is much lower than the approved threshold and provides for an **additional 433, 353 and 5,241 vehicular trips during AM, PM peak hours and daily, as contingency**. This provides additional offset for the estate traffic generation, readily satisfying all traffic modelling with increased contingency and without a need to undertake any more modelling with higher trip rates.

In summary – the application of TfNSW rates for the proposed development is not required and as such the Ardex SSD and

		assessments undertaken for the proposal included in our original TA is deemed sufficient and acceptable.
4	Comment: Section 6.7 - future SLR /Bakers Lane/NS Road 01 - It should be noted that the layout of this intersection is not supported by TfNSW. TfNSW has provided preliminary guidance on the 3 November to the applicant and DPIE regarding the layout and modelling of this intersection (Attachment B). This guidance was given to the applicant based on the following condition (B18) for SSD 9522 (Masterplan): **Internal Road Network and Southern Link Road** B18. Prior to the commencement of any construction (excluding bulk earthworks) on lots 1-4 north of Bakers Lane, the Applicant must prepare a concept design demonstrating how the internal road network can provide access to lots 1- 4 and link to the future Southern Link Road. The design must be prepared in consultation with TfNSW and to the satisfaction of the Planning Secretary. ***Note:*** *The concept design must address access arrangements to lots 1-4 both with and without the future Southern Link Road, including ensuring any access points are an appropriate distance from signalised intersections.* As TfNSW does not support the intersection design the modelling inputs for the 2036 year model are not supported. Recommendation: In order to provide accurate assumptions for 2036 model, it is recommended that the applicant continue to develop the intersection design relating to SSD 9522 Condition B18 in consultation with TfNSW.	Following extensive consultation with DPE, TfNSW and the Project Team, it is noted that Modification 3 of SSD-9522 (MOD 3) is no longer seeking approval of Lots 1 & 4, therefore, they have been removed from that application. Hence, the future SLR / Bakers Lane / NS Road 01 intersection will be addressed in future modifications and Condition B18 from the approved SSD-9522 Conditions of Consent will be retained. The ultimate signalised intersection design and modelling for the SLR / Bakers Lane / NS Road 01 will be referred in another Modification.
5	Comment: Section 6.7 - future SLR /Bakers Lane/NS Road 01 – the report states 'the Site's truck exit point has been located approximately 150 metres from the stop line of the southern approach for the potential signalised intersection which confirms that the queue back from the signal will not impact the access point.' It is not clear where this access is in relation to the signals as there is no plan provided. Recommendation: A plan should be provided or referenced indicating where the intersection in relation to the site truck exit point.	Following extensive consultation with DPE, TfNSW and the Project Team, it is noted that MOD 3 is no longer seeking approval of Lots 1 & 4, therefore, they have been removed from this application. Hence, the future SLR / Bakers Lane / NS Road 01 intersection will be addressed in future modifications and Condition B18 from the approved SSD-9522 Conditions of Consent will be retained.

We trust the above is of assistance and if you have any inquiries, please do not hesitate to contact the undersigned.

