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Mr David Gibson
Team Leader, Social Infrastructure
Social and Infrastructure Assessments
Department of Planning, Industry and Environment

FAO: Nathan Stringer, Planning Officer

Dear Nathan,

RESPONSE TO REQUEST FOR INFORMATION - SSD-8571481

1. INTRODUCTION

This submission of additional information has been prepared by Urbis on behalf of Technical and Further Education (**TAFE**) NSW in respect of the State Significant Development (**SSD**) application (SSD-8571481) for an educational facility at 2-44 O'Connell Street, Kingswood (**the project**).

This information is submitted in response to the Request for Information (**RFI**) issued by the Department of Planning, Industry and Environment (**DPIE**) via email on 25 June 2021, and the additional comments received from Penrith City Council and Transport for NSW in respect of the project. This response also seeks to clarify and expand on the issues addressed in the Submissions Report and submitted to DPIE in June 2021. This response is supported by the following appendices prepared by the consultant team:

- Revised Architectural Plans (**Attachment A**).
- Revised Landscaping Plans (**Attachment B**).
- Arborist Addendum Statement (**Attachment C**).
- Traffic Impact Assessment Addendum (**Attachment D**).
- Revised Green Travel Plan (**Attachment E**).
- Final Mitigation Measures (**Attachment F**).

Key matters for considerations are addressed in **Section 2** of this submission, and a detailed response to each matter raised by DPIE, Penrith City Council and Transport for NSW is provided in **Table 1**.

No significant material changes are proposed to facilitate the approval and construction of the project than previously outlined in the Environmental Impact Statement (**EIS**) submitted in March 2021 and the Submissions Report submitted in June 2021. Minor revisions to the width of the vehicular access point on O'Connell Street and removal of an additional 17 trees are proposed in response to agency recommendations, however this will not introduce any statutory non-compliances than

previously assessed. A minor adjustment to the location of the cycle path is also proposed in response to specialist consultant recommendations. For completeness, this letter provides an updated suite of mitigation measures for DPIE's final consideration provided at **Appendix F**.

TAFE NSW also seek to include flexibility to stage the construction of the development. A new staging condition allowing a staging report to be submitted to the satisfaction of the Planning Secretary is required to be included in the consent to facilitate the flexibility.

We trust this information will allow DPIE to finalise the assessment of the application and proceed to determination, following issue of draft conditions of development consent. Where any matters are still unresolved or require further discussion, it is requested a Microsoft Teams meeting is scheduled with the relevant parties to discuss these issues to ensure a fair and equitable outcome is achieved.

2. KEY CONSIDERATIONS

2.1. ADEQUACY OF ROAD NETWORK

2.1.1. Intersection Performance

The Transport for NSW submission (Item 2) has raised concerns with the adequacy of the queue length of the right turn bay at the Great Western Highway / French Street / O'Connell Street intersection following construction and operation of the proposed development in the 2030 scenario. The TfNSW submission recommends the right turn bay on the western leg of the Great Western Highway is extended to accommodate the increased traffic expected as a result of the development.

TAFE NSW respectfully disagrees with this conclusion as additional studies and analysis utilising revised modelling inputs have been undertaken, which indicate there will be an acceptable level of service and average delay time at the Greater Western Highway / O'Connell Street intersection. The above recommendation is therefore unreasonable as the proposal will not cause an exceedance of the queue length of the right turn bay or result in an unacceptable level of service at this intersection based on the revised modelling outputs, and as such no upgrades are necessary.

In summary, Traffix have undertaken revised SIDRA modelling for the 2030 scenario to provide an accurate representation of the operation of the surrounding road network following completion of the development. The results of this are provided in the Traffic Impact Assessment at **Attachment D** and summarised as follows:

