

Our Ref : Cochlear Response to Submissions

Contact: Anissa Levy

19th September 2008

Ms Megan Webb
Environmental Planning Officer
Major Development Assessment
Department of Planning NSW
Level 4, Western gallery
23-33 Bridge Street
SYDNEY NSW 2001

Dear Megan,

SMEATON GRANGE SOFT DRINK MANUFACTURING PROJECT (08_0011)

This letter is written in response to the Department of Planning's (DoP) comments on the proposal (date 7 August 2008) and agency submissions received during the exhibition period for the above project. The agency submissions specifically addressed are:

- Roads and Traffic Authority (RTA) (Letter dated 11 July 2008);
- Camden Council (CC):
 - Letter dated 10 July 2008
 - Letter dated 16 April 2008
 - Letter dated 16 January 2008

This letter addresses issues in relation to traffic and parking. A full response to each item is provided in this letter, however Cardno have summarised the comments received from the DoP, RTA and CC - refer to Table 1 where the comments have been categorised into the following groups to avoid repetition:

- Heavy vehicle routes;
- Cumulative traffic impacts;
- Traffic impact of development;
- Car parking requirements;
- Car parking design;
- Site Access;
- Other.

Should you have any questions, please do not hesitate to contact the undersigned on (02) 9496 7700.

Prepared by
for and on behalf of
CARDNO EPELL OLSEN PTY LTD



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United States



TABLE 1 - SUMMARY OF TRAFFIC AND PARKING RELATED AGENCY RESPONSES

TOPIC	DOP	RTA	COUNCIL LETTERS		
			DATED 10 JULY 2008	DATED 16 APRIL 2008	DATED 16 JANUARY 2008
HEAVY VEHICLE ROUTES	Please clearly identify the truck routes that will be used once the facility is operational.				8. B-DOUBLES It should be noted that the that the existing B-Double route through Smeaton Grange runs North East along Anzac Avenue from Hartley Road and then North West to Camden Valley Way from the Anzac Avenue/Anderson Road roundabout. Any proposed alterations or extensions to this approved route will require the approval of the Roads and Traffic Authority and should be sought. Council would prefer that the existing B-Double route through Smeaton Grange is maintained in it's current form. However the extension of the route South West along Anderson Road to the proposed site can be considered.

TOPIC	DOP	RTA	COUNCIL LETTERS		
			DATED 10 JULY 2008	DATED 16 APRIL 2008	DATED 16 JANUARY 2008
CUMULATIVE TRAFFIC IMPACTS	As identified in Councils submission there are a number of other projects which are currently being developed in the area. What would the cumulative impact of the proposal with these other developments be on surrounding road network?		3. The submitted traffic report only takes into account one other approved development application when assessing the traffic impacts upon the surrounding street network from this development. Council considers that the report should also consider other approved development applications in the Smeaton Grange Industrial Estate including: - Recent approvals for factories and warehouses at 7 Smeaton Grange Road & 466 Camden Valley Way. - A proposed car showroom currently under assessment by Council at 522 & 528 Camden Valley Way. - A proposed concrete batching plant currently under assessment by Council at 42 Anderson Road.		

TOPIC	DOP	RTA	COUNCIL LETTERS		
			DATED 10 JULY 2008	DATED 16 APRIL 2008	DATED 16 JANUARY 2008
TRAFFIC IMPACT OF DEVELOPMENT	The traffic on the surrounding road network already exceeds the road capacity in some areas and this project would create further congestion in these and other areas. What measures would be put in place to: - upgrade and maintain the surrounding road network? and - manage traffic?	2. The intersection of Turner Road and Camden Valley Way has been identified to be operating at a congested level with long delays during peak periods. Camden Council should be advised of the impact of the proposed development and to consider any traffic measures on Turner Road to improve the peak operation.		10. ACCESS & PARKING A traffic report should be requested that assesses the potential traffic impacts of the development upon the surrounding and wider street network. This should also include all of the entrances/exits to/from the Smeaton Grange Industrial Estate being: - Junction of Smeaton Grange Road/Camden Valley Way, - Junction of Anderson Road/Camden Valley Way. - Junction of Hartley Road/Narellen Road.	6. TRAFFIC The traffic report contained within Appendix K refers to a "proposed 50 metre right turn slip lane on Anderson Road." This 50 metre right turn lane was imposed as a condition of consent from the Roads and Traffic Authority on DA 8112007 (referred to on Page 44 of Appendix K as the approved development on lots 429-431 Anderson Road). It should be noted that if this approved development (DA 8112007) was not to proceed, the required right turn lane will not be constructed unless required as part of this project (P&N Beverages). The Department should note this and also fully consider all the traffic impacts from this development upon Council's street network as detailed in Appendix K.