Yours sincerely,

Dr Ali Rasouli

Principal Traffic Engineer

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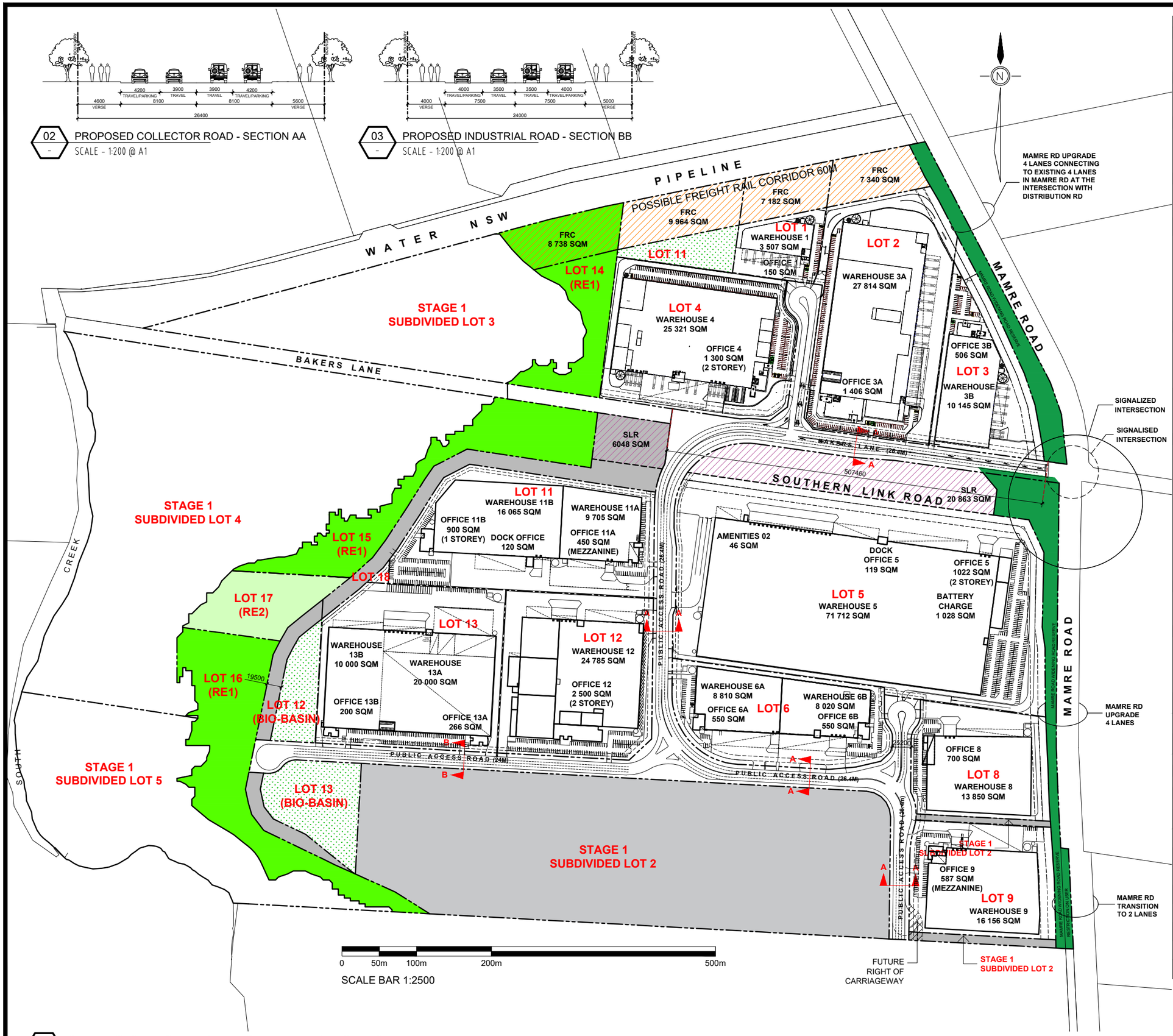
Appendix A
Revised Masterplan

