URBIS

KEMPS CREEK ESTATE – SSD-9522 MOD 3

Response to Request for Information

Frasers Property Industrial (**Frasers**) and Altis Property Partners (**Altis**) (referred to as the '**Frasers and Altis Kemps Creek JV'**) received comments from a number of State and local authorities in response to the SSD-9522 MOD 3 Modification Report issued to DPE on 26 November 2021. The State and local authorities include:

- Department of Planning and Environment (**DPE**) - 11 February 2022 (refer **Table 1**)
- Penrith City Council (PCC) – 3 February 2022 (refer **Table 2**)
- Chief Engineer from DPE – 24 February 2022 (refer **Table 3**)
- Transport for NSW (TfNSW) – 17 March 2022 (refer **Table 4**)

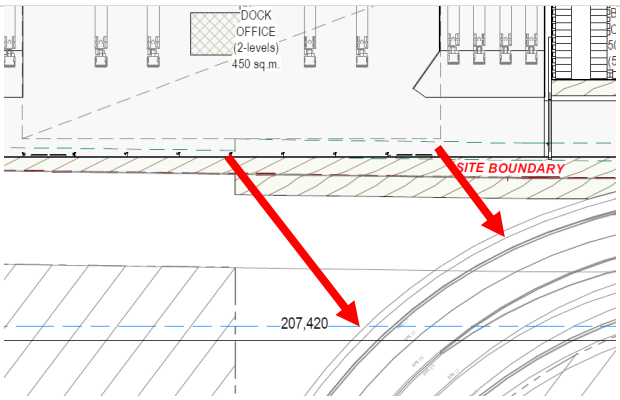
The Frasers and Altis Kemps Creek JV, and the project team have provided responses and actions to each of the comments raised by the State and local authorities in Tables 1 – 4 provided within this document.

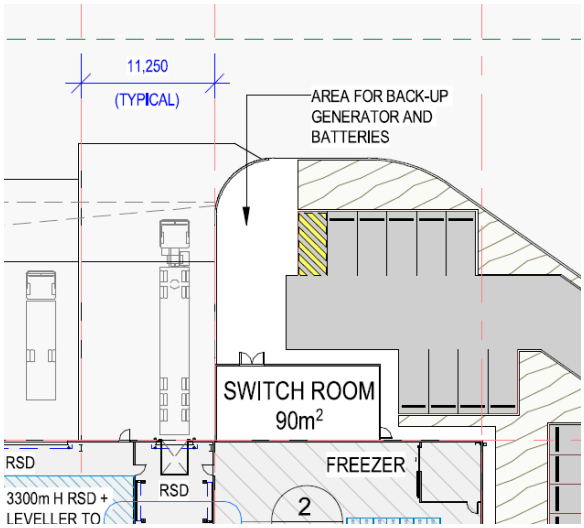
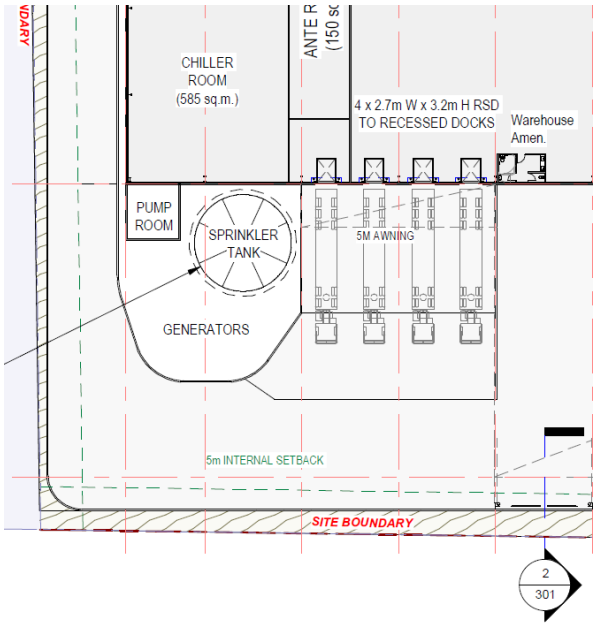
DPE COMMENTS

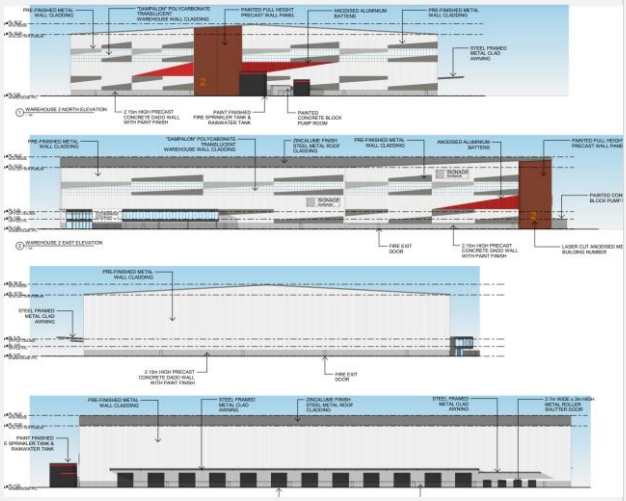
Table 1 DPE Comments and Response Table

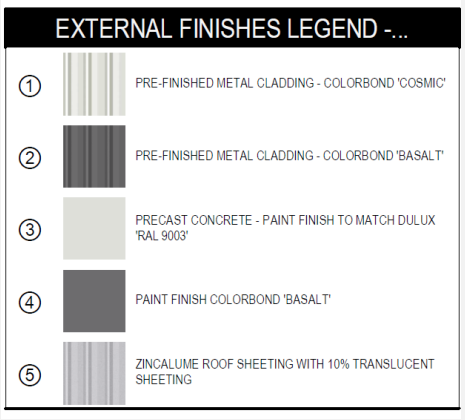
Comment	Response	Section
The Department notes that MOD 2, which is also under assessment, proposes changes to the approved site plan, including the areas of Lots 1-4. Please clarify whether any revisions to the MOD 3 proposal will be required should MOD 2 be determined prior to MOD 3.	The SSD-9522 MOD 3 application contemplates and is designed in anticipation of MOD 2 approvals, with the additional inclusion of a right turn lane as part of MOD 3. There are no revisions to MOD3 required, should MOD 2 be determined prior to MOD 3.	**Section 1 of** MOD 3 Report
Please also provide updated development layout plans to those included at Appendix 1 of the consent for SSD-9522.	An updated development layout plan and also a subdivision plan for the whole estate has been prepared. These plans have been included in **Appendix A**.	**Appendix A** in this Response Table
The Department notes the request to delete Conditions B4 and B18 on the basis that the information provided as part of the modification application addresses the requirements of those conditions. It is considered unnecessary to delete conditions of consent on the basis that they have been satisfied. Please provide additional justification for the modification of these conditions.	It is understood that there is no need for conditions to remain in the consent if they have been satisfied. These conditions are based on a previous scheme which has since been updated. These conditions no longer need to be included in the consent since the changes have been made in the updated layout plan. A design change in the plan does not require conditions to remain in the consent and a letter from DPE. We have TfNSW sign off on this also.	N/A
Please provide justification for the increase in car parking spaces while the overall GFA is proposed to be reduced.	The known tenant for Warehouse 2, has a known employment base and the amount of car parking provided is a specific tenant requirement. They require more spaces due to the anticipated number of employees for their operation. This will bring more jobs to the Kemps Creek Estate and the broader Mamre Road Precinct. The Traffic Impact Assessment has also demonstrated that the proposed car parking spaces can be satisfied at the entry point into the estate. Refer **Appendix C**. Below is a comparison of the parking rates within both the Mamre Road and Mamre South DCPs. Mamre Road DCP	**Section 8.3** of MOD 3 Report **Appendix C** of MOD 3 Report

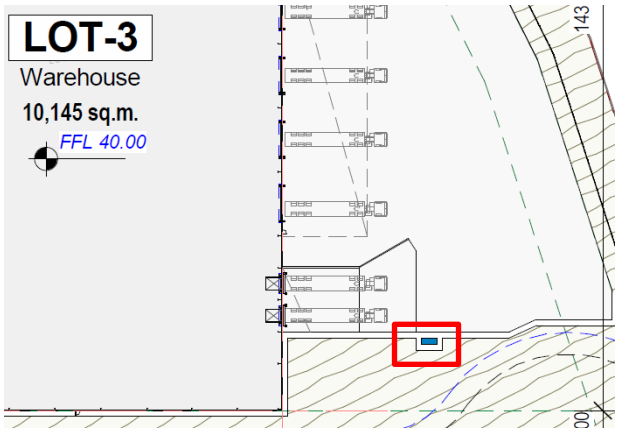
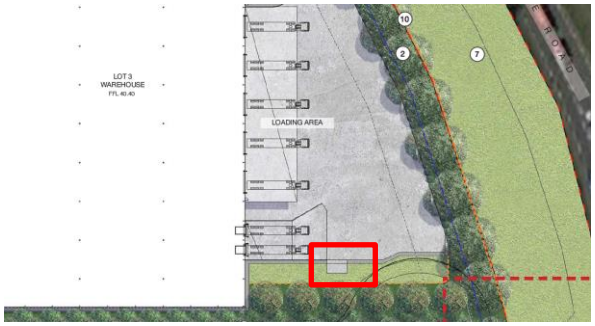
Comment	Response	Section
	▪ Industries: 1 space per 200m2 of GFA or 1 space per 2 employees, whichever is greater. ▪ Warehouse or distribution centres: 1 space per 300m2 of GFA or 1 space per 4 employees, whichever is the greater. ▪ Ancillary office space: 1 space per 40m2 of GFA <u>Mamre South DCP</u> ▪ Warehouse or distribution centres: 1 space per 300m2 of GFA ▪ Office: 1 space per 40m2 of GFA ▪ Industries: 1 space per 200m2 of GFA	
Clarify why the receiving office and despatch office for Lot 2 are included in the warehouse floor area and not office floor area; similarly, the dock office for Lot 4.	Loading docks related to offices and/or workshops (within the warehouse building envelope) are considered ancillary areas to the warehouse, due to their operational functions. These ancillary spaces often grow, shrink or shift during detailed design when the warehouse fitout is being developed. For example. this is happening with the known tenant for Lot 2, which the proponent is currently in discussions with. By including these areas within the warehouse, the overall area of the warehouse will not change for CC certification purposes.	N/A
The 7.5 m building setback to Bakers Lane should be extended along the entire southern boundary of Lot 4 as it fronts the Bakers Lane road reserve, rather than changing to 5 m approximately halfway along.	The transition from the 7.5m to 5m setback along the hardstand area of Lot 4 is considered appropriate given there is no longer a direct interface with Bakers Lane, with the realigned corridor now connecting into the Southern Link Road. Given the Bakers Lane has been realigned to connect into the future Southern Link Road, the site actually achieves a building setback which exceeds 7.5m, when measured from the realigned Bakers Lane corridor.	**Appendix A** of this Response Table

Comment	Response	Section
		
The proposed awning and columns within the setback area do not comply with the development controls in Condition A7.	The proposed nine support structures in Lot 4, as shown below, are no longer proposed as part of SSD-9522 MOD 3. The proposed awnings and columns were part of a previous requirement for a potential tenant who are no longer in agreement for Lot 4 and Warehouse 4. Hence, this previous non-compliance which was proposed on strategic merit is no longer required.	**Appendix A** in this Response Table
The Visual Impact Assessment (Appendix B) should include consideration of the rooftop plant proposed for Lots 2 and 4.	The Visual Impact Assessment has been updated by Geoscapes to include the rooftop plant proposed within Lots 2 and 4. The VIA concludes that the roof equipment to Warehouses 2 and 3 is most visible from Mamre Road as demonstrated within VP 21. However, when comparing the impact of the roof equipment compared to the overall bulk and scale of the previous MOD1 scheme, it is not considered to be a significant visual detractor.	**Appendix B** of this Response Table
The Department notes that Section 8.5 of the Modification Report states that the modifications result in a reduction in landscaped area by 3,976 m2 but an increase in tree canopy area by 2,825 m2. Please clarify how this is achieved.	We increased the tree density on this submission to make up for reduced garden beds hence why there is more canopy cover and less landscape area.	**Section 8.5** of MOD 3 Report
Please provide details on the location, size and intended use of the generators proposed for Lot 2 and Lot 4.	The bio-diesel back-up generators is a specific customer request for Lots 2 and 4 which are available for immediate use when required. The generators have a capacity of 1,500kv a day, and are 4m x 5m and 2m in height. The generator is located next to the switch room, in the south eastern corner of Lot 2 and in the south western corner of Lot 4 next to the sprinkler tank.	**Appendix A** in this Response Table

Comment	Response	Section
	Lot 2 Generator location:  Lot 4 Generator location:  	
The Department notes that the air quality assessment (Appendix L) considers the inclusion of generators on Lot 2. However, it does not consider the generators for Lot 4 that are identified in the Warehouse 4 Floor Plan (SP-KC1-DA-104-P).	The generators for Lot 4 have been assessed by Northstar Air Quality attached in **Appendix X** of this response table. The requirement for emergency backup generation through three small 614 kW biodiesel fuelled generators is not anticipated to result in any significant air emissions. In addition, given the anticipated low usage of these small generators, impacts on surrounding areas would be anticipated to be minimal.	**Appendix L** of this Response Table

