



17 December 2020

Our Reference: SYD19/01350/09
Departments Reference: SSD-10448

Bruce Zhang
Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Zhang,

EXHIBITION OF EIS - ASPECTS INDUSTRIAL ESTATE – LOTS 54-58, DP259135 - MAMRE ROAD - KEMPS CREEK

Reference is made to the Department's referral dated 13 November 2020 with regard to the abovementioned State Significant Development Application (SSDA), which was referred to Transport for NSW (TfNSW) Services for comments.

The proposal seeks development approval for the Aspect Industrial Estate SSDA under section 4.22 of the Environmental Planning and Assessment Act (EP&A Act) and sets out the concept proposal, establishes the framework for future development and Stage 1 works for the proposed industrial hub of land.

The documentation including *AsonGroup Transport Assessment Report* (TAR) in support of the proposal has been reviewed and comments and recommendations are provided in **Attachment A**.

If you have any further questions, Ms Laura van Putten would be pleased to take your call on (02) 8849 2480 or please email development.sydney@rms.nsw.gov.au. I hope this has been of assistance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Pahee Rathan'.

Pahee Rathan
Senior Land Use Assessment Coordinator

Attachment A

Active Transport Considerations

1. Comment

Clause 18 of the WSEA SEPP requires that a consent authority must not grant consent to development on any land to which WSEA SEPP applies unless a development control plan (DCP), has been prepared for the land.

A draft DCP has been submitted with the Environmental Impact Statement. Appendix KK – Section 4. Transport, Access and Car Parking of the Draft Aspect Industrial Estate Development Control Plan Objective (d); To encourage the use of alternative forms of transport where practical. The corresponding Control (8) only provides for “Consideration” to be given to the delivery of infrastructure and/or the implementation of management measures that encourage the use of alternative forms of transport.

The Department of Planning, Infrastructure and Environment (DPIE), is currently exhibiting the Mamre Road Precinct – Draft Development Control Plan with Objectives and Controls in line with TfNSW policies of integrating land use and transport regarding off-street bicycle parking and end of trip facilities.

Recommendation

It is requested that before the development application is approved, the applicant revise the AIE DCP to include Objectives and Controls within Section 3.4.4 – Public Transport, Pedestrian and Cycle Network, of the Mamre Road Precinct DCP.

2. Comment

The SEARs for SSD-10448 outlines the proposal needs to provide details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and specific Workplace travel plan) and the provision of facilities to increase the non-car mode share for travel to and from the site.

A Green Travel Plan, including a Travel Access Guide, will be required for each of the 11 proposed warehouse and distribution centre buildings within Aspect Industrial Estate.

Recommendation

It is requested that before the development application is approved, the applicant provide a Green Travel Plan (GTP) that demonstrates the measures to be implemented to encourage employees of the development to make sustainable travel choices, including walking, cycling, public transport and car sharing. The GTP should include:

- Specific mode share targets that support high mode share towards public transport, walking and cycling. Mode share should be reviewed annually;
- Details of proposed end of trip facilities including number/ location of bike parking spaces, showers etc.
- Provision of storage lockers for staff;
- TfNSW considers that carpooling is likely to be the main travel demand management strategy likely to reduce single occupant car travel in the short to medium term. The GTP should include details of this measure including carpooling schemes and/ or shuttle bus for employees;
- Priority parking for car share/ carpooling for private vehicles;

- Prepare a site specific Travel Access Guide for staff and visitors;
- Appointment of a Travel Plan Coordinator to oversee the implementation and review of the GTP;
- Specific information on behavior change programs including a communication strategy for engaging staff and visitors regarding sustainable transport use to the site, and how the programs will be implemented into the GTP; and
- Annual review of the GTP for at least the first five years including surveys, evaluation and review. The GTP must include examples of proposed travel surveys and;
 - After 12 months of operation, conduct surveys of current and additional trips associated with the proposal and current mode share including staff and visitor mode share. Include operational hours, peak usage including staff travel time and visitor travel times.

Resources to assist can be found here:

<https://www.mysydney.nsw.gov.au/travelchoices/tgm>

TfNSW requests the abovementioned information for further assessment prior to the determination of the application. TfNSW will further review and provide response upon receipt of the additional information.

