

31 May 2021

TfNSW Reference: SYD21/00604/01

Portal Reference: SSD-18406916

Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: David Schwebel

Dear Mr Schwebel,

Request for SEARs - Elizabeth Enterprise Precinct - Stage 1 Works for Warehouse and Distribution Centre - 1669-1723 Elizabeth Drive, Badgerys

Thank you for your correspondence via the Major Projects Planning Portal dated 18 May 2021 requesting Transport for NSW to provide details of key issues and assessment requirements regarding the abovementioned development for inclusion in the Secretary's Environmental Assessment Requirements (SEARs).

The proposed development lies within the Western Sydney Aerotropolis. It is understood that the development proposes a Stage 1 concept plan for general industry and warehouse and distribution centres. The site forms a sub-precinct of the broader Elizabeth Enterprise Precinct (EEP) which extends further to the north (Stage 2) and east (Stages 3 & 4) within the adjacent Mamre Road Precinct.

The proposal seeks consent for future development lots and building footprints, as well as consent for works which will include construction of an initial warehouse building and associated infrastructure required to be constructed for the development to operate, including road intersections, internal road construction and other associated on-site utilities.

Stages 1-4

- The draft concept plan outlined in the scoping report only provides for Stage 1. TfNSW understands that Stage 2 (north of the Stage 1) will utilise the connection through Stage 1 to Elizabeth Drive. Stage 3 & 4 are located on the eastern side of South Creek. The broader EEP of all 4 stages covers an area of approximately 240ha. It is understood that connecting Stage 1 & 2 to Stage 3 & 4 would likely result in significant constructability issues due to South Creek being a key biodiversity corridor.

In this regard TfNSW is of the view that at minimum Stage 1 & 2 should be addressed simultaneously as a combined concept Masterplan to understand the broader impacts to the surrounding road network as a result of the proposed development. Should Stages 3 & 4 not be included in the broader modelling for this site, it is likely that TfNSW would not support any connection between Stages 1 & 2 and Stages 3 & 4 across South Creek.

- Alternatively should all 4 stages be considered, TfNSW would suggest that a comprehensive analysis of the anticipated infrastructure requirements be undertaken, this will need to be supported by strategic and detailed transport planning methods to be documented in a Transport Management and Accessibility Plan (TMAP).

Development access - Stage 1 concept plan

- The plan indicates that a round-about is proposed at the intersection of Elizabeth Drive/Martin Road/future development access. The applicant is to demonstrate if a roundabout at this location is the most appropriate intersection treatment.

It should be noted that the development to the south of Elizabeth Drive (CSR Brick Making Facility) site has been given in principle support for signals at this location under a separate SSD.

TfNSW suggests that consultation is undertaken with CSR in determining the most appropriate treatment solution and timing of construction which will service both future developments.

- Suez access road is located in close proximity to the future intersection with Elizabeth Drive/Martin Road, consideration should be given to the option of the closing of this access road and all traffic from the surrounding developments be re-directed through the future collector road. It suggested that this option be investigated and options modelling be undertaken.
- The plan shows multiple access points to service separate lots along the internal collector road *Access Road 01* which connects to Elizabeth Drive. Direct access to the collector roads should be kept to a minimum to support traffic efficiency and to reduce conflict points along the collector road. In this regard TfNSW recommends investigation into relocating these access points to alternative roads (where possible) or away from key intersections to reduce fragmented road side activity.
- In addition to the abovementioned point the location of *Access Road 02* is located close to the proposed intersection with Elizabeth Drive. Considerations should be given to relocating this access or restricting movements to the collector road to reduce conflict points and increase traffic efficiency along the *Access Road 01*.

The proposed intensification of development within the subject site will likely generate the need for major new services including new and upgraded road infrastructure that should broadly align with NSW Government plans for the Western Sydney Aerotropolis.

The transport network within the concept plan should be developed using the criteria for measuring and evaluating the alignment of movement and place both in existing contexts and in comparing future options. Reference should be made to the NSW Government's Movement and Place Framework document. The objectives and principals of the Western Sydney Aerotropolis Planning Package are also key matters for consideration, in particular, the intention to promote walking, cycling and public transport as viable alternatives to reliance on private vehicle use.

