

25 October 2021

Our Reference: SYD20/00773/10

Departments Reference: SSD-10479

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

Dear Mr Schwebel,

**EXHIBITION OF EIS – AMMENDED PLANS & DOCUMENTATION – (106-228) 200
ALDINGTON ROAD INDUSTRIAL ESTATE - KEMPS CREEK**

Reference is made to the Department of Planning, Industry and Environment's referral dated 5 October 2021 with regard to the abovementioned draft Environmental Impact Statement, which was referred to Transport for NSW (TfNSW) in accordance with the State Environmental Planning Policy (Infrastructure) 2007. This letter is offered as a collective response from agencies of the TfNSW cluster.

TfNSW has reviewed the documentation provided for the abovementioned development and provides comments and recommendations 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
A/Senior Manager Land Use Assessment West & Central
Greater Sydney

Attachment A

Transport & Accessibility Management Plan (TMAP) – Appendix D

1. Comment

The following comments are provided on the development assessment in isolation from known proposed (but not approved) developments:

- a. The SIDRA model used optimum cycle times of between 90 – 120 secs. In order to determine the worst case scenario the intersection should be modelled at a cycle time of 120-140 secs and no less. TfNSW suggests that different phasing options are investigated with the 120+sec cycle time to assist with managing queue lengths.
- b. There are some anomalies in the SIDRA outputs. It is unclear why the 3% growth rate has not been included on all legs. The base model for 2026, 2031 and 2036 does not change for the traffic entering and exiting Abbots Road.
- c. The report mentions that the 2036 model does not include the SLR. It is unclear why there is a reduction in vehicle movements entering and exiting Abbots Road for the 2036 outputs. Further clarity is required to understand the reduction.
- d. A traffic assignment diagram should be provided showing what percentage of vehicle movements is proposed to travel north or south on Aldington Road. In addition further clarity is needed to ensure that the model provided directs all heavy vehicle movements to access Mamre Road from Abbots Road intersection and not Bakers Lane. This is due to the presence of schools along Bakers Lane.
- e. Appendix A2 - 2031 AM Project Case – the SIDRA outputs indicate that the 95% back of queue is at 127.3m for the Mamre Road (south) right turn movement, which will queue out into through lane. This indicates that the right turn bay will not adequately support the proposed traffic specified in the Masterplan.

Recommendation

TfNSW believes that there is a need for further refinement and clarification to determine the scope of the intersection. The modelling indicates that a critical leg is at risk of not being able to accommodate for the traffic proposed under this proposal in isolation in 2031. Whilst it is understood that there are constraints in the road reserve at this location, there is still a need to ensure that the intersection can

operate at a safe level. The length of the right turn bay on Mamre Road (south) needs to be lengthened to accommodate for the proposed traffic.

TfNSW requests that any updated model associated with this development is accompanied with the raw SIDRA files for review.

2. Comment

- a. Appendix A1 - 2026 PM MRP LOG – the right turn movement from Mamre Road is operating at LOS E. The 95% back of queue is showing to be at 97m, whereas the right turn bay only has 100m storage. This results in a risk of traffic queuing out into through lane. Therefore should further investigations be undertaken which take into account the MRP LOG the intersection design would need to ensure that the additional traffic can be accommodated for.
- b. Appendix Z - Civil Drawings - Intersection (1) & (2) – Turning path plans are provided for 30m PBS type 2B. According to the Draft Mamre Road Precinct DCP Road design item (16), it should be tested for 36.5m PBS Level 3 type A vehicles.

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.

Green Travel Plan

3. Comment

- TfNSW notes that the applicant has provided a **Framework Sustainable Travel Plan**. In their previous submission TfNSW advised that the applicant 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 prior to the issue of the first occupation certificate.
- TfNSW has reviewed the **Response to Submission** documents for the **200 Aldington Street Kemps Creek development (Stage 1)**; these are the **Framework Sustainable Travel Plan** and the **Transport and Accessibility Management Plan (TAMP)**.

Recommendations:

- TfNSW recommends that the **Framework Sustainable Travel Plan (FSTP)** adopt both short and long term measures in the FSTP given the lack of public transport and active transport infrastructure facilities in this area.

- In **Section 5.2 Strategies and Actions** TfNSW recommends that short term goals be implemented in the FSTP; one of these is the internal shuttle service (**Table 3 Section 2.5**) and the second would be implementing car-pooling (**Table 3, Section 3**) schemes. The other longer term goals in **Section 5.2 Strategies and Actions** would all be implemented in the FSTP just prior to and during public and active transport infrastructure being made available. Due to this advice TfNSW recommends that a detailed implementation strategy for the FSTP be developed noting all the tasks for completion, how they will be completed and completion date, including an implementation checklist to achieve the proposed initiatives. TfNSW notes there is a separate communications strategy to guide this, and TfNSW recommends that the implementation strategy be updated with the communication tasks to promote initiatives.
- TfNSW recommends that the Travel Access Guide or TAG includes the short term initiatives discussed earlier (shuttle and carpooling), and removes the bus travel map (as bus travel in the site area is not recommended). The longer term TAG can be updated once public and active transport infrastructure are upgraded. For further helpful information – please check this link [How to Create a Travel Access Guide doc here](#).
- TfNSW also recommends that the Travel Survey to staff promotes these options of the shuttle and the carpooling scheme short term, and that the survey is updated longer term to reflect changes to public and active transport.
- TfNSW recommends that the applicant submit a copy of the updated FSTP for TfNSW endorsement, prior to the issue of the Occupation Certificate.