Comment	Response	Section
Please provide updated details for any proposed signage with regard to Condition B90. It is noted that the elevations in the architectural plans at Appendix A include notes referencing ‘external mega graphics guidelines’ – please clarify.	The elevations have been updated to remove referencing to ‘external mega graphics’ and replaced with ‘sustainability messaging’. The text is painted on the warehouses in a fixed location and is not illuminated or changeable. This will be painted across all warehouses. This is a new thing the proponents are introducing across a number of their projects and is simply a messaging system calling out sustainability measures, i.e. “we are using 60% less energy”. The messaging is not building identification signage. In relation to proposed signage, all elevations have been updated with details of signage areas in accordance with Condition B90, and nominated areas for tenant signage.	**Appendix A** in this Response Table
The modification report states that the development will retain the same materials and finishes as approved previously. However, the external finishes identified in the architectural plans at Appendix A are different to those shown on previously approved plans for Lots 1-4. Please clarify.	The proposed materiality for Warehouses 1-4 as part of MOD 3 will be largely the same as what was previously approved for Lots 1-4 (Warehouses 1-3). Only the colours have been updated. Whilst there are more materials proposed in the original approval, the MOD 3 architectural drawings present a more simplified yet visually appealing elevation drawing. MOD 3 building materiality for Lots 1-4 are the same as those previously approved. Proposed finishes under the original approval for Lots 1-4: 	**Appendix A** in this Response Table

Comment	Response	Section
	Proposed finishes under MOD 3:  	
It is noted that the Operational Noise Assessment (Appendix D) included consideration of the rooftop plant for Lot 2. Please also include consideration of the proposed generators for Lot 2 and as well as the proposed rooftop plant, generators and any other known operational noise sources for Lot 4.	The Operational Noise Assessment has been updated to include the proposed generators for Lot 2 and 4 and other mechanical plant noise sources. The additional noise sources and outcomes to the noise assessment are summarised in Appendix X of this Response Table.	**Appendix X** of this Response Table
The Department notes that the gas cylinder storage area for Warehouse 2, shown in Figure 4.3 of the SEPP 33 Assessment (Appendix K), is located next to the smoker's area identified on the Warehouse 2 Floor Plan (SP-KC1-DA-102-P). Please clarify if this poses any safety risks.	In response to the location of the gas cylinder store adjacent to the smoking area, it is difficult to show exact detail on the site plan based on the scale of the plan. The cylinder store would be assessed for Hazardous Area Classification and hazardous zoning diagram would be developed for the store. A review of Australian Standard AS 60079.10.1:2009, Classification of Hazardous Areas – Explosive Gas Atmospheres, indicates that an ignition source exclusion zone of around 1.5m would be required for a gas cylinder. This would be doubled to provide additional safety and a minimum separation of 3m would be applied. Notwithstanding this, a more detailed assessment would be prepared as part of the site safety management requirements and the appropriate separation provided	**Appendix K** of MOD 3 Report
The gas cylinder storage area for Warehouse 3, shown in Figure 4.5 of the SEPP 33 Assessment, should be located outside of the landscaped area.	The gas cylinder storage area as indicated in Figure 4.5 of the SEPP 33 Assessment has been shown on the updated Architectural Drawing and Landscape Plan for Lot 3.	**Appendix A** in this Response Table **Appendix E** in this

Comment	Response	Section
	The area for the gas cylinder storage areas has also been removed from the landscape area which has been recalculated. Lot 3 Architectural Plan:  Lot 3 Landscape Plan: 	Response Table

PCC COMMENTS

Table 2 PCC Comments and Response Table

Comment	Response/Action	Reference
Planning Review Advice		
(a) Proposal This modification application (MOD3) proposes the following: ▪ Deletion of Condition B4 and B18, and amendment of Conditions B52 and B54 of SSD-9522, ▪ Change to Lots 1-4, ▪ Alterations to Gross Floor Area, ▪ Amendments to Condition A22 which relates to Contributions, ▪ Inclusion of a new north-south access road off Bakers Lane which provides access to Lots 1-4, ▪ Reduction in warehouse tenancies from 6 to 4, ▪ Reduction in proposed building heights to a maximum of 21.65m, The Department is advised that Page 1 of the applicant's Modification Report states that the proposal seeks an amendment to Condition A22. The nature of the amendment sought is not explained in the Report. DPIE is advised to seek clarity. No assessment of this component of the proposal has been undertaken by Council.	Condition A22 is not proposed to be amended. MOD 3 Report updated to remove reference to Condition A22 and replace with amendment to Conditions B52 and B54.	**Section 1** of MOD 3 Report
(b) Applicable Development Control Plan The applicable Development Control Plan for the site is the Mamre Road Precinct DCP. The Penrith DCP 2014 does not apply to the subject site or application.	Not agreed – the applicable DCP for the site is the site-specific Mamre South DCP. Many controls within the Mamre South DCP are actually the same as controls within the Mamre Road Precinct DCP, such as building setback controls.	**Section 6.4.1** of MOD 3 Report
(c) Proposed Lot and Warehouse Reconfigurations	The issue in relation to warehouse allotments not having adequate frontage to a public road	**Section 4** of MOD 3 Report

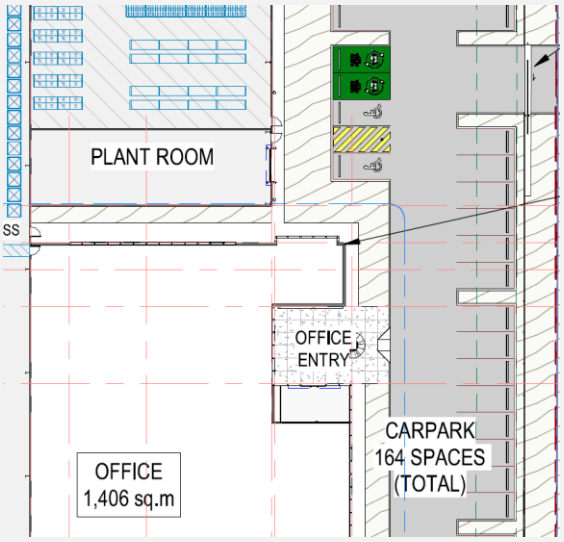
Comment	Response/Action	Reference
In letter dated 29 November 2021 issued in response to the lodgement of MOD 2 to the SSDA, Council raised objection to the provision of warehouse allotments that are not provided with adequate frontage to a public road and in this regard, the addition of the north-south interallotment road with teardrop/cul-de-sac is an improvement on the approved layout (subject to further design resolution related to pedestrian access and safety matter as raised in Section 4, Traffic Management Advice, below).	has been addressed through the inclusion of the teardrop cul-de-sac. The proposed modification seeks to directly address Condition B18 of SSD-9522, which was imposed by Transport for NSW (TfNSW) requiring that all access to lots north of Bakers Lane be obtained from a single roadway so as to reduce crossings onto Bakers Lane. The updated Estate layout introduces a new cul-de-sac connection for this purpose, at a suitable distance from the future signalised intersection between Mamre Road and the SLR, to ensure there are no disruptions to traffic conditions at this critical node.	**Appendix A** of this Response Table
Precinct wide observation - Council takes this opportunity to again emphasise that all warehouse allotments are to be provided with frontage to a public roadway which is to be designed to comply with the relevant road typology design requirements detailed in the Mamre Road Precinct DCP, and all dimensions (roadway widths, setbacks etc.) are to be noted on plans including architectural and landscape plans. This will ensure that safe and efficient access is provided for all users; and that streetscapes are provided with the requisite landscaping and setbacks to ensure a high quality, green and sustainable Precinct.	The key controls within the DCP in relation to roadway widths, setbacks and landscaping are all met in the proposed MOD 3 layout and design for Lots 1-4.	**Section 4** of MOD 3 Report **Section 8.1** of MOD 3 Report **Appendix A** of this Response Table
Council recommends that the Department does not support (for all proposals) battle-axe style warehouse lots including those accessed by private roads or driveways which do not replicate the DCP design requirements including those stipulated for roadway widths, setbacks and landscaping.	The proposed Lot 1-4 layout under MOD 3 is a direct response to Condition B18 and TfNSW's requirements for a new cul-de-sac. The proposed modification seeks to directly address Condition B18 of SSD-9522, which was imposed by TfNSW requiring that all access to lots north of Bakers Lane be obtained from a single roadway so as to reduce crossings onto Bakers Lane.	**Section 5** of MOD 3 Report **Section 8.1** of MOD 3 Report **Appendix A** of this Response Table

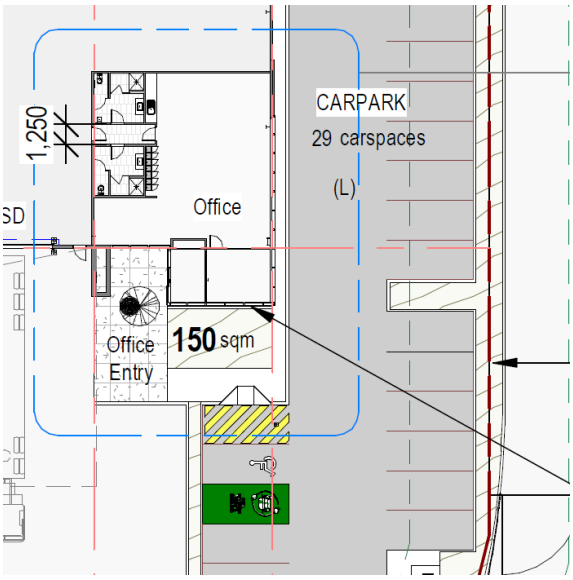
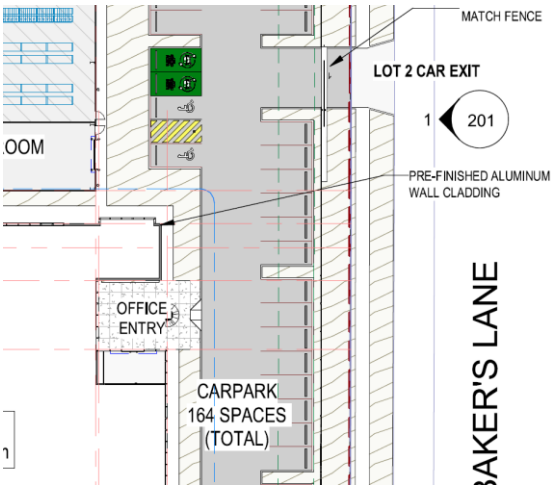
Comment	Response/Action	Reference
	Condition B18 – Internal Road Network and Southern Link Road, states: *B18. Prior to the commencement of any construction (excluding bulk earthworks) on lots 1-4 north of Bakers Lane, the Applicant must prepare a concept design demonstrating how the internal road network 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.* The key controls within the DCP in relation to roadway widths, setbacks and landscaping are all met in the proposed layout and design.	
Careful consideration is to be given to the design of warehouse buildings and office areas to ensure that these are well designed, high in amenity (internal and external) incorporate end of trip facilities and are accessible at each level.	The design of the Lots 1-4 within MOD 3 ensure Condition B18 is satisfied whilst also achieving a well designed warehouse configuration and layout. The proposed warehouses will be supported by office areas that located in accessible locations in relation to car parking areas and pedestrian access routes. The Lot 1-4 layout is well supported by landscaping which soften the edge along the street frontage.	**Section 5** of the MOD 3 Report
External storage is to be located behind warehouses and is not to present to the street frontages (as per the Mamre Road DCP requirements).	The proposed configuration of Lots 1-4 within MOD 3 has hardstand areas with a street frontage within Lots 1, 2 and 4. However the proposed layout enables maximum setback from the street frontage to be achieved. There is also sufficient landscaping provided to screen this activity from the streetscape, which is clearly demonstrated in the Landscape Plan and Visual Impact Statement. Refer **Appendix E** and the **Appendix B** of the MOD 3 Report.	**Appendix B** of this Response Table **Appendix E** of this Response Table
(d) Proposal to delete Condition B4 & B18 of Consent no. SSD-9522 The Department is advised that the proposal to delete Condition B4 and B18 is not supported by Council.	It is understood that there is no need for conditions to remain in the consent if they have been satisfied. Condition B4 is proposed to be amended, whilst Condition B18 is proposed to be deleted.	N/A

