



Ms Anthea Sargeant
Executive Director
Key Sites and Industry Assessments
Department of Planning and Environment
PO Box 39
Sydney NSW 2001

Attention: Kate MacDonald

Dear Ms Sargeant

Sydney Zoo – Notice of Exhibition

Thank you for your letter of 9 December 2015 advising of the exhibition for the proposed Sydney Zoo development. TfNSW appreciates the opportunity to provide comments on the proposal. I apologise for the delay in providing a response.

Roads and Maritime Services will be providing a separate response.

An evaluation of the Traffic Impact Assessment has been undertaken against the requirements outlined in the Secretary's Environmental Assessment Requirements (SEARs) and other requirements.

The full evaluation is attached at **Annexure A**, key issues include:

- The proponent's decision not to undertake assessment for the peak Sydney Zoo visitation period and instead provide notation that this would occur during school holiday periods is not supported and it is not in accordance with the issued SEARS.
- The conclusions reached about the adequacy of the State road network to readily absorb development traffic are not supported. The proponent should adopt a future 'design year', and factor traffic levels to the design year before drawing conclusions about the ability of the State road network to absorb the additional traffic generated.
- The proponent should take responsibility for providing the identified pedestrian links between the site and bus stops along the Great Western Highway.

The contact officer is Edmond Platon, Transport Planner, who can be contacted on 8202-2557 or edmond.platon@transport.nsw.gov.au.

Yours Sincerely

19/4/16

Mark Ozinga
**Principal Manager Land Use Planning & Development
Transport Strategy**

CD15/21812

Annexure A to Sydney Zoo Notice of Exhibition SSD7228

On 22 September amended SEARS were issued for the subject development application number SSD 7228. The SEARS for Transport Access and Parking (TAP) were as follows:

TAP SEAR 1	Consultation with the NSW Roads and Maritime Services, Transport for NSW, Blacktown City Council and any other providers of public transport.
TAP SEAR 2	Accurate predictions of the traffic generated by the development during construction and operation, including during peak visitor periods.
TAP SEAR 3	A detailed assessment of the potential impacts of the development on the capacity, efficiency and safety of the road network during construction and operation, including the truck routes, cumulative traffic generated by the existing and the proposed development.
TAP SEAR 4	Details of any required upgrades to road infrastructure.
TAP SEAR 5	Details of surrounding public transport and any upgrades or changes in services required for the development.
TAP SEAR 6	Details of access, internal roads and vehicular parking required as a result of the development.

Each of the SEARS is addressed in turn:

TTP SEAR 1 - Consultation with the NSW Roads and Maritime Services, Transport for NSW, Blacktown City Council and any other providers of public transport

Recommendation:

- If the proponent is required to undertake additional assessment, as recommended below, then a prior joint meeting should be held with Roads and Maritime Services Land Use Assessments and the TfNSW Land Use Planning and Development Section.

TTP SEAR 2 - Accurate predictions of the traffic generated by the development during construction and operation, including during peak visitor periods

Issue:

- Typically traffic estimates are provided for the year of opening and opening plus a 'design year'. The nomination of the future design year is a standard requirement in references such as Austroads *Part 12: Traffic Impacts of Development*. A typical design year for developments of this scale in Sydney is opening year plus ten years.
- The proponent's Traffic Impact Assessment (TIA) has made predictions based on the year the existing traffic was sampled (21 July 2015 - the second week of State school term 3) but has not nominated a future 'design year'. The proponent has not applied a background growth factor to account for either the year of opening or the longer term 'design year'.

Recommendation:

- The proponent should submit an amendment to the Traffic Impact Assessment that applies an agreed growth rate to the traffic noted in July 2015 to account for the future nominated year of opening and the nominated design year 10 years hence from the opening date.

Issue:

- The SEARS require the proponent to make accurate traffic estimates for peak visitor periods. The proponent's TIA declines to undertake this requirement in the SEARS stating (pg.31): *"It is not considered suitable to assess Sydney Zoo's potential traffic generation during its peak operating period of the year, given that this would occur infrequently and at times when typical traffic activity of the surrounding road network would not occur (traffic reductions during school holidays and public holidays). However the intersection (Great Western Highway/ Rudders Street / Bungarrabee Access) is generally expected to operate satisfactorily with longer queues expected at times, consistent with larger event / tourist venues"*
- It is considered that the correct course of action would have been for the proponent to undertake analysis for the peak visitation period alongside an agreed and appropriate discount on the background traffic to account for the fact peak visitation may occur during school holidays.