TOPIC	DOP	RTA	COUNCIL LETTERS		
			DATED 10 JULY 2008	DATED 16 APRIL 2008	DATED 16 JANUARY 2008
CAR PARKING REQUIREMENTS				10. ACCESS & PARKING Based on the floor space figures listed in the Preliminary Environmental Assessment, a minimum of 420 car parking spaces would be required. This figure is based on calculations made in accordance with Council's Development Control Plan. Provision should be made for courier car parking spaces that are located in convenient and appropriate sign posted locations.	-
CAR PARKING DESIGN		I. The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1 - 2004 and AS 2890.2 - 2002 for heavy vehicle usage.		10. ACCESS & PARKING Provision of access and manoeuvring facilities for B-double size vehicles should be provided to allow operational flexibility for the facility in the future.	

TOPIC	DOP	RTA	COUNCIL LETTERS		
			DATED 10 JULY 2008	DATED 16 APRIL 2008	DATED 16 JANUARY 2008
SITE ACCESS			7. SITE ENTRY/EXIT POINTS The Department should ensure that the proposed entry/exit points from the site are compatible with the surrounding road network in terms of roundabout medians, street lighting and any other utility services present or still to be fully constructed. The entrances/exits should also be designed, in accordance with the relevant Australian Standards, to allow for entry and exit of the size of service vehicles/trucks that will use them.		
OTHER		3. Council should ensure that all proposed traffic measures within the local road system meet appropriate Australian design standards. All works including signs and linemarkings associated with the proposed development will be carried out at no cost to the RTA.			

1.0 HEAVY VEHICLE ROUTES

DoP Comment:

"Please clearly identify the truck route/s that will be used once the facility is operational"

Council Comment (16 January 2008):

"It should be noted that the existing B-Double route through Smeaton Grange runs North East along Anzac Avenue from Hartley Road and then North West to Camden Valley Way from the Anzac Avenue/Anderson Road roundabout. Any proposed alterations or extensions to this approved route will require the approval of the Roads and Traffic Authority and should be sought. Council would prefer that the existing B-Double route through Smeaton Grange is maintained in its current form. However the extension of the route South West along Anderson Road to the proposed site can be considered."

As noted in the Traffic Report, the water deliveries in the B-Double tanker are advised to come from Moss Vale and hence would most likely use the following general route:

