

Ms Karen Harragon  
Director Social and Other Infrastructure Assessments  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

**Notice of Exhibition – Moorebank Precinct East (MPE): Stage 2 Application SSD 7628**

Dear Ms Harragon

Reference is made to the ongoing discussions regarding the subject proposals. This is the combined response of Transport for NSW and Roads and Maritime Services (collectively referred to as TfNSW).

The proponent has indicated that it is yet to finalise the cumulative assessment of the subject application and will provide a draft response to TfNSW in July 2017 (noting that this month has now passed). The need for a cumulative assessment and agreed mitigation framework has been a consistent theme of TfNSW representations as recognised by the Planning Assessment Commission (PAC).

Analysis by the proponent in Sections 3.3 and 5.7 of the Operational Traffic and Transport Impact Assessment found that the broader road network in the study area would need to be upgraded to cater for the forecast traffic increases from the proposed development and general background growth. Despite this, the proponent is not proposing any mitigation works beyond those along Moorebank Avenue, referring to the broader contributions being determined once the ultimate development cumulative assessment is completed.

Without the proponent's assessment of cumulative impacts and agreement of a mitigation framework, TfNSW could only conditionally support the application. The condition requested is a deferred commencement of any approval granted to Stage 2 construction until such time as the proponent has finalised the cumulative development modelling assessment. This includes agreement from TfNSW on the mitigation measures and staging triggers associated with the cumulative development modelling assessment.

TfNSW has a number of other comments about the Development Application that it requests form part of the deferred commencement condition. These issues are provided in **Annexure A**.

In summary, the deferred commencement condition requested should require the proponent to address the following to TfNSW satisfaction:

1. Finalise an agreement for State Road Network mitigation for the cumulative impacts associated with the current stages , prior to Stage 2 construction on the site.
2. Address the matters identified in **Annexure A** of this letter.

Suggested standard conditions of consent are in **Annexure B** of this letter.

Thank you again for providing TfNSW the opportunity to comment on this application. For further information, please contact Mr Colin Langford, Principal Network Manager West Precinct, Roads and Maritime Services on (02) 8849 2339.

Yours sincerely



Jim Modrouvanos

~~Cara Caroline Barnes~~  
A/ **Deputy Secretary**  
**Freight Strategy and Planning**



Ken Kanofski  
**Chief Executive**  
**Roads and Maritime Services**

CD16/17545

## Annexure A – Summary of TfNSW Issues

Noting the proponent's cumulative assessment is still in progress, TfNSW has considered the impacts relating solely to the Stage 2 Development Application and raise the following issues to be addressed by the proponent:

- The proponent is requested to provide all traffic modelling in support of the application for TfNSW review.
- The proponent is requested to develop a simplified table detailing the key assumptions for each construction and operational stage, along with likely accumulative trip generation. The figures should take into account and include an updated delivery schedule aligned with the trip generation numbers of the approved and proposed development applications for both the MPE and MPW sites.

A summary table was submitted by the proponent on 16 June 2017 for review by TfNSW. The summary table indicates that the anticipated cumulative trip generation for the MPE and MPW concept plan approvals (MP10\_0193 and SSD 5066 respectively) are **9,337 light vehicle** movements and **10,798 heavy vehicles** movements per day (2 way). The predicted cumulative trip generation for the Stage 1 and 2 MPE applications and Stage 2 MPW application is **6,808 light vehicle** movements and **2,540 heavy vehicles** movements per day (2 way).

If the applicant seeks future approval for additional warehousing the predicted cumulative trip generation is **11,128 light vehicle** movements and **4,978 heavy vehicles** movements per day (2 way). It is not clear how 250,000sqm of additional warehousing would reduce external heavy vehicle trips, and thus reducing heavy vehicle movements by **5,820** when compared to the cumulative trip generation for the MPE and MPW concept plan approvals.

