

13 October 2021

TfNSW Reference: SYD21/00574/04

DPIE Reference: SSD-18204994

Shaun Williams
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Williams

**EXHIBITION OF EIS - EXHIBITION OF EIS - SNACK BRANDS MANUFACTURING
FACILITY - 14 & 2 DISTRIBUTION DRIVE, ORCHARD HILLS**

Reference is made to the Department of Planning, Industry and Environment's referral dated 13 September 2021 with regard to the abovementioned 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 Rathan
A/Senior Manager Land Use Assessment West & Central
Greater Sydney

Attachement A

Transport Assessment

1. Comment

TfNSW has reviewed the Transport Assessment and seeks further clarifications and changes.

Recommendation

TfNSW provides the following traffic and safety recommendations to be addressed for further review:

- 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 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.

In this regard TfNSW does not support the use of the lower trip generation rate and recommends that the preferred trip rate of was 2.91 vt/100m²GFA (0.23 AM & 0.24 PM) is to be used. The model provided as part of the Transport Assessment (TA) is to be updated to reflect this.

- b. The TA states that a total of 274 car parking spaces are proposed for the overall Lot 10 & 11 site, including an additional 160 spaces (as part of the extension) to the existing 114 spaces. This is still a deficit of 183 spaces in accordance with the Mamre West DCP. TfNSW raises the question as to how will this impact the circulation in the local network and interface with Mamre Road.
- c. The forecasted trip generation indicates that the PM peak will increase from 87 veh/hr (approved threshold) to 98 veh/hr. This should be modelled to indicate how the intersections on Mamre Road will perform. It may be considered a minor increase for an individual site, however if we allowed a number of these minor increases across multiple sites without assessment, the cumulative traffic impacts would not be captured. It is recommended that the increased forecasted trip generation rate be modelled.

- d. The TA relies on outdated data from the approved First Estate Masterplan. The Masterplans base model does not take into account the current traffic flows in the area and therefore does not adequately indicate what the actual impacts will be as a result of this development. In addition it is not clear whether the current interim access (Distribution Drive and Mamre Road) works efficiently and what the impacts will be with the additional traffic proposed under this development.

It is recommended that updated data be provided to validate any model undertaken to date. TfNSW requests the raw SIDRA files for review once the model has been updated. The model is to be provided in line with TfNSW key issues advice for consideration in the draft SEARs.

- e. It is noted that the Mamre West Precinct Stage 2 planning proposal is currently being assessed by Penrith City Council, the expected traffic generation for this proposal should be considered in the updated future year modelling.

2. Comment

It should be noted that TfNSW support for the rezoning for Mamre West Stage 1 was contingent on the delivery of the fourth leg at the James Erskine Drive/Mamre Road signals and concurrent decommissioning of the temporary signals at Distribution Drive/Mamre Road to left in/left out. This position is consistent with the original 2016 Mamre West rezoning by DPIE.

Freight and Heavy Vehicle Considerations

3. Comments

Mamre Road is an approved PBS 2B route and large industrial development within Western Sydney Employment Area should consider PBS 2B as the design vehicle. However, the Transport Assessment (TA) site accesses and internal hardstand areas have been designed to cater for trucks of up to 26.0 metres B-doubles.

Recommendation

The TA needs to graphically demonstrate site accesses and internal hardstand areas have been designed to cater for trucks of up to a 30m PBS Level 2B vehicle.

4. Comments

The TA has acknowledged two RSDs where B-doubles will be need to be reversed to unload from the rear. As the rear trailer is in the way, the front trailer (or A-trailer) of a B-double is typically unloaded by de-coupling the trailers, or jack-knifing the combination.

Recommendation

The TA needs to clarify whether a de-coupling area is required so that both the 'A' and 'B' trailers can be unloaded from the rear for the two RSDs which require B-double reverse movements.

Mamre Road Corridor

5. Comment

The utilities proposed to service the site need to be coordinated with the Mamre Road upgrade stage 1 works. TfNSW would like to avoid relocation of new utilities where possible.

Recommendation

TfNSW requests the applicant to provide the DWG of the proposed utilities to service the site. From the infrastructure report, this includes:

- Electrical services
- Telecommunication
- Sewer
- Potable water
- Gas

In addition it is requested that DWG's of the applicants architectural and civil plans be provided in order for TfNSW to review against TfNSW road design to ensure there are no conflicts.

Active Transport Considerations

6. Comment

Future Transport 2056 emphasises the importance of walking and cycling for short trips and reinforces the importance of walking and cycling to increase the catchment of public transport as part of the whole customer journey.

Building Momentum - State Infrastructure Strategy 2018-2038 includes recommendations related to walking and cycling, including integrating transport with land use; managing travel demand; unlocking capacity in existing assets; and improving population health outcomes through more active transport.

The Transport Assessment (TA), states The Mamre West DCP does not provide Bicycle Parking provision, so the TA referenced the Mamre Road Draft DCP, Table 12, which directs the use of the *DPIE Planning Guidelines for Walking and Cycling 2004*. Note: The NSW Planning Guidelines for Walking and Cycling has been superseded by *Cycling Aspects of Austroads Guides, 2017*, which recommends that bicycle parking for all-day use on a regular basis should be expected to be combined with end-of-trip facilities such as showers, lockers etc.

Use of the *Cycling Aspects of Austroads Guides, 2017*, Appendix I – Bicycle Parking provisions results in the need for 70 secure bicycle parking spaces with adequate end-of-trip facilities provided.

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, 2017* 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.

Work Place Travel Plan

7. Comment

The Transport Assessment (TA), Section 3.4 – Journey to Work Travel Mode Share Review states: *“Noting the high preference for private vehicle usage over the other modes, it is considered that there is latitude to encourage a move to other travel modes in the longer term which would reduce the pressure on the road network system.”*

One such tool to assist in this shift away from private vehicle usage is the implementation of strategies forming part of a Workplace Travel Plan (WTP). This, however, does not form part of the scope for the purposes of this SSDA application but forms part of Conditions of Consent under the First Estate SSD-7173.”

It is noted in Table 5: Response to TfNSW’s Advice that the proponent is agreeable to preparing a detailed Work Place Travel Plan as a condition of consent to this SSD.

Recommendation:

It is requested that prior to commencement of operation, the applicant be conditioned to prepare a Work Place 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 Work Place Travel Plan and Transport Access Guide to TfNSW for review.

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