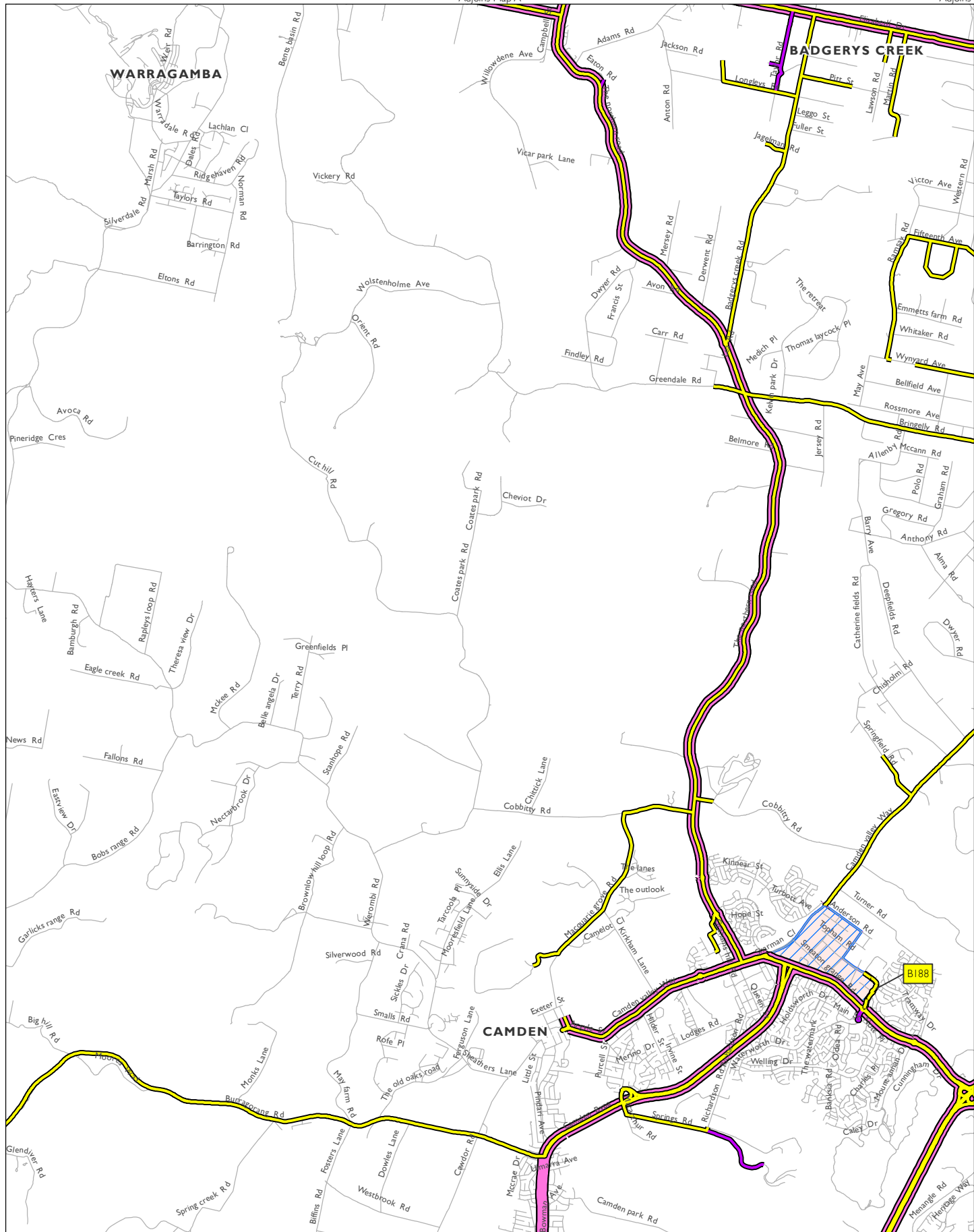
- Hume Highway, between Aylmerton and Narellan Road;
- Narellan Road, between the Hume Highway and Smeaton Grange Road; and
- Hartley Road, Anzac Avenue, Anderson Road and Bluett Drive within Smeaton Grange.

Other delivery and dispatch trucks are expected to originate at various locations throughout the Sydney Metropolitan area and would utilise the Sydney ring road network via either the M5 or M7 Motorways. Access to the ring road can be gained via 2 main routes (from the site):

- OPTION 1 via Camden Valley Way, for all heavy vehicles including B-doubles:
 - Bluett Drive/Anderson Road;
 - Camden Valley Way; and
 - M5 Motorway (east) or M7 Motorway (north).
- OPTION 2 via Narellan Road:
 - For B-Doubles*:
 - Bluett Drive/Anderson Road;
 - Camden Valley Way;
 - Narellan Road;
 - Hume Highway; and
 - M5 Motorway (east) or M7 Motorway (north).
 - For other heavy vehicles:
 - Bluett Drive/Anderson Road/Anzac Avenue/Hartley Road;
 - Narellan Road;
 - Hume Highway; and
 - M5 (South Western) Motorway (east) or M7 Motorway (north).

*Option 2 route has been amended to avoid the use of Hartley Road for B-doubles.