- Section 5.1 and Appendix B of the Operational Traffic and Transport Impact Assessment report provides trip generation assumptions for the warehouse and intermodal terminal components. However the applicant has not provided traffic generation information for the proposed retail, commercial and light industrial land uses. The applicant is requested to provide additional information regarding the trip generation and traffic distribution for the retail, commercial and light industrial components and should include these in the cumulative assessment.
- Table 5-6 of the Operational Traffic and Transport Impact Assessment report provides intersection analysis results with and without the proposal in 2019. The do-minimum scenario indicated that delays on the state road network for intersections I-2, I-3, I-4, I-6, and I-8 are expected to be less for the AM and PM peaks 'with the Proposal' than 'without the Proposal'. Given that the same intersection layout was modelled, the applicant is requested to clarify how the intersections perform better with the Proposal than without.
- Table 5-7 of the Operational Traffic and Transport Impact Assessment report provides intersection analysis results with and without the proposal in 2029. The do-minimum scenario indicated that delays on the state road network for intersections I-2, I-3, I-4, I-6, and I-8 are expected to be less for the AM and PM peaks 'with the Proposal' than 'without the Proposal'. Given that the same intersection layout was modelled, the

applicant is requested to clarify how the state road network is expected to perform better with the Proposal than without at these intersections.

- Section 1.8 of the Operational Traffic and Transport Impact Assessment report states that Moorebank Avenue would be upgraded for 1.4km, commencing from approximately 95m south of the northern boundary of the MPE site to approximately 120m south of the southern MPE site boundary. A preliminary layout of the proposed Moorebank Avenue upgrade has been provided in Appendix D of the Operational Traffic and Transport Impact Assessment report, however further details are requested regarding the following:
  - I. Lane configurations – how will the proposed lane widening works affect existing signalised intersections and approved construction access arrangements for MPE Stage 1 and MPW Concept Plan and Early Works applications.
  - II. Intersection upgrades – the proponent should provide details of traffic signal plans and staging details for the four intersections that are going to be upgraded.
  - III. Road alignment – further details regarding the proposed change in level of Moorebank Avenue by up to 2 metres is required, including but not limited to; cross-sections, verge treatment, hydrology and stormwater management, service impacts, boundary levels and tie-ins. Staging plans will need to demonstrate how 2 lanes of traffic will be maintained along Moorebank Avenue, whilst the road is raised by 2 metres.
  - IV. Traffic impact mitigation – how will traffic impacts associated with the proposed works along Moorebank Avenue be mitigated for all key project phases of the Moorebank Intermodal development.

## **Annexure B – Standard Conditions**

The proponent will be required to enter into a Works Authorisation Deed with Roads and Maritime Services for the roadworks and traffic lights.

Should the application be supported following adequate resolution of the abovementioned matters, the anticipated operational conditions of consent required by Roads and Maritime Services include:

- i) The construction of new or modification to existing traffic lights along Moorebank Avenue will require consent from Roads and Maritime under Section 87 of the Roads Act, 1993. Proposed traffic control light and/or modifications shall be designed to meet Roads and Maritime requirements prior to the commencement of construction works.

The Traffic Control Signal (TCS) plans shall be drawn by a suitably qualified person and endorsed by a suitably qualified practitioner. The submitted designs shall be in accordance with Austroads Guide to Road Design in association with relevant Roads and Maritime supplements (available on [www.rms.nsw.gov.au](http://www.rms.nsw.gov.au)). The certified copies of the signal/civil design plans shall be submitted to Roads and Maritime for consideration and approval prior to the release of a Construction Certificate by the Principal Certifying Authority and commencement of road works.

Roads and Maritime fees for administration, plan checking, civil works inspections and project management shall be paid by the developer prior to the commencement of works.

The proponent will be required to enter into a Works Authorisation Deed (WAD) for the abovementioned works. Please note that the WAD will need to be executed prior to Roads and Maritime assessment of the detailed signal/civil design plans.

