



Dave Auster
Environmental Planning Officer
Department of Planning, Housing and Infrastructure
Email: dave.auster@dpie.nsw.gov.au

State Significant Development Application – SSD-81434988
221-235 Luddenham Road, Orchard Hills
Alspec Warehousing Facility

17 September 2025

Dear Mr Auster,

Sydney Metro welcomes the opportunity to comment on the Alspec Warehousing Facility State Significant Development Application (**SSDA**) at 221-235 Luddenham Road, Orchard Hills, submitted by the Applicant Urbis.

The Sydney Metro – Western Sydney Airport (**SMWSA**) project is a Critical State Significant Infrastructure (CSSI) project, which is an interfacing development with the Alspec Industrial Business Park (**AIBP**), currently under construction. The Sydney Metro Stabling and Maintenance Facility (**SMF**) is an interfacing development that is currently in construction phase. The sole access for the SMF for construction and delivery of rolling stock is from Patons Lane, and therefore resolution of traffic issues related to the development of this site is essential to ensure the successful operation of the Metro in future.

Sydney Metro acknowledges the significant volume of development and construction activities occurring at the AIBP site. However, Sydney Metro as a CSSI project requests that the Department of Planning, Housing and Infrastructure (**DPHI**) ensure priority is given to Sydney Metro's use of Patons Lane during its AM and PM peak construction hours, and this must be clearly documented across all Construction Traffic and Pedestrian Management Plans (**CTMP**) associated with the AIBP to ensure a consistent approach.

Sydney Metro has reviewed the Environmental Impact Statement including Appendix E - Mitigation Measures Table, Appendix P - Construction Traffic Management Plan and Appendix HH - Traffic Impact Assessment and provide the following comments and recommendations for consideration by DPHI in relation to the assessment of the SSD.

1. Overarching Construction Traffic and Pedestrian Management Plan - AIBP

The Applicant has informed Sydney Metro that the Bulk Earthworks Development Application (**DA24/0294**), which was approved by Penrith City Council on 5 May 2025, will serve as the overarching Construction Traffic and Pedestrian Management Plan (**CTPMP**) for the AIBP site.

As part of the Bulk Earthworks development, Sydney Metro has worked through a range of construction-related impacts through its review of the associated CTPMP. Through this process, Sydney Metro and the Applicant agreed

on several mitigation measures to reduce potential delays and congestion during the construction of various AIBP developments, particularly at the Patons Lane/Luddenham Road intersection. This means that the CTPMP for the Bulk Earthworks development should be updated to reflect any subsequent changes or developments. Additionally, all future Construction Traffic Management Plans (**CTMPs**) for individual projects within the AIBP site must be reviewed to ensure they align with the principles set out in this overarching CTPMP.

Sydney Metro recommends that all CTMPs, including the overarching CTPMP, include the following agreed key mitigation measures:

- a. **Restricting AIBP construction vehicles from using Patons Lane:** Vehicular traffic generated during construction stage shall not be permitted to enter and exit via Patons Lane and Luddenham Road intersection during the Sydney Metro's peak construction hours, which are between 7.30AM and 8.30AM, and 4.30PM and 5.30PM weekdays. The Applicant is to consider using the site's southern access point for access and egress of all light and heavy vehicles during peak periods.
- b. **A requirement for on-ground traffic controllers:** Traffic controllers are to ensure that Sydney Metro construction traffic be given priority access to Patons Lane to minimise disruptions for Sydney Metro's construction activities and deliveries, and if required, traffic controllers must divert any AIBP construction vehicles to access the site via the southern driveway on Luddenham Road.
- c. **Implementing a one-way access/egress arrangement:** For periods outside of the construction peak hours, reverting to the one-way loop arrangement, that is enter via Patons Lane and exit via the southern access off Luddenham Road.
- d. **Unimpeded access to Patons Lane:** Patons Lane access must be maintained at all times to not impede Sydney Metro's construction activities.

2. Environmental Impact Statement

a. Section 3.9.1 Access and Circulation

Comment: Figure 16: Traffic Movement plan – The colour coding is inconsistent with the identified vehicle types shown in the map.