Transport Assessment

3. Comment

- a. It is noted that the Traffic Report assesses the 2026 impacts of the development. However to understand the impacts beyond 2026, an assessment of the traffic modelling should consider the scenarios of year 2026, 2031, 2036 and the year until the facility cease operation.
- b. The SIDRA models of the signalised intersection used varying cycle time. In order to determine the worst case scenario expected from this development, typically TfNSW would use 140seconds as the cycle time for full development scenario.
- c. Based on the surrounding land use, strategic reports and journey to work data, TfNSW requests further detail on how the 6 scenarios were selected.
- d. The right turn bay on Mamre Road South Approach for several scenarios appears to not be adequate to store the predicted queue length.
- e. Section 7.4 – Further detail is requested to be provided to clarify how arrival and departure distribution has been adopted.
- f. Section 7.7 – Although the location of the intersection is in line with TfNSW proposed upgrades. A TfNSW prescribed warrant assessment is required to be undertaken on any new signalised intersection. It is noted that the expected traffic generation for the development does not meet any warrants.

The traffic signal at this location needs to be supported by traffic data which justifies the requirements set out in Section 2 of the *RMS Traffic Signal Design Manual*. The capacity to fund traffic signals is a consideration outside of the need to demonstrate suitable justification warranting such treatment as outlined in Section 2 of the *RMS Traffic Signal Design Manual*.

Therefore, a traffic signal warrant assessment is required to be submitted as outlined in Section 2 of the *RMS Traffic Signal Design Manual* to confirm when the traffic signal at the intersection will be warranted.

- g. Section 7.8 Figure 18 - Stage 1 2026 SIDRA Intersection Layout – Pedestrian crossings have not been provided on all legs of the proposed signalised intersection within the SIDRA modelling provided. An exemption from TfNSW is required should a pedestrian crossing not be provided on all legs.

It is therefore required that pedestrian crossings are provided on all legs and the modelling is updated to reflect this.

- h. Section 7.8.3 - it noted on the report that “*one of TfNSW’s currently key transport movement and outcome is to achieve a LOS E or better for the MR Precinct intersections*”. This statement is incorrect and should be removed from any report. TfNSW would expect any new intersection to perform as an average at LOS C or better.
- i. Section 7.8.3 - It is noted that the report states both stage-1 and AIE the overall intersection will operate at LOS A and B respectively. However the SIDRA model output is clearly showing that the right turn in and out from Road 1 perform poorly in most scenarios and has LOS E or F. This is not acceptable.

It is recommended that the applicant propose mitigation measures to bring LOS to acceptable level or better.

- j. Appendix F 3 – The swept paths for vehicles egressing Lot 3 on estate road 02 appears to encroach over the centreline of the road in order to achieve the turn. Consideration should be given to widening the driveway access to allow for adequate turn paths to be achieved.
- k. The swept paths provided are of a 26m B-Double. Swept paths will be required to be provided to accommodate the largest type of heavy vehicle which could reasonably be expected to service the site. The WSEA SEPP outlines the required vehicle lengths to be accommodated for.

In this regard, the design vehicle for the access to the site should be assessed with a 30m PBS 2B vehicle, in addition to the 26m B-Double.

- l. Appendix B (Preliminary CTMP) – All demolition and construction vehicles are to be contained wholly within the site and vehicles must enter the site before stopping. A construction zone will not be permitted on Mamre Road.

Recommendation

TfNSW requests the abovementioned information to be addressed/provided for further assessment prior to the determination of the application. TfNSW will further review and provide response upon receipt of the additional information.

Corridor Preservation

4. Comment

Clause 33C of the WSEA SEPP requires all proposed development demonstrate compatibility with the delivery of an integrated freight network within the Mamre Road Precinct. On 10 November 2020, the Department Planning Industry and Environment (DPIE) placed the draft Mamre Road Precinct Development Control Plan (DCP) on exhibition. Until the DCP is finalised, Clause 18 of the WSEA SEPP applies to any development application. It requires a site-specific DCP to be prepared and applicable before development consent can be granted. TfNSW notes the Aspect Industrial Estate (AIE) Development Control Plan does not address the freight network or dedicated freight corridor (DFC). The AIE concept masterplan refers to the potential for a future dedicated corridor and the EIS notes, the applicant (Mirvac) in consultation with TfNSW, was advised the DFC would be addressed through EIS review process and with knowledge of the draft Mamre Road Precinct DCP.

Recommendation

To ensure the dedicated freight corridor can be delivered in the future and that it provides dedicated access to surrounding industrial precincts and individual warehouses/distribution centres, TfNSW seeks the applicant address the following:

- Demonstrate how access to and from the DFC to AIE will be achieved
- Demonstrate how an integrated freight network can be achieved throughout the AIE