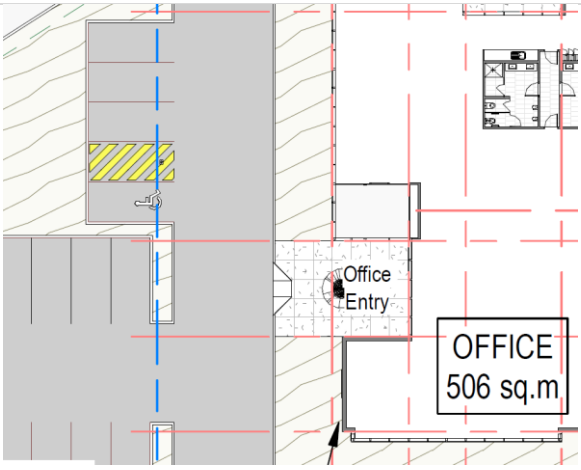
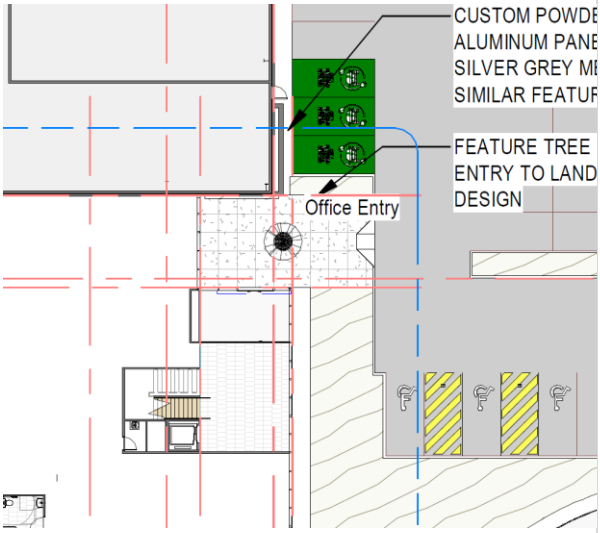
Comment	Response/Action	Reference
Details relating to this component of the Modification application are included under Section 2, Development Engineering Advice, below.	Condition B4 was amended as part of the Approved Modification 2 to SSD9522, we are no longer proposing this condition be deleted. ***Condition B4*** *Prior to commencement of road construction, the Applicant must submit design plans to the satisfaction of the Planning Secretary and the relevant roads authority which demonstrate the proposed access to the development and the internal road intersections are:* *(a) designed to accommodate the turning path of a B-Double heavy vehicle and a 19.0 m Articulated vehicle; and* *(b) consistent with the most recent version of Austroads Guide to Road Design and TfNSW specifications.* *The proposal is consistent with the relevant legislative and policy framework including the EP&A Act and the State Environmental Planning Policy (Western Sydney Employment Area) 2009 (WSEA SEPP).* *The impacts identified to be relevant to MOD 3 include:* ▪ *Noise and visual impacts* ▪ *Traffic impact* <u>Justification for amendment of B4</u> Condition B4 is proposed to be amended as this modification application includes the detailed road layout and turning path plans requested by this condition. It is noted that Condition B4 is also sought to be deleted by MOD2 which is currently under assessment by DPIE. Its amendment is concurrently sought as part of MOD3 in the instance that MOD 3 is determined prior to MOD 2. In Condition B4, replace ‘commencement of road construction’ with ‘the issue of a Subdivisions Works Certificate for the estate roads’ and replace ‘Planning Secretary and the relevant roads authority’ with ‘Certifying Authority’.	

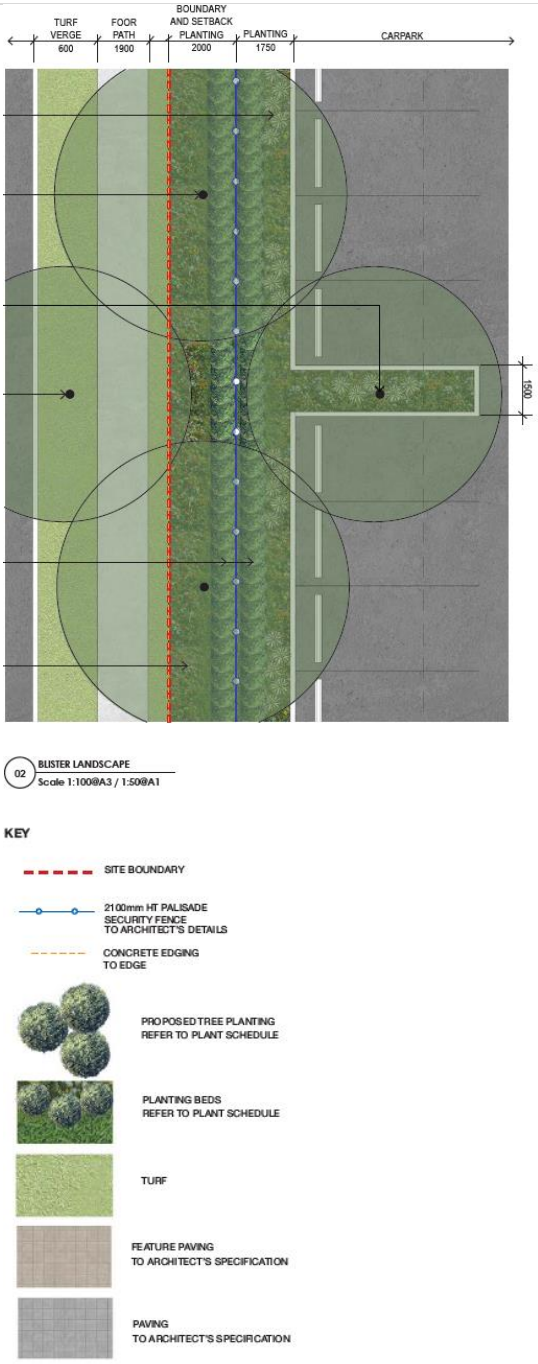
Comment	Response/Action	Reference
	In Condition B4, replace subclause (a) with the following: (a) designed for 30 m Performance Based Standards (PBS) Level 2 Type B vehicles and tested for 36.5 m PBS Level 3 Type A vehicles Condition B18 is based on a previous scheme which has since been updated. These conditions no longer need to be included in the consent since the changes have been made in the updated layout plan. A design change in the plan does not require conditions to remain in the consent and a letter from DPE. The condition proposed to be removed in the MOD 3 Report include Condition B18 which has been responded to and satisfied as part of MOD 3. The condition includes: ***Condition 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.* <u>Justification for removal of B18</u> The proposed modification seeks to directly address Condition B18 of SSD-9522, which was imposed by Transport for NSW (TfNSW) requiring that all access to lots north of Bakers Lane be obtained from a single roadway so as to reduce crossings onto Bakers Lane. Condition B18 is proposed to be deleted as this modification directly addresses the requirements	

Comment	Response/Action	Reference
	of this condition through the introduction of the new cul-de-sac road from which all warehouse lots will gain access. The new road will reduce the number of crossings from Bakers Lane from 7 to 4. The updated Estate layout introduces a new cul-de-sac connection for this purpose, at a suitable distance from the future signalised intersection between Mamre Road and the SLR, to ensure there are no disruptions to traffic conditions at this critical node. If the conditions cannot be removed, the Frasers Altis JV would like to request a letter of confirmation from DPE stating the conditions have been satisfied by MOD 3 and no further action is required.	
(e) Parking Surplus parking is proposed. The Department is advised to include the area of the site utilised by surplus car parking and hard stand in Gross Floor Area calculations as is required by the Mamre Road Precinct DCP (Section 4.6 Access and Parking, Controls, (3)). This requirement supports modal split, encourages alternative modes of transport other than private vehicle and will reduce heat island impacts, and the visual impact of vast swathes of car parking hard stand.	The known tenant for Warehouse 2, has a known employment base and the amount of car parking provided is a specific tenant requirement. They require more spaces due to the anticipated number of employees for their operation. This will bring more jobs to the Kemps Creek Estate and the broader Mamre Road Precinct. The Traffic Impact Assessment has also demonstrated that the proposed car parking spaces can be satisfied at the entry point into the estate. Refer **Appendix C** of the MOD 3 Report.	**Section 8.3** of MOD 3 Report **Appendix C** of the MOD 3 Report
Car parking shall be designed having regard to the 'world-class' expectations of the Precinct detailed within the Mamre Road Precinct DCP. Section 4.6 Access and Parking of the DCP requires that: ▪ The design of parking and access areas is to address WSUD principles (these are to be demonstrated and shown on plans),	MOD 3 applies the approved car parking rates set out in SSD-9522 which are consistent with Condition A8 of the previous consent set out under the Mamre South DCP, which is the same as the parking rates within the Mamre Roads DCP. The parking rates under the DCPs are as follows: SSD-9522 Mamre South DCP ▪ Warehouse or distribution centres: 1 space per 300m2 of GFA ▪ Office: 1 space per 40m2 of GFA	**Section 8.3** of MOD 3 Report **Appendix C** of the MOD 3 Report

Comment	Response/Action	Reference
▪ Parking areas should incorporate dedicated parking bays for electric vehicle charging. It is recommended the design align itself with the requirements highlighted above and those of Section 4.6 of the DCP.	▪ Industries: 1 space per 200m2 of GFA <u>Mamre Road DCP</u> ▪ Industries: 1 space per 200m2 of GFA or 1 space per 2 employees, whichever is greater. ▪ Warehouse or distribution centres: 1 space per 300m2 of GFA or 1 space per 4 employees, whichever is the greater. ▪ Ancillary office space: 1 space per 40m2 of GFA The application of WSUD principles to the design do not change the outcomes of the previous approval. Electric vehicle charging bays are provided within each of the lots, as indicated below in green in Lot 2. 	
Accessible car parking spaces are to be re-located to be closest to the staff entry points.	Accessible car parking spaces within Lots 1-4 are provided to the closest entry points or in the closest location which provides the safest route to the office entry points.	**Appendix A** of this Response Table

Comment	Response/Action	Reference
	Lot 1  Lot 2  Lot 3	

Comment	Response/Action	Reference
	 Lot 4 	
(f) Landscaping within Car Parking Areas and Roadway It is raised for the Department's consideration that landscaped blisters are not provided within the car parking hardstands in accordance with the requirements of the DCP.	The landscaped blisters have been updated in the Architectural Drawings in accordance with the DCP requirements.	**Appendix A** in this Response Table **Appendix E** in this Response Table
Landscape blisters are undersized and narrow and blister spacings exceed 10 car spaces on many occasions. The landscape package does not provide sufficient detail to enable an understanding of the design of the landscape blisters which are required to be a minimum 1.5m	The landscaped blisters have been updated in the Architectural Drawings in accordance with the Mamre Road Precinct DCP requirements. Landscape blister controls are not provided within the site-specific Mamre South DCP. A detailed representation of the landscape blister has been provided to show the typical landscape treatment.	**Appendix A** in this Response Table **Appendix E** in this Response Table

Comment	Response/Action	Reference
dimension (as per the Mamre Road DCP).		
Given car parking and hardstand areas exceed the requirements of the DCP, there is opportunity for increased tree planting and canopy cover. Justification for non-compliance is not provided.	The known tenant for Warehouse 2, has a known employment base and the amount of car parking provided is a specific tenant requirement. They require more spaces due to the anticipated number of employees for their operation. This will bring more jobs to the Kemps Creek Estate and the broader Mamre Road Precinct.	**Appendix C** of the MOD 3 Report

Comment	Response/Action	Reference
Limited amenity is provided to staff areas. Canopy trees and buffer landscaping is to be co-located in these areas.	A detailed plan for the staff breakout areas has been provided within the Landscape Concept Plan to demonstrate the amenity provided in more detail.  	**Appendix E** of this Response Table
It is recommended that the cul-de-sac be provided with landscaping to improve streetscape presence and assist in the provision of shade.	Buffer landscaping and suitable vegetation has been provided in the updated Landscape Plan to improve streetscape and provide more shading.	**Appendix E** of this Response Table
<u>(g) Heights and Roof Top Plant Machinery</u> It is raised for the Department's consideration that the approved Height of Buildings is to be measured from Natural Ground Level and is to include rooftop plant machinery including screening devices and air conditioning units.	The height of roof-top-plant varies. The top of the highest plant sits at 3.5m above the warehouse ridge level which is inclusive of a perimeter screen up to 1m above the top of the unit. The highest RL of the building inclusive of the plant is at 18.1m above the Finished Floor Level (14.6m + 3.5m)	**Appendix A** of this Response Table

Comment	Response/Action	Reference
To avoid subsequent MODs and issues with future DAs (submitted to Council) not complying with approved Heights expressed in consent no. SSD-9522 (as modified), Council recommends that any height limit expressed in a consent condition is to clarify that height is from a defined approved Finished Floor Level, or from Natural Ground Level; and is to clarify that height does or does not include roof mounted plant and any associated screening devices.	The top of building height levels are measured from the Finished Floor Level.	**Appendix A** of this Response Table
Roof top plant is not indicated in the provided architectural photo montages and is not included in the Geoscapes Visual Impact Addendum Report. Council recommends that the plans and reports be amended to address this matter and to allow a thorough assessment by the Department.	The Visual Impact Assessment has been updated by Geoscapes to include the rooftop plant proposed within Lots 2 and 4. The VIA concludes that the roof equipment to Warehouses 2 and 3 is most visible from Mamre Road as demonstrated within VP 21. However, when comparing the impact of the roof equipment compared to the overall bulk and scale of the previous MOD1 scheme, it is not considered to be a significant visual detractor.	**Appendix B** of this Response Table
(h) Lot alterations Level transitions are to be managed between Lots and thus alterations in lot configurations shall include detail as to how level transition is best managed to avoid cut and fill imbalance and the need to superfluous retaining structures and battering.	There are no interfaces with other developers sites or other lots associated with the MOD 3 assessment. Any need for retaining would be coordinated with individual development layouts within the estate. The comment is not relevant to this project at the current stage, and as such no additional details are required to demonstrate.	N/A
Amended Lot and warehouse layouts are to comply with the minimum landscape and setback requirements of the Mamre Road DCP.	The amended lot and warehouse layouts comply with the minimum landscape and setback requirements of the SSD-9522 (Condition A7) Mamre South DCP across all lots, with a minor non-compliance along the southern boundary of Lot 4. The original consent was assessed and provided again the Mamre South DCP. The proposed nine support structures in Lot 4, as shown below, are no longer proposed as part of SSD-9522 MOD 3. The proposed awnings and columns were part of a previous	**Section 8.1** of the MOD 3 Report **Appendix A** of this Response Table