Recommendation

To help minimise confusion for this public-facing document and reviewer, it is recommended to amend the entrance/exit markers so the colours are consistent with the vehicle type (i.e. entry point for trucks should be marked pink, exit points for cars should be marked blue).

b. Section 3.9.2 Parking

Comment: It is noted that 246 parking spaces are being proposed, which exceeds the requirement of 194 spaces. A similar outcome was identified by Sydney Metro and raised against the previous SSDA that was lodged (SSD-69845208), with Alspec responding that the additional parking spaces is for future demand/development of the site. However, as per Figure 6, each warehouse development has their own parking facility.

Recommendation

Request the Applicant confirm what additional development they are referring to that would utilise the additional spaces for this development and SSDA-69845208. An oversupply of parking encourages additional single-vehicle trips, which in turn generates poorer traffic outcomes. Suggest the Applicant modify the volume of parking spaces to be more in-line with the required amount or confirm which future developments will utilise the additional parking spaces.

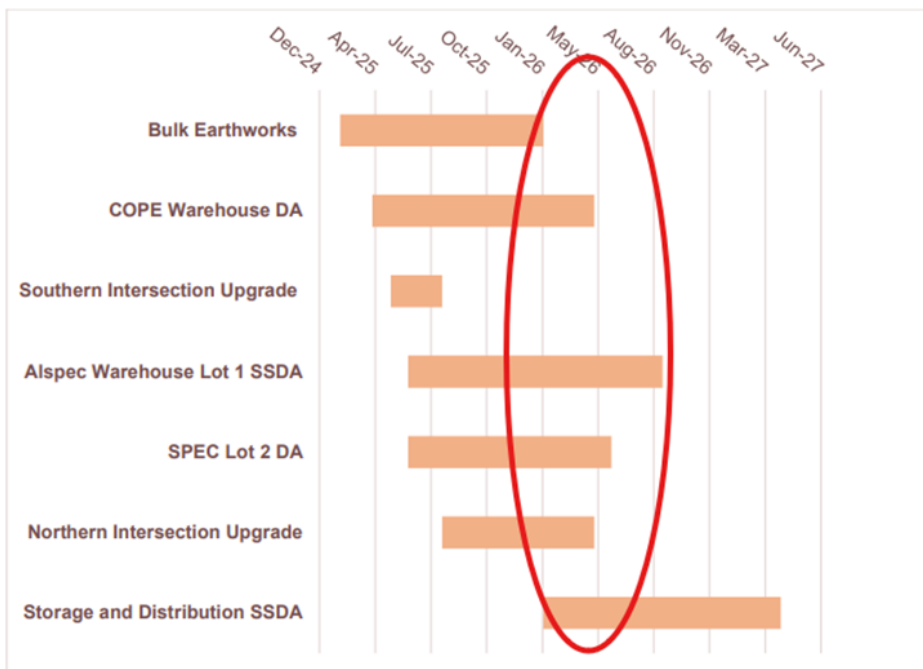
c. Section 3.14 Development Timing

Comment: It is recommended that the Applicant include details of development timing in relation to the Southern and Northern intersection Development Applications, and how construction activities will be managed if occurring concurrently.

d. Section 6.4.2.1 Construction

Comment: “During this period, the storage and distribution warehouse construction will be yet to commence, and the southern intersection upgrade works will be completed. Therefore, traffic volumes from these construction activities have not been considered in the cumulative assessment”

The CTMP submitted for this SSDA identifies that the construction activities overlap with four (4) other Alspec developments, including the Northern Intersection Upgrade. As such Sydney Metro strongly recommend that this development be included in the overarching CTMP (Bulk Earthworks) that is being updated.



Recommendation

Sydney Metro is concerned about the extensive development occurring at the AIBP site, which includes four (4) separate construction projects occurring at the same time as mentioned in the AIBP Indicative Construction Timeline in the CTMP. Among these are two SSDAs, including the Northern Intersection Upgrade. Sydney Metro is concerned about how these construction activities will impact Sydney Metro’s construction efforts, especially during the Patons Lane/Luddenham Road upgrade.

Given that these construction activities are expected to generate up to 100 vehicles per hour during the AM peak, Sydney Metro requests that the Applicant ensure all agreed mitigation measures are implemented during construction activities and clearly documented in the CTMP. These mitigation measures should be focused on ensuring that deliveries to the Sydney Metro site are not delayed.

e. Section 6.4.3 Mitigation Measures

Comment: “During the AM and PM peak hours, Sydney Metro construction traffic will be given priority access via Patons Lane. To reduce congestion, traffic controllers will assess the traffic conditions and, if required, will divert any AIBP construction vehicles to access the site via the existing driveway on Luddenham Road.”