The RTA Travel restrictions Vehicle Routes Sydney E Map is provided on the following page. This shows the majority of Smeaton Grange as being within the B-Double Approved Zones. The P&N site falls outside the zone. Access to the subject site can only be gained by travelling along Anderson Road east of Anzac Avenue and Bluett Drive between Anzac Avenue and the site entrance. **It is recommended that the B-Double Approved Zone be extended to cover these road sections.**



TRAVEL RESTRICTIONS
VEHICLE ROUTES

Scale 1:100,000

00.512

Kilometres

Map produced by RTA, RIANTE SIS Unit.

Map data copyright (c) 2007 Roads & Traffic Authority NSW.

Some spatial data courtesy of NSW Department of Lands.

Sydney Map
E

LEGEND

B-Double

25/26m Approved Routes

23m Approved Routes

19m Approved Routes

B-Double Approved Zones

4.6m High Vehicle

4.6m High Vehicle Routes

4.6m High Vehicle Approved Zones

Restrictions

Travel Restriction Apply

For the following restriction details see Travel Restrictions Table.

B3

B-Double Restriction

H3

4.6m High Vehicle Restriction

Classified Roads

Local Roads

Regional Roads

State Roads

A small map of Australia with a grid overlay. The grid is labeled A through H. A red box highlights the area corresponding to the main map, which is located in the southeast of Australia, specifically in the state of New South Wales. The text 'Grid Map Index' is written below the grid.

Map valid to 15 November 2008

Monday, August 11, 2008 8:58:05 AM

2.0 CUMULATIVE TRAFFIC IMPACTS

DoP Comment:

"As identified in Councils submission there are a number of other projects which are currently being developed in the area. What would the cumulative impact of the proposal with these other developments be on surrounding road network?"

Council Comment (10 July 2008):

"The submitted traffic report only takes into account one other approved development application when assessing the traffic impacts upon the surrounding street network from this development. Council considers that the report should also consider other approved development applications in the Smeaton Grange Industrial Estate including:

- Recent approvals for factories and warehouses at 7 Smeaton Grange Road & 466 Camden Valley Way.*
- A proposed car showroom currently under assessment by Council at 522 & 528 Camden Valley Way.*
- A proposed concrete batching plant currently under assessment by Council at 42 Anderson Road."*

The above developments were raised by Camden Council in a letter dated 10 July 2008 after the traffic & parking assessment was submitted in March 2008. The applicant was not formerly made aware of these approved sites nor the need to consider them as part of this application process in previous correspondences with Council.

The recently approved sites at 7 Smeaton Grange Road and 466 Camden Valley Way are somewhat removed for the locality of the subject development.

The other sites at 522 & 528 Camden Valley Way and 42 Anderson Road have yet to be determined and it is not common practice to assess the impact of other non-approved sites as the determination had not been made in relation to development of these sites.

However, the impact of the additional traffic generated by these sites and full development of the Smeaton Grange Estate has been addressed under the Smeaton Grange Traffic Masterplan. The Traffic Masterplan was undertaken by Cardno on behalf of Investa. The Traffic Masterplan makes recommendations for road network improvements as a result of growth in the Industrial Area. A draft was submitted to Council and the RTA for review in July this year. To-date no formal comments on the Masterplan have been received by either agency.

3.0 TRAFFIC IMPACT OF DEVELOPMENT

DoP Comment:

"The traffic on the surrounding road network already exceeds the road capacity in some areas and this project would create further congestion in these and other areas. What measures would be put in place to:

- upgrade and maintain the surrounding road network? and*
- manage traffic?*

An assessment of the operation of the following 10 key intersections in the surrounding road network was undertaken in the Traffic Impact Assessment.

- Camden Valley Way / Turner Road
- Camden Valley Way / Anderson Road
- Camden Valley Way / Smeaton Grange Road
- Anzac Avenue / Anderson Road
- Anzac Avenue / Hartley Road
- Anzac Avenue / Smeaton Grange Road
- Hartley Road / Narellan Road
- Turner Road / Bluett Drive
- Anderson Road / Bluett Drive
- Bluett Drive / P&N Access Road

A copy of the intersection analysis results for the base case with approved DA is provided in Table 2.

