

3 April 2025

TfNSW Reference: SYD25/00115/02
DPHI Reference: SSD-65924461



Ms Kiersten Fishburn
Secretary
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Thomas Bertwistle

**ENVIRONMENTAL IMPACT STATEMENT EXHIBITION - WAREHOUSE AND DISTRIBUTION CENTRE
49-61 STEPHEN ROAD, BANKSMEADOW**

Dear Ms Fishburn,

Reference is made to the Department of Planning, Housing and Infrastructure's (DPHI) referral inviting Transport for NSW (TfNSW) to comment on the Environmental Impact Statement (EIS) relating to the proposed warehouse and distribution centre at 49-61 Stephen Road, Banksmeadow.

DPHI is advised that as part of the consultation process to satisfy the Secretaries Environmental Assessment Requirements (SEARs) for this State Significant Development Application (SSDA), TfNSW provided its comments to the Applicant's traffic consultant on the Traffic Impact Assessment (TIA) prepared to support the proposal. TfNSW's review has identified that those comments have not been addressed in the TIA that was submitted with this SSDA (i.e. the report submitted for comments is the same report submitted with this SSDA).

As such, TfNSW advises that it is unable to complete its assessment of this SSDA and therefore **does not support** the SSDA in its current form. TfNSW requests that the Applicant address the items provided in **TAB A** and to resubmit an amended TIA for review by TfNSW. Following receipt of updated information that addresses comments in **TAB A**, TfNSW will review the material and respond accordingly.

For more information, please contact Jim Tsirimiagos, Land Use Planner, on 0412 376 198, or by email at development.sydney@transport.nsw.gov.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Lissenden".

Andrew Lissenden
A/Senior Land Use Planner - Eastern
Land Use, Network & Place Planning
Transport Planning | Planning, Integration and Passenger

TAB A

1. Traffic Impact Assessment (TIA) comments

- a. The traffic assessment scope generally follows the TfNSW advice letter to DPHI dated 16 January 2024 (SYD22/01604/02) with the exception of the following:
 - “Weekly tube surveys on Stephen Road and Botany Road to understand the change in heavy and light vehicle volumes / percentages between the existing conditions and post development”
- b. Following a review of the TIA dated November 2024, the following comments are made on the TIA:
 - i) While tube surveys are referenced in the report in Section 8.1 of the TIA, the results are not provided. Please include the tube survey results for review.
 - ii) In Section 8.2 of the TIA, the site peak hour and network peak hour are referenced. Please advise what the likely site peak hour and road network peak hour are and are they expected to overlap at this site?
 - iii) Figure 12 and Figure 13 of the TIA estimate no additional right turning vehicles from Foreshore Road into Botany Road. Please include justification for this or if additional vehicles are anticipated to use the movement, please document the change in the queue for the right turn into Botany Road.
 - iv) The cycle times modelled for the two signalised intersections appear incorrect. Please confirm the cycle times on the day of the survey as a review of SCATS plan data indicates the following cycle times:

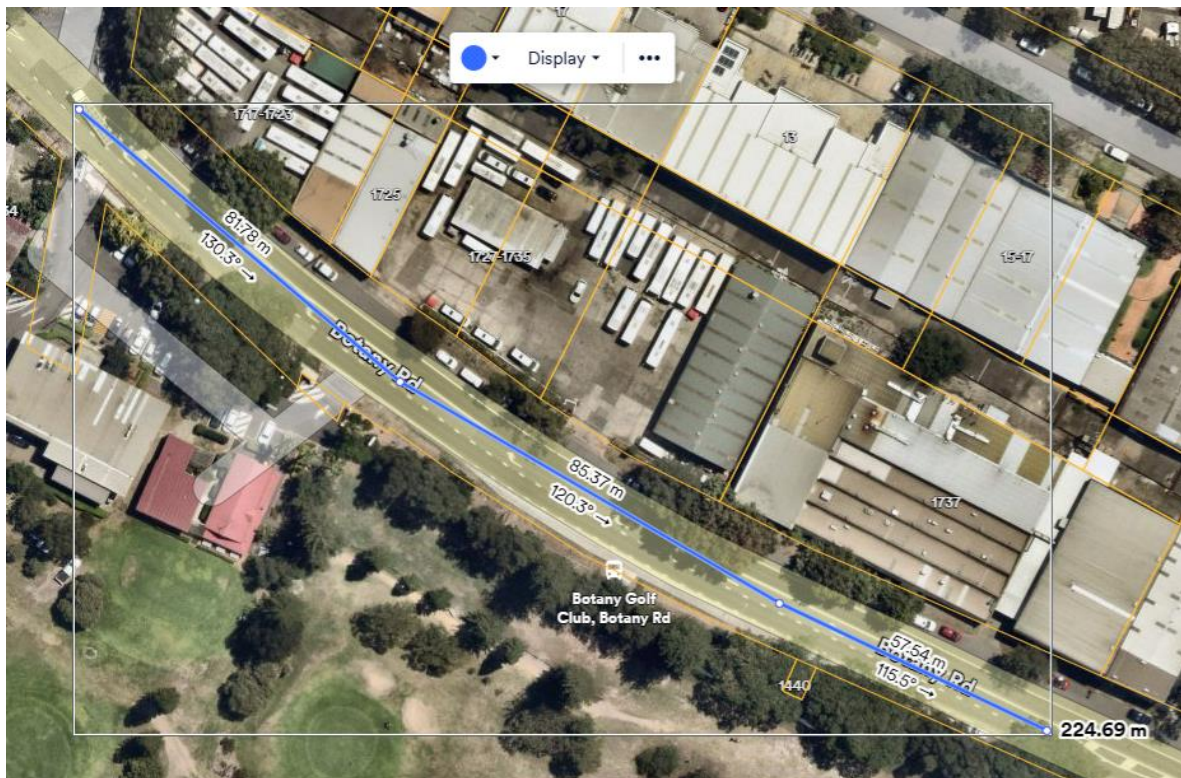
Intersection TCS Number	Intersection	AM Cycle Time	PM Cycle Time
1525	Foreshore Road / Botany Road / Penrhyn Road	130 sec	130 sec
2763	Stephen Road / Swinbourne Road	100 sec	100 sec

