

8 December 2021

TfNSW Reference: SYD21/00456/02 & Departments Reference: SSD-17552047

Katelyn Symington
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Symington,

**EXHIBITION OF EIS – ALDINGTON ROAD ESTATE - 155-217 ALDINGTON ROAD -
KEMPS CREEK**

Reference is made to the Department of Planning, Industry and Environment's referral dated 4 November 2021 with regard to the abovementioned draft Environmental Impact Statement, which was referred to Transport for NSW (TfNSW) in accordance with the State Environmental Planning Policy (Infrastructure) 2007. This letter is offered as a collective response from agencies of the TfNSW cluster.

TfNSW has reviewed the documentation provided for the abovementioned development and raises concerns with the proposed development and supporting Transport & Accessibility Management Plan (TAMP) in its current form. This includes:

- Provisions for the dedicated freight network (DFN) in line with the Mamre Road Precinct DCP
- Various comments on TAMP and proposed road layout
- Recommendations on the draft Construction Traffic Management Plan & draft Green Travel Plan

TfNSW provides detailed comments and recommendations in **Attachment A**.

If you have any further questions, Ms Laura van Putten would be pleased to take your call on (02) 8849 2480 or please email development.sydney@rms.nsw.gov.au. I hope this has been of assistance.

Yours sincerely



Edmond Platon

A/Senior Manager Land Use Assessment West & Central

Attachment A

Corridor Protection Considerations

1. Comment

In November 2021 the Mamre Road Precinct Draft Development Control Plan (DCP) was adopted. The DCP identifies a dedicated freight network (DFN) through the Mamre Road Precinct. Section 3.4.2 of the DCP provides controls to protect the DFN, including the requirement that:

5) Development applications for lots with an identified access point (refer Figure 17) shall demonstrate how access to and from the dedicated freight corridor will be achieved.

TfNSW has reviewed the relevant documentation and notes access arrangements for the DFN and circulation across the site have not been addressed.

Recommendation

It is recommended that the applicant amend the concept plan and make provision for the DFN to access the site and ensure future designs for Lots 3 and 4 accommodate the inclusion of access arrangements for the DFN. TfNSW also request the applicant demonstrate how an integrated freight network can be safeguarded within their development.

Transport & Accessibility Management Plan (TAMP)

2. Comment

It is unclear from the plans provided whether the road and driveway configurations (for the warehouses on Lot 9) will provide sufficient capacity for vehicles entering, exiting and manoeuvring throughout the site. Whilst there are statements contained in the TAMP to suggest this is the case TfNSW is unable locate any swept path diagrams to verify this.

Recommendation

It is requested that swept path plans be provided demonstrating the design vehicle is able to adequately manoeuvre through these intersections to the satisfaction of Council.

3. Comment

Appendix E – Swept Path - Turning path plans are provided for 30m A-Double. According to the Mamre Road Precinct DCP Road design item (20), it should be tested for 36.5m PBS Level 3 type A vehicles.

Recommendation

It is requested that Swept path plans be provided showing the test vehicle of a 36.5m PBS Level 3 type A vehicle.

4. Comment

It is unclear whether offering a shared heavy and light vehicle entry to Lot 9 will present a safety/ efficiency conflict and how this risk will be managed.

Recommendation

It is recommended that a more detailed explanation is provided which identifies and mitigates the risks involved with combining accesses to the satisfaction of Council.

5. Comment

TfNSW provided a detailed response of key issues and assessment requirements for inclusion in the Secretary's Environmental Assessment Requirements (SEARs). These requirements outlined in detail what the assessments and information to be provided in order to understand the impacts to the road networks as a result of the traffic types and volumes generated from this development. The SEARs clearly states under General Requirements:

- *The Environmental Impact Statement (EIS) for the development must meet the form and content requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (the Regulation).*

In addition, the EIS must include:

- *consideration of issues discussed in **Attachment 2** (public authority responses to key issues)*

Recommendation

TfNSW requests that the key issues and assessment requirements provided by TfNSW (see **Attachment B**) for inclusion in the SEARs be addressed/provided for further assessment prior to the determination of the application. TfNSW will further review and provide response upon receipt of the additional information.

In addition to the above, TfNSW provides the following comments to be addressed in the updated TAMP:

- i. It is noted that the SSDA includes a Masterplan with a total build area of 64,080m². The proposal also includes the creation of 9 individual development lots. There is no indication of what the traffic impacts will be once the individual lots are developed.

Whilst the future use of the respective lots are not yet known, there is still a need to provide a cumulative traffic study to understand the impacts of the projected increase in traffic activity as a consequence of the subdivision proposal. Therefore it is requested that an indicative building area yield is assumed and the potential traffic generation is adequately assessed.