02 - PROPOSED COLLECTOR ROAD - SECTION AA
SCALE - 1:200 @ A1

03 - PROPOSED INDUSTRIAL ROAD - SECTION BB
SCALE - 1:200 @ A1



01 - STATE SIGNIFICANT DEVELOPMENT APPLICATION PLAN
SCALE - 1:2500 @ A1

DEVELOPMENT AREAS			
LOT 1 **		16654 SQM	
WAREHOUSE	1		3507 SQM
OFFICE	1		150 SQM
			3657 SQM
LOT 2**		62449 SQM	
WAREHOUSE	3A		27814 SQM
OFFICE	3A		1406 SQM
			29220 SQM
LOT 3		25403 SQM	
WAREHOUSE	3B		10145 SQM
OFFICE	3B		506 SQM
			10651 SQM
LOT 4		46886 SQM	
WAREHOUSE	4		25321 SQM
OFFICE	4		1300 SQM
			26621 SQM
LOT 5 **		145527 SQM	
WAREHOUSE	5		71813 SQM
OFFICE	5		1030 SQM
DOCK OFFICE	5		121 SQM
BATTERY CHARGE			1032 SQM
PUMP ROOM			65 SQM
AMENITIES 02			48 SQM
			74109 SQM
LOT 6		33833 SQM	
WAREHOUSE	6A		8810 SQM
OFFICE	6A		550 SQM
WAREHOUSE	6B		8020 SQM
OFFICE	6B		550 SQM
			17930 SQM
LOT 8		26256 SQM	
WAREHOUSE	8		14235 SQM
OFFICE	8		700 SQM
			14935 SQM
LOT 9		28899 SQM	
WAREHOUSE	9		16156 SQM
OFFICE	9		587 SQM
			16743 SQM
LOT 11		49808 SQM	
WAREHOUSE	11A		9705 SQM
OFFICE	11A		450 SQM
GF ENTRY	11A		70 SQM
WAREHOUSE	11B		16065 SQM
OFFICE	11B		900 SQM
DOCK OFFICE	11B		120 SQM
			27310 SQM
LOT 12		43682 SQM	
WAREHOUSE	12		24785 SQM
OFFICE	12		2500 SQM
			27285 SQM
LOT 13		51693 SQM	
WAREHOUSE A	13		20000 SQM
OFFICE A	13		266 SQM
WAREHOUSE B	13		10000 SQM
OFFICE B	13		200 SQM
			30466 SQM
LOT 11 ** (BIO-BASIN)		15753 SQM	
LOT 12 (BIO-BASIN)		7177 SQM	
LOT 13 (BIO-BASIN)		13259 SQM	
LOT 14 ** (RE1)		20261 SQM	
LOT 15 (RE1)		24642 SQM	
LOT 16 (RE1)		31481 SQM	
LOT 17 (RE2)		12378 SQM	
LOT 18		425 SQM	
STAGE 1 SUBDIVIDED LOT 2		140392 SQM	
STAGE 1 SUBDIVIDED LOT 3		62087 SQM	
STAGE 1 SUBDIVIDED LOT 4		152148 SQM	
STAGE 1 SUBDIVIDED LOT 5		58452 SQM	
PUBLIC ACCESS ROADS		55768 SQM	
UNRESOLVED LAND USE**		24956 SQM	
BAKERS LANE ROAD WIDENING		2668 SQM	
MAMRE ROAD DEDICATION		26690 SQM	
TOTAL		**1179627 SQM**	**278927 SQM**
TOTAL SOUTHERN LINK ROAD (SLR) **		26911 SQM	
TOTAL FREIGHT RAIL CORRIDOR (FRC) ***		33224 SQM	

REVISION	DESCRIPTION	DATE
A	FOR INFORMATION	29/06/2022

LEGEND
- BULK EARTHWORKS
- BIO-BASIN
- ZONE RE1
- ZONE RE2

NOTE:
* BAKERS LANE TO BE WIDENED TO 26.4m
** LOTS INCLUDE SLR / FRC LAND
*** SLR AREAS SHOWN ON LOTS 5 & 10
*** FRC AREAS SHOWN ON LOTS 1, 2, 11 & 14

N

ALTIS PROPERTY PARTNERS
FRASERS PROPERTY

COMMERCIAL & INDUSTRIAL DIVISION
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BUILDING C, LEVEL 3
RHODES NSW 2138
PHONE 02 9767 2000
FAX 02 9767 2908
PO BOX 3307
RHODES NSW 2138

PROJECT
STATE SIGNIFICANT DEVELOPMENT APPLICATION PLAN FOR KEMPS CREEK

ADDRESS
MAMRE ROAD & BAKERS LANE
KEMPS CREEK

DRAWING TITLE
STATE SIGNIFICANT DEVELOPMENT APPLICATION PLAN

SCALE	1:2500 @ A1
DRAWN	MR
CHECKED	MP
DATE	29.06.22
JOB NUMBER	0000-00-000

DRAWING NUMBER: SSD-MRM-TM-021
ISSUE: A