- v) While TfNSW cannot provide detailed comments on the SIDRA models without seeing the files, we note that storage at an intersection should be the length of a turn lane measured up to the point at which a vehicle can be stored within that lane and let vehicles in the other lane pass, rather than the length of the lane (i.e. including taper). TfNSW notes that the right turn bay for the Botany Road/Foreshore Road/Penrhyn Road intersection has been coded at 80m, where the likely storage for a vehicle to sit within the lane is likely closer to 61m, as shown below.



In other instances, the right turn bay distances seem to be out of date. For example, for the intersection of Botany Road and Hills Street the TIA has coded the Botany Road right turn bay as being 55m in length, whereas TfNSW information indicates that this is in fact over 220m in length (see image below).

All distances for lane lengths and parking shall be reconfirmed, preferably with on-site verification.



vi) Other parameters to ensure are checked include walking speed set to 1.2m/s.

- c. TfNSW also requires the provision of the electronic SIDRA files for review. These files will need to be updated to address the comments above. Details are also required on how the base model has been calibrated with on-site observations (e.g. instance queue lengths, delays, etc).

2. Green Travel Plan (GTP) comments

- a. General: TfNSW notes that the site is currently served by some active and public transport options, and the GTP should be updated when new infrastructure and services are added. Certainly, carpooling and shuttle bus options (for example extra services from the warehouse development to the train stations) are viable options in the interim, as well as use of existing active and public transport services.
- b. Section 2.1: Public transport infrastructure: Please add in train stations for completeness in this section – it is noted the bus service to the stations, but not the locations of train network which would be helpful.
- c. Mode share: Please update the text for Table 3 ABS Travel mode share, as this states that “a high percentage (56%) of workers within the area who use public transport” – the table shows 86% as car as driver or passenger. Further, the target mode shift for car as driver and passenger (84%) is still considered high – with very little change for public transport from the existing mode share to proposed. Even an increase in car as passenger through implementing a carpooling scheme will help in the interim.
- d. Travel Survey: The GTP should include a travel survey to be provided to the employees and visitors, and should include questions on residential postcode which will inform strategies to encourage public and active transport options.
- e. Bicycle parking and End of Trip Facilities (EoT): TfNSW appreciates that some bicycle parking spaces are to be provided as well as EoT – however no detail on the amount has been provided, other than that it is “in accordance with DCP requirements” which are likely to be absolute minimums. Further, TfNSW asks that both the bicycle parking and EoT be monitored over time to ensure sufficient supply to encourage active transport. The bicycle parking should be flexible to allow for parking of other micromobility options, as they come on stream. The bicycle parking should be safe, secured and under cover. Some further guidance on bicycle parking and end of trip facilities can be found in the [Cycleway Design Toolkit](#).
- f. Travel Access Guide (TAG): TfNSW appreciates that a TAG has been provided in Appendix A. of the GTP. The TAG should also include:
 - i) A comprehensive map showing all modes of public and active transport, including buses (private and public), trains, walking and cycling routes, as well as times for these public transport options (noting that some of this information is already included in the GTP).
 - ii) Add a section on train station and rail options
 - iii) Number and location of End of Trip facilities and bicycle parking (bicycle racks, showers, lockers, change rooms) and locate on more detailed map.

For further helpful information, please check this link [How to Create a Travel Access Guide](#).