



Transport
for NSW

22 October 2021

TfNSW Reference: SYD20/01234/02

DPIE Reference: SSD-10272349

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

Dear Ms Thornton

EXHIBITION OF EIS - YIRIBANA LOGISTICS ESTATE - KEMPS CREEK

Reference is made to the Department of Planning, Industry and Environment's referral dated 23 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

Transport for NSW

27 Argyle Street, Parramatta NSW 2150 | Locked Bag 5085, Parramatta NSW 2124
P (02) 8849 2666 | W transport.nsw.gov.au | ABN 18 804 239 602

Attachement A

Transport Management and Accessibility Plan (TMAP)

1. Comment

The TMAP provided does not address the comments (i. to l.) provided by TfNSW in the SEARs.

Recommendation

It is strongly recommended that the report provides the required analysis in order to understand the impacts of the development to the surrounding network.

2. Comment

The TMAP provides some analysis of the future connection to the adjacent site and the proposed signalised intersection. However it should be noted that the adjacent development SSD 10448 has not been given consent and the proposal for this development application does not include the connecting road to be constructed under the Stage 1 development.

Recommendation

It is recommended that the traffic report provides the following options for the future year(s) analysis:

- a. Internal road connection through to the adjacent site and access only to Mamre Road from the proposed signalised intersection
- b. Temporary Left in/left out access from Mamre Road

3. Comment

The TMAP Appendix C – indicates that the right turning movements perform at a LOS F and E. It is notes that the notes for the asterisks have also not been included, it is unclear what they stand for. Despite overall intersection LOS being A, individual movements for a new intersection should not be performing at LOS F – this may have safety implications with drivers more likely to take high risk behaviour due to long delays.

Recommendation

The intersection should be should be constructed to perform at a “LoS C” or better and mitigation measures are to be provided should individual movements be failing.

Freight and Heavy Vehicle Considerations

4. Comment

TfNSW advice in relation to SEAR's was that external and internal roads should be designed to accommodate at least a PBS 3A vehicle. The design vehicle that has been adopted is a PBS 2B vehicle which would limit the future productivity benefits that could be realised by tenants upon completion of Mamre Road upgrade.

Temporary Left in/Left out (LILO) intersection with Mamre Road

5. Comment

- a. The proposed intersection extends across the frontage of the adjacent properties. Should Mamre Road be upgraded prior to the local road connection this access will likely require further land acquisition from the affected properties. How will the applicant ensure that the relocation and reconstruction of the deceleration/acceleration lane can be achieved within the adjoining property boundaries in the event that Mamre Road is upgraded prior to the removal of this access? Has consultation been undertaken with the affected land owners? The land required for this relocation should be at no cost to TfNSW.
- b. The applicant is to dedicate 3.5 m wide land (from the edge of the road reserve) for the full length of the deceleration.
- c. What is proposed to prevent right turning movements at this access? The intersection is to be designed to be physically restricted to LILO.
- d. What is the proposed alternate route for vehicles seeking to turn right in or right out?
- e. Deceleration lane does not appear to meet Austroads requirements for 80km/h design speed (and design speed of 5km/h for curve/turn). The intersection is to be designed in line with Austroads Standards.
- f. Acceleration lane does not appear to meet Austroads requirements for 80km/h design speed (and design speed of 5km/h for curve/turn). The intersection is to be designed in line with Austroads Standards.

Recommendation

TfNSW requests the abovementioned information to be addressed/provided for further assessment prior to the determination of the application. TfNSW will further review and provide response upon receipt of the additional information.

Construction Traffic Management Plan

6. Comment

Section 4.1.4 states '*There are a number of planned developments in the area therefore, prior to implementation of the final CTMP, a cumulative traffic generation assessment should be undertaken. It is anticipated that this could be included as a Condition of Consent.*'

Recommendation

TfNSW recommends that TfNSW comments provided in the SEARs be included in any condition to consent. The comments are reiterated below:

The preparation of a preliminary Construction Pedestrian and Traffic Management Plan (CPTMP) to demonstrate the proposed management of the impact in relation to construction traffic addressing the following:

- i. assessment of cumulative impacts associated with other construction activities (if any);

- ii. an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity;
- iii. details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process;
- iv. details of anticipated peak hour and daily construction vehicle movements to and from the site;
- v. details of on-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle;
- vi. details of temporary cycling and pedestrian access during construction.

7. Comment

There are no details provided regarding the proposed construction access to Mamre Road. It is noted that the access will be via a 'temporary access road' however there is no indication if this will be the same access as the proposed temporary left in/left out operational development access.

Recommendation

TfNSW recommends that the temporary stage 1 operational development access should be constructed prior to a construction certificate being issued. The temporary access should be designed to cater for both construction and operational traffic and removed once the internal road connection is provided.

Active Transport Considerations

8. 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 23 secure bicycle parking spaces for Warehouse 1 and 45 secure parking spaces for Warehouse 3 totalling 68 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.

Framework Sustainable Travel Plan

9. Comment

TfNSW has reviewed the EIS Appendix V – Transport and Accessibility Plan document which includes the Framework Sustainable Travel Plan and provides the below advice for the EIS SSD-10272349 Yiribana Logistics Estate development application.

Recommendations

- TfNSW recommends that the **Framework Sustainable Travel Plan (FSTP)** adopt both short and long term measures in the FSTP given the lack of public transport and active transport infrastructure facilities in this area.
- In **Section 5.2 Strategies and Actions** TfNSW recommends that short term goals be implemented in the FSTP; one of these is the internal shuttle service (**Table 3 Section 2.5**) and the second would be implementing car-pooling (**Table 3, Section 3**) schemes. The other longer term goals in **Section 5.2 Strategies and Actions** would all be implemented in the FSTP just prior to and during public and active transport infrastructure being made available. Due to this advice TfNSW recommends that a detailed implementation strategy for the FSTP be developed noting all the tasks for completion, how they will be completed and completion date, including an implementation checklist to achieve the proposed initiatives. TfNSW notes there is a separate communications strategy to guide this, and TfNSW recommends that the implementation strategy be updated with the communication tasks to promote initiatives.
- TfNSW recommends that the Travel Access Guide or TAG includes the short term initiatives discussed earlier (shuttle and carpooling), and removes the bus travel map (as bus travel in the site area is not recommended). The longer term TAG can be updated once public and active transport infrastructure are upgraded. For further helpful information – please check this link [How to Create a Travel Access Guide doc](#) [here](#).
- TfNSW also recommends that the Travel Survey to staff promotes these options of the shuttle and the carpooling scheme short term, and that the survey is updated longer term to reflect changes to public and active transport.

TfNSW requests that the applicant submit a copy of the updated FSTP for TfNSW endorsement, prior to the issue of the Occupation Certificate.