Comment	Response/Action	Reference
	requirement for a potential tenant who are no longer in agreement for Lot 4 and Warehouse 4. Hence, this previous non-compliance which was proposed on strategic merit is no longer required.	
Development Engineering Advice		
(a) Road Act Matters Any works within the existing road reserve area of Bakers Lane will require approval from the relevant Roads Authority being Penrith City Council under the Roads Act.	Noted. There are no changes proposed within the existing road reserve area of Bakers Lane.	**Section 1** of MOD 3 Report
(b) Proposal to delete Condition B4 of Consent no. SSD-9522 The MOD3 application proposes to delete Condition B4, however following submissions for the MOD2 application the Planning Report for MOD2 accepted Council's proposed modified condition for Condition B4, to align with the recently adopted Mamre Road Precinct DCP.	Condition B4 of SSD-9522-MOD 1 states the following: *"Prior to commencement of road construction, the Applicant must submit design plans to the satisfaction of the Planning Secretary and the relevant roads authority which demonstrate the proposed access to the development, the internal road intersections and access to each development lot are:* *(a) designed to accommodate the turning path of a B-Double heavy vehicle and a 19.0 m Articulated vehicle; and* *(b) consistent with the most recent version of Austroads Guide to Road Design and TfNSW specifications."* Condition B4 is now proposed to be amended, instead of being deleted. Condition B4 was amended as part of the Approved Modification 2 to SSD9522, we are no longer proposing this condition be deleted. The proposed changes to Condition B4 include: In Condition B4, replace 'commencement of road construction' with 'the issue of a Subdivisions Works Certificate for the estate roads' and replace 'Planning Secretary and the relevant roads authority' with 'Certifying Authority'.	**Appendix C** of MOD 3 Report **Appendix G** of MOD 3 Report

<table>
<tr><th>Comment</th><th>Response/Action</th><th>Reference</th></tr>
<tr><td></td><td>In Condition B4, replace subclause (a) with the following:

(b) designed for 30 m Performance Based Standards (PBS) Level 2 Type B vehicles and tested for 36.5 m PBS Level 3 Type A vehicles

<u>Justification for amendment of B4</u>

Condition B4 is proposed to be amended as this modification application includes the detailed road layout and turning path plans requested by this condition. It is noted that Condition B4 is also sought to be deleted by MOD2 which is currently under assessment by DPIE. Its amendment is concurrently sought as part of MOD3 in the instance that MOD 3 is determined prior to MOD 2.

The design of the internal roads has been addressed by Costin Roe Consulting.</td><td></td></tr>
<tr><td>Although B-Triple access (36.5m PBS Level 3 vehicles) is not proposed to access the lots, the road network shall be checked against such vehicles as required by the Mamre Road Precinct DCP. Accordingly, it is recommended that Condition B4 remain although may be modified as follows:

Prior to the issue of a Subdivision Works Certificate for the estate roads, the Certifying Authority shall ensure that:

(a) access to the development and the internal road intersections are:

(i) designed for 30m Performance Based Standards (PBS) Level 2 Type B vehicles and tested for a 36.5m PBS Level 3 Type A vehicles.

(ii) consistent with the most recent version of Austroads Guide to Road Design and TfNSW specifications

(b) access to each development lot is:</td><td>The Mamre Road DCP (2021) outlines the following requirements in Section 4.6.1.

“10) Vehicular access must be swept path tested for the largest vehicle that will access a particular site e.g. 30m PBS Level 2 Type B or 36.5m PBS Level 3 Type A vehicles.”

Furthermore, Table 13 (within Section 4.6.1 of the Mamre Road DCP 2021) outlines the following minimum design vehicle requirements for industrial developments:

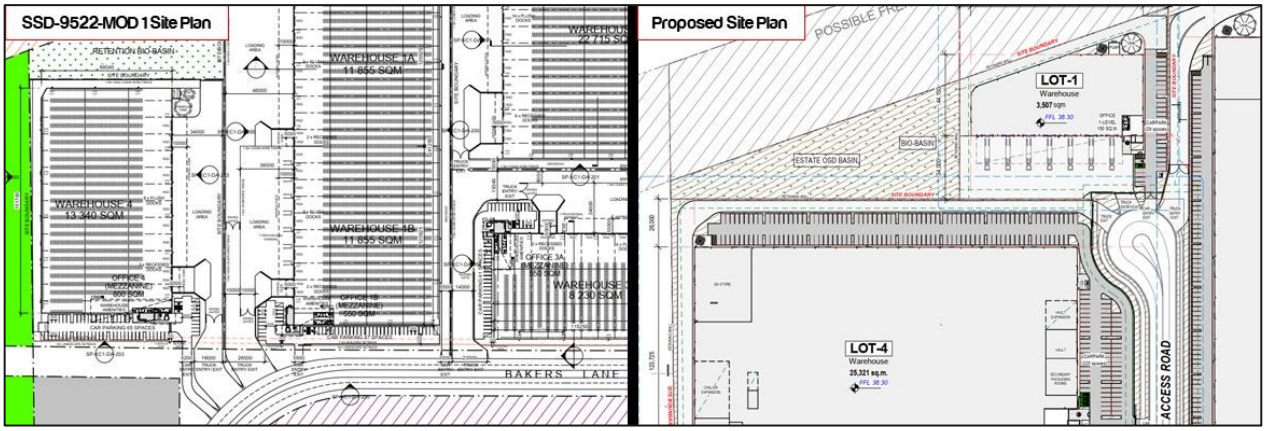
<table><tr><th>Site Area</th><th>Design Vehicle</th></tr><tr><td>Greater than 20,000sqm</td><td>30.0m PBS Level 2 Type B</td></tr></table>
It is noted that Ason Group has undertaken swept path assessments for 30.0m Super B-doubles at the proposed access to each Lot, which complies with the requirements set out in the Mamre Road Precinct DCP.

The design of the internal road intersection has been addressed by Costin Roe Consulting.

Condition B4 is now proposed to be amended, instead of being deleted. Condition B4 was amended as part of the Approved Modification 2</td><td>Appendix C of MOD 3 Report

Appendix G of MOD 3 Report</td></tr>
</table>

Comment	Response/Action	Reference
(iii) designed for a 30m Performance Based Standards (PBS) Level 2 Type B vehicles. Design plans including turn path templates demonstrating compliance, shall be submitted with the application for a Subdivision Works Certificate.	to SSD9522, we are no longer proposing this condition be deleted. The proposed changes to Condition B4 include: In Condition B4, replace 'commencement of road construction' with 'the issue of a Subdivisions Works Certificate for the estate roads' and replace 'Planning Secretary and the relevant roads authority' with 'Certifying Authority'. In Condition B4, replace subclause (a) with the following: (c) designed for 30 m Performance Based Standards (PBS) Level 2 Type B vehicles and tested for 36.5 m PBS Level 3 Type A vehicles Justification for amendment of B4 Condition B4 is proposed to be amended as this modification application includes the detailed road layout and turning path plans requested by this condition. It is noted that Condition B4 is also sought to be deleted by MOD2 which is currently under assessment by DPIE. Its amendment is concurrently sought as part of MOD3 in the instance that MOD 3 is determined prior to MOD 2.	
(c) Proposal to delete Condition B18 of SSD--522 It is recommended that this condition remain.	Noted.	N/A
It is raised for the Department's consideration that the plans by Costin Roe Consulting, drawing numbers Co13362.02-SK4-06, SK4-07, SK4-08 & SK4-09 have not demonstrated that the future intersection and road network has been tested for a 36.5m PBS Level 3 Type A vehicle.	The assessment of the 36.5m check vehicle has been included in the submission as required of the DCP and noted by Council. The 36.5m vehicle reflect those references as PBS B-Triple Level 3&4. Refer to drawings Co13362.02-SK4-11 through Co13362.02-SK4-13 in **Appendix G** of this Response Table.	**Appendix G** of this Response Table
Traffic Management Advice		
(a) Road Act Matters	It is noted that the four proposed driveways on the cul-de-sac have a separation of approximately 1 to 3 metres each. Sufficient	Refer diagram

Comment	Response/Action	Reference
Although the proposal includes the deletion of a number of driveways access from Bakers Lane, which is supported, concerns are raised regarding the four driveways proposed at the cul-de-sac as these are not provided with adequate separation due to potential conflict in traffic movements.	delineation and pedestrian refuge islands are also proposed at these driveways to facilitate safer traffic movements and pedestrian crossing at these access points. Notwithstanding, it is noted that the proposed separation for these driveways is no different than what has been previously approved in SSD-9522-MOD 1. A comparison between the previously approved driveways (in SSD-9522-MOD 1) and the proposed driveways is shown in the figure below. In this regard, the Proposal seeks to provide vehicular access points along the cul-de-sac similar to that of approved MOD 1. This means that the number of access crossovers previously approved along Bakers Lane are now reduced which results in a better design outcome. Furthermore, the proposed cul-de-sac provides better delineation for all warehouses and again results in a better design outcome.	provided below.
		
The absence of spacing between the driveways located at the cul-de-sac and Bakers Lane (Lot 2 truck exit and Lot 3 car entry/exit) raise a safety issue for pedestrians who will cross these driveways.	Refer to the above response with regards to the separation of the driveways and pedestrian safety in relation to the driveways proposed at the cul-de-sac. The separation between the driveways located at Bakers Lane (Lot 2 truck exit and Lot 3 car entry / exit) is approximately 1.5 metres. A pedestrian refuge island is also proposed between both of these driveways that is approximately 1.5 metres in width and 1.5 metres in length. Furthermore, operational data provided by the tenant indicates that there will be 0 outgoing	N/A

<table>
<tr><th>Comment</th><th>Response/Action</th><th>Reference</th></tr>
<tr><td></td><td>trips in the AM Peak and 4 outgoing trips in the PM Peak for the Lot 2 truck exit driveway.

At the Lot 3 car entry / exit driveway, there will be 18 trips (inbound and outbound) in the AM Peak and 13 trips (inbound and outbound) in the PM Peak. This translates to 2 to 3 cars every 10 minutes during the peak periods.

As such, the traffic movements at these driveways are of such low order that it is unlikely to create any safety concerns at these access points during on-street peak periods.</td><td></td></tr>
<tr><td>Section 8 of the Transport Assessment report shall include design review of the proposed left turn and right turn lanes at Bakers Lane / Access Road intersection, shall demonstrate that the turning lane lengths are designed in accordance with Austroads standards and storage length should be based on SIDRA results.</td><td>It is noted that TfNSW has provided the JV with pre-DA comments regarding the Bakers Lane / Access Road intersection at both the interim and ultimate scenarios (on 3 November 2021).

As part of this consultation, the design of this intersection has been refined and addressed separately by Costin Roe Consulting.</td><td>Appendix G of MOD 3 Report</td></tr>
<tr><td>The Department is advised to seek explanation as to why a left turn slip lane is required at the intersection of Bakers Lane and the Access Road, noting that Figure 21 shows that only 1vph is turning left from Bakers Lane onto the Access Road.</td><td>A left turn slip lane has been provided in the interim sequence design (2026) to ensure consistency with the ultimate sequence design (2036) when the Southern Link Road (SLR) is expected to be delivered.</td><td>Appendix C of MOD 3 Report</td></tr>
<tr><td>Council recommends that access to each lot shall be provided in accordance with the driveway categories specified in AS 2890.1:2004 Table 3.1 and the applicant should be advised to consider redesigning the cul-de-sac island to prevent overtaking/cutting through movements and to improve safety for vehicles entering and exiting the driveways at this location.</td><td>Table 3.1 of AS2890.1:2004 provides the minimum driveway dimensions for car access points (based on class of parking facilities, frontage road type and number of car parking spaces).

