



18 March 2021

Our Reference: SYD20/01146/02

Departments Reference: SSD-9794683

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

Dear Mr Zhang,

EXHIBITION OF EIS - OAKDALE WEST ESTATE STAGE 3 - WAREHOUSES 2A, 2C, 2D, 2E - 2 - 18 ALDINGTON ROAD, KEMPS CREEK

Reference is made to the Department's referral dated 16 February 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 for construction and use of three warehouses (four tenancies) within the Oakdale West Industrial Estate (OWE) 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* (TA) 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'.

Pahee Rathan
Senior Land Use Assessment Coordinator

Attachment A

Active Transport Considerations

1. Comments

Future Transport 2056 emphasises the importance of walking and cycling for short trips and reinforces the importance of walking and cycling to increase the catchment of public transport as part of the whole customer journey.

Building Momentum - State Infrastructure Strategy 2018-2038 includes recommendations related to walking and cycling, including integrating transport with land use; managing travel demand; unlocking capacity in existing assets; and improving population health outcomes through more active transport.

The Transport Assessment (TA), includes 20 bicycles spaces at Lot 2A and that the provision of bicycle parking facilities for Lots 2C and 2D does not currently form part of the proposal. Further, the TA does not mention the provision of any end of trip facilities for the three lots. The *NSW Planning Guidelines for Walking and Cycling* has been superseded by *Cycling Aspects of Austroads Guides, 2017*, which recommends that bicycle parking for all-day use on a regular basis should be expected to be combined with end-of-trip facilities such as showers, lockers etc.

Recommendation

It is requested that prior to the issue of the Construction Certificate, the applicant be conditioned to provide bicycle parking and end of trip facilities for staff and visitors in accordance with Australian Standard AS1742.9:2018 *Manual of Uniform Traffic Control Devices - Bicycle Facilities*, and *Cycling Aspects of Austroads Guides* including:

- Locate bicycle parking and storage facilities in secure, convenient, accessible areas close to the main entries incorporating adequate lighting and passive surveillance and in accordance with Austroads guidelines.

Green Travel Plan

2. Comments

The Transport Assessment includes a Preliminary Sustainable Travel Plan, however it's considered that further inclusions are required in the plan. The recommendations below are provided to encourage the use of sustainable transport to the site, which will help reduce the use of single vehicle trips.

Recommendation

It is requested that the applicant be conditioned to the following:

- The applicant shall prepare a Green Travel Plan in consultation with TfNSW. The applicant shall submit a copy of the final plan to TfNSW for endorsement at development.sco@transport.nsw.gov.au, prior to the issue of the first occupation certificate. The Green Travel Plan should include, but not be limited to:
 - be prepared by a suitably qualified traffic consultant;

- include objectives and modes share targets (i.e. site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the GTP;
 - consideration of a staff travel survey and workforce data analysis to inform likely staff travel patterns and resultant travel plan strategies to / from the site;
 - implementation strategy that commits to specific actions (including operational procedures to be implemented along with timeframes) to encourage the use of sustainable transport and discourage the use of single occupant car travel to access the site;
 - details of bicycle parking and dedicated end of trip facilities including but not limited to lockers, showers and change rooms and e-bike charging station(s) for staff to support an increase in the non-car mode share for travel to and from the site;
 - a Transport Access Guide for staff and visitors providing information about the range of travel modes, access arrangements and supporting facilities that service the site;
 - a communication strategy for engaging with staff and visitors regarding public and active transport use to the site and the promotion of the health and wellbeing benefits of active and non-car travel to the site;
 - include a mechanism to monitor the effectiveness of the measures of the plan; and
 - the appointment of a Travel Plan Coordinator responsible for implementing the plan and its ongoing monitoring and review, including the delivery of actions and associated mode share targets.
- The plan shall be reviewed annually for at least the first five years and involve surveys, evaluation and review.
 - The plan (and any updates to the plan), shall be implemented and adhered to at all times by the applicant following the issue of the first occupation certificate.

Heavy Vehicle Considerations

3. Comment

All warehouses have been designed to accommodate 26m B-Doubles.

Recommendation

The proponent should consider PBS2B vehicles as the design vehicle. While the performance between 26m B-Doubles and PBS2B is similar, the issue will be the storage length e.g. bay and swept path.

4. Comment

The Internal road is not designed for a one way flow. Heavy vehicles will be required to manoeuvre within the estate road and may cross path with opposing trucks.

Recommendation

The proponent should consider making internal roads one way to avoid conflicting movements.

5. Comment

There are no details on driver facility or staging area that will be provided in OWE.

Recommendation

It is requested the proponent provide details of any driver facilities or staging areas that will be provided in OWE.

