

18 November 2021

TfNSW Reference: SYD21/00462/07

Departments Reference: SSD-17647189

Rebecka Groth
Department of Planning Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Groth,

**EXHIBITION OF EIS – ACCESS LOGISTICS PARK - 884-928 - MAMRE ROAD -
KEMPS CREEK**

Reference is made to the Department of Planning, Industry and Environment's referral dated 18 October 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

Attachment A

1. General Comments

It appears that the proposed roundabout south-east corner of the site would allow for a connection to a future dedicated freight network. How this would function in relation to the proposed estate road providing connection to adjacent land to be developed to the east will need to be investigated in further detail.

Corridor Protection Considerations

2. Comment

In November 2020 the Department of Planning Industry and Environment (DPIE) released the Mamre Road Precinct Draft Development Control Plan. Objective 3.4.3(7), applications for lots with an identified access point (refer to Figure 16) shall demonstrate how access to and from the dedicated freight corridor will be achieved within the development site.

Recommendation

It is noted the proposed development is adjacent to the proposed dedicated freight network (DFN) and access is identified at Lot 16. It is requested that before the development applicant is approved, the applicant demonstrate to the satisfaction of TfNSW, how the proposed development would provide access across the development site.

Transport & Accessibility Management Plan (TMAP)

3. Comment

The report provides modelling which includes the anticipated connecting link with the adjacent site (Aspect Industrial Estate (AIE) development). However there is no current timeline provided as to when this link will be constructed. This results in all traffic accessing Access Logistics Park (ALP) from the proposed Left in/Left out (LILLO) intersection. With no clear timeframes the following concerns are raised and additional information is required:

- a. How will right turn movements be facilitated for (prior to the connection being constructed)?
- b. Modelling does not cater for the scenario where only LILLO access is provided to Mamre Road (as the connection to Mirvac site does not appear to have any definitive construction date);
- c. It is noted that Section 6.5.2 assumes that the Southern Link Road (SLR) will be built by 2026. As there is no funding in place for construction the SLR should not be included in modelling prior to 2036;
- d. It is noted that Section 6.5.3 assumes that Mamre Road will be upgraded to 3 lanes by 2036. The current strategic design allows for 2 travel lanes in both

directions with land available for future lanes. Clarification is sought as to why 2036 includes the ultimate 3 lanes;

Recommendation

TfNSW requests that as there is no definitive timeframe of the link to the AIE site, further modelling is undertaken for 2026, 2031, 2036 with the access only from the LILO at Mamre Road. A detailed description is to be provided indicating how the vehicle movements will be dispersed without right turn movements.

The additional abovementioned information is also 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.

4. Comment

Appendix A – SIDRA Results

- a. LOS F for right turn movement on Mamre Road is not considered acceptable
- b. SIDRA model shows in Stage-1, the right lanes from Mamre Road South approach and has “LoS F” in both AM and PM. In addition, right lanes from New Road East approach and has “LoS E” in PM. Each travel lane needs to be “LoS C” or better.
- c. SIDRA model shows in Master Plan, right lanes from New Road East approach and has “LoS F” in both AM and PM. Each travel lane needs to be “LoS C” or better.

Recommendation

As mentioned in comment 3 there are some assumption for 2026 and 2036 considered too optimistic. This will need to be adjusted and will likely result in a worse outcome. TfNSW will not support intersections that are failing or at capacity on day of opening. This would result in an unsafe intersection. Further refinement of the intersection with Mamre Road and the AIE site is to be undertaken to ensure that the intersection can accommodated the expected growth in the area.

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.

5. Comments

Appendix B. Design Advice & Swept Paths

- a. Swept Paths analysis is missing the test vehicle of 36m long B triple (PBS Level 3 Type A) as per the Mamre Rd Precinct Draft DCP.
- b. Figure 5 shows swept path diagrams for the proposed roundabout south-east corner of the site. No swept path appears to be provided for a vehicle travelling from west to east through the roundabout which would appear to be the tightest manoeuvre for a longer vehicle.

Recommendation

It is requested swept path diagrams be provided demonstrating the design vehicle is able to adequately manoeuvre through these intersections.