- ii) The proponent may be required to dedicate land or provide an easement for the maintenance of the traffic control lights. Further details will be included in the WAD process.
- iii) The proposed road upgrade, road raising and widening works by the proponent along Moorebank Avenue shall be designed to meet Roads and Maritime requirements, and endorsed by a suitably qualified practitioner. The design requirements shall be in accordance with AUSTROADS and other Australian Codes of Practice. The certified copies of the civil design plans shall be submitted to Roads and Maritime for consideration and approval prior to the release of the Construction Certificate by the Principal Certifying Authority and commencement of road works.
- iv) The works associated with traffic lights and road upgrade works are to be designed and delivered at no cost to TfNSW or Roads and Maritime Services.
- v) The Applicant is to ensure that the construction and operation of the proposed development will not prevent the existing use of Moorebank Avenue as a public road to a standard commensurate to its current use prior to the development. A staging plan should be submitted for review and approval to Roads and Maritime Services and TfNSW prior to construction works commencing, to ensure adequate capacity

including a requirement to maintain two lanes open to traffic along Moorebank Avenue at all times.

- vi) Prior to the issue of any Construction Certificate, the proponent is required to undertake a Road Safety Audit for the proposed construction vehicle assess on Moorebank Avenue by an independent TfNSW accredited road safety auditor in accordance with the relevant Austroads guidelines to identify the safety issues for the proposed construction vehicle access. The proponent shall recommend corrective actions for the identified safety issues and propose appropriate traffic management measures (i.e. temporary traffic signals and other traffic management measures) in consultation and approval from the relevant Council, TfNSW and Roads and Maritime.

The Road Safety Audit report should be submitted to the relevant Council and Roads and Maritime for review and comment.

- vii) A Construction Traffic and Access Management Plan detailing staging of works, construction vehicle routes, construction traffic generation, construction traffic impacts, impacts to pedestrians / cyclists, local property access, hours of operation, parking for workers, access arrangements, cumulative construction impacts, mitigation measures and traffic control should be developed in consultation with the relevant Council, TfNSW and Roads and Maritime Services.

The Construction Traffic and Access Management Plan should be submitted to the relevant Council, TfNSW and Roads and Maritime for approval prior to the commencement of construction works.

- viii) The proponent is to generate and provide a report each six months (in a format agreed with TfNSW and Roads and Maritime) that advises:
- The number of actual and standard twenty foot equivalent shipping containers despatched and received during the period;
  - The number of days in the period that the truck gate was open for despatching trucks 24 hours a day, 7 days a week. Detail any exceptions and advise actual hours of operation;
  - A record of every vehicle entry by class, date and time;
  - The number of light vehicles turning right into the driveway/s and the number of light vehicles turning left from the driveway/s for a representative day; and
  - The despatch location or origin address.
- ix) The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements in relation to landscaping and/or fencing, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1- 2004, AS2890.6-2009 and AS 2890.2 – 2002 for heavy vehicle usage.
- x) The swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS requirements. In this regard, a plan shall be submitted to the consent authority and Roads and Maritime for approval, which shows that the proposed development complies with this requirement.
- xi) All vehicles are to enter and leave the site in a forward direction.

- xii) All vehicles are to be wholly contained on site before being required to stop.
- xiii) A Road Occupancy Licence is to be obtained from the Transport Management Centre for any works that may impact on traffic flows on Moorebank Avenue or the adjoining state road network during construction activities.
- xiv) All demolition and construction vehicles are to be contained wholly within the site and vehicles must enter the site before stopping. A construction zone will not be permitted on Moorebank Avenue without the express approval of RMS.
- xv) The developer shall be responsible for all works required by public utility adjustment/relocation works, necessitated by the above work and as required by the various public utility authorities and/or their agents.
- xvi) All works/regulatory signposting associated with the proposed development are to be approved by Roads and Maritime Services.