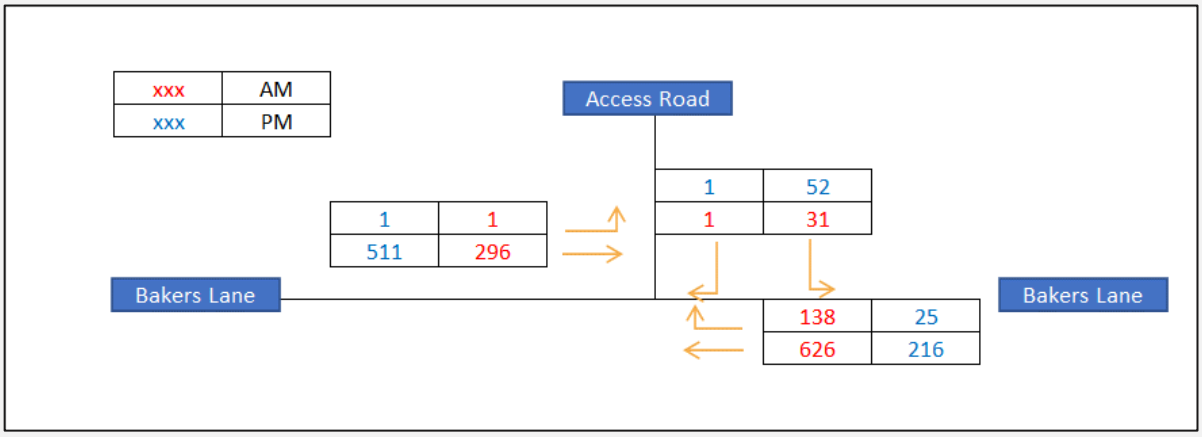
In this regard, the access category for each Lot is mentioned below, along with the proposed dimension of each driveway as well.

<table>
<tr><th>Lot</th><th>Cat.</th><th>Req.</th><th>Provision</th></tr>
<tr><td>1</td><td>2</td><td>6 - 9m (comb.)</td><td>6.2m (comb.)</td></tr>
<tr><td>2</td><td>3</td><td>Entry: 6m
Exit: 4 - 6m</td><td>Entry: 6m</td></tr>
</table>
</td><td>N/A</td></tr>
</table>

Comment	Response/Action	Reference
	<table><tr><td></td><td></td><td></td><td>Exit: 6m</td></tr><tr><td>3</td><td>2</td><td>6 - 9m (comb.)</td><td>6.2m (comb.)</td></tr><tr><td>4</td><td>2</td><td>6 - 9m (comb.)</td><td>6.2m (comb.)</td></tr></table> As noted in the above table, the car access driveway provision complies with the requirements set out in AS2890.1:2004. The design of the internal roads has been addressed by Costin Roe Consulting. Notwithstanding, the detailed design of the proposed cul-de-sac island can be addressed separately and in response to a suitable condition of consent as part of the Construction Certification (CC) stage of this MOD.	
Council recommends that Lot 3 truck swept paths (Sheet AG15) are to be modified to show that a truck can turn around while there are parked trucks.	It is noted that a 26.0m B-double (if needed on a very rare occasion) will side load next to the Roller Shutter Doors (RSDs). It is important to emphasise that the tenant of Lot 3 will not require frequent movements of a B-double based on advice provided to Ason Group. Therefore, this occurrence is likely to happen infrequently. Furthermore, based on Ason Group's significant experience with industrial Sites, side loading of B-doubles is deemed to be normal practice and occurs within many hardstand areas of industrial developments, comparable to these warehouses. Moreover, when a B-double is side-loading, the RSDs located at the east of Lot 3 will be unoccupied to facilitate this activity, through a specific management plan and under pre-scheduled orders by the proposed tenant. Operational management measures will take place to ensure potential conflicts will be minimised as much as practically possible. Lastly, other smaller trucks entering this Lot can still use the recessed docks located towards the southern end of Lot 3.	N/A
According to Table 19 of the Transport Assessment report, Lots 1 – 4 will be accessed by trucks up to 26m B-double. However, the swept	As mentioned above, side loading of 26.0m B-doubles is deemed to be normal practice and occurs within many hardstand areas of industrial	N/A

Comment	Response/Action	Reference
paths presented in Appendix D only used 20m semi-trailers to demonstrate the movements in and out of the truck bays. The Department is advised to seek clarification on this inconsistency and ensure coordinated reports demonstrate compliance with the required access provisions for the Precinct.	developments, comparable to the proposed warehouses.	
(b) Parking It is raised for the Department's consideration that Table 8 of the Transport Assessment report indicates that the MOD 3 proposal will have a surplus of 161 car parking spaces from the required parking provision of 299 spaces.	It is noted that Lot 1 provides a surplus of 13 car parking spaces, Lot 2 provides a surplus of 36 car parking spaces and Lot 4 provides a surplus of 103 car parking spaces. These additional car parking spaces have been provided mainly in order to maintain to suit specific tenant requirements. Furthermore, these warehouses will be operating on a 24-hour basis, which ensures that the staff shifts would not align during the AM and PM network peaks. In this regard, staff shift timings for Lot 2 has been provided, reviewed and agreed by JV to be as follows: - 6:00 AM to 2:00 PM; - 2:00 PM to 10:00 PM; and - 10:00 PM to 6:00 AM. Additionally, staff will typically arrive / depart in the 30-minute period prior to the following shifts. The above shift changes are outside road network peak periods. As the warehouses are in operation on a 24-hour basis and the staff will typically arrive during off-peak periods, it is noted that the surplus of car parking spaces would not generate additional trips during the AM and PM network peaks. On this basis, the surplus of car parking spaces is not likely to encourage higher vehicle use during peak periods and has mainly been provided to maintain car parking flexibility within the respective Lots.	N/A

Comment	Response/Action	Reference
	Finally, use of other modes of transport have been considered by the provision of a separate Green Travel Plan (GTP) which aims to reduce dependency of private vehicles.	
The parking surplus is considered significant and is not supported as this could encourage higher vehicle use, especially noting that the approved MOD 1 only has a surplus of 2 parking spaces. Refer to related matters raised under 1. Planning Matters, above.	Refer to the response provided in the previous item.	N/A
(c) Traffic Generation The proposed GFA for Lots 1, 2, 3 and 4 for this MOD 3 application is understood to be approximately 10,226sqm less than the that of the approved MOD 1 (noting that surplus car parking and hard stand areas should be included in GFA calculations as is required under the Mamre Road DCP). As such, the traffic assessment that was submitted and approved under MOD 1 application remains valid.	Noted.	N/A
It is noted that updated traffic assessment was prepared for MOD 2 application which is currently under the review by TfNSW and is excluded as part of this MOD 3 review.	Noted.	N/A
Section 6.6.1 of the report indicates that the “trips for the three access driveways leading to Bakers Lane have been excluded from the traffic profile and the modelling (as they do not enter nor exit from the cul-de-sac).	The trips associated with the cul-de-sac are included in the amended traffic profile, as shown in figure below. The amended traffic profile includes trips from the following access point: - Lot 3 car entry / exit. Trips from the Lot 2 car exit and the Lot 3 truck exit access points have been excluded from the traffic profile as vehicles will exit directly onto Bakers Lane. Furthermore, amended SIDRA modelling has been assessed to address this comment. The	**Appendix C1** in this Response Table

Comment	Response/Action	Reference
	detailed amended SIDRA outputs are attached in **Appendix C1**.	
		
Considering that the majority of the development trips would likely be travelling from Mamre Road, ingress car trips to Lot 3 would make a u-turn on Bakers Lane via Access Road cul-de-sac, since car entry to Lot 3 is restricted to left in only. Therefore, the Department is advised that inbound car trips to Lot 3 shall also be included in the intersection volume profile presented in Figure 21.	The Lot 3 car trips and U-turn movements at the cul-de-sac are included in the traffic volume profile presented above and SIDRA analysis has been assessed again to address this comment. As can be seen in **Appendix x1,** the intersection operates with spare capacity and good LoS A. Notwithstanding, the interim sequence technically speaking operates at a LoS D in the AM Peak and a LoS C in the PM Peak. However, the total vehicle input at that northern approach right-turn lane is 1 vehicle making a right turn out only. This input cannot be avoided as 0 vehicle entries (at any legs) cannot be made in the SIDRA intersection software. In reality, vehicles would not be turning right out onto Bakers Lane during the interim stage noting that the exit movements are available for them from the signalised intersection of Mamre Road / Bakers Lane. Hence the intersection would technically operate at LoS A.	**Appendix C1** in this Response Table
It is recommended that the Department seek clarification as to why the midblock volumes of Bakers Lane (west of Lot 4/ Access Road) shown in the 2036 SLR / Bakers Lane / North-South Road 01 intersection (Figure 22) are less than the volumes shown in 2026 Bakers Lane / Access Road intersection (Figure 21).	It is noted that the midblock PM count, west of the Lot 4 Access Road (2026) is slightly lower than the SLR / Bakers Lane (2036) as it is sourced from the strategic model EMME output. This discrepancy can be in response to other Local and Regional connections assumed for the EMME model in the longer-term future. Finally, the intersection operates at the following capacity in 2026:	N/A

<table>
<tr><th>Comment</th><th>Response/Action</th><th>Reference</th></tr>
<tr><td></td><td>
<table>
<tr><th>Peak</th><th>LoS</th><th>DoS</th></tr>
<tr><td>AM Peak</td><td>A</td><td>0.222</td></tr>
<tr><td>PM Peak</td><td>A</td><td>0.179</td></tr>
</table>
The intersection operates at the following capacity in 2036:
<table>
<tr><th>Peak</th><th>LoS</th><th>DoS</th></tr>
<tr><td>AM Peak</td><td>B</td><td>0.505</td></tr>
<tr><td>PM Peak</td><td>C</td><td>0.517</td></tr>
</table>
This suggests a satisfactory outcome, with spare capacity.
</td><td></td></tr>
<tr><td>Council recommends that Appendix C must also include detailed SIDRA results for Bakers Lane / Access Road intersection.</td><td>The detailed SIDRA results outlined within Appendix C have been attached separately in Appendix x2.</td><td>Appendix x1 in this Response Table</td></tr>
<tr><td><u>(d) Construction Traffic Management Plan (CTMP)</u>

The preliminary Construction Traffic Management Plan (CTMP) provided as part of the Traffic Assessment provides high level detail only. Further assessment of the CTMP must be undertaken by the Department upon submission of a more detailed CTMP.</td><td>Noted. A detailed CTMP for the proposed development can be prepared separately and in response to a condition of consent as part of the CC phase of this MOD.</td><td>N/A</td></tr>
<tr><td colspan="3">Environmental Management Considerations</td></tr>
<tr><td><u>(a) Proposed Amendment to Condition B52</u>

In relation to the proposal to amend condition B52 it is raised for the Department’s consideration that the table shown in the Modification Report regarding condition B52 does not entirely reflect the supporting Operational Noise Assessment (ONA) dated 23/11/2021 and as such, the ONA document should be relied on for conditioning purposes (Receiver 7</td><td>The table in the MOD 3 Report will be updated to be consistent with the modified noise limits presented in the Operational Noise Assessment.</td><td>Appendix A in this Response Table</td></tr>
</table>

Comment	Response/Action	Reference
noise limits are incorrect in the Modification Report), should the Department be of a mind to support this aspect of the proposed modification.		
(b) Proposed Amendment to Condition B54 No objection is raised to the proposal to revise Condition B54 of the SSD consent.	Noted.	**N/A**

DPE CHIEF ENGINEER COMMENTS

Table 3 DPE Chief Engineer Comments and Response Table

Comment	Response	Section
It is understood that the Condition B4, in its current state, should read: Prior to the issue of a Subdivision Works Certificate for the estate roads, the Certifying Authority shall ensure that access to the development, the internal road intersections and access to each development lot are: (a) designed for 30m Performance Based Standards (PBS) Level 2 Type B vehicles and tested for a 36.5m PBS Level 3 Type A vehicles. (b) consistent with the most recent version of Austroads Guide to Road Design and TfNSW specifications.	Noted.	N/A
Design plans, including turn path templates demonstrating compliance, shall be submitted with the application for a Subdivision Works Certificate. This is inconsistent with how Condition B4 is represented in the Urbis Report (referenced above) at Section 5.3. For absolute clarity and for avoidance of doubt, the precise wording of Condition B4 should be clarified.	Noted.	N/A
The proposed SSD modification (Mod-3) seeks the removal of SSD-9522 Condition B4 and B18. It is understood that the applicant seeks to remove these conditions because the applicant is of the opinion that these conditions have been met in their Mod 3 submission. The Chief Engineer does not support the removal of the conditions on the grounds that the	It is understood that there is no need for conditions to remain in the consent if they have been satisfied. Condition B4 is now proposed to be amended, instead of being deleted. Condition B4 was amended as part of the Approved Modification 2 to SSD9522, we are no longer proposing this condition be deleted. The proposed changes to Condition B4 include:	N/A