- Compared to previous modelling detailed in the Environmental Impact Statement and Submissions Report, the revised SIDRA modelling has utilised an updated background traffic growth rate that accurately reflects the performance of the Great Western Highway.
- The updated background traffic growth rate has been calculated based on data collected from the permanent classifier counter at the intersection of Great Western Highway and Pages Road (Station ID 7123-PR), collected and distributed by Transport for NSW. This data indicates that traffic along the Great Western Highway has been decreasing over the past 7 years. Compared to the 2015 data, there has been a **19% decrease in annual average daily traffic** along the Great Western Highway, decreasing from 28,324 weekday movements in 2015 to 22,689 movements in 2021. It is noted that traffic data for 2020 was excluded due to impacts of the COVID-19 pandemic. This demonstrates a significant consideration that requires a re-assessment of the traffic modelling to determine the intersection performance in the 2030 scenario.
- In respect of the above, it is considered reasonable to reduce the growth rate from 2% to 0% having regard for declining long term traffic volume trends along this corridor. This will reflect a

more accurate representation of traffic movement along the Great Western Highway in the modelling outputs.

- The model retains the previous travel modes for trip distributions of 84% students and staff driving to TAFE. It is noted the implementation of the Green Travel Plan (**Attachment E**) targets a travel mode of 69.3% students and staff driving to TAFE by 2030 – a significant suppression of car use and an overall reduction in traffic generation in the surrounding area. Notwithstanding this, the reduced travel mode in the Green Travel Plan has not been incorporated into the revised SIDRA modelling. This will ensure the outcomes of the model demonstrate a conservative, worst-case assessment in accordance with relevant practice. The revised model is therefore still considered to overestimate the traffic generation of the development in 2030.
- The results of the revised modelling using an accurate 0% background traffic growth rate at the Great Western Highway / O'Connell Street intersection during the daily peak (AM) are as follows:
  - Level of service: B. Definition: *Good with acceptable delays and spare capacity*.
  - Queue length at the right-hand turn bay: 64.4m. This is comfortably accommodated within the length of the right turn bay which is 67m.

The above results indicate that during the 2030 scenario the Great Western Highway / O'Connell Street intersection will perform with **acceptable delays, spare capacity, and within existing turning bays.** Accordingly, based on the revised, more accurate modelling undertaken by Traffix, there are no improvements or upgrades required to the surrounding road network to accommodate traffic generated by the proposal during the 2030 scenario.

Transport for NSW's recommended condition seeks to mitigate the environment impact of future traffic delays and pressure on road infrastructure that as illustrated in the modelling is not caused by the proposed development when considering accurate data. Accordingly, to impose a condition upon TAFE NSW requiring payment of this upgrade would not be reasonable or equitable, as the recommended condition would have no nexus with the development (SSD-8571481) and the estimated 2030 performance scenario as illustrated in the revised traffic modelling.

2.1.2. Vehicular Access Arrangements

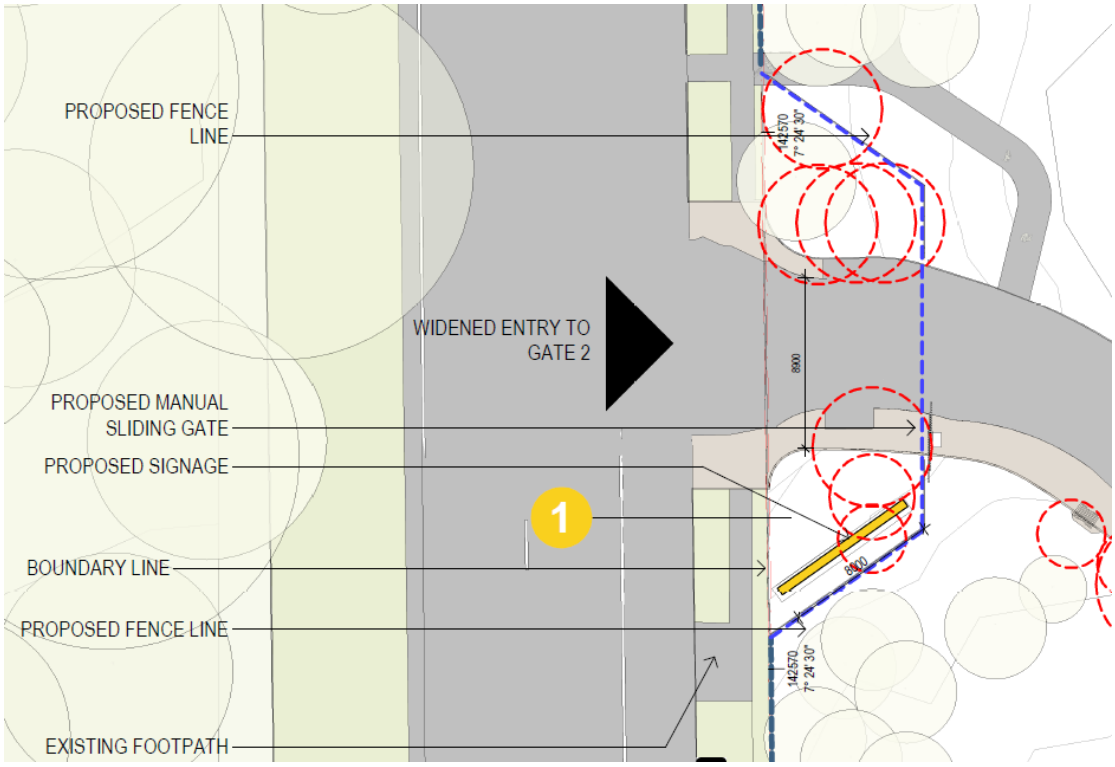
Penrith City Council submission (Item 2) and the Transport for NSW submission (Item 3) have questioned the adequacy of the site access arrangements on O'Connell Street, specifically with regard to the suitability of the width of the driveway. Further analysis was recommended to inform the design arrangement and any local road works necessary to accommodate the development.