In order to ensure consistency across other developments approved at the AIBP, all vehicular traffic generated during the construction stage shall not be permitted to enter and exit via Patons Lane and Luddenham Road intersection during the Sydney Metro’s peak construction hours, which are between 7.30AM and 8.30AM, and 4.30PM and 5.30PM weekdays. The Applicant is to use the AIBP site’s southern access point for access and egress of all heavy and light vehicles during peak periods.

Recommendation

Sydney Metro recommends that the EIS and CTMP be updated to note that this no-access period is subject to extension if there are significant impacts on Sydney Metro’s construction activities during Alspec’s initial construction activities.

3. Construction Traffic Management Plan (Appendix P)

General comment

A number of sections in this CTMP need to be updated to reflect the latest CTMP that Sydney Metro reviewed for DA24/0294 (CTMP Version 1.6, dated 31 July 2025) where a number of traffic management mitigation measures were agreed upon.

a. Section 3.1 Site Access

Comment: Figure 3-5 Construction traffic flow during Sydney Metro off peak periods – alternate option with traffic controllers is not supported as it will increase construction traffic movement on Patons Lane.

The Sydney Metro preferred option is Figure 3-4, where during ‘Sydney Metro off peak’ periods construction vehicles will revert to the one-way loop arrangement, that is to enter via Patons Lane and exit via the southern access off Luddenham Road. This will reduce vehicular movements on Patons Lane by allow vehicles to exit directly onto Luddenham Road. This vehicle movement is shown in Figure 3-4.

Recommendation

Figure 3-5 should be deleted and removed from the CTMP as an ‘alternate option’ as this option is not supported due to the construction vehicle impacts created on Patons Lane.

Comment: Figure 3-6 – Indicative AIBP Construction Timeline outlines the proposed construction schedule. However, the indicative dates for the Southern and Northern Intersection Upgrades appear to require updating. It is important that these dates are revised to ensure Sydney Metro has an accurate understanding of AIBP’s peak construction period and its potential impact or overlap with the construction and delivery timelines for Sydney Metro’s rolling stock.

b. Section 4.1 Assumptions

Comment: The following statement - “resulting in an increase of up to 95 light vehicle trips along Patons Lane and Luddenham Road in the AM and PM peak hours. These vehicles are assumed to consist exclusively of light vehicles” is to be updated.

Recommendation

This sentence should be updated to state 95 vehicle (all-types) trips along Patons Lane and Luddenham Road instead of 96 light vehicle trips.

c. Section 4.2 Background Traffic Volumes

Comment: Part 4.2.2 Sydney Metro – Western Sydney Airport stabling and maintenance facility mentions Oversize over-mass vehicles (OSOM) vehicles are expected to access the SMF site overnight or outside of general peak periods. This information is incorrect as there is no designated or agreed-upon timeframe for the OSOM vehicle movements to and from the SMF.

Recommendation

The CTMP is to be updated to reflect the comment above in noting that there is no confirmed timeframe for OSOM vehicles to access the SMF. The CTMP should however provide details on how access will be prioritised for OSOM vehicles to the SMF.

d. Section 5.2.7 Authorised Traffic Controllers

Comment: This section of the CTMP does not mention that the Traffic Controllers will also be responsible for prioritising Sydney Metro construction vehicles when delays occur.

Recommendation

Update the responsibilities of the authorised traffic controllers to include the following:

On-site traffic controllers to be required to manage and direct/ manage traffic at the Patons Lane/Luddenham Road intersection to minimise queue lengths and delays for vehicles during construction hours, prioritising Sydney Metro construction traffic even outside of peak periods.

e. Section 5.3 Construction Mitigation Measures

Comment: Dot point 4 outlines the mitigation measures for managing traffic and transport during construction. To eliminate any potential ambiguity, dot point 4 should be updated to align with the agreed construction traffic mitigation measures with Sydney Metro.

