3 September 2024

Chris Ritchie
Director, Industry Assessments
Department of Planning, Infrastructure and Housing
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150.

Dear Chris

WASTE MANAGEMENT FACILITY, BOTANY (SSD-62855708) – GOODMAN SUBMISSION

Goodman has several concerns regarding the Waste Management Facility (SSD-62855708) at 2-4 Hales Street (the Site), which is currently under consideration for the construction and operation of a waste management facility handling up to 300,000 tonnes of construction and demolition waste per annum (the Proposal). Our primary concerns involve the traffic impacts resulting from the Proposal.

Goodman owns the Port Air Industrial Estate (34 Luland Street & 1&1A Hale Street / Lot 100 DP1213007) (The Estate), situated to the south of the Site:

Figure. 1 - The Site (red) & The Estate (green)

The Estate spans 186,300 sqm with a gross floor area of 95,382 sqm, accommodating sixteen tenants, nine of whom conduct port-related operations. All tenants rely heavily on frequent truck movements for their warehouse and distribution activities.

AU02-1967080693-63828\2.0Goodman Group
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- Paul's Custom and Forwarding Solutions Pty Ltd
- Pendulum Logistics Pty Ltd
- R Weatherdon and Co Pty Ltd
- Visco Selected Fine Foods Pty Ltd

Traffic Impact

Heavy vehicle access to / from the Estate is limited to Hale Street (refer to Fig.1 in yellow) between 7am-6pm to Foreshore Drive, with *out of hours* access also permitted via Luland Street (blue). No heavy vehicle access is allowed via Botany Road, putting significant strain on the Hale Street/Foreshore Drive route to handle heavy vehicle access to the Estate. Traffic congestion along Hale and Luland Streets has increasingly become an operational bottleneck for the Estate.

We are particularly concerned that the Proposal's additional 412 vehicle trips per day will exacerbate the already strained conditions on Hale and Luland Streets, leading to further congestion and delays.

An evaluation of the Traffic Impact Assessment (TIA) supporting SSD-62855708 revealed deficiencies that must be addressed to ensure an accurate reflection of the Proposal's traffic impacts, validating its acceptability. These include:

- **Lack of Calibration or Documentation.**
    - The TIA does not indicate whether the traffic model was calibrated against observed queue lengths or other traffic data, raising doubts about the accuracy of the current traffic representation.
    - The SEARs specifies that the assessment must include:
      "An assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts on existing performance levels at key intersections, using a calibrated SIDRA (or similar) traffic model."

- The TIA lacks information on whether or how the base case model was calibrated. Calibration typically involves comparing observed and modelled queue lengths and signal phase times to ensure accuracy.

- Data for Calibration: Observed signal times should be obtained from Transport for NSW (TfNSW) by requesting SCATS history data files recorded on the days when traffic counts were conducted.

- Due to the absence of documented calibration details, it is questionable whether the model has been accurately calibrated. Any performed calibration should be documented in the TIA.

- **Discrepancies in Traffic Queuing**

  - There appear to be discrepancies between the modelled and observed traffic queues on Hale Street. These differences suggest the base case model may not accurately represent actual traffic conditions.

  - Base Case Queue Lengths: The modelled maximum queue lengths on Hale Street in the base case (existing situation) are:
    - AM Peak: 47 metres
    - PM peak: 63 metres

  - Concerns Over Accuracy: The report does not indicate whether the model was calibrated to observed queue lengths, nor does it provide observed queue lengths. Google Maps, despite being not the appropriate tool for this purpose, typically shows significantly larger queues on Hale Street, extending beyond the roundabout at Hale Street and Luland Street, as depicted in the figure below.

Figure 2 – Google queuing delay, Hale Street

  - Although Google Maps might not always capture peak hour queues, it underscores the need for collecting accurate queue length data.

- **Study Area Considered for SIDRA Intersection Modelling**

- The traffic assessment is limited to the single signalised intersection of Foreshore Road with Hale Street. Though generally suitable for a project of this scale, it should also consider downstream and upstream impacts from adjacent intersections.

- The roundabout at Hale Street and Luland Street was excluded despite being crucial for Estate access, limiting the TIA's comprehensiveness.

- Since Luland Street serves as the primary access road to the Estate, the exclusion of this intersection limits the ability of the TIA to evaluate the Proposal's direct impact on this vital access route.

- Given the identified queue extensions and project implications towards Botany Road, an operational assessment of this roundabout is essential.

- **Model Accuracy**

  - The base case model indicates Level of Service (LOS) A for peak hours at the Foreshore Road/Hale Street intersection, suggesting minimal delays. However, discrepancies in queue lengths question the accuracy of this depiction.

  - Modelled signal control allows a 'filtered' right-turn from the south during Phase A, raising concerns given the 80 km/h speed limit on Foreshore Road and the need to filter across three lanes. The TCS plan does not support a 'filtered' right-turn.

- **Need for a Comprehensive Signal Coordination Assessment**

  - The Foreshore Road / Hale Street intersection is in close proximity to two other signalised intersections on Foreshore Drive:
    - Foreshore Road / Ulm Avenue / Generals Holmes Drive off-ramp
    - Foreshore Road / Generals Holmes Drive

  - Due to their proximity (approximately 110 meters), these intersections likely operate under coordinated signal control. Therefore, the Foreshore Road / Hale Street intersection should have been evaluated as part of a network model in SIDRA, including the adjacent intersections, to provide a comprehensive analysis of traffic impacts.

- **Signal Cycle Time**

  - Current Settings in SIDRA Model: The assessed cycle time in the SIDRA model is 95 seconds (AM) and 90 seconds (PM), appearing low given assumed coordination with nearby intersections where cycle times typically range from 120 to 140 seconds during peaks.

  - Verification using SCATS history data and LX files from TfNSW would yield more accurate analyses.

  - Best Practice Consideration: It is standard practice to set the cycle time to observed values in the base case model scenarios. Any changes to cycle time, due to likely

signal coordination, could increase traffic delays and result in a lower level of service.

- **Swept Path**

  - The swept path analysis shows that exiting B-double vehicles might encroach onto parked vehicles on Hale Street's southern side and cross into opposing lanes when entering, posing potential safety concerns.

- **Truck Access**

  - The Proposal's 29-meter-wide truck access is less than 20 meters from the Hale/Luland Street roundabout. This proximity raises safety issues, highlighting the need to include the roundabout in the assessment.

Addressing these matters is crucial to confirm that the road network can handle the additional traffic from the Proposal and that its impacts on the precinct are manageable. If the updated assessment confirms unacceptable queuing and intersection operation, the Proposal must be refused and an alternative, more appropriate location should be sought for this use.

Given the Estate's strategic location near the Port, it is imperative that its sixteen tenants can continue to operate efficiently and without disruption.

We thank you for your consideration and request to be kept informed as the SSD-62855708 assessment progresses. Please contact me at 9230 7225.

Yours sincerely

Guy Smith
Head of Planning