In response to concerns raised regarding the adequacy of the western access point on O'Connell Street, it is proposed to seek consent for an increase to the width of the driveway access point as illustrated in the revised Architecutral Plans (**Attachment B**). It is proposed to increase the access point by 1m to increase the existing width from 7.9m to a total width of 8.9m. The amended access driveway has been designed in accordance with AS2890.1 (2004) and AS2890.2 (2018), as Austroads Guidelines are not applicable due to the driveway's location on private land. The amendments will require tree removal, as discussed further in **Section 2.2**.

As illustrated in the revised swept paths appended to the Traffic Impact Assessment (**Attachment D**), the widened driveway will accommodate the largest size vehicle (12.5m heavy rigid vehicle) passing a B99 design vehicle at the site boundary. It is noted this scenario will not be frequent, as heavy rigid vehicles are only anticipated to access the site once every 2 weeks, arriving and departing outside of peak times. It is further noted the results of SIDRA modelling indicate the access driveway will operate at a Level of Service A, and that there will be no impact on the sight distances as a result of the

proposed changes. This scenario will therefore be appropriate for the site and future operating scenarios.

Figure 1 Proposed amendment to O'Connell Street access arrangement



Source: Gray Pucksand

2.1.3. Green Travel Plan

A Green Travel Plan has been prepared for the site, which outlines travel demand management measures to minimise the impact of the development on general traffic and bus operations and encourage use of non-car mode share for travel to and from the site.

In response to outstanding matters requested for inclusion by Penrith City Council and Transport for NSW, a revised Green Travel Plan (**GTP**) has been prepared by Traffix and is provided at **Attachment E**. This revised plan incorporates recommended suggestions and is considered a complete document that will be implemented during operation of the facility.

2.2. ARBORIST IMPACT

The Arboricultural Impact Assessment (Revision A) prepared by Tree IQ and appended to the EIS lodged in June 2021 identified the removal of 30 trees was required to construct the education facility and associated access arrangements.

An Arborist Addendum Statement prepared by Tree IQ has been prepared and is submitted at **Attachment C** which provides a revised assessment of tree removal based on the works outlined in the final revised Architectural Plans at **Attachment A**. The assessment is informed by a site visit undertaken on 4 August 2021 and identifies an *additional* 17 trees are required for removal. Of these,

4 trees have a Useful Life Expectancy of 5-15 years, 6 trees have been allocated a retention value of Consider for removal, and 1 tree requires removal.

In direct response to the specialist recommendation provided by Tree IQ, the cycle path providing access from the facility to Great Western Highway has been adjusted to avoid impact on the tree protection zone of trees 13, 92 and 93. This revision has been included within the project and is illustrated within the revised Architectural Plans at **Attachment A**. No tree removal or impact on trees will therefore result from the construction of the cycle path.