TfNSW has reviewed the submitted scoping report and other supporting documentation and provides the following advice for consideration to the draft SEARs in **Attachment A**.

It is suggested the applicant meet with TfNSW to discuss these issues and the options available prior to undertaking a traffic impact assessment.

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', with a stylized flourish at the end.

Pahee Rathan

Senior Land Use Assessment Coordinator
Transport for NSW

Attachment A

Key Issue Transport and Accessibility:

Provide a transport and accessibility impact assessment, which includes, but is not limited to the following:

- Address the statutory provisions contained in all relevant environmental planning instruments, including:
 - State Environmental Planning Policy (Major Infrastructure Corridors) 2020
 - State Environmental Planning Policy (Western Sydney Aerotropolis) 2020
- Details of all traffic types and volumes likely to be generated by the proposed development during construction and operation, including description of heavy vehicle types, commercial vehicles and haul route origins and destinations. Traffic flows are to be shown diagrammatically to a level of detail sufficient for easy interpretation;
- Daily inbound and outbound traffic profile by time of day and day of week broken down per vehicle types;
- Details of the origin/destination of dangerous goods movements to/from the site (if any)
- Traffic management plan on how to manage number of vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing that can be accommodated on the site to avoid queuing in the surrounding road network. This to demonstrate how internal and external traffic can be managed in conjunction with existing traffic on site including:
 - investigate the use of vehicles with higher carrying capacity such as PBS combinations, or those enrolled in the Safety, Productivity and Environment Construction Transport Scheme (SPECTS)¹;
- Detailed plan site layout to demonstrate that the site will be able to accommodate the *most productive vehicle types*² as well as the worst performing vehicles (sufficient loading/ unloading) and parking on site in accordance with the relevant Australian Standard and the draft Western Sydney Aerotropolis Development Control Plan, 2019;
- Details of the driver facilities provided on site (such as toilets, heavy vehicle rest area and de-coupling area);
- Swept path diagrams to demonstrate the largest vehicles as well as the worst performing vehicles entering, exiting and manoeuvring throughout the site;

¹ **SPECTS** allows participating heavy vehicles greater network access and the ability to carry more construction materials including spoil and waste. Using vehicles with a higher carrying capacity will reduce the number of heavy vehicle movements for the given freight task. Note that the proposal is within SPECTS approved area. (<https://roads-waterways.transport.nsw.gov.au/business-industry/heavy-vehicles/schemes-programs/spects.html>)

² **Note** that several key corridors within and surrounding Aerotropolis should be designed to accommodate at least PBS2B or PBS3A in some locations. PBS2B or PBS3A vehicles may be required to serve distribution centres (first and last mile access) in this precinct.

- An assessment of the forecasted impacts on traffic volume generated on road safety and capacity of road network including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model as prescribed by Transport for NSW. This is to include the identification and consideration of approved and proposed developments/planning proposals/road upgrades in the vicinity including, but not limited to the M12 Motorway, Elizabeth Drive and the Outer Sydney Orbital. The traffic modelling should consider the scenarios of year 2026, 2031, 2036. These should include, but not be limited to:
 - Elizabeth Drive/The Northern Road;
 - Elizabeth Drive/Luddenham Road;
 - Elizabeth Drive/Badgerys Creek Road;
 - Elizabeth Drive/Martins Road;
 - Elizabeth Drive/Devonshire Road;
 - Elizabeth Drive//Mamre Road; and
 - Elizabeth Drive/M7.
- The abovementioned model should also take into account:
 - Stage 2 for future year models; and
 - Option to close Suez access road connection to Elizabeth Drive.
- Traffic counts:
 - Counts are not to be undertaken within close proximity to the school holidays/long weekend;
 - Counts undertaken within close proximity to these events may not indicate normal traffic conditions. Ideally vehicle counts should be undertaken during a typical day, to include Thursday (or Wednesday), Friday and Saturday for the study (not near school/public holidays). This will provide the departments with an accurate understanding of the existing traffic conditions and the actual impact of this development application to the surrounding network;
 - Counts are to include a breakdown of light and heavy vehicles; and
- Due to the Covid-19 Pandemic, counts undertaken at the moment may not be representative. Alternative approaches to traffic counts due to the impact of Covid-19 on current traffic patterns.
- Detail how the proposed development connects to adjoining sites to facilitate their future development for their intended purposes;
- Addresses the relevant provisions, goals and objectives in the following:
 - Development near Rail Corridors and Busy Roads - Interim Guideline 2008; and
 - Sydney Metro At Grade and Elevated Sections Corridor Protection Guidelines (available from sydneymetro.info);

