



16 April 2021

TfNSW Reference: SYD20/00740/04

Client Reference: SSD 10053

Director
Department of Planning, Industry and Environmental
GPO Box 39
SYDNEY NSW 2001

Attention: **Jonathon Blackmore**

EXHIBITION OF EIS FOR MOOREBANK AVENUE REALIGNMENT - MOOREBANK AVENUE, MOOREBANK

Dear Sir/Madam,

Reference is made to the Department of Planning, Industry and Environment (the Department) request, dated 1 July 2020, to review the proposed Moorebank Avenue Realignment (MAR) SSD-10053 which was referred to Transport for NSW (TfNSW) for Section 87 approval under the *Roads Act, 1993* for the modification of the Moorebank Avenue /JLU signalised intersection and new traffic signals, and for comment.

TfNSW has reviewed the submitted application and does not provide Section 87 approval for the proposed traffic signal intersection works on the MAR.

TfNSW also raises the following issues to be adequately addressed prior to the determination of this application:

1. The traffic signal warrant assessment in the Traffic Impact Assessment report (TIA) indicates that the four proposed intersections do not meet traffic signal warrant. However, the TIA concentrates on the assessment of the traffic signal options. It is requested that the priority-control/roundabout options should also be fully assessed and provide a clear evaluation of both options.
2. Table 6.8 of the TIA tabulates the travel time extracted from SIDRA models. However it is unknown which option (traffic signal option or priority-control option) this travel time is related to. It is requested that further assessment should be undertaken for the impact of the proposed traffic lights on the delay of through traffic comparing to the priority control option.
3. The TIA suggests the four proposed signalised intersections do not meet the traffic signal warrants but are required to allow safe turning movements of B-Doubles and super B-Doubles. However, a roundabout would provide safe access without causing undue delays to the through movements.

4. Section 6.3.1 of the TIA indicates the priority-controlled intersection will experience excessive delays for the right turn traffic from terminal accesses. However, it should be noted, as per Appendix E – SIDRA results for operational stage, that the excessive delay occur only for ONE right turn vehicle from the terminal accesses during peak hour. Other approaches will operate in acceptable Level of Service.
5. It appears that Road Safety Audit has not been undertaken for the realignment of Moorebank Avenue. It is advised that the earlier a project is audited the more likely that the road safety issues or risks identified can be significantly reduced or eliminated. As a result this minimises compromises in road safety and costly treatments at later stages of the project.

It is requested that Road Safety Audits should be undertaken during the following stages of the project in accordance with Austroads *Guide to Road Safety Part 6: Managing Road Safety Audits* and Austroads *Guide to Road Safety Part 6A: Implementing Road Safety Audits* by an independent TfNSW accredited road safety auditor.

- Concept Design Stage;
- Detailed Design Stage; and
- Pre-Opening of the Project.

6. The applicant should provide a detailed cadaster plan with an overlay of the MAR which clearly identifies what land required for the MAR. The submitted EIS does not adequately identify property boundary lines, land ownership. It is advised that relevant land ownership approvals are required to allow the relevant road authority to issue design and construction approval for the MAR.
7. Section 5.1 of the EIS states that the existing section of Moorebank Avenue that is owned by the Commonwealth will be decommissioned and alterations will be made to Moorebank Avenue to enable it to function as a restricted access to the MLP. However, it is not clear whether Moorebank Avenue will still be classified as a public road and whether permanent signalised intersections will be decommissioned.

Any proposed changes or removal of existing traffic signals require TfNSW approval in accordance with Section 87 of the *Roads Act, 1993*. The existing Works Authorisation Deed for the Moorebank Avenue Upgrade works referred to a MAUW may also require amendments with regard to design and maintenance requirements.

8. TfNSW is investigating the Cambridge Avenue upgrade which includes upgrading Moorebank Avenue to four lanes between Cambridge Avenue and the southern extremity of Moorebank Logistics Park and is a Proposed Initiative in Infrastructure Australia's Priority List.

The EIS and concept civil design should provide details of how the MAR will tie-in to the Cambridge Avenue upgrade project. It is also not clear whether the MAR will

preclude TfNSW's ability to undertake future upgrades between the East Hills Rail Line and the southern boundary of Lot 1 DP 1048263.

9. The submitted EIS states that the existing signalised intersection for the Defence Logistics Site will be relocated to Anzac Road. The applicant should confirm what planning approval has been secured for these relocation works, and what will be the alternative JLU access should the applicant not obtain planning approval for the relocation works.
10. Maintenance access and responsibility details should be provided for the proposed MAR and all associated infrastructure.
11. Construction and operational vehicular access details should be provided for the MAR construction phase and proposed compounds. It is not clear whether construction access will be under priority control or under traffic signals, and if approval is required under the *Roads Act, 1993*.
12. A construction schedule/staging plan should be provided for the construction phase/s of the MAR and how it will impact motorist movements on the existing Moorebank Avenue.
13. There is discrepancy on section 5.5 of the construction vehicle routes. The 5th paragraph states '*no heavy vehicle associates with the project is expected or required to use Anzac Road and Cambridge Ave*'. However the following section states that '*a number of smaller trucks via Cambridge Ave for disposal of unsuitable materials*'. Further clarification should be given with respect to the construction vehicle haulage route.
14. The proposed MAR should be consistent with relevant scope and requirements of the Voluntary Planning Agreement that was executed for the Moorebank Precinct West Stage 2 SSD.

If you have any further questions, Mr. Felix Liu would be pleased to take your call on 8849 2113 or email development.sydney@rms.nsw.gov.au. I hope this has been of assistance.

Yours sincerely,



Pahee Rathan
A/Senior Manager Land Use Assessment