- ii. It is noted that the modelling assumptions include some road upgrades/new connections being constructed by 2026 such as the Southern Link Road (SLR). Was it considered in the model that SLR might not be built by 2026?
- iii. Future year modelling should be provided as outlined in Attachment B.
- iv. Table 10 indicates that the intersection of Abbots Road and Aldington Road will be signalised. Appendix D - Aldington Road & Abbots Road intersection movement summary is identified as a roundabout but modelled as signals, this will need to be clarified.
- v. It is not clear whether the abovementioned signals at the intersection of Abbots Road and Aldington Road are proposed as part of this Development Application. TfNSW requires further detail to understand why the intersection is being modelled as signals when the current treatment is an uncontrolled T-intersection. In addition the following questions are raised:
 - Who is constructing the signals?
 - When will they be constructed?
 - Should signals be proposed, do they meet TfNSW Warrants?
 - Section 6.5.1 Figure 15 - Why are the signals modelled without pedestrian legs?
- vi. The cycletimes shown in the movement summary are not consistent. Should the abovementioned signals at the intersection of Abbots Road and Aldington Road be constructed, the cycletimes would be linked and therefore should be modelled with this consideration. In this regard as per previous discussions TfNSW would accept a maximum cycletime of 120 seconds for this area. Isolated/optimum etc cycletimes will not be supported.
- vii. In order to undertake a more detailed review of the provided documentation, it is requested that all SIDRA results referred to in the TAMP are provided (including the Base models). This should include SIDRA output and raw SIDRA (.sip) files. This will enable our modelling and traffic teams to

undertake a detailed review of the model to ensure that the inputs are accurate and supported. Further comments can be provided following the review of the models which may require the assessment to be updated.

Road layout & Plans

6. Comment

Mamre Road Precinct DCP Table 9. Provides a summary of the preferred road typology. The summary includes road reserve widths for different road types. *Frasers Property* subdivision plan road reserve widths appear narrower than that required by the cross-sections for a typical distributor road (Aldington Road) and a collector road.

Figure 12 of the DCP indicates that the road network hierarchy for the east west road should be a collector road. In addition the DCP indicates that the connection to Aldington Road is to be signalised. This would result in the need to provide a central median and therefore the road reserve of 26.4 meters in width would be required.

A measurement was not provided for the width of Aldington Road however it appears that the widths are less than the required 30.6 metres for a distributor road.

Recommendation

The subdivision plan should be updated to reflect the Mamre Road Precinct DCP preferred road typologies.

7. Comment

TfNSW notes that the notations on Drawing No. SP1-AE-DA-004 suggest the north-south internal road will be extended to accommodate surrounding development and that this is consistent with the provisions of the Mamre Road Precinct DCP.

Significant landform modification/ retaining works are proposed to the Northern portion of the site, it is unclear if these works impede capacity to extend the internal collector road to the north.

Recommendation

Further clarification should be provided to understand why the road is not being constructed to the development boundary and whether the proposed landform modification/ retaining works will impede capacity to extend the internal collector road to the north. There may be implications to the broader road network should this connection not be able to be achieved.

8. Comment

The EIS 3.2.10 (page 28) states - *As demonstrated in the Transport and Accessibility Management Plan, the Abbotts Road / Mamre Road intersection is the key intersection with regards to access to and from Mamre Road. Interim upgrades are proposed as part of the Proposed Development to support the initial development of the Site by 2026.* This indicates that the intersection will be upgraded as part of this development however there is no plans provided to support this.

Recommendation

Further clarity is required to understand what road infrastructure is being proposed under this development application and whether there is any planning agreement being negotiated for this intersection. Should an intersection upgrade be proposed plans are to be provided. These should include draft TCS plans and civil plans.

Draft Construction Traffic Management Plan (CTMP)

9. Comment

Section 4.1.2 – it is unclear how 170 truck movements a day were calculated.

Recommendation

Further clarification is requested to understand how the daily truck movements were calculated.

Green Travel Plan

10. Comment

TfNSW has reviewed the EIS document which includes the Framework Sustainable Travel Plan and provides the below advice for the EIS Access Logistics Park development application.

•**Objectives:** The updated FSTP should implement both short and long term measures that will ensure non-private vehicular modes of transport are the preferred mode of travel to/from the project site. Your current FSTP should include objectives to reduce the proportion of single-occupant car travel by staff to and from the site. TfNSW recognises the GTP has a car-pooling initiative and would recommend this be extended to visitors on the site. TfNSW also recommends a shuttle service from Blacktown Station be considered (there may need to be several shuttles operating at once to move increased staff 24/7). The GTP objectives should be to increase active and public transport mode share for the life of the development (once public and active transport improvements are made).

- **Mode share targets:** TfNSW recommends that the FSTP adopt both proposed short and long term mode shares that should be determined by a qualified traffic consultant. Car-pooling and shuttle bus services to and from train stations have also been proposed here. Please note TfNSW proposed mode share for both long term and short term just after occupation.