Recommendation:

- The proponent submits a complying Traffic Impact Assessment by completing an assessment of the peak period traffic estimates. Roads and Maritime and TfNSW are prepared to discuss an appropriate discount on background traffic levels to account for the fact that peak visitation may occur during school holidays.

Issue:

- TTP SEAR 2 envisages that the proponent would prepare accurate predictions of the traffic generated by the development during construction.
- Section 7.6 of the TIA comments on the need for a construction traffic management plan to be prepared. There is no advice provided on the number of construction vehicles likely to be generated, the direction they would be taking on the State road network or what measures would be taken to avoid disruption to peak traffic flows or bus services.

Recommendation:

- The proponent updates the TIA to provide predictions of the traffic generated by the development during construction, the times of the day the flows will be generated, the direction they will be travelling, the key State Road intersections likely to be impacted as well as the key measures likely to be adopted to avoid peak hour disruptions or disruptions to regular bus services.

TAP SEAR 3 - A detailed assessment of the potential impacts of the development on the capacity, efficiency and safety of the road network during construction and operation, including the truck routes, cumulative traffic generated by the existing and the proposed development.

Issue:

- The SEARS stipulate a need to define the truck routes. Operating a zoological park is presumed to require at least deliveries of food and other provisioning at least every business day of the year. The TIA provides no advice on the number of trucks or the

truck routes they will follow or the times of day the food and other provisions could be expected to be delivered.

Recommendation:

- The TIA is updated to detail the number of vehicles associate with the food / provisioning and animal health task, where the trucks will originate from, the roads they will use, the times of day this will occur and the key State road intersections that will be impacted.

Issue:

- The SEARS stipulate a need to consider the cumulative traffic generated by the existing and proposed development. The nearby Wet 'n' Wild facility is discussed at 7.5.2 of the TIA however the Wet 'n' Wild facility was not operational when the traffic survey was conducted in July 2015.

Recommendation:

- The proponent is conditioned to provide a 'summer time' analysis for the year of opening and the 'design year' that takes into account the additional traffic from the Wet 'n' Wild facility as well as Sydney Motorsport Park. The traffic volumes from the Wet 'n' Wild facility as well as Sydney Motorsport Park should be empirical.

TAP SEAR 4 - Details of any required upgrades to road infrastructure.

Issues:

- Section 7.3 of the TIA details the Traffic Impact of the development. The approach of assessing the impact of the development during the road network AM, PM and Saturday peak periods is supported considering the nature of this development.
- The approach of adding the site generation traffic volumes to the identified AM peak although peak site generation is predicted to be at 11am is also supported.
- Section 6.3.1 of the Environmental Impact Statement appears to advocate the use of 'spare capacity on the east and west approaches (i.e. the Great Western Highway) to lessen the delays of 60 seconds or more for vehicles waiting on the Bungarabee Access and Rudders Street. This approach is not supported.
- The conclusions reached in section 7.3 of the TIA are not supported because, as previously discussed, the proponent has not 'factored up' the reported traffic volumes for the predicted day of the opening or the adopted 'design year.' Therefore the conclusion reached that no infrastructure upgrades are required on the State Road network cannot be supported

Recommendation:

- The proposed access at the intersection of Great Western Highway /Rudders Street / Bungarabee Access Point should be upgraded to the satisfaction of Roads and Maritime Services.

- The proponent should be conditioned to provide an amended TIA that uses a growth rate agreed with Roads and Maritime, Services and TfNSW to provide amended traffic analysis for the year of opening and the agreed 'design year'.
- It is noted that the approach outlined in Section 6.3.1 of reducing the green time on the Great Western Highway, a high volume State Road, to improve wait times on Rudders Street and the proposed Bungaribee Access requires approval from Roads and Maritime Services.

TAP SEAR 5 - Details of surrounding public transport and any upgrades or changes in services required for the development.

Issue:

- Footpaths to bus stops on Great Western Highway need to be provided by proponent.

Recommendation:

- The proponent should be conditioned to provide footpaths to bus stops on Great Western Highway.

TAP SEAR 6 - Details of access, internal roads and vehicular parking required as a result of the development.

Issue:

- Swept path analysis has not been provided for heavy vehicles and buses from Great Western Highway into the site.

Recommendation:

- The proponent should be conditioned to provide swept path analysis demonstrating heavy vehicles and buses enter the site from Great Western Highway.