

13 May 2021

Our Reference: SYD18/01322/48

Departments Reference: SSD 9522

Bianca Thornton
Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Thornton,

**SECTION 4.55 (2) MODIFICATION TO PROPOSED WAREHOUSE & LOGISTICS HUB
657-769 MAMRE ROAD - KEMPS CREEK - SSD 9522-MOD 1**

Reference is made to the Department's referral dated 28 April 2021 with regard to the abovementioned State Significant Development Application (SSDA), which was referred to Transport for NSW (TfNSW) Services for comments.

TfNSW notes that the modification seeks consent to modify the existing SSD 9522 Development consent to enable the following:

- Stage 1 Subdivision Plan:
 - Amendment to Lot 1;
 - Increase in the size of the easements;
 - Construction of a slip lane to facilitate access into Lot 5;
 - Amendment to the internal access road, which was approved as a 30.7 m wide access road to Lots 5-8, for which will be amended to 24 m wide to Lots 5, 6 & 8.
- Stage 2 Subdivision Plan:
 - Amendment to Lot 5, 6, 8 & 10;
 - Removal of Lot 7;
 - Amendment to the site area of the Public Access Roads;
 - Amendment to the site area of the Southern Link Road.
- Masterplan:
 - Increase in overall GFA across the Site from 162,355 m² to 186,123 m²;
 - Increase in overall car parking from 744 spaces to 772 spaces;
 - Decrease in the site area of the public access roads from 58,490 m² to 55,381 m²;
 - Reduction in the length of the cul-de-sac traversing to the north.

TfNSW has reviewed the submitted documentation and provides the following comments to the Department:

Amendments to Lot 1

1. Comment

TfNSW notes that the modification includes an amendment to Lot 1, comprising an increase in Site Area from 680,972 m² to 684,083 m². TfNSW would not support any changes to Lot 1 until Condition B18 of the development consent has been adequately addressed and the required changes are supported by TfNSW.

Recommendation

In this regard TfNSW suggests that any modification to Lots 1-4 is removed from this Modification application until such time as condition B18 has been adequately addressed and the changes are supported by TfNSW.

Freight – permitted vehicle

2. Comment

TfNSW requests that DPIE replace all references in the draft Mamre Road DCP from “26m long B-double (PBS level 2 type B)” with “30m PBS Level 2 Type B”.

This is in line with the NSW Heavy Vehicle Access Policy Framework which identifies 30m PBS Level 2B Vehicles as the next PBS vehicle to be permitted wider access on NSW roads.

Recommendation

TfNSW requests rewording Condition A6(d) to the following: “the largest vehicle permitted to access the site is a 30m PBS Level 2 Type B”.

Public Transport – Bus planning

3. Comment

There are no bus planning issues with the development, however as it is off a bus route, there should be provision for a bus turning area to enable buses to extend down to the site.

Recommendation

It is requested that the applicant be conditioned to provide provision for a bus turning area to enable buses to extend down to the site.

4. The applicant approached TfNSW as a relevant stakeholder to consult on the proposed subject modification to Lots 5, 6, 7, & 8. **Attachment A** provides a correspondence table between TfNSW and the applicant to date. In response to the latest comments from the applicant dated 15/04/2021. TfNSW Response dated 1/4/21 Items 2 & 4 have been adequately addressed. TfNSW provides the following comments numbered based on TfNSW Response dated 1/4/21:

Slip lane from NS Rd 1 to service Lot 5 – Item 1

a. Comment

TfNSW is supportive of attending a meeting with DPIE and the applicants to discuss the driveway access for Lot 5 on the NS Rd 1.

b. Comment

Drawing C013362_01-SK28 Revision A (**Attachment B**), indicates that the safe intersection site distance (SISD) is 151m. TfNSW notes that this SISD analysis was undertaken between a vehicle in Lane 2 and a vehicle in the auxiliary lane about to enter the site. The SISD should be measured between a vehicle in lane 1 and the first few meters of the auxiliary lane (which is considered the conflict point). Please note that SISD is measured along the carriageway from the approaching vehicle to the conflict point (see Austroads Guide to Road Design (AGRD) Part 4A 3.2.2). Any future analysis should reflect the abovementioned comments and be in line with Austroads guidelines.

c. Comment

It is understood that the future Southern Link Road (SLR) will have a signalised intersection to Bakers Lane in the location of the proposed bend on Bakers Lane. It is difficult to understand how the arrangement of a slip lane will work with the ultimate design. TfNSW is of the understanding that the start of the slip lane will be too close to the future signals and would likely lead to adverse safety outcomes.

d. Comment

The proposed internal road network of Lot 5 provides an access of left in only from NS Rd 1 which loops around to egress from the cul-de-sac located on the south east corner of the lot. The arrangement requires the largest vehicle to undertake a turning movement equal to a u-turn in order to loop around the warehouse. This will result in the vehicle being required to slow down to a slow speed in order for this movement to be achieved. It is unclear if the proposed deceleration lane length has taken this into consideration.

Recommendation

Whilst TfNSW is in general not supportive of any access to the NS Rd 1, TfNSW understands that it is desirable to have an internal loop network. Therefore it is suggested that should there be an access to Lot 5 to the NS Rd 1 it should be restricted to egress only (left out only) and located at the furthest point of the Lot away from the future SLR corridor. This will retain the loop road around the warehouse and remove the abovementioned (b-d) concerns.

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



Pahee Rathan

Senior Land Use Assessment Coordinator

Attachment A

SSD9522 – MOD1 – TNSW Correspondence Table

Applicant Submission – 23/2/21 Good Afternoon	TNSW Response 26/2/21 Thank you for providing TNSW the attached modification plans prior to formal lodgement to DPIE.	Applicant Response 4/3/21 Responses to your queries are provided using the same numbering system, as follows:	TNSW Response 1/4/21 TNSW provides the following comments:	Applicant Response 15/4/21 We respond to each matter raised using the same numbering system, below
<p>Fraser Property Group & Abix Property have a Joint Venture regarding a logistics hub development within the Magore Rd precinct.</p> <p>The JV partners have received state significant development consent from DPIE as SSD 9522.</p> <p>We are now seeking a MOD to reflect a revised masterplan layout (attached – SSD-MRM-MOD-001_C)</p> <p>DPIE have issued some SEARS requirements (attached), requiring us to directly consult with Agencies, including TNSW.</p> <p>We need to address item 14 on page 4 of the attached SEAR requirements. The item requests "Consultation with relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners, particularly Penrith City Council, Transport for NSW and DPIE Central Western team."</p>	<p>TNSW notes that the modification seeks the following:</p> <ul style="list-style-type: none"> Major re-configuration of the approved Lots 5, 6, 7 and 8 design, Overall increase (of 22,658 m²) to the approved SSD plan: <ul style="list-style-type: none"> MOD 1 warehouse GFA 178,222 m² MOD 1 ancillary office GFA 6,791 m², Total MOD 1 GFA 185,013 m² Reconfiguration of the internal approved road layouts and introduction of a new roundabout at the northern end of the North-South Road 02 (NS Road 02), re-configure lots 5-8 to provides the following points to be addressed prior to lodgement: <p>TNSW provides the following comments to be addressed prior to lodgement:</p>	<p>1. The updated attached Dup SSD-MRM-MOD-001 Rev J reflects the two access points to the NS Rd 01 and also the cul-de-sac is shown matching Fig 7 from the TA. It is noted that the access points on NS Rd 01 are proposed to operate as per below:</p> <ul style="list-style-type: none"> Entry for trucks into Lot 5 and via a proposed left turn slip lane. An entry access point for car parking facility 	<p>1. TNSW notes that the NS Rd 01 is a "High Order Road" or primary (collector) road as stated in the Magore Road Precinct DCP. The DCP also states Driveways should be provided from lanes and secondary streets rather than the primary street, wherever practical. In addition TNSW has concerns with the access being located on the departure of the bend, it appears that the required sight distance will likely not be achieved. As there is provision for the access to be from a "secondary" road it is suggested that the access to Lot 5 be relocated to the secondary road.</p>	<p>1. The Magore Road Precinct DCP identifies the North/South road as a potential higher order road, with the classification to be determined following detailed traffic modelling. The DCP also states that access would be denied only on distributor Roads. The traffic modelling completed by 6500 group on behalf of DPIE + TNSW has identified that the traffic volumes on this road will not constitute a Distributor road, meaning the classification will be either a Collector Road or local industrial road. TNSW's extract from the DCP shows a preference for access being provided from "lanes or secondary streets" which is what is being proposed here, with a slip lane designed to come off the North/South road, avoiding major disruption to the flow of traffic and achieving the objectives of the DCP.</p>
<p>This MOD does not require any further infrastructure to be provided other than what has previously been advised in the original SSD 9522 consent process. The attached updated report from 6500 demonstrates this</p> <p>Could I request an email from yourself advising that no further infrastructure upgrades are required regarding this modification? We need to respond to DPIE.</p>	<p>Design</p> <p>1. The plans provided in the <i>proposed vehicular access strategy Figure 7</i> do not reflect what's shown the attached plans - <i>drawing number SSD-MRM-MOD-001</i>. The report indicates that there are two access points to the NS Rd 01 however the attached plans indicate there are more than the two access points. In addition there is no cul-de-sac provided in the plans as mentioned in the report. The plans and report should be identical to understand what the overall access strategy actually is.</p>	<p>1. The updated attached Dup SSD-MRM-MOD-001 Rev J reflects the two access points to the NS Rd 01 and also the cul-de-sac is shown matching Fig 7 from the TA. It is noted that the access points on NS Rd 01 are proposed to operate as per below:</p> <ul style="list-style-type: none"> Entry for trucks into Lot 5 and via a proposed left turn slip lane. An entry access point for car parking facility 	<p>1. TNSW notes that the NS Rd 01 is a "High Order Road" or primary (collector) road as stated in the Magore Road Precinct DCP. The DCP also states Driveways should be provided from lanes and secondary streets rather than the primary street, wherever practical. In addition TNSW has concerns with the access being located on the departure of the bend, it appears that the required sight distance will likely not be achieved. As there is provision for the access to be from a "secondary" road it is suggested that the access to Lot 5 be relocated to the secondary road.</p>	<p>1. The Magore Road Precinct DCP identifies the North/South road as a potential higher order road, with the classification to be determined following detailed traffic modelling. The DCP also states that access would be denied only on distributor Roads. The traffic modelling completed by 6500 group on behalf of DPIE + TNSW has identified that the traffic volumes on this road will not constitute a Distributor road, meaning the classification will be either a Collector Road or local industrial road. TNSW's extract from the DCP shows a preference for access being provided from "lanes or secondary streets" which is what is being proposed here, with a slip lane designed to come off the North/South road, avoiding major disruption to the flow of traffic and achieving the objectives of the DCP.</p>

				<p>Our proposed slip lane has:</p> <p>i. Adequate site distance as shown in the attached Drawing C01362_01-SK28 Rev A to demonstrate there is no issue associated with vehicles coming around the bend and not seeing an AV enter the slip lane.</p> <p>ii. A slip lane is proposed to ensure:</p> <p>a. There is no interruption to the flow of traffic on the N-S road as AV's can enter at the travel speed and use the slip lane to decelerate.</p> <p>b. It removes a volume of traffic off the N-S road at an earlier point before vehicles reach the intersection of the E-W Rd 2 and then the cul-de-sac south of the proposed Lot 5, that does not have a slip lane</p> <p>Altis and Frasers requests an urgent meeting with both TfNSW and DPIE to discuss this, especially considering the major economic impacts associated with an access denied position on the North/South road on the western side of Mamre Road.</p> <p>We believe this issue is now resolved</p>		
			<p>2. In addition to the abovementioned point, TfNSW would not support multiple access points along the collector roads NS Rd 01, NS Rd 02, EW Rd 01 and EW Rd 02. It is suggested to consolidate individual sites to reduce fragmented road side activity. Site consolidation should keep direct access to the collector roads to a minimum similar to the approved SSD Plan in Figure 1. Reducing conflict points along the collector road will support traffic efficiency and safety.</p>	<p>2. Regarding access to each of the roads, we advise:</p> <p>a. NS Rd 01 - two entry access points only from the NS Rd 01 are proposed with this Mod1, and all buildings exit from the cul-de-sac as shown in Fig 7 from the TA</p> <p>b. NS Rd 02 - this is a local industrial road and is required to provide access to lot 6 + Lot 8, which do not come from the main N/S "collector" road and provides for an exit from Lot 5.</p> <p>c. EW Rd 01 - access is unchanged in this MOD from the approved SSD, in fact there are no proposed changes to any built form north of Baker's Lane, from that which has been approved in SSD0522</p> <p>d. EW Rd 02 - the western extents of this road is a local industrial road with standard vehicle access proposed under future development applications. This application proposes no building direct access to/from this road.</p>	<p>2. Regarding access to each of the roads, we advise:</p> <p>a. See TfNSW response in point 1.</p> <p>b. It is noted that the NS Rd 02 north of NS Rd 01 is not stated as a "high order road".</p> <p>c. Noted the lots located north of EW Rd 1 are being addressed separate to Mod 1</p> <p>d. Noted</p>	

	<p>Modelling</p> <p>3. Further details of the modelling mentioned in the report should be attached as an Appendix to the report and the raw SIDRA modelling files are to be included for review.</p>	<p>3. With respect to the modelling, Ason Group has undertaken revised Sequence 1A modelling to include assessment of the MOD 1 revised Gross-Floor-Plan (GFAs) SIDRA analysis for this revised modelling is provided to TfNSW for review. However, it is notable that the modelling for Sequences 1B, 2 and 3 has not changed from the approved SSD as the ultimate GFA figures have not increased as part of this MOD. Accordingly, we provide the revised SIDRA modelling files for all Sequences, in the link below</p> <p>https://www.dropbox.com/s/huy71146e5taikh/P1565m01%20Mamre%20Road%20Kemps%20Creek_SIDRA%20Modelling.zip?dl=0</p>	<p>3. TfNSW has reviewed the updated modelling and provides the following comments:</p>	
			<p>4. Referring to the SIDRA files provided can be seen that a variety of cycle times were used. Typically we would use 140 seconds as the cycle time for a full development scenario. In this regard it is recommended that the models are re-run and results are to be generated considering the said cycle time for comparison.</p>	<p>Refer attached Technical Memo from Ason dated 15/4/21</p>
			<p>5. In reference to 2018 – 2025 Sequence 1A SIDRA model:</p> <p>a. <u>AM Peak</u>: the right turn movement on the north approach of Mamre Road/Bakers Lane intersection yields an LOS F and has a maximum queue length of 125m – Does this queue length incorporate long vehicles such as B-doubles?</p> <p>b. <u>PM Peak</u>: the right turn movements on the north and south approach of Mamre Road/Bakers Lane intersection yields an LOS F and E, and has a maximum queue length of 37.5m and 10.8m respectively – Does this queue length incorporate long vehicles such as B-doubles?</p> <p>It should be noted that a Level of service C should be sort on the state road network.</p>	<p>Refer attached Technical Memo from Ason dated 15/4/21</p>

			<p>Additional comments:</p> <p>6. Once SLR is constructed in the future, Altis/Fraser need to ensure that there is sufficient space for a signalised intersection to be developed approximately 500m west of Mamre Road.</p>	<p>The attached Drawing SSD-MRM-MOD-001 (Rev K) demonstrates that there is sufficient distance west of Mamre Rd being 507m</p>
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