



18 November 2020

Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
12 Darcy Street
Parramatta NSW 2150

Attention: Patrick Copas

Dear Mr Betts,

**SSD-10468 EIS EXHIBITION
WAREHOUSE AND CUSTOMER FULFILMENT CENTRE
74 EDINBURGH ROAD, MARRICKVILLE**

Thank you for referring the Environmental Impact Statement (EIS) to Transport for NSW (TfNSW).

TfNSW has reviewed the EIS and provides the following advisory comments for the Department's consideration in **TAB A**.

If you have any further inquiries in relation to this development application please contact Charlotte Brogan, A/Development Assessment Officer, on 0409 316 965 or by email at: development.sydney@transport.nsw.gov.au.

Yours sincerely,

**Brendan Pegg
Senior Land Use Planner
Planning and Programs, Greater Sydney Division**

TAB A

Modification of Existing Traffic Control Site (TCS)

Comment:

TfNSW notes that the subject site has development consent for a home improvement centre (DA 2015/00168) of approximately 13,350sqm which was granted development consent by the Sydney East Joint Regional Planning Panel on 23 October 2015. The current application seeks to maintain similar vehicular access arrangements, however the network conditions have changed during this period.

Recommendation:

This arrangement involves the modification of an existing Traffic Control Site (TCS) at Edinburgh Road / Smidmore Street, which requires TfNSW to provide approval under Section 87 of the *Roads Act 1993*. Whilst this was done previously under DA 2015/00168, as the conditions of the network have changed (including recent redevelopments such as Marrickville Metro Shopping Centre), TfNSW requires:

- Electronic copy of the SIDRA modelling data, which includes current and future use of the intersection layout; and
- Swept path analysis for the turning movements proposed with the largest size vehicle with all movements at the proposed additional leg of the intersection.

TfNSW will need to review the modelling and swept paths to provide 'in-principle' agreement and approval under Section 87 of the *Roads Act 1993*. If 'in-principle' approval is agreed by TfNSW, formal approval under Section 87 of the *Roads Act 1993*, will be required.

Transport Impact Assessment (TIA)

Comment:

Limited details regarding changes to TCS phasing at the intersection of Smidmore Street / Edinburgh Road have been provided.

Recommendation:

A revised TIA, as part of the Response to Submissions (RtS), should be provided with inclusion of SIDRA modelling of the subject signalised intersection, specifically in relation to concerns regarding vehicle queuing along Edinburgh Road between Smidmore Street and Sydney Steel Road. The report should identify effects of the signal phasing and proposed signal capacity the aforementioned leg of the intersection up to the roundabout including operation in the analysis. An electronic copy of the findings should be submitted to TfNSW for review and verification as part of the RtS.

TfNSW advises that 'in-principle' support is given to the right hand movement and creation of diamond phase is supported, subject to being supported by the modelling and capacity to be accommodated.

Comment:

Section 3.20 states that "*Deliveries to the customer fulfilment centre will be made by semi-trailers up to 20 metres long*". TfNSW questions the suitability of the local road network to accommodate for such vehicles.

Recommendation:

The proponent is to clarify on the maximum size vehicle to be utilised by the site and the route path proposed, to ensure that it can be accommodated on the network. It should be noted that Bedwin Road Bridge has limited structural capacity which should be considered as part of the response and proposed changes to any of the existing freight routes.

Comment:

No reason is provided in Section 3.18 of the TIA as to why there is proposed separate access for emergency vehicles via Edinburgh Road.

Recommendation:

The proponent is to clarify the reasoning and management details of this separated access arrangement.

Comment:

The TIA has limited detail regarding the use of point-to-point vehicles to the site, particularly for online orders that may be collected by third parties (other than the customer).

Recommendation:

The proponent is to clarify how point-to-point vehicles will operate to the site and provide details on how they will be managed.

Comment:

TfNSW has reviewed the internal swept paths for the site and notes that the semi-trailer movement (Sheet 9 in the TIA) is only illustrating the end docking space being utilised. For the other seven loading dock spaces to be utilised, TfNSW believes that the movements may encroach on the car parking spaces.

Recommendation:

The proponent is to review the swept path of all semi-trailer movements to ensure that the vehicles can operate without impacting the proposed car parking areas.

Comment:

The TIA has limited analysis on the use of bicycles for deliveries and whether the proponent has considered this mode of transport for its operations, third party deliveries and / or customer pick-ups.

Recommendation:

The proponent is to review the use of bicycles for deliveries and whether it should be incorporated into the design of the site.

Comment:

Section 3.15 indicates that end of trip facilities will be provided, however provides no detail as to the number and whether it will be sufficient to encourage active transport to the site.

Recommendation:

Clarification on the proposed number of end-of-trip facilities is required to ensure that there is adequate provision to support and encourage active transport.