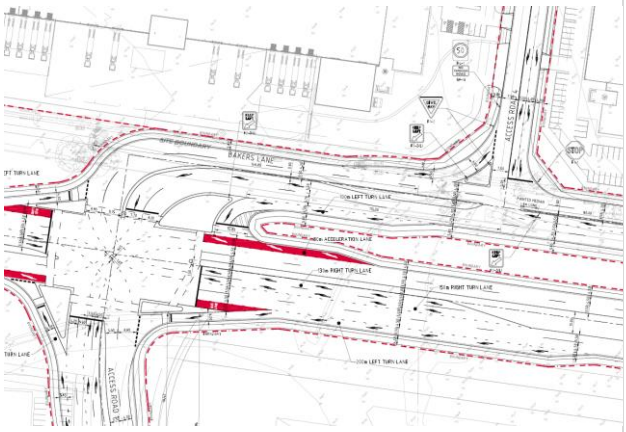
Comment	Response	Section
conditions have already been met. If the subject conditions have been complied with, it is inconsequential to leave the conditions as originally agreed to in the SSD-9522.	In Condition B4, replace 'commencement of road construction' with 'the issue of a Subdivisions Works Certificate for the estate roads' and replace 'Planning Secretary and the relevant roads authority' with 'Certifying Authority'. In Condition B4, replace subclause (a) with the following: (d) designed for 30 m Performance Based Standards (PBS) Level 2 Type B vehicles and tested for 36.5 m PBS Level 3 Type A vehicles Justification for amendment of B4 Condition B4 is proposed to be amended as this modification application includes the detailed road layout and turning path plans requested by this condition. It is noted that Condition B4 is also sought to be deleted by MOD2 which is currently under assessment by DPIE. Its amendment is concurrently sought as part of MOD3 in the instance that MOD 3 is determined prior to MOD 2 ***Condition 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.* Justification for removal of B18 The proposed modification seeks to directly address Condition B18 of SSD-9522, which was imposed by Transport for NSW (TfNSW) requiring that all access to lots north of Bakers Lane be obtained from a single roadway so as to reduce crossings onto Bakers Lane. Condition B18 is proposed to be deleted as this modification directly addresses the requirements of	

Comment	Response	Section
	this condition through the introduction of the new cul-de-sac road from which all warehouse lots will gain access. The new road will reduce the number of crossings from Bakers Lane from 7 to 4. The updated Estate layout introduces a new cul-de-sac connection for this purpose, at a suitable distance from the future signalised intersection between Mamre Road and the SLR, to ensure there are no disruptions to traffic conditions at this critical node. If the conditions cannot be removed, the Frasers Altis JV would like to request a letter of confirmation from DPE stating the conditions have been satisfied by MOD 3 and no further action is required.	
The Chief Engineer cannot find any merit in removing Conditions B4 and B18. Therefore, the removal of these conditions is NOT SUPPORTED	Condition B4 of SSD-9522-MOD 1 states the following: “Prior to commencement of road construction, the Applicant must submit design plans to the satisfaction of the Planning Secretary and the relevant roads authority which demonstrate the proposed access to the development, the internal road intersections and access to each development lot are: (a) designed to accommodate the turning path of a B-Double heavy vehicle and a 19.0 m Articulated vehicle; and (b) consistent with the most recent version of Austroads Guide to Road Design and TfNSW specifications.” It is noted that Ason Group has undertaken swept path assessments for 30.0m Super B-doubles at the proposed vehicular access to each warehouse, which complies with the requirements set out in the Mamre Road DCP 2021 and exceeds the requirements set out in Condition B4 of SSD-9522-MOD 1. Furthermore, Ason Group has been advised that the design vehicle for all warehouses would be a 26.0m B- Double. As such, the assessment undertaken for 30.0m Super B-Doubles is more conservative.	**Appendix C** of the MOD 3 Report **Appendix G** of the MOD 3 Report

Comment	Response	Section
	The design of the internal roads has been addressed by Costin Roe Consulting.	
THE ASON GROUP report (referenced above) mentions approval of Mod 2 and the proposed Mod 2 proposal for deletion of Condition of B11. Consistent with previous Chief Engineer comments, the Mod 2 deletion of Condition B11 is NOT SUPPORTED.	Condition B4 is now proposed to be amended, instead of being deleted. Condition B4 was amended as part of the Approved Modification 2 to SSD9522, we are no longer proposing this condition be deleted. The proposed changes to Condition B4 include: In Condition B4, replace 'commencement of road construction' with 'the issue of a Subdivisions Works Certificate for the estate roads' and replace 'Planning Secretary and the relevant roads authority' with 'Certifying Authority'. In Condition B4, replace subclause (a) with the following: (e) designed for 30 m Performance Based Standards (PBS) Level 2 Type B vehicles and tested for 36.5 m PBS Level 3 Type A vehicles <u>Justification for amendment of B4</u> Condition B4 is proposed to be amended as this modification application includes the detailed road layout and turning path plans requested by this condition. It is noted that Condition B4 is also sought to be deleted by MOD2 which is currently under assessment by DPIE. Its amendment is concurrently sought as part of MOD3 in the instance that MOD 3 is determined prior to MOD 2 ***Condition 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.*	N/A

Comment	Response	Section
	Justification for removal of B18 The proposed modification seeks to directly address Condition B18 of SSD-9522, which was imposed by Transport for NSW (TfNSW) requiring that all access to lots north of Bakers Lane be obtained from a single roadway so as to reduce crossings onto Bakers Lane. Condition B18 is proposed to be deleted as this modification directly addresses the requirements of this condition through the introduction of the new cul-de-sac road from which all warehouse lots will gain access. The new road will reduce the number of crossings from Bakers Lane from 7 to 4. The updated Estate layout introduces a new cul-de-sac connection for this purpose, at a suitable distance from the future signalised intersection between Mamre Road and the SLR, to ensure there are no disruptions to traffic conditions at this critical node. If the conditions cannot be removed, the Frasers Altis JV would like to request a letter of confirmation from DPE stating the conditions have been satisfied by MOD 3 and no further action is required.	
A better commentary of the merits of the proposed turning manoeuvres into and out of Bakers Lane, of the proposed Modification, is recommended prior to finalisation of the evaluation of the Chief Engineer. The improved engineering details should be consistent with agreed proposed design vehicle turning paths. These engineering details (correct vehicle used in the turning path assessment) should be compliant with the agreed Condition B4. It has NOT been demonstrated that the approved design vehicle can exit the parking at Lot 4. This should be reassessed.	Condition B4 of SSD-9522-MOD 1 states the following: “Prior to commencement of road construction, the Applicant must submit design plans to the satisfaction of the Planning Secretary and the relevant roads authority which demonstrate the proposed access to the development, the internal road intersections and access to each development lot are: (a) designed to accommodate the turning path of a B-Double heavy vehicle and a 19.0 m Articulated vehicle; and (b) consistent with the most recent version of Austroads Guide to Road Design and TfNSW specifications.” Condition B4 is now proposed to be amended, instead of being deleted. Condition B4 was amended as part of the Approved Modification 2 to	**Appendix G** of the MOD 3 Report **Appendix G** of this Response Table

Comment	Response	Section
	SSD9522, we are no longer proposing this condition be deleted. The proposed changes to Condition B4 include: In Condition B4, replace 'commencement of road construction' with 'the issue of a Subdivisions Works Certificate for the estate roads' and replace 'Planning Secretary and the relevant roads authority' with 'Certifying Authority'. In Condition B4, replace subclause (a) with the following: (f) designed for 30 m Performance Based Standards (PBS) Level 2 Type B vehicles and tested for 36.5 m PBS Level 3 Type A vehicles <u>Justification for amendment of B4</u> Condition B4 is proposed to be amended as this modification application includes the detailed road layout and turning path plans requested by this condition. It is noted that Condition B4 is also sought to be deleted by MOD2 which is currently under assessment by DPIE. Its amendment is concurrently sought as part of MOD3 in the instance that MOD 3 is determined prior to MOD 2 It is noted that Ason Group has undertaken swept path assessments for 30.0m Super B-doubles at the proposed vehicular access to each warehouse, which complies with the requirements set out in the Mamre Road DCP 2021 and exceeds the requirements set out in Condition B4 of SSD-9522-MOD 1. Furthermore, Ason Group has been advised that the design vehicle for all warehouses would be a 26.0m B-Double. As such, the assessment undertaken for 30.0m Super B-Doubles is more conservative. The design of the internal roads has been addressed by Costin Roe Consulting (refer **Appendix X** of this Response Table).	

Comment	Response	Section
	  The Functional Layout Plan SLR/Bakers Lane MOD 3 provided in the MOD 3 Report (refer **Appendix G** of MOD 3 Report) confirms the distance to the future SLR intersection from proposed cul-de-sac is at 146.65m, as shown below. This is also compliant in terms of Australian Standards and clarified in consultation with TfNSW. 	
It is recommended that the Department seek clarification as to why the midblock volumes of Bakers Lane (west of Lot 4/ Access Road) shown in the 2036 SLR / Bakers Lane / North-South Road 01 intersection (Figure 22) are less	It is noted that the midblock PM count, west of the Lot *4 Access Road (2026) is slightly lower than the SLR / Bakers Lane (2036) as it is sourced from the strategic model EMME output. This discrepancy can be in response* to other Local and Regional connections assumed for the EMME model in the	N/A

Comment	Response	Section
than the volumes shown in 2026 Bakers Lane / Access Road intersection (Figure 21).	longer-term future. Finally, the intersection operates at the following capacity in 2026: The intersection operates at the following capacity in 2036: This suggests a satisfactory outcome, with spare capacity.	

Peak	LoS	DoS
AM Peak	A	0.222
PM Peak	A	0.179

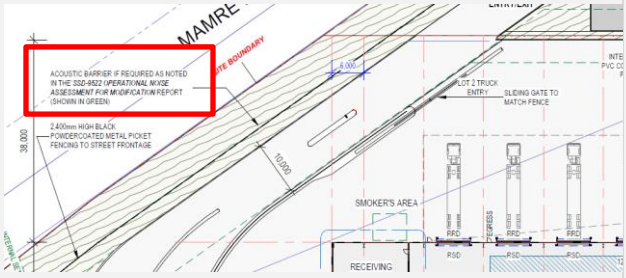
Peak	LoS	DoS
AM Peak	B	0.505
PM Peak	C	0.517

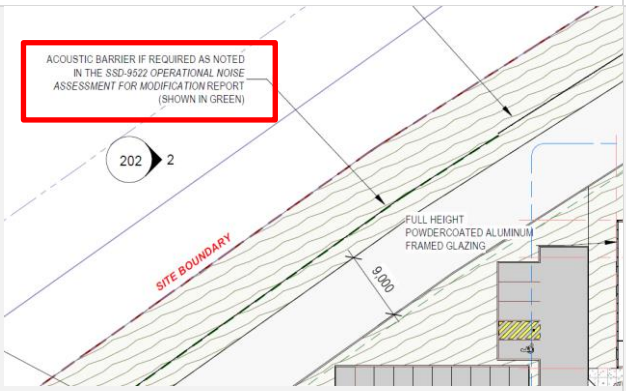
TFNSW COMMENTS

Table 4 TfNSW Comments and Response Table

Comment	Response	Section
TfNSW provided preliminary advice to the applicant dated 3 November 2021 (see Attachment A). The modification application does not appear to consider all of TfNSW comments. In this regard TfNSW request that all the comments provided in the attached email are addressed. The following comments and recommendations are provided to the Department.	The comments provided by TfNSW in Attachment A have been addressed and responded to within the Transport Assessment from Ason Group and Civil Engineering drawings from Costin Roe (refer **Appendix C** and **Appendix G** of the MOD 3 Report respectively).	**Appendix C** of the MOD 3 Report **Appendix G** of the MOD 3 Report
Southern Link Road – Ultimate Intersection Design The response and the associated design does not address TfNSW' previous comments/suggestions. For instance: ▪ The majority of signal configuration comments and notably the safety aspect are not addressed; ▪ Pedestrian safety comments; ▪ Modelling memo for the ultimate arrangement.	As above. The comments from TfNSW, included in the below **Appendix A** of **Appendix G** of the MOD 3 Report, have been reviewed, responded to (refer Table 4.2 of our submission report) and design adjusted accordingly. The drawing noted in **Appendix A** of **Appendix G** of the MOD 3 Report (**Co13362.01-SK30-A**), assumed to have been assessed, does not form part of the formal application and should not be assessed by TfNSW. This drawing was produced for initial consultation with TfNSW prior to the submission. The intent of this drawing was to show the distance between the SLR and the cul-de-sac only, and did not include any amendments to the design which were incorporated following TfNSW initial review/ advise letter. The design submitted, refer drawing **Co13362.02-SK4-06** and associated submission pack, addresses each TfNSW comment, including safety aspects. Further we note that all of the items in Attachment A have been responded to and included in Table 4.2 of the submitted report. We request TfNSW review the final documents included in the submission, and the detailed responses in both our report and the Ason TIA (including SIDMA modelling) and reiterated below. We consider the amendments made between the preliminary	**Appendix G** of the MOD 3 Report

Comment	Response	Section
	drawing and final submission will show the concerns have been addressed.	
TfNSW notes the alignment offset of the access road (to Lots 1-4) creates significant geometric challenges for the future intersection of Southern Link Road (SLR) and north south access road (south of SLR) as shown in Figure 22 *Asongroup* Transport Assessment. The future intersection of SLR and north south access road forms a future key intersection to the estate and is expected to be constructed to State Road standards. It is crucial the future intersection layout is supported by TfNSW to ensure adequate land setbacks are provided, and the interim access strategy can be achieved within the design. TfNSW notes the issues raised may be resolved by aligning the access road (to Lots 1-4) at the cross section of the intersection. *Recommendation* TfNSW recommends the alignment of the access road (to Lots 1-4) be relocated to align with the future intersection of the SLR and north south access road and the comments/suggestions provided in Attachment A are addressed for further review.	TfNSW to review the drawing **Co13362.02-SK4-06** and associated submission. We consider the submitted drawing resolves issues noted in Appendix A of their response letter. Consideration to extending the north leg has been made however this results in unacceptable commercial changes (including a committed tenant that has specific operational requirements) which do not suit the requirements or use of the land. This comment has been addressed by Ason Group in the Transport Assessment in **Appendix C** of the MOD 3 Report. SIDRA modelling has been undertaken for the potential future SLR/ Bakers Lane / North-South 01 Access Road intersection for an assumed year 2036. This assessment has been undertaken noting that the SLR / Bakers Lane / North-South Road 01intersection is likely to operate as a signalised intersection when a Sequence 3 upgrade plan is delivered by TfNSW.	Section 6.6.2 of **Appendix C** of the MOD 3 Report.
Modelling TfNSW notes the modelling outputs provided are transposed versions and are missing key information. In order to undertake a more detailed review of the provided documentation, it is requested that all SIDRA results referred to in the supplementary traffic assessment are provided (including the Base	The SIDRA models have been provided as part of this Response Table to TfNSW. The models attached include: ▪ P1840 _MOD 4 SIDRAs_BL x Access Road_Interim_2026.sip9 ▪ P1840_MOD 4 SIDRAs_SLR x BL_Ultimate_2036.sip3	**Appendix C3** and **C4** of this Response Table.