6. Comment

It is unclear from Figure 7 provided in the TA whether Building 2D parking area will be accessed by both heavy vehicles and cars via the same driveway, or separately.

Recommendation

The proponent should confirm whether there will be separate car/heavy vehicle access for Building 2D and provide justification if there is not. Sharing the access road will result in light vehicles mixing with a large amount of heavy vehicles.

West North South Link Road (WNSL)

7. Comment

It is noted that the WNSLR and Estate Road 01 and Lockwood Road are expected be delivered prior to construction of this SSD. This development application is dependent on the construction of these roads, it is therefore important to understand the timeline for the delivery of these road connections. Should the construction of these lots begin prior to the completion of these roads, what is the alternative access arrangements?

Recommendation

It suggested that timelines for the completion of the abovementioned roads be provided. In addition in the event that these roads are not complete prior to construction of these lots an alternative arrangement be provided.

SSD 7348 Mod 6 Approval

8. Comment

TfNSW notes that the increase in this development applications yield relies on the approval of SSD 7348 Mod 6. The approval will affect the proposed building height and ridge height for Building 2.

Recommendation

It is therefore advised that approval must be sort for SSD 7348 Mod 6 prior to any consent being provide for this development.

Trip Generation Rate

9. Comment

TfNSW raises concerns to the Department with regard to the adopted trip generation rate. The adopted trip generation rate for this development of 1.892 vehicles per day per 100m² of GFA is considered very low. The various land-use changes within the Western Sydney Employment Area (WSEA) has meant that the current adopted trip generation rate is 2.91, which is a much higher than what has been used to assess this development. If an assessment is not completed based on the current adopted figure then there might be unknown adverse impacts on the network in future.

Recommendation

It is therefore recommended that a model comparison of the traffic generation from this development application with the current adopted rate of 2.91 is undertaken to indicate if the model adopted is sufficiently calibrated to be fit for purpose. Justification and evidence should be provided to substantiate the adopted daily traffic generation.

Vehicular Access and internal road network

10. Comment

The access for vehicular parking for building 2C is located in the centre of the development Lot (approximately 90m from the future SLR). Ideally the location of the vehicular access should be provided for away from intersections of major roads.

Recommendation

Relocate the access for vehicular parking for building 2C north away further from the intersection of SLR.

11. Comment

The swept path plans for Building 2A indicate that simultaneous entry/exit cannot be achieved with the largest vehicles. This can lead to conflict points at the access to the lots where 2 opposing vehicles are attempting to use these accesses at the same time.

Recommendation

The design of the access points should allow for simultaneous entry/exit movements of the largest vehicle. The swept path of the longest vehicle entering and exiting the subject site, shall be in accordance with AUSTRROADS and to the satisfaction of Council.

12. Comment

In addition to the above point it I noted that the design of the internal road network within Building 2A does not allow for continuous 2 way flow.

Recommendation

The design should be updated to allow for the continual 2 way flow along the main access road, in particular on the corners where there is restricted sight distance to the satisfaction of Council.

Storm Water

13. Comment

Building 2C & 2D are located adjacent to the future Southern Link Road (SLR). A detailed design plans and hydraulic calculations of any changes to the strategic stormwater drainage system should be provided.

Recommendation

Should consent be provided a detailed design plans and hydraulic calculations of any changes to the stormwater drainage system are to be submitted to TfNSW for approval, prior to the commencement of any works. Please send all documentation to development.sydney@rms.nsw.gov.au.

A plan checking fee will be payable and a performance bond may be required before TfNSW approval is issued.

General

14. Comment

- a. A Construction Pedestrian Traffic Management Plan (CPTMP) specific to the separate lots within this development detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council for approval prior to the issue of a Construction Certificate.
- b. The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements in relation to landscaping and/or fencing, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1-2004, AS2890.6-2009 and AS 2890.2-2018 for heavy vehicle usage. Parking Restrictions may be required to maintain the required sight distances at the driveway.
- c. Sight distances from the proposed vehicular crossings to vehicles on the Estate Road 03 are to be in accordance with the Austroads Guide to Road Design: Part 4A: Unsignalised and Signalised Intersections (Section 3 – Sight Distance) and AS 2890. Vegetation and proposed landscaping/fencing must not hinder sight lines to and from the vehicular crossings to motorists, pedestrians and cyclists.
- d. It is noted that the Lots 2C-2D do not show bicycle parking facilities. It is recommended that to support and encourage active transport, bicycle parking facilities are provided within the development or close to it. Bicycle Parking should be provided in accordance with AS2890.3.

Recommendation

TfNSW requests the abovementioned information to be conditioned.