Temporary Left In/Left out (LILO) Access at Mamre Road

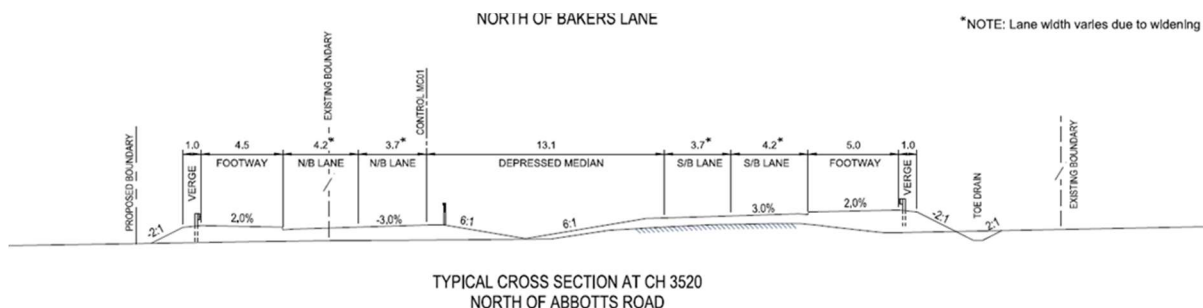
6. Comment

TfNSW provides the following design comments to be addressed prior to any consent being provided:

Acceleration Lane – Whilst TfNSW do allow for acceleration lanes in some instances, the current location raises issues with weaving between vehicles accelerating in the acceleration lane and having to pick a gap to merge in to the through traffic stream and local residents diverging in to the acceleration lane to then diverge in to the shoulder to access their properties. In addition the acceleration lane extends over the adjoining properties. Should the ultimate arrangement be constructed this would require land acquisition from the adjoin properties. Has Altis consulted with the properties regarding this outcome?

- a. Mamre Road upgrade - The future upgrade of Mamre Road would be designed for Flood Immunity. It is expected the future surface level would be above the current Mamre Road surface level. The increase in surface level will be determined after investigation during Concept Design Phase. The future design does not take into account. There appears to be insufficient land to dedicate to the TfNSW for the future upgrade of Mamre Road. The ultimate Mamre Road strategic plan has been design for:
 - Ultimate 6 through lanes,
 - Raise in surface level for Flood Immunity
 - Shared Path/Footway
 - Verge
 - Embankment
 - Toe Drain
 - Space for utilities.

A sample cross section, north If Abbots Road for reference is:



The Ultimate Strategic Mamre Design does not consider an additional Left in / Left out at this location and this surface level. Any additional lanes to the design will require additional dedicated land to facilitate the additional lanes.

To ensure the left in / left out arrangement is maintained after Mamre Road is upgraded to the ultimate design, additional land to the east of the TfNSW Proposed boundary will need to be dedicated for future upgrade.

The developers ultimate design for the intersection is to be provided to determine the required boundary adjustments and building setbacks to accommodate the LI/LO in the future arrangement.

Draft VPA

7. Comment

Clause 16 states - *Altis agrees to pay monetary development contributions at the rate of \$200,000 per hectare of Net Developable Area as requested by the Department and outlined in the Draft Contributions PI.* It is unclear as to what monetary will be used to contribute for the reconstruction of the intersection when Mamre Road will be upgraded.

Recommendation

TfNSW requests further clarity on what the contributions are intended for and whether any consideration has been given to this access point once the ultimate upgrade is undertaken.

Construction Traffic Management Plan (CTMP)

8. Comment

Section 2.3.2 – has swept paths been undertaken for figure 6 to demonstrate that anticipated largest truck can turnaround at the proposed locations?

Green Travel Plan

Comment

TfNSW has reviewed the EIS document which includes the Framework Sustainable Travel Plan and provides the below advice for the EIS Access Logistics Park development application.

Recommendations

- **Objectives:** The updated STP must be updated to implement both short and long term measures that will ensure non-private vehicular modes of transport are the preferred mode of travel to/from the project site. Your current GTP should include objectives to reduce the proportion of single-occupant car travel by staff to and from the site (including car pooling and shuttle bus services), and increase the mode

share of public transport and active transport for the life of the development (once public and active transport improvements are made).

- **Mode share targets:** TfNSW recommends that the **Framework Sustainable Travel Plan (FSTP)** adopt both short and long term mode shares that should be determined by a qualified traffic consultant in the FSTP given the lack of public transport and active transport infrastructure facilities in this area. Short term initiatives such as car-pooling and shuttle bus services to and from train stations or bus stops have been also been proposed here. Please note TfNSW proposed mode share for both long term in 2026 and short term just after occupation.

Mode type – ‘Reach’ 2026	Proposed Mode Share	TfNSW proposed mode share
Private vehicle as driver	88%	75%
Car as passenger	3%	10%
Train	0%	0%
Bus	4%	5%
Walk only	1%	0%
Motorbike/scooter	1%	0%
Bicycle	1%	5%
Taxi	1%	5%

Mode type – ‘Short term’	TfNSW proposed mode share
Car one person	75%
Car pooling	10%
Shuttle bus	20%

- In **Table 4 – Proposed STP Action Strategies** TfNSW recommends that short term goals be implemented in the FSTP; one of these could be an internal shuttle service going to and from nearby train stations, and the second would be implementing car-pooling schemes. Both of these can be put in the Proposed STP Action Strategies section with specific dates and times and who is responsible for this just after occupation takes place. The other longer term goals in this section 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.