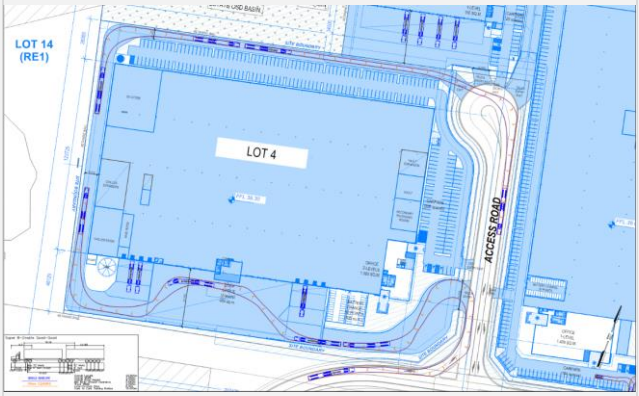
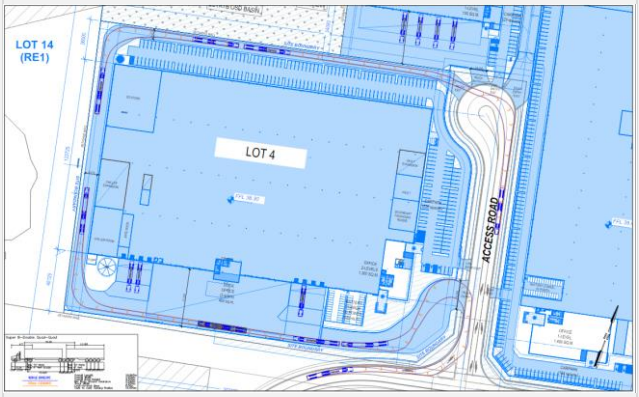
Comment	Response	Section
models). This should include SIDRA output and raw SIDRA (.sip) files. This will enable our modelling and traffic teams to undertake a detailed review of the model to ensure that the inputs are accurate and supported. Further comments can be provided following the review of the models which may require the assessment to be updated. *Recommendation* It is requested the modelling be updated for a realigned access road (to Lots 1-4) and the SIDRA outputs and raw SIDRA (.sip) files are provided for further review. In addition, the supporting analysis for the future intersection (SLR and north south access road) is requested be provided in the same form.		
Noise Wall The plans indicate a 1600m long 3m high noise wall is proposed on the northeastern boundary adjacent to Lot 2 and north of lot 3. It is unclear if the noise wall is located within the boundary of the development. The noise wall is to be provided within the development boundary and should not encroach the proposed road reserve for the ultimate Mamre Road design. In addition the question is raised as to how the wall will be maintained in the future. *Recommendation* TfNSW requests clarification on where the noise wall is proposed to be located and further information is sought including civil plans showing the cross sections and clarification as to how the walls will be accessed and maintained.	The noise wall along the north eastern boundary will be provided within the development boundary of Lots 2 and 3, as indicated in the plans below. Please refer to drawing SP-KC1-DA-102 and SP-KC1-DA-103. Lot 2  Lot 3	**Appendix A** of this Response Table

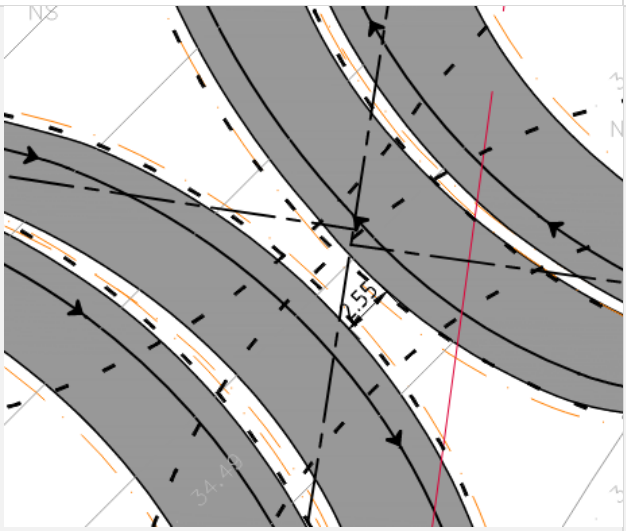
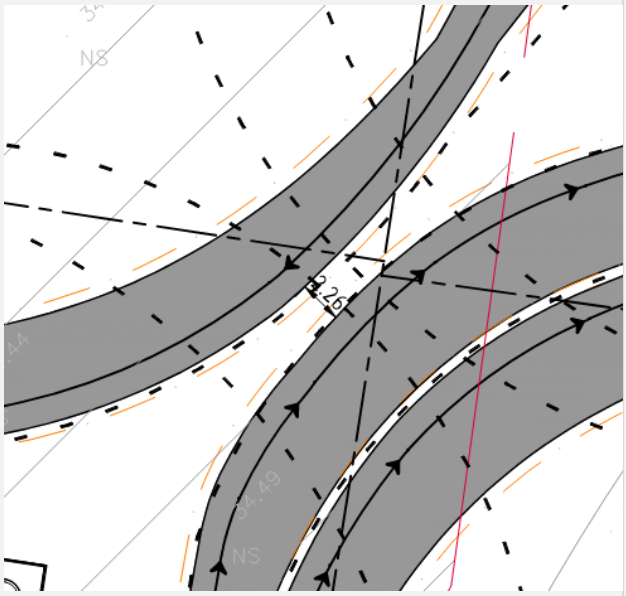
Comment	Response	Section
		
Interim Scenario – access Lot 2 Items 3&4 Table 2 of the Traffic Report provides some commentary on the access points. TfNSW understands that the access/egress from Lot 2 at Bakers Lane is restricted to Left in/Left out which is supported. However there remains safety concerns with the closely spaced heavy vehicle exit and the entry/exit to the carpark. In addition the swept path indicates a heavy vehicle would be required to swing from the western side of the driveway in order to achieve egress from the site. It is unclear how the driver know to do this. *Recommendation* It is recommended the applicant address the abovementioned concerns to the satisfaction of Council.	In this regard, the truck exit crossover and the driveway design have been amended to provide further separation between the two crossovers. We note that the amended driveway design will enforce truck drivers to swing out and make this exit movement as shown in belo swept path. We also confirm that the access design will be undertaken to Council's satisfaction at the detailed design stage of the project.	**Appendix A** of this Response Table.

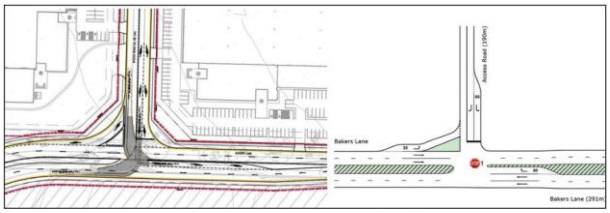
ATTACHMENT A

Comment	Response	Section
SLR layout (CO13362.01-SK30-A) It is noted that the signalised intersection design has been provided to understand how the ultimate road layout will work with the proposed layout for the Lots 1-4	The drawing which was submitted as part of the SSDA MOD 3 Application which provides a concept layout of the future SLR intersection, and cul-de-sac is drawing **Co13362.02-SK4-06**, at **Appendix G** of the MOD 3 Report.	**Appendix G** of the MOD 3 Report.

Comment	Response	Section
and will not be constructed under this SSDA. However the design still needs to be realistic in order to ensure that adequate land is reserved for the ultimate layout. In this regard, following comments are required to be addressed as part of this Modification to SSDA.	The drawing noted (**Co13362.01-SK30-A**), and assumed assessed, does not form part of the formal application and should not be assessed by TfNSW. This drawing was produced for initial consultation with TfNSW prior to the submission. The intent of this drawing was to show the distance between the SLR and the cul-de-sac only, and did not include any amendments to the design which were incorporated following TfNSW initial review/ advise letter. It is requested that TfNSW review the actual drawing package submitted. Our comments are based on the drawing **Co13362.02-SK4-06** and associated submission pack.	
Signal configuration • TfNSW would require the signals to be designed as double diamond. This allows for better flexibility during time of heavy congestion.	This comment has been addressed by Ason Group in the Transport Assessment in **Appendix C** of the MOD 3 Report. The SIDRA modelling results show that all the approaches in AM and PM perform at an acceptable level of service. Furthermore, the results suggest that all movements have enough capacity and the modelled queue length is less than the storage capacity lengths in all directions. The overall DoS and 95thpercentile of queues indicate that the intersection operates at an acceptable level in both the AM and PM Peak scenarios with significant spare capacity. Accordingly, this functional layout is deemed acceptable from traffic modelling grounds. **TABLE 22 SIDRA RESULTS – 2036 ULTIMATE SIGNAL DESIGN WITH DOUBLE DIAMOND PHASING** Intersection | Approach | AM Peak: DoS | Delay (Seconds) | LoS | PM Peak: DoS | Delay (Seconds) | LoS Access Road | South | 0.51 | 55 | D | 0.52 | 45 | D SLR | East | 0.44 | 23 | B | 0.51 | 24 | B Bakers Lane | North | 0.05 | 26 | B | 0.10 | 23 | B SLR | West | 0.49 | 27 | B | 0.37 | 33 | C **Overall** | | **0.51** | **27** | B | **0.52** | **32** | C	**Appendix C** of the MOD 3 Report.
• Swept paths are required for further review. It is difficult to comment on the high angled entry without seeing the swept paths. Question are raised as to whether a B-double could achieve the angles at the northern leg.	Swept paths have been provided for all legs of the SLR intersection. Refer to drawings **Co13362.02-SK4-07** to drawing **Co13362.02-SK4-09**. The comment relates to the SLR intersection and the below diagram relates to the cul-de-sac and not relevant to the comment. This has been addressed by Ason Group in the Transport Assessment in **Appendix C** of the MOD 3 Report.	**Appendix G** of the MOD 3. Appendix D of **Appendix C** of the MOD 3 Report.