Mode type – ‘Reach’ 2026	Proposed Mode Share	TfNSW proposed mode share
Private vehicle as driver	88%	75%
Car as passenger	3%	10%
Train	0%	0%
Bus	4%	5%
Walk only	1%	0%
Motorbike/scooter	1%	0%
Bicycle	1%	5%
Taxi	1%	5%

Mode type – ‘Short term’	TfNSW proposed mode share
Car one person	75%
Car pooling	10%
Shuttle bus	20%

- **Table 4 –** TfNSW recommends that short term goals be implemented in the FSTP; one of these could be an internal shuttle service going to and from nearby train stations, and the second would be implementing car-pooling schemes. Both of these can be put in the **Implementation Strategy** section (listed below) with specific dates and times and who is responsible for this just after occupation takes place. The other longer term goals in this section would all be implemented in the FSTP just prior to and during public and active transport infrastructure being made available.
- **Travel Coordinator and committee:** TfNSW advises you that often the Travel Plan Coordinator will need a team or committee to ensure all of the actions of the FSTP are done. The FSTP cannot be at the discretion of site management to get the responsibilities of the FSTP implemented. The

applicant will need to determine a strategy for the tenant(s) to take over the ongoing responsibilities for the FSTP, making it clear to the tenants that there are requirements to try and achieve sustainable transport mode shares for the site, as a condition of the development, for its lifecycle.

- **Travel Access Guide:** TfNSW recommends that the TAG document be updated. The Travel Access Guide or TAG should include the short term initiatives discussed earlier (shuttle and car pooling), and removes the cycling (as bus and train travel in the site area is not recommended). The longer term TAG can be updated once public and active transport infrastructure are upgraded. For further helpful information – please check this link [How to Create a Travel Access Guide doc](#) [here](#).
- **Parking management strategy** – – TfNSW asks that a parking management strategy be implemented in the updated FSTP. TfNSW also asks that this FSTP implements a car parking management strategy in the FSTP that prioritises use by staff and visitors on a needs basis, and actively encourages staff and visitors using sustainable transport options that are available to and from the site. This will include how car parking onsite will be limited and managed at the site.
- **Funding the STP:** The GTP will need to be appropriately funded and otherwise resourced, by the proponent, for a period of at least 5 years, or via an appropriate appointed entity, such as a body corporate. This will include ongoing travel demand initiatives that will require resourcing. This is in recognition that any travel demand management interventions will need to be significant in scale to be effective. This should be covered in the updated FSTP Implementation Strategy.
- **Implementation Strategy:** TfNSW recommends that you re-name your proposed FSTP Action Strategy document to be called an **Implementation Strategy**, which has an **implementation plan** of tasks and actions, including all of your initiatives and incentives, timing and completion dates, your communications tasks, and who will do the tasks, timing of tasks to be completed; this will ensure the overall effectiveness of the GTP. The **Implementation Strategy** should:
 - Identify the party or parties responsible for delivery and implementation of each element of the updated GTP throughout various stages of the development lifecycle, including for its ongoing implementation, monitoring and review, for a period of at least 5 years post-OC;

- Be updated both on an annual basis, and when future transport services and pathways eventuate. Your stakeholder engagement strategy will be included in this (including all of your stakeholders, key messages and the channels you will use to engage your stakeholders) – please find our link for **Potential engagement techniques** that may be useful to you.
- **Strategies and initiatives:** The updated FSTP will need to identify and implement planned strategies and initiatives in your **Implementation Strategy** that will reduce the proportion of single occupant car travel to/from the site and increase the use of public and active transport by staff to and from the site. These include options of shuttle buses to and from the site (24/7) a car-pooling scheme, making sure the initiatives are updated longer term in the GTP to reflect changes to public and active transport. Some additional **incentives (both long and short term) are provided here:**
 - Pre-loaded opal cards when staff first occupy the site.
 - Staff that are committed to public transport receive subsidised panniers or backpacks.
 - Wayfinding at the site for End of Trip facilities such as bicycle facilities, change rooms and showers.
 - Incorporating a role for a GTP sustainable travel champion that focuses on modelling the desired behaviours and positive communication around active and public transport.
 - Implementing a car-pooling scheme with guaranteed ride home. Online car sharing systems for staff, operating across an entire precinct to maximise access to possible rides and build community spirit. This could include discounted membership of car share clubs.
- **Data** – The GTP must be updated to include available data that identifies the travel behaviours of site users to measure and monitor the effectiveness of the objectives and mode share targets of the GTP. These include:
 - Weekly rates of car pooling
 - Weekly car park usage rates
 - Shuttle trips to and from the site
 - An additional weekly report of patronage be included in the GTP using Opal data to and from the site.
 - Traffic volumes can also be assessed on the road network within the site area, before and after work. These could be monitored to assess whether:
 - Staff and visitors are re-moding private vehicles to public transport.
 - Parking and pedestrian counts

- **Travel Survey** – TfNSW notes the FSTP has a travel survey tailored to this site in this document and would ask for this to be updated. TfNSW recommends that the Travel Survey asks questions to staff and visitors that promotes these options of the shuttle and the car-pooling scheme (with the most convenient car parks designated for car-pooling participants), and that the survey is updated longer term to reflect changes to public and active transport. Staff travel surveys are conducted to obtain workforce data analysis (including staff residential postcodes) to identify the actual staff/visitors travel origin and destination patterns, to inform strategies that help to reduce car parking demand for staff and students to get to and from the site; please find our [online travel survey here](#).

Recommendations

It is recommended that the GTP be updated based on the above and submitted to TfNSW and Council for endorsement, prior to the issue of the Construction Certificate. Please send all documentation to development.sydney@transport.nsw.gov.au.