Table 2: Existing Base - Intersection Analysis Summary (Existing + Approved DA)

Intersection	Intersection Control	AM Peak			PM Peak		
		Degree of Saturation	Delay (s)	Level of Service	Degree of Saturation	Delay (s)	Level of Service
Camden Valley Way / Turner Road	Give-Way (N-S)	1.000	>120	F	1.000	>120	F
Camden Valley Way / Anderson Road	Traffic Signals	0.634	22.7	B	0.863	33.5	C
Camden Valley Way / Smeaton Grange Road	Give-Way (N-S)	0.373	15.2	B	0.716	26.3	B
Anzac Avenue / Anderson Road	Roundabout	0.006	13.9	A	0.019	13.1	A
Anzac Avenue / Hartley Road	Roundabout	0.074	16.5	B	0.111	13.6	A
Anzac Avenue / Smeaton Grange Road	Give-Way (E-W)	0.020	9.2	A	0.044	8.9	A
Hartley Road / Narellan Road	Traffic Signals	1.109	>120	F	1.130	122.2	F

* Average Delay is provided for whole intersection for signalised intersection, for all other intersections the average delay for the worst approach is provided.

This shows that only 2 intersections are currently experiencing significant delays:

- Camden Valley Way / Turner Road
- Hartley Road / Narellan Road

A copy of the intersection analysis results for the base case with approved DA and the subject development is provided in Table 3.

Table 3: Existing with Development - Intersection Analysis Summary (Existing + Approved DA + P&N)

Intersection	Intersection Control	AM Peak			PM Peak		
		Degree of Saturation	Delay (s)	Level of Service	Degree of Saturation	Delay (s)	Level of Service
Camden Valley Way / Turner Road	Give-Way (N-S)	1.000	>120	F	1.000	>120	F
Camden Valley Way / Anderson Road	Traffic Signals	0.685	25.2	B	0.865	33.8	C
Camden Valley Way / Smeaton Grange Road	Give-Way (N-S)	0.402	16.1	B	0.760	29.4	C
Anzac Avenue / Anderson Road	Roundabout	0.059	14.6	A	0.088	14.2	A
Anzac Avenue / Hartley Road	Roundabout	0.074	16.6	B	0.133	13.7	A
Anzac Avenue / Smeaton Grange Road	Give-Way (E-W)	0.020	9.2	A	0.044	8.9	A
Hartley Road / Narellan Road	Traffic Signals	1.092	122.3	F	1.128	>120	F
Turner Road / Bluett Drive	Give Way (E-W)	0.083	9.0	A	0.025	9.0	A
Anderson Road / Bluett Drive	Roundabout	0.008	14.0	A	0.011	17.7	A
Bluett Drive / P&N Access Road	Give Way (N-S)	0.183	9.4	A	0.167	9.0	A

* Average Delay is provided for whole intersection for signalised intersection, for all other intersections the average delay for the worst approach is provided.

The unsignalised intersection of Camden Valley Way and Turner Road currently fails under existing traffic conditions in both the AM and PM peaks, no appreciable changes in operating characteristics is observed from the additional development traffic from the P&N site.

The signalised intersection of Hartley Road and Narellan Road currently fails under existing traffic conditions in both the AM and PM peaks, operating with high degrees of saturation and delays. The additional development traffic from the P&N site adds small delays and queue lengths and at worst in the PM peak, the additional development traffic accounts for a 2% increase in overall traffic volumes.

All other intersections continue to operate satisfactorily with the development traffic. Overall the impact of the subject development on key surrounding intersections is minimal and no remedial works at intersections are warranted as a result of the proposed subject development.

RTA Comment:

"The intersection of Turner Road and Camden Valley Way has been identified to be operating at a congested level with long delays during peak periods. Camden Council should be advised of the impact of the proposed development and to consider any traffic measures on Turner Road to improve the peak operation."

The assessment of the existing operation of the intersection of Turner Road and Camden Valley Way shows it already operates extremely poorly. The additional traffic as a result of the proposed P and N development will not make a significant difference to the operating parameters.

Furthermore the Oran Park and Turner Road Precinct Plan Transport Assessment undertaken for the Growth Centres Commission in August 2007 by Maunsell Aecom recommended that Camden Valley Way/Turner Road intersection be made left-in/left-out only.

This recommendation was confirmed by the RTA at a meeting held to discuss the Smeaton Grange Masterplan and the P and N proposal. The RTA advised that Camden Valley Way was to be widened to a four lane divided carriageway in the short term and ultimately to a six lane divided carriageway.