- **Future travel plans:** For the purpose of this review - TfNSW will need to see any future travel plans that are proposed for this site, and review them in accordance with the planning requirements, it will not be at the discretion of the applicant to develop and implement these plans without TfNSW reviewing them first.
- **Proposed STP Action Strategy:** TfNSW advises you that often the Travel Plan Coordinator will need a team or committee to ensure all of the actions of the STP are done. The STP cannot be at the discretion of site management to get the responsibilities of the STP implemented. The applicant will need to determine a strategy for the tenant(s) to take over the ongoing responsibilities for the GTP, making it clear to the tenants that there are requirements to try and achieve sustainable transport mode shares for the site, as a condition of the development, for its lifecycle.
- **Travel Access Guide:** TfNSW recommends that the Travel Access Guide or TAG includes the short term initiatives discussed earlier (shuttle and carpooling), and removes the network map (as bus and train 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.
- **Parking management strategy** – TfNSW asks that a parking management strategy be implemented short and long term. TfNSW also asks that this STP implements a car parking management strategy in the STP that prioritises use by staff and patrons on a needs basis, and actively encourages staff and patrons using sustainable transport options that are available to and from the site. This will include how car parking onsite will be limited and managed at the site.
- **Funding the STP:** The STP will need to be appropriately funded and otherwise resourced, by the proponent, for a period of at least 5 years, or via an appropriate appointed entity, such as a body corporate. This will include ongoing travel demand initiatives that will require resourcing. This is in recognition that any travel demand management interventions will need to be significant in scale to be effective. This should be covered in the updated STP Strategy and Action Plan.

- **Data** – The STP must be updated to include available data that identifies the travel behaviours of site users to measure and monitor the effectiveness of the objectives and mode share targets of the STP.
 - Data short term includes:
 - Weekly rates of car pooling
 - Weekly car park usage rates
 - Shuttle trips to and from the site
 - Data longer term includes:
 - An additional weekly report of patronage be included in the STP using Opal data to and from the site.
 - Traffic volumes can also be assessed on the road network within the site area, before and after work. These could be monitored to assess whether:
 - Staff and patrons are re-moding private vehicles to public transport;
 - Parking and pedestrian counts.

- **Proposed STP Action Strategy:** TfNSW recommends that you re-name your Proposed STP Action Strategy to an Implementation Strategy, which has an implementation plan of tasks and actions, including all of your initiatives and incentives, timing and completion dates, your communications tasks, and who will do the tasks; this will ensure the overall effectiveness of the STP. The Implementation Strategy should:
 - Identify the party or parties responsible for delivery and implementation of each element of the updated STP throughout various stages of the development lifecycle, including for its ongoing implementation, monitoring and review, for a period of at least 5 years post-OC;
 - Be updated both on an annual basis, and when future transport services and pathways eventuate. Your stakeholder engagement strategy will be included in this (including all of your stakeholders, key messages and the channels you will use to engage your stakeholders) – please find our link for [Potential engagement techniques](#) that may be useful to you.

- **Strategies and initiatives:** The updated STP will need to identify and implement planned strategies and initiatives that reduce the proportion of single occupant car travel to/from the site (including public and active transport) and increasing the use of public and active transport travel to the site. Some additional incentives (both long and short term) are provided here:
 - Pre-loaded opal cards when staff and patrons first occupy the site.
 - Staff that are committed to active travel receive subsidised panniers or backpacks.
 - Wayfinding at the site for End of Trip facilities.

- Incorporating a role for a GTP sustainable travel champion that focuses on modelling the desired behaviours and positive communication around active and public transport.
 - Implementing a car-pooling scheme with guaranteed ride home. Online car sharing systems for staff, operating across an entire precinct to maximise access to possible rides and build community spirit. This could include discounted membership of car share clubs.
- **Travel Survey** – TfNSW notes there is no attachment of a travel survey tailored to this site in this document and would ask for this to be provided. TfNSW 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. Once updated the TAG will also need to be reviewed by TfNSW. Staff travel surveys are conducted to obtain workforce data analysis (including staff and patron residential postcodes) to identify the actual staff/residents travel origin and destination patterns, to inform strategies that help to reduce car parking demand for staff and students to get to and from the site; please find our [online travel survey here](#).
- TfNSW recommends that the applicant submit a copy of the updated FSTP for TfNSW endorsement, prior to the issue of the Construction Certificate.