

16 April 2021

Our Reference: SYD20/00773/06

Departments Reference: SSD-10479

David Schwebel
Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Schwebel

**RESPONSE TO SUBMISSION FOR PROPOSED INDUSTRIAL BUILDING - 106-228
ALDINGTON ROAD, KEMPS CREEK**

Reference is made to the Department's referral dated 26 March 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 concept SSD 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* – response to Traffic comments 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



Pahee Rathan
Senior Land Use Assessment Coordinator

Attachment A

Green Travel Plan

1. Comment

TfNSW notes the Framework Sustainable Travel Plan prepared by ASON Group to support SSD – 10479. The proposal includes the construction of warehouse (W5) on Lot F with a GFA of 50,930 m² and two ancillary offices with GFA of 1,250m² each.

A Green Travel Plan (GTP) for warehouse (W5) and the ancillary office buildings should be developed in consultation with TfNSW and submitted to TfNSW for endorsement prior to the issue of the first occupation certificate. The Masterplan identifies a further twelve industrial buildings which will also require GTPs when development consent is requested for these sites.

Recommendation

The applicant shall prepare a Green Travel Plan in consultation with TfNSW for the warehouse and ancillary office buildings proposed for Lot F. 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 staged 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 public and active transport and car sharing to discourage single occupant car travel to 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 and car sharing 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.

Transport for NSW has developed a Travel Plan Toolkit designed for the person or group responsible for developing and implementing a Travel Plan. This toolkit provides the steps, templates and resources for developing a comprehensive Travel Plan and may be accessed at:

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

Corridor Preservation Considerations

2. Comment

In November 2020 the Department of Planning Industry and Environment (DPIE) released the Mamre Road Precinct Draft Development Control Plan. Objective 3.4.3(b) aims to provide a dedicated freight access from the intermodal terminal to surrounding industrial precincts and individual warehouses/distribution centres. *To enable a precinct-wide integrated freight network, all development within the Mamre Road Precinct must demonstrate how an integrated network can be safeguarded within their development.*

Recommendation

It is noted the proposed development is removed from the proposed dedicated freight corridor but is still within the Mamre Road Precinct. It is requested that before the development application is approved, the applicant demonstrate, to the satisfaction of TfNSW, how the proposed development would safeguard for an integrated freight network.

Note: This could take the form of a mud map showing how automated vehicles may move around the industrial development, servicing each of the proposed warehouses.

Southern Link Road

3. Comments

Southern Link Road

The proposal does not directly impact the current Southern Link Road alignment, however there needs to be consideration given to trip distribution to and from the site so to not adversely impact the current strategic design configuration of the intersection at Southern Link Road. The intersection at Southern Link Road as per the current TfNSW strategic design would need to accommodate the additional traffic from the site without an adverse impact on the Level of Service.

Mamre Road Precinct

The road network proposed by this development consortium does not align with the draft Mamre Road Precinct (MRP) Development Control Plan (DCP). Figure 14 on page 53 of the MRP DCP shows the following roads adjoining the development:

- Two high order roads: one running east-west through the southern portion of the site, and the other along the site's northern boundary (shared with the adjoining landowner);

- A local industrial road running north-south through the site connecting the high order roads; and
- Open space edge run in the north-east corner of the site, running along to the RE2 zone boundary.

The high order road along the site's northern boundary and the open space edge run in the north-east corner of the site, running along to the RE2 zone boundary has not been included in the SSDA. The local industrial road running north-south through the site has been reduced in length.

The comment to Control 1, Section 2.1 of Appendix B – Table of Compliance – Draft Mamre Road Development Control Plan acknowledges that the industrial road access proposed varies from that identified in the MRP DCP and states that “this is considered acceptable given the proposal's ability to still meeting the Precinct Vision.” However, the section explaining how the proposal meets the Precinct Vision (comment to Control 3, Section 2.1 of Appendix B) does not highlight a reason acceptable to balance the variance of the proposed road access from that of the MRP DCP.

Recommendations

It is requested that before the development application is approved, the SSDA demonstrates the proposal meets the requirements of the roads within the MRP DCP.

Aldington Road Upgrade

The SSDA needs to account for the future upgrade of Aldington Road to support traffic demand on completion of the construction work associated with this site, and once the final road reserve widths and configurations are endorsed within the DCP. The comment to Control 1, Section 3.4.1 of Appendix B acknowledges that “should the development be approved, a condition of consent be included that enables the future roads to be constructed to the endorsed DCP road reserve controls”.

Mamre Road Upgrade

As per Control 5, Section 3.4.1 of Appendix B, the intersection and associated upgrade of Mamre Road should be undertaken to accommodate the increases in traffic generated by this development.

Traffic Management and Access Plan (TMAP) comments

4. Comment

- a. TfNSW provides the following comments on Appendix B (SIDRA Output summaries):
 - i. The SIDRA (Site C) Mamre/Abbotts roads, right turning lane for Mamre Road South approach and Abbotts Road East approach has LOS E and F. This is not acceptable, even in the interim arrangement for 2026. When upgrading and/or constructing new intersections it is preferred to have "LOS C" or better intersections on individual approach.

- ii. For Scenario 1 (year 2026) – AM Base + Dev – The SIDRA (Site C) shows Mamre Road south approach will have a queue length 147.6m which is greater than the provided right turn bay length (120m), this will impact the single lane through movement by blocking the through movement northbound.
 - iii. The SIDRA (Site C) model shows Mamre Road south approach in PM will have queue length 94.9m, this is less than AM, even though there will be 50% more HV in the PM. Justification is required to understand why this approach will result in lesser queue lengths.
- b. Page 45, figure 18, in AM peak South approach at Mamre/Abbotts roads has total vehicle 885 going north of the intersection and South approach at Mamre Road/Banks Drive has total vehicle 1206. TfNSW requests clarification on where the extra 321 vehicles are coming from on this 2026 scenario.
 - c. Appendix B displays the northern access to the site is a T-intersection with Stop Control whilst the southern access follows a roundabout arrangement. The revised concept master plan document does not reflect this. These documents are to be updated to ensure that both are reflecting the actual proposed arrangement.
 - d. Appendix E - The swept paths provided only show the movements internally of a 26m B-double. Swept paths on the northern access and southern access not shown. TfNSW request all swept paths to be provided to show how a 26m B-double will manoeuvre within the site and enter /exit the access points.

Recommendation

TfNSW requests the abovementioned information be addressed and the TMAP be updated to reflect the outcomes.