



13 May 2020

Mr Chris Ritchie
Director, Industry Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: William Hodgkinson

Dear Mr. Ritchie,

**EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT
ORICA SOUTHLANDS WAREHOUSE ESTATE
28 MCPHERSON STREET, BANKSMEADOW**

Reference is made to the Department of Planning, Industry, and Environment (DPIE) correspondence via the Major Projects Planning Portal dated 8 April 2020, regarding the abovementioned application which was referred to Transport for NSW (TfNSW) for comment.

TfNSW has reviewed the Environmental Impact Statement (EIS) and the associated Transport Impact Assessment (TIA) and provides the following advisory comments for the Department's consideration:

Container Storage

Comment

Executive Summary of the EIS includes the following:

"The development meets the criteria of SSD under Schedule 1, clause 12(1) of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) as it involves development that has a capital investment value (CIV) of more than \$50 million for the purpose of warehouse or distribution centre (including container storage facilities) at one location and related to the same operation."

It is noted that:

- There is no space identified in the drawings that shows the on-site capacity for containers; and
- No evidence or description of container lifting equipment operation and storage of the equipment are also provided.

Recommendation

It is requested that the applicant provides the following information as part of the applicant's Response to Submissions (RtS):

- Storage space should be identified, particularly where storage will include dangerous goods being stored on site; and
- Any interaction of the lifting equipment and the site traffic should be assessed, noting that the loading bay adjoins the car park.

Design Vehicle

Comment

Section 8.1 of the TIA prepared to support the development application states the following:

“A swept path analysis has been undertaken with 19.0m Articulated Vehicles (AV) and 26.0m B-Double design vehicles that demonstrate satisfactory operation of the proposed access.”

Recommendation

It is requested consideration should be given to the use of PBS 2B vehicles as these vehicles are currently permitted for some movements within the port precinct.

Safety at Site Access

Comment

It is noted that:

- There is a potential safety risk associated with entry/exit conflicts and the landscaping or other barriers (vegetation is shown in the artist's impression) at the entrance adjoining Nant Street frontage with the restriction of visibility for vehicles entering and exiting the site
- The proposed site entrance/exit is opposite the Toll driveway. However, the traffic modelling and swept path analysis infers that there is street parking opposite the entrance to the site.

Recommendation

It is requested that the applicant undertakes a Road Safety Audit for the proposed Orica entry/exit as part of the applicant's Response to Submissions, 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. Based on the results of the road safety audit, the applicant shall review the design drawings and implement safety measures if required.

Vehicle Movements to and from Port Botany

Comment

Section 7.6.2 of the EIS states the following:

“The Three Ports SEPP aims to provide a consistent planning regime for the development and delivery of infrastructure and to protect land for port-related purposes.”

Recommendation

It is requested that the applicant should identify the likely volume of vehicle movements to and from Port Botany (from stevedores and from container storage yards) in the Traffic Report as the document states that this traffic will exist, and in part justifies the use of the Three Ports SEPP lands on this basis.

Alternate Route into the site

Comment

TfNSW notes that an alternate route to access the site is via Stephen Road which was not addressed in the TIA.

Recommendation

It is requested that the proponent consider the use of the alternate route into via Stephen Road into the site to alleviate traffic turning right into Botany Road from the signalised intersection (east approach) which according to the SIDRA modelling will extend beyond the 55m storage capacity and particularly worsen in the AM.

SIDRA Modelling

Comment

TfNSW considers that the Level of Service (LoS) for the Botany Road / Foreshore Road / Penrhyn Road intersection to be inaccurate, as the submitted TIA reports a LoS B in the morning peak and a LoS C in the afternoon peak. TfNSW considers that this intersection is currently running at LoS D in the morning peak and freight peak (1345 to 1445) and LoS C in the afternoon peak.

Recommendation

The proponent should provide complete details of the traffic distribution of vehicles and movements travelling east and west, turning left and right at Botany Road / Foreshore Road. This should include the number of vehicles and movements used in the modelling, as well as further explanation on the data used for future projected traffic distribution. This required to better justify the reported LoS results and why the traffic distribution provided is different to the current intersection performance.

Comment

The TIA reports 1218 (42%) vehicles coming from the east and 1691 (58%) vehicles coming from the west in the AM peak. For the vehicles turning into Botany Road, it is reported that 325 (57%) vehicles turn left in and 244 (43%) vehicles right in. The modelling distribution indicates 66 (87%) vehicles coming from the west and 10 (13%) vehicles coming from the east.

Recommendation

An explanation of the distribution has not been detailed in the TIA. TfNSW assumes this is a result of the right turn bay into Botany Road already being at capacity. If there are more vehicles expected to turned right from Botany Road into Botany Road, this would result in a longer queue and potentially require extension of the right turn bay. It is requested that the proponent review the distribution and mitigation measures any accordingly.

Comment

At Hills Road, the queue extends from not much back to 49.5m in the AM. Upon review the queue space appears to be longer than 50m and potentially reaching up to 100m.

Recommendation

It is requested that the proponent review the Hills Road queue length.

TfNSW requests that the above comments are addressed by the proponent as part of the RtS and TfNSW will provide a response accordingly.

If you have any further inquiries in relation to the above please contact Narelle Gonzales, A/Land Use Planner, on 0409 541 879 or by email at: development.sydney@rms.nsw.gov.au.

Yours sincerely,



Brendan Pegg
Senior Land Use Planner
Planning and Programs, Greater Sydney Division