Therefore in total, the project seeks consent for removal of **47 trees.**

Final mitigation measures are proposed by Tree IQ and included in the final suite of Mitigation Measures identified at **Attachment F**.

It is also noted, 106 trees and shrubs will be planted throughout the site as illustrated in the revised Landscaping Plans (**Attachment B**) to mitigate the loss of existing trees. This will result in the following canopy coverage:

- Existing: 1,740sqm
- Post-tree removal: 1,215sqm
- Proposed (existing retained and proposed at maturity): 8,784sqm

3. CONCLUSION

We welcome the comments and have endeavoured to provide sufficient information for DPIE to progress the assessment of the SSDA, issue draft conditions of consent and determine the application. Where any matters are still unresolved or require further discussion, it is requested a Microsoft Teams meeting is scheduled with the relevant parties to discuss these issues to ensure a fair and equitable outcome is achieved within a reasonable timeframe.

Should you require any additional information or clarification please do not hesitate to contact the undersigned on 0412 377 462.

Yours sincerely,

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Table 1 – Detailed Response to DPIE, Penrith City Council and Transport for NSW submissions

Item	Agency Comment	Proponent Response
Department of Planning, Industry and Environment		
1	*Clarify the number of full-time equivalent (FTE) construction and operational jobs to be created by the proposal.*	▪ Construction phase: 231 full-time jobs created ▪ Operational phase: 68 full-time and 20 casual jobs created (at 2030)
2	*Confirm the total number of trees to be planted, noting that the RtS advises that amendments to tree planting have been made following SDRP discussions. Please also clarify the overall canopy coverage for the IATC site (i) as existing, (ii) post-tree removal, and (iii) as proposed once the replacement trees have matured.*	▪ Total number of trees planted: 106 trees ▪ Canopy coverage: - Existing: 1,740sqm - Post-tree removal: 1,215sqm - Proposed once matured: 8,784sqm
3	*confirm the number of secure bicycle parking spaces to be provided, and clearly identify the relocated spaces (northern elevation) on the revised plans.*	▪ Proposed bicycle spaces: 26 secure bicycle spaces, including 10 spaces on the north side and 16 spaces on the south side. ▪ Spaces will be protected by passive surveillance and a CCTV system and have been designed to comply with AS 2890.3. ▪ Refer to Architectural Plans at **Attachment A**, specifically plan reference DA 103 Revision E.
4	*clarify labelling on the landscaping plans submitted with the RtS, which refer to other drawings which do not appear to have been submitted. For example, 'Landscape Plan 1 – Lower Ground' refers to another drawing titled 'L-DA-06', which has not been provided.*	▪ Refer to revised Landscaping Plans at **Attachment B**.
5	*ensure that all plans include drawing numbers, including the submitted landscaping plans.*	▪ Refer to revised Architecutral Plans at **Attachment A**.

Item	Agency Comment	Proponent Response
Penrith City Council		
6	*Engineering considerations* *No concerns or objections are raised to the proposed development on flooding grounds. The location of the Construction Hub is clear of any local overland flow flooding*	▪ Noted.
	On-site stormwater detention will be required to ensure that post developed stormwater flows match with pre-developed flows. Any on-site detention system must be accessible from the street. On this basis the following conditions are recommended and considered necessary.	▪ On-site stormwater detention will not be required on the site. ▪ Correspondence issued from the Penrith City Council Major Developments team on 21 January 2021 is attached, stating that the site is outside Council's mandatory OSD area, and that detention is therefore not required.
	An Infrastructure Restoration Bond is to be lodged with Penrith City Council for development involving works around Penrith City Council's Public Infrastructure Assets. The bond is to be lodged with Penrith City Council prior to commencement of any works on site or prior to the issue of any Construction Certificate, whichever occurs first. The bond and applicable fees are in accordance with Council's adopted Fees and Charges. An application form together with an information sheet and conditions are available on Council's website. Contact Penrith City Council's Asset Management Department on 4732 7777 or visit Penrith City Council's website for more information.	▪ Noted.
	Stormwater drainage from the site shall be discharged overland from a series of headwalls to the existing on-site dam adjoining the Great Western Highway. Stormwater flows from the development site shall not exceed pre-developed stormwater flows. On-site stormwater detention may be required to limit post development flows. The stormwater drainage system shall be designed in accordance with Penrith City Council's Stormwater Drainage Specification for Building Developments. The design shall ensure that the development has no adverse impact by the diversion, damming or concentration of stormwater flows. The proposed method of stormwater discharge shall be detailed in the construction plans issued by the Certifier.	▪ On-site stormwater detention will not be required on the site. ▪ Correspondence issued from the Penrith City Council Major Developments team on 21 January 2021 is attached, stating that the site is outside Council's mandatory OSD area, and that detention is therefore not required.