- Demonstrate how the Sydney Metro - Western Sydney Airport has been considered in the Stage 1 DA assessment including;
 - the impact of any proposed civil works or roads³;
- Measures to integrate the development with the existing/future public transport network including, but not limited to:
 - details of future bus routes through the development, indicative bus stop locations and connecting pedestrian and bicycle routes and paths developed in consultation with Transport for NSW to enable safe, equitable and sustainable access for future workers and visitors;
- Include an assessment of the accessibility and provision of public transport and active transport and how it is impacted by the proposed development;
- Detailed plans of the site access and proposed layout of the internal road and pedestrian network and parking on site in accordance with the relevant Australian Standards, draft Western Sydney Aerotropolis DCP and Council's DCP;
- Measures to ameliorate any adverse traffic and transport impacts due to the development based on the above analysis, including:
 - travel demand management programs to increase sustainable transport (Green Travel Plan and specific Workplace Travel Plan⁴) and the provision of facilities to increase the non-car mode share for travel to and from the site.
- Detailed plans of any proposed road upgrades, infrastructure works or new roads required for the development and an assessment of potential impact on local road pavement lifespan; and
- The preparation of a preliminary Construction Pedestrian and Traffic Management Plan (CPTMP) to demonstrate the proposed management of the impact in relation to construction traffic addressing the following:
 - assessment of cumulative impacts associated with other construction activities (if any);
 - an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity;
 - details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process;
 - details of anticipated peak hour and daily construction vehicle movements to and from the site;

³ The Stage 1 DA and supporting plans will need to ensure that any internal roads proposed for vehicular access do not impact on the operations of the Metro corridor which will be at surface grade level (through the site). Level changes along the corridor will be prohibited as this will impact on the at grade corridor levels.

⁴ Sydney Metro is being delivered to assist with the realisation of the 30-minute city. As such active transport access to and from the metro stations at Luddenham and Airport Business Park should be encouraged. The EIS and supporting Green Travel Plan and specific Workplace Travel Plan must demonstrate how the new subdivision layout will provide future workers and visitors easy and direct access to the nearby metro stations and wider precinct. Good permeability of the subdivision by walking and cycling should also be provided.

- details of on-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle;
- details of temporary cycling and pedestrian access during construction.
- Construction timing and phasing of the project must not impact on the delivery of the Sydney Metro rail corridor. The EIS and supporting Construction Pedestrian and Traffic Management Plan (CPTMP) must clearly delineate the proposed staging of the concept plan and anticipated times for the construction of the warehouse and logistics buildings proposed for the entire site to appropriately manage traffic impacts and ensure the timely delivery of each project through successful integration and operation.

Relevant Policies and Guidelines:

- NSW Road User Space Allocation Policy, 2021
- Guide to Traffic Generating Developments (Roads and Maritime Services, 2002).
- RMS Technical Direction TDT 2013/ 04a.
- NSW Freight and Ports Plans 2018-2023.
- Heavy Vehicle Access Policy Framework and Last Mile Toolkit
- Guidelines for Planning and Assessment of Road Freight Access in Industrial Areas.
- Cycling Aspects of Austroads Guides.
- Providing for Walking and Cycling in Transport Projects Policy, 2021.
- Guide to Traffic Management Part 12: Integrated Transport Assessments for Developments (Austroads, 2020).
- Australian Standard 2890.3 Parking facilities, Part 3: Bicycle parking (AS 890.3).
- Building Momentum – State Infrastructure Strategy 2018-2038.