Recommendation

Dot point 4 should be updated to include the following: *During AM and PM peak hours, all AIBP construction vehicles are to access and egress the site via the third access point located 1km south of the Patons Lane/Luddenham Road intersection.*

Comment: Dot point 6 states that OSOM deliveries will have priority access to Patons Lane overnight. This mitigation measure is to be updated as there is no designated or agreed-upon timeframe for the OSOM vehicle movements to and from the SMF to occur overnight. The CTMP is to be updated to reflect this.

f. Section 6 Summary / Recommendation

Comment: With several developments taking place at various stages within the AIBP, it is important that this CTMP aligns with the commitments outlined in the recently approved CTMP for the Bulk Earthworks Development Application (DA24/0294). As mentioned above, Sydney Metro has worked with the Applicant to develop several mitigation measures to be included in the CTPMP.

To ensure that this CTMP maintains the agreed commitments between Sydney Metro and the Applicant to reduce potential delays and congestion during the construction of various AIBP developments, including this

development, and particularly at the Patons Lane/Luddenham Road intersection, the following mitigation measures are to form part of the CTMP for this SSD. It is recommended to include the agreed mitigation measures as conditions of consent and in the CTMP.

Recommendation

To ensure a consistent approach to managing traffic impacts at the AIBP, as agreed by Sydney Metro and the Applicant, the following conditions are recommended to be included as part of the CTMP:

- Vehicular traffic generated during construction stage shall not be permitted to enter and exit via Patons Lane and Luddenham Road intersection during the Sydney Metro's peak construction hours, which are between 7.30AM and 8.30AM, and 4.30PM and 5.30PM weekdays. The Applicant is to consider using the site's southern access point for access and egress of all light and heavy vehicles during peak periods.
- Traffic controllers are to ensure that Sydney Metro construction traffic be given priority access to Patons Lane to minimise disruptions for Sydney Metro's construction activities and deliveries, and if required, traffic controllers must divert any AIBP construction vehicles to access the site via the southern driveway on Luddenham Road.
- For periods outside of the construction peak hours, reverting to the one-way loop arrangement, that is enter via Patons Lane and exit via the southern access off Luddenham Road.
- Patons Lane access must be maintained at all times to not impede Sydney Metro's construction activities.

In addition to the above, Sydney Metro recommends that DPHI include a condition of approval requiring the Applicant to continue to liaise with Sydney Metro and incorporate in any feedback received in the preparation of the Construction Traffic Management Plan prior to the commencement of works on the site.

4. Traffic Impact Assessment (Appendix HH)

a. General Comment

Please ensure the Traffic Impact Assessment includes the construction impact assessment from other developments at the AIBP.

b. Section 5.5.1 Assessed Network and Traffic Demand

Comment: It is unclear if background traffic has been included in the traffic modelling to assess the impacts of the Storage and Distribution warehouse development, and concurrent AIBP warehouse developments at the Luddenham Road/ Patons Lane intersection and Patons Lane/ Site Access A intersection.

Table 5-11 includes turning movement demands for Scenario A and Scenario B. It is unclear if the volumes are from the development or if they include background traffic also.

Recommendation

Sydney Metro request the Applicant to confirm that the background traffic has been included in Scenarios A and B of the modelling assessment.

Table 5-11 – Can the Applicant confirm if the volumes are from the development or if they include background traffic. Can this be made clearer in the table and/or the preceding commentary.

c. Section 5.5.2 Findings and Results

Comment: “During the AM and PM peak hours, Sydney Metro construction traffic will be given priority access via Patons Lane.” This statement contradicts the key construction mitigation measures.

Recommendation

Please update to clarify that AIBP construction vehicles will not be permitted to access Patons Lane during Sydney Metro AM and PM peak construction times.

d. Section 5.2.3 STFM Model

Comment: This section states that 2036 traffic forecasts were informed using STFM outputs.

Recommendation

Sydney Metro recommends the Applicant provide clarification on how 2027 forecasts were determined.

e. Section 5.6.1 Construction Impact


Comment: Cumulative construction traffic assessment results table does not match the latest CTMP that Metro reviewed (CTMP version 1.6, dated 31 July 2025).

Additional submission to DPHI

Sydney Metro is currently awaiting feedback from the project team about possible delays in the delivery of equipment and rolling stock to the Sydney Metro Stabling and Maintenance Facility. An updated submission is to be provided to ensure any additional project related concerns on the timely delivery and construction of the Sydney Metro Western Sydney Airport project are not adversely impacted by the subject development.

Please contact Vanessa Cagliostro Manager Urban Planning via email at vanessa.cagliostro@transport.nsw.gov.au should you have any further inquiries on this matter.

Sincerely,



Lara Maree Dominish

Director Place Making and Property