Item	Agency Comment	Proponent Response
7	*Traffic Management Considerations* *Concerns previously raised regarding local road / intersection service levels of "D" as a result of this development remain of concern.* *Comments raised in Council's previous submission regarding this aspect are considered to require resolution including investigation into mitigation measures / infrastructure upgrades to ensure that the service level is not reduced or adversely impacted upon as a consequence of this proposal.*	▪ Transport for NSW guidelines define Level of Service D as "*operating near capacity".* ▪ The intersection will operate within its capacity under all future scenarios and no upgrades are required. Refer to further discussion in the Traffic Impact Assessment at **Attachment D**.
	Further the access arrangements into the site are considered to require further analysis to inform the design arrangement and local road works necessary to accommodate the development. *To address this critical aspect, the following is necessary and should be submitted for detailed assessment. The Traffic and Car Parking Assessment Report should ensure the following has been addressed:*	▪ As discussed in **Section 2.1.2,** it is proposed to increase the access point by 1m to increase the existing width of 7.9m to 8.9m.
	Intensification of use on the site – traffic volumes overall for the site (existing and proposed, as well as growth forecast to 2030)	▪ Existing and proposed traffic generation volumes for the site, in addition to the growth forecast to 2030 is addressed in the submitted Traffic Impact Assessment lodged within the Submissions Report package in June. ▪ Traffic volumes for the site are as follows: - Existing: 235 vehicle trips per hour in the AM peak period and 107 vehicle trips per hour in the PM peak period. - Proposed: 331 vehicle trips per hour in the AM peak period and 156 vehicle trips per hour in the PM peak period - 2030: 453 vehicle trips per hour in the AM peak period and 220 vehicle trips per hour in the PM peak period.

Item	Agency Comment	Proponent Response
	Potential connection to proposed future road on adjacent site immediately to the south.	▪ It is noted there is currently no approved plan for a road on the adjacent site immediately to the south. Any future connections would be the subject of further planning approvals. ▪ Notwithstanding this, potential future road connections to the site to the south are illustrated in the Structure Plan provided in Section 8.4 of Architectural Design Report, submitted in the Submissions Package.
	Demonstrated compliance with relevant standards (such as AS2890.1/AS2890.2/AS2890.6), technical directions and guidelines for car parking and access	▪ The proposed car park has been designed in accordance with AS2890.1 (2004), AS2890.2 (2002), AS 2890.3 (2015) and AS2890.6 (2009).
	Assessment of potential need to upgrade existing driveway access as unsignalised intersection with regard to Austroads Guide to Road Design basic turn treatments or auxiliary lane treatments needed? ▪ *Sight distances for vehicles exiting site* ▪ *Sight distances for vehicles approaching queued/propped vehicles on O'Connell Street* ▪ *Auxiliary turning lanes needed? – deceleration/acceleration* ▪ *Warrants for turn treatments on the major road at unsignalised intersections (Warrants for BA, AU and CH Turn Treatments)* ▪ *Vehicle turning volumes in vph (existing and proposed growth)* ▪ *Meets minimum stopping sight distances (min. SSD)* ▪ *Queue lengths* ▪ *Up to date relevant traffic volume surveys for O'Connell Street and site access*	▪ As discussed in **Section 2.1.2**, the application seeks to amend the driveway access on O'Connell Street to increase the width of the driveway and ensure safe passing of vehicles. The adequacy of the access is assessed in the Traffic Impact Assessment at **Attachment D**. ▪ The amendments to the existing driveway access are minor and do not impact the existing (and currently satisfactory) sight distances for vