

10 September 2021

TfNSW Reference: SYD21/00947/01

DPIE Reference: SSD-22191322

Deana Burn
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Burn

EXHIBITION OF EIS - 2 ALDINGTON ROAD, KEMPS CREEK

Reference is made to the Department of Planning, Industry and Environment's referral dated 5 August 2021 with regard to the abovementioned final 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 does not support this application in its current form. TfNSW provides 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



Pahee Rathana
A/Senior Manager Land Use Assessment West & Central
Greater Sydney

Attachement A

Active Transport Considerations

1. Comment

Section 2.5 Conditions of Consent; Table 5 – Response to Conditions of Consent in the Transport Assessment, Condition number B14 states '*The provision of bicycle parking can be a condition of consent for this SSD which can readily be provided as part of the Construction Certificate (CC) stage.*'

Recommendation:

It is requested that prior to the issue of the Construction Certificate, the applicant be conditioned to provide bicycle parking and end of trip facilities for staff and visitors in accordance with Australian Standard AS1742.9:2018 *Manual of Uniform Traffic Control Devices - Bicycle Facilities*, and *Cycling Aspects of Austroads Guides* including:

- Locate bicycle parking and storage facilities in secure, convenient, accessible areas close to the main entries incorporating adequate lighting and passive surveillance and in accordance with Austroads guidelines.

Sustainable Travel Plan and Transport Access Guide

2. Comment

TfNSW has reviewed the Preliminary Sustainable Travel Plan and Transport Access Guide presented in Appendices D and E, respectively, in the TA, and requests the applicant work with TfNSW to finalise the Preliminary Sustainable Travel Plan and Transport Access Guide to encourage sustainable transport to the site. It should be a priority for the proponent to secure funding, human resourcing and an agreed timeframe for completion of key actions identified in the final Sustainable Travel Plan to support sustainable transport outcomes. TfNSW would welcome further discussions with the proponent regarding these matters to ensure their delivery.

Recommendation:

It is requested that prior to commencement of operation, the applicant be conditioned to finalise the Preliminary Sustainable Travel Plan and Transport Access Guide in consultation with TfNSW (development.sco@transport.nsw.gov.au) to reduce the proportion of single-occupant car travel and increase the mode share of car sharing, public transport and active transport for the development.

The applicant is to submit a copy of the final Sustainable Travel Plan and Transport Access Guide to TfNSW for review.

TfNSW offers a range of advice, templates and guidelines to assist in preparing Green Travel Plans and Travel Access Guides. These resources may be found at: <https://www.mysydney.nsw.gov.au/travelchoices/tdm>

Transport Assessment

3. Comment

- a. TfNSW raises concerns to the Department with regard to the adopted trip generation rate. The adopted trip generation rate for this development of 1.892 vehicles per day per 100m² of GFA is considered very low. The various land-use changes within the Western Sydney Employment Area (WSEA) has meant that the current adopted trip generation rate is 2.91, which is a much higher than what has been used to assess this development. If an assessment is not completed based on the current adopted figure then there might be unknown adverse impacts on the network in future.

As the adopted trip generation rate was implemented prior to this development assessment, TfNSW would not support the lower trip generation rate used in this assessment. It is recommended that the Transport Assessment is updated to ensure that the current adopted trip generation rate of 2.91 vehicles per day per 100m² of GFA is used.

- b. TfNSW notes that the Transport Assessment states, *“the projected traffic associated with this SSD will not result in requirements for any additional upgrades onto the surrounding road network during interim (2026) and ultimate (2036) from what has already been approved.”*

However as TfNSW has requested adjusted trip generation rates this will result in an increase in projected traffic impacts to a more realistic rate. In order to understand the impacts of this development TfNSW would require modelling to be undertaken. In this regard the Traffic Study should be updated and should include a cumulative Traffic Study which is to include a traffic assignment diagram and SIDRA network modelling of the staged development (and proposed upgrades) including the ultimate development year plus 10 years growth of at the least the following intersections (but not limited to):

- i. Lenore Drive/Templar Road
- ii. Lenore Drive/Compass Drive/Grady Crescent.

- b. Given that over two years have been passed since the base model was developed for the OWE, the traffic conditions of the study area may have changed significantly. The study needs to take into account the current traffic volumes.

Due to the Covid-19 Pandemic, counts undertaken at the moment may not be representative. Alternative approaches to understand the impact outside of Covid-19 on traffic patterns should be discussed with TfNSW.

- c. The traffic impacts are to be assessed without Southern Link Road (SLR). As noted in the report whilst the SLR network planning and development process is ongoing, there is no funding or timing for construction at this stage.
- d. In addition the electronic SIDRA files should be submitted for review.

Recommendation

The application is to be modified with the abovementioned requirements and submitted to TfNSW for review prior to the determination of the application. Upon receipt of the information TfNSW will undertake an assessment and provide a response accordingly.