The delays experienced at the intersection are due to the very heavy through traffic volumes on Camden Valley Way. The delays to traffic along Camden Valley way will be improved with the provision of additional lanes along Camden Valley Way. Improvements to turning volumes at the intersection could only be improved with the provision of traffic signals. The RTA has advised that they would not support traffic signals at this location.

As such it was not considered that any traffic measures on Turner Road to improve the peak operation would be required.

Council Comment (16 April 2008):

"A traffic report should be requested that assesses the potential traffic impacts of the development upon the surrounding and wider street network. This should also include all of the entrances/exits to/from the Smeaton Grange Industrial Estate being:

- Junction of Smeaton Grange Road/Camden Valley Way,*
- Junction of Anderson Road/Camden Valley Way."*
- Junction of Hartley Road/Narellan Road."*

The submitted traffic report does consider the potential traffic impacts of the development upon the surrounding and wider street network and includes an assessment of all entrances/exits to/from the Smeaton Grange Industrial Estate, as noted above.

Council Comment (16 January 2008):

The traffic report contained within Appendix K refers to a "proposed 50 metre right turn slip lane on Anderson Road." This 50 metre right turn lane was imposed as a condition of consent from the Roads and Traffic Authority on DA 8112007 (referred to on Page 44 of Appendix K as the approved development on lots 429-431 Anderson Road).

It should be noted that if this approved development (DA 8112007) was not to proceed, the required right turn lane will not be constructed unless required as part of this project (P&N Beverages).

The Department should note this and also fully consider all the traffic impacts from this development upon Council's street network as detailed in Appendix K."

For the purposes of assessing this application it has been assumed that the 50 metre right turn slip lane on Anderson Road will be constructed. To the best of our knowledge this will be undertaken as a condition of consent for development of the site known as lots 429-431 Anderson Road. Furthermore, the Smeaton Grange Traffic Masterplan makes recommendations for works at this intersection as part of the future development of the site.

4.0 CAR PARKING REQUIREMENTS

Council Comment (16 April 2008):

"Based on the floor space figures listed in the Preliminary Environmental Assessment, a minimum of 420 car parking spaces would be required. This figure is based on calculations made in accordance with Council's Development Control Plan."

As stated in the Traffic Impact Assessment the development proposes to provide a total of 316 right-angle off-street car parking spaces at-grade within the development. Application of Camden Council's DCP 2006 (Part D) to the proposed floor areas requires that a minimum of 302 spaces are provided. Hence a surplus of 14 spaces is provided.

5.0 CAR PARKING DESIGN

RTA Comment:

"The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1 - 2004 and AS 2890.2 - 2002 for heavy vehicle usage"

Council Comment (10 July 2008):

"Provision of access and manoeuvring facilities for B-double size vehicles should be provided to allow operational flexibility for the facility in the future."

A detailed review of the proposed car parking areas has been undertaken in the Traffic and Parking Impact Assessment (Section 4). The Swept Path analysis, also provided in Section 4, demonstrates that B-Double trucks will easily manoeuvre around the site, entering via the southern driveway access and exiting via the northern driveway access.

6.0 SITE ACCESS

Council Comment (10 July 2008):

"The Department should ensure that the proposed entry/exit points from the site are compatible with the surrounding road network in terms of roundabout medians, street lighting and any other utility services present or still to be fully constructed. The entrances/exits should also be designed, in accordance with the relevant Australian Standards, to allow for entry and exit of the size of service vehicles/trucks that will use them"

A review of the proposed entry/exit points from the site has been undertaken in the Traffic and Parking Impact Assessment (Section 4). Entrances comply with relevant Australian Standards as detailed in the Traffic Impact Assessment. The swept path analysis confirms that the proposed entrances/exits allow for entry and exit of the heavy vehicles including B-doubles, where required.

7.0 OTHER

RTA Comment:

"Council should ensure that all proposed traffic measures within the local road system meet appropriate Australian design standards.

All works including signs and linemarkings associated with the proposed development will be carried out at no cost to the RTA"

These issues can be dealt with as appropriate conditions of consent.