

20 December 2021

TfNSW Reference: SYD21/00981/03

Departments Reference: SSD-25725029

Rebecca Goth
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Goth,

**EXHIBITION OF EIS – ARDEX WAREHOUSE & MANUFACTURING FACILITY –
657-769 MAMRE ROAD - KEMPS CREEK**

Reference is made to the Department of Planning, Industry and Environment's referral dated 24 November 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 does not support this application in its current form. TfNSW 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@transport.nsw.gov.au. I hope this has been of assistance.

Yours sincerely



Edmond Platon
A/Senior Manager Land Use Assessment West & Central
Greater Sydney

Attachment A - Traffic Impact Assessment (TIA)

Modelling

1. Comment

Section 6.1 – TfNSW raises concerns to the DPIE with regard to the adopted daily trip generation rate. The adopted trip generation rate for this development of 2.64 vehicles per day per 100m² of GFA is considered very low. The following Peak rates are included in the assessment:

- AM Rate 0.247 trips per 100m² of GFA.
- PM Rate 0.182 trips per 100m² of GFA.

The various land-use changes within the Western Sydney Employment Area (WSEA) has meant that the current adopted daily trip generation rate is 2.91 per 100sqm GFA, which is a higher than what has been used to assess this development. In addition it should be noted that the PM trip rate of 0.182 trips per 100m² of GFA and considerably lower than the than the agreed WSEA rate of 0.24 trips per 100m² of GFA. This trip generation rate has been used to consider all developments within the Mamre Road Precinct. If an assessment is not completed based on the current adopted figure then there might be unknown adverse impacts on the network in future in the PM peak.

Recommendation

The daily and AM & PM Peak trip rates used for this report are to be updated to be consistent with the agreed WSEA daily trip generation rate of 2.91 per 100sqm GFA and the AM 0.23 & PM 0.24 peak trips per 100m² of GFA.

2. Comment

Section 6.1 – Figures 12, 13 and 14 demonstrate that there is no increase in traffic volume in and out of the site for 2026, 2031 and 2036.

Recommendation

It is recommended that clarification is provided to understand why the volumes do not increase.

3. Comment

Appendix A & B show SIDRA outputs in a custom table which are difficult to interpret and are missing critical information for review.

Recommendation

It is recommended that the SIDRA referred to in the TIA be provided for review (including the Base models).

This should include SIDRA output and raw SIDRA (.sip) files. This will enable our modelling and traffic teams to undertake a detailed review of the model to ensure that the inputs are accurate and supported. Further comments can be provided following the review of the models which may require the assessment to be updated.

4. Comment

Section 6.7 - *future SLR /Bakers Lane/NS Road 01* - It should be noted that the layout of this intersection is not supported by TfNSW. TfNSW has provided preliminary guidance on the 3 November to the applicant and DPIE regarding the layout and modelling of this intersection (**Attachment B**). This guidance was given to the applicant based on the following condition (B18) for SSD 9522 (Masterplan):

Internal Road Network and Southern Link Road

B18. Prior to the commencement of any construction (excluding bulk earthworks) on lots 1-4 north of Bakers Lane, the Applicant must prepare a concept design demonstrating how the internal road network can provide access to lots 1-4 and link to the future Southern Link Road. The design must be prepared in consultation with TfNSW and to the satisfaction of the Planning Secretary.

Note: *The concept design must address access arrangements to lots 1-4 both with and without the future Southern Link Road, including ensuring any access points are an appropriate distance from signalised intersections.*

As TfNSW does not support the intersection design the modelling inputs for the 2036 year model are not supported.

Recommendation

In order to provide accurate assumptions for 2036 model, it is recommended that the applicant continue to develop the intersection design relating to SSD 9522 Condition B18 in consultation with TfNSW.

5. Comment

Section 6.7 - *future SLR /Bakers Lane/NS Road 01* – the report states ‘*the Site’s truck exit point has been located approximately 150 metres from the stop line of the southern approach for the potential signalised intersection which confirms that the queue back from the signal will not impact the access point.*’ It is not clear where this access is in relation to the signals as there is no plan provided.

Recommendation

A plan should be provided or referenced indicating where the intersection in relation to the site truck exit point.

Swept Path

6. Comment

Appendix D – *Swept Path Analysis and Design Commentary* – The swept path plans are provided for 26m A-Double. According to the Mamre Road Precinct DCP Road design item (20), it should be tested for 36m PBS Level 3 type A vehicles.

Recommendation

It is requested that Swept path plans be provided showing the test vehicle of a 36m PBS Level 3 type A vehicle.

Preliminary Construction Traffic Management Plan (PCTMP)

7. Comment

Predicted haulage routes are not provided. It is noted that the report states the route is *'in line with the overarching CTMP prepared previously by Ason Group.'* However this attachment is not provided.

Recommendation

It is recommended that the haulage routes are provided as the CTMP is further developed.

Green Travel Plan

8. Comment

It is noted that the applicant includes the following references: *"Detailed discussion regarding future bus routes would be a scope for the broader estate and should be undertaken in consultation with TfNSW. Furthermore, a preliminary Green Travel Plan (GTP) has been prepared and is submitted as part of this application. This document is subject to TfNSW's review and will require further liaison from TfNSW as it contains information regarding the planning infrastructure for the future public transport provision."* and *"A preliminary Green Travel Plan (GTP) has been prepared and is submitted as part of this application."* However, it appears that there has been no Travel Plan or related TDM documentation submitted to the Portal or provided to date as part of the application.

Recommendation

TfNSW request that the applicant provide the aforementioned documentation for consideration, prior to our making an assessment of the application.

Further, we have the following comments relating to the TIA:

- a. **Public Transport** - We note and support the commentary regarding the provision of improvements for public transport (PT) at an early stage in the development to achieve a culture of PT use.
- b. **Cycling** - There is some high level commentary on encouraging cycling and this should also be covered in the GTP.
- c. **Walking** - The TA is almost silent on walking. It is recognised that this is an industrial facility, and therefore walking will not necessarily be a favoured mode in terms of safety or convenience, however it is essential in order to access other modes of transport and should be addressed in the GTP.
- d. **General TDM commentary** –In order to encourage mode share change, the following should also be considered:
 - TfNSW recommends that the applicant promotes the use of sustainable transport initiatives such as car-pooling or car sharing for their employees to reduce the use of cars on the site. Shuttles to site could also be considered for key origins to the centre.
 - TfNSW recommends that a Travel Plan be created for this site once the public transport and active network around the site has been improved.
 - TfNSW has developed a Travel Plan Toolkit to assist in the development of a Travel Plan, available [here](#).