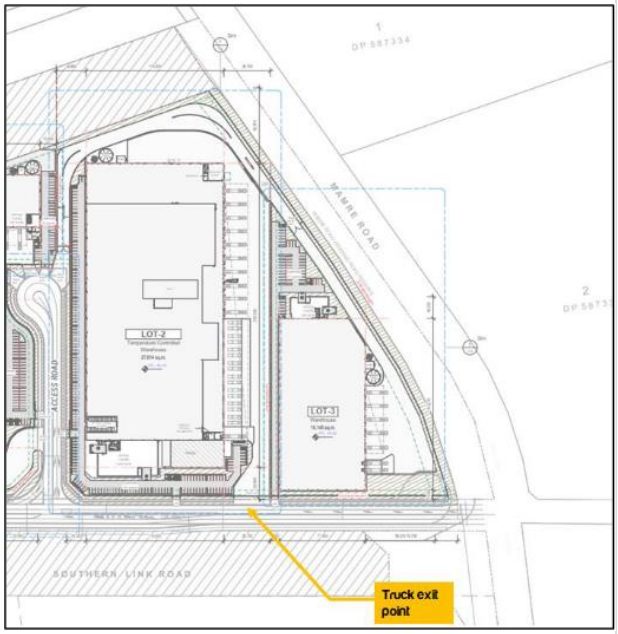
Comment	Response	Section
	Please refer to Appendix D of the Transport Assessment which has the Swept Path Analysis on Super B-Doubles.   	
• North leg: - The high angle of the north leg reduces visibility to the signals and is considered not acceptable - The major movement will dominate the other movements which raises efficiency issues	The angle of the left turn lane provides a perpendicular entry to the SLR. The design arrangement considered to provides suitable visibility in accordance with Austroads and TfNSW. TfNSW to review the drawings submitted **Co13362.02-SK4-06**, at **Appendix G** of the MOD 3 Report.	**Appendix G** of the MOD 3
• Minimum distance required between turning vehicles 2 metres – clarify distance	Clearances of 2.55m and 2.26m has been achieved for the opposing turns, being greater than that required. The dimension is shown on the drawing. Refer drawing Co13362.02-SK4-08 & Co13362.02-SK4-09 and excerpts below.	**Appendix G** of the MOD 3

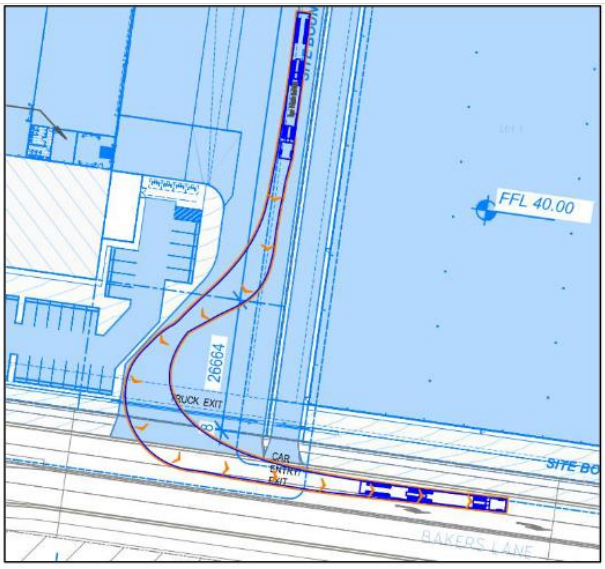
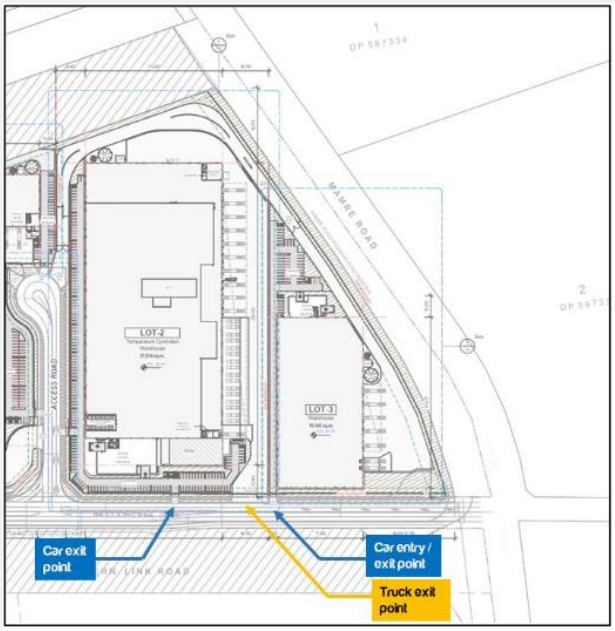
Comment	Response	Section
	 	
• It is unclear why a bus jump was not provided for the eastbound lane	Bus jumps are provided on both directions – TfNSW to review the drawings submitted **Co13362.02-SK4-06**, at Appendix G of the MOD 3 Report.	**Appendix G** of the MOD 3
• Why is there a chevron section on the south leg. This is not supported.	There is no proposed chevron - refer to submitted drawing **Co13362.02-SK4-06,** at Appendix G of the MOD 3 Report.	**Appendix G** of the MOD 3 Report
<u>Pedestrian Safety</u> The west pedestrian leg extends over 7 lanes of traffic. There needs to be consideration of a staged crossing. Alternatively if there is low pedestrian movements, the median has to be wide enough to store a person and to include a push	Pedestrian refuge as noted has been provided on both east and western pedestrian legs. TfNSW to review the drawings submitted **Co13362.02-SK4-06,** at **Appendix G** of the MOD 3 Report.	**Appendix G** of the MOD 3 Report

Comment	Response	Section
button. This should be provided on the west, and east leg of the intersection. This will require a larger footprint and should be identified now as the current arrangement will not be supported.		
North leg – The angle of the left turn slip lane creates vision impairments to the pedestrian signals and not accepted on safety ground.	The angle of the left turn lane provides a perpendicular entry to the SLR. The pedestrian movement has sufficient site distances and refuge ability, and the design arrangement considered to providea suitable safety level in accordance with Austroads and TfNSW. TfNSW to review the drawings submitted **Co13362.02-SK4-06,** at Appendix G of the MOD 3 Report.	**Appendix G** of the MOD 3 Report
A modelling memo needs to be provided with the signal design to understand what steered the design.	This comment has been addressed by Ason Group in the Transport Assessment in **Appendix C** of the MOD 3 Report. Notably, the SLR Layout has been amended and the modelling section within this report refers to the C013362.02-SK4-06-A layout plan prepared by Costin Roe Consulting. Refer to Section 6.6 which details the 2036 signal modelling that has been undertaken for the SLR / Bakers Lane/ N-S intersection. Notably, the revised design suggests that there is a 147 m separation from the proposed signal to the southern internal access point. SIDRA modelling has been undertaken for the interim Bakers Lane / Access Road intersection for an assumed year 2026. The Bakers Lane / Access Road assumed as a priority-controlled intersection and the intersection layout for this scenario is shown overleaf in Figure 20.  *Figure 20: Potential Intersection Layout (Signalised Intersection) for SLR / Bakers Lane (in 2026)* Based on the warehouse GFAs (for Lots 1 to 4) and the Kemps Creek Logistics Hub's SSD-9522 traffic generation rates within Section 6.1,	Section 6.6 of **Appendix C** of the MOD 3 Report.

Comment	Response	Section
	the inbound and outbound trips for each Lot is summarised in Table 20. **TABLE 20 SUMMARY OF DEVELOPMENT PEAK HOUR TRAFFIC GENERATION** Land Use Type / AM (In, Out) / PM (In, Out) Lot 1: 7, 2, 1, 5 Lot 2: 58, 14, 11, 42 Lot 3: 21, 5, 4, 16 Lot 4: 53, 13, 10, 39 Total: 139, 34, 26, 102 In addition to the above, additional assumptions were adopted and are outlined below which are similar to the approved Kemps Creek SSD: • Through traffic volumes along Bakers Lane has been sourced from the approved Kemps Creek SSD original TA for 2026; • It is assumed all ingress/egress to the MOD is via the future Bakers Lane East and through Sequence 1A signal; and • The MOD traffic will be distributed to Mamre Road, prior to the delivery of the signal, which implies only right in and left out development trips at this intersection, with minimum right turn out movement.	
TfNSW suggest that investigation be undertaken into the following design considerations: • Extending the north leg straight north as opposed to following the current Bakers lane alignment. This will remove most of the abovementioned concerns with regards to the obscure angle of north leg.	TfNSW to review the drawing **Co13362.02-SK4-06** at **Appendix G** of the MOD 3 Report and associated submission. We consider the submitted drawing resolves issues noted. Consideration to extending the north leg has been made however this results in unacceptable commercial changes (including impact to a committed tenant) which do not suit the requirements or use of the land.	**Appendix G** of the MOD 3 Report
• Could the north leg slip be relocated away from the signal as a separate uncontrolled intersection? If this is considered there will need to be adequate distance from the SLR/Mamre Road intersection so as to not have any changing issues close to signals.	Relocation of the northern slip lane could be considered as part of future more detailed assessments. The concept shows that an intersection solution with the SRL is available, if the SLR is to be developed in the future.	

Comment	Response	Section
<u>Proposed interim design – IF2-KC-FS550-B</u> Whilst the proposed interim design is reliant on the ultimate design, TfNSW provides the following high level comments to consider: • The swept paths provide no indication of whether right turn movements are permitted (previous designs indicated they had right turn movements). Clarification is required, how will the right turn movements be restricted.	Refer to drawings **Co13362.00-SK4-06** to **SK4-09** included in **Appendix A** of **Appendix D** of the MOD 3 Report, for swept paths of design and check vehicles. This comment has been addressed by Ason Group in the Transport Assessment in **Appendix C** of the MOD 3 Report. The proposed MOD reduces the direct vehicular access crossovers along Bakers Lane from what was originally approved under SSD-9522. A new north-south access road terminating into a cul-de-sac has been proposed on Bakers Lane(as part of this MOD). Notably, the cul-de-sac also has a one-way directional flow road, which provides added safety for vehicle access/egress. Furthermore, this reduces the number of direct access crossovers on Bakers Lane from 7 (based on the previous SSD-9522 MOD 1 masterplan) to 3. It is indeed considered as an improvement from the previously approved design with several direct vehicular access points along Bakers Lane.	**Appendix G** of the MOD 3 Report Section 2.2.1 of **Appendix C** of the MOD 3 Report.
• Unclear of the distance from the signals to the access closest to Mamre Road- clarification required	The distance from the signalised intersection to the Lot 3 light vehicle access point is ~180m. This distance exceeds the requirements of 50-100m separation from new signals at green field sites advised by TfNSW Furthermore, SIDRA analysis undertaken for Sequence 1A suggests that the queue back at the western leg of Mamre Road / Bakers Lane will NOT impact this access. In this regard, the queue back for the different modelling scenarios are as follows: • 2025 scenario - AM Peak: Queue of 72m. - PM Peak: Queue of 133m. • 2026 scenario - AM Peak: Queue of 73m. - PM Peak: Queue of 143m. • 2031 scenario - AM Peak: Queue of 73m.	Section 1.5 of **Appendix C** of the MOD 3 Report.

Comment	Response	Section
	- PM Peak: Queue of 153m. • 2036 scenario - AM Peak: Queue of 74m. - PM Peak: Queue of 160m Finally, the estimated traffic generation of this light vehicle access point is in the order of 18trips in the AM Peak and 13trips in the PM Peak which is considered to be relatively minimal and translates into 2-3cars every 10 minutes for those peak periods.	
• Access closest to Mamre Road – in order for a 26m B-double to undertake the turn they would need to undertake the turn from the wrong side. Any access to should be able to accommodate for simultaneous entry/exit.	This comment has been addressed by Ason Group in the Transport Assessment in **Appendix C** of the MOD 3 Report. It is noted that the heavy vehicle access point shown in the following figure is the closest to Mamre Road.  It is important to note that this access point is a heavy vehicle exit point only for Lot 2 (which does NOT ACCOMMODATE ENTRY movements).Therefore, 26.0m B-double trucks will not undertake entry movements for Lot 2 (from this access crossover). Based on the swept path analysis included in Appendix D,this exit movement can occur in a lane correct manner. A reduced copy is also re-produced overleaf.	Section 1.5 of **Appendix C** of the MOD 3 Report.

Comment	Response	Section
		
• 3 driveways shown in proximity (closest to Mamre Road) – light access heavy access and light access – concern with conflicting movements, swept paths missing.	This comment has been addressed by Ason Group in the Transport Assessment in **Appendix C** of the MOD 3 Report. The three closest access points to Mamre Road are shown in the figure below.  With regards to the western light vehicle access point and the heavy vehicle access point, they will be restricted to exit only. Therefore, light vehicles and heavy vehicles will not undertake turns from the wrong side of Bakers Lane to enter the respective Lots. Furthermore, both light vehicles and heavy vehicles will exit this access point in a lane correct manner which suggests that	Appendix D of **Appendix C** of the MOD 3 Report.

Comment	Response	Section
	the access crossover design is suitable for the respective design vehicle. With regards to the light vehicle access point (within close proximity of Mamre Road for Lot 3),its distance from the Bakers Lane / Mamre Road intersection is ~180m and justification for this access point is already provided in item 2 above. The swept path assessment for light vehicles and heavy vehicles entering to/ exiting from the access points is attached in Appendix D.	
• The heavy vehicle access to lot 4 is very close to the access to Bakers lane and may cause queuing onto Bakers Lane (this could cause possible issue with the ultimate alignment and impact to the efficiency of the signals also.	This comment has been addressed by Ason Group in the Transport Assessment in **Appendix C** of the MOD 3 Report. The information provided within this section also details if the necessary queue lengths at Bakers Lane and SLR are sufficient to cater for the vehicles travelling at this intersection, without queueing on the respective roads. Furthermore, our modelling has been undertaken based on Costin Roe's latest design that allows for a Double Diamond phasing at this signal. In summary –based on our modelling, the intersection is expected to operate at aLoS B with average delays of 27seconds(for the AM Peak) and a LoS C with average delays of 32seconds (for the PM Peak). SIDRA modelling results suggests that the queue at the northern leg is 6mfor the AM Peak and 11 m for the PM Peakfor the right-turn and left-turn lanes only and can be accommodated by the respective bays. Furthermore, this queuing occurs at the Bakers Lane / SLR / Acccess Road intersection (at 2036) which is well below the 147m separation proposed by the JV.Based on the above, queuing at the northern leg will not have any material traffic impacts at this intersection. On top of that, the Lot 4 entry point onto the north-south access road is proposed to be open during operational hours of this warehouse and the control point for this warehouseis80m from the access point. Overall –the queueing storage for the northern approach is quite minimal which is deemed satisfactory.	Section 1.5 of **Appendix C** of the MOD 3 Report.

Comment	Response	Section
	The modelled queueing estimation suggests that there would be no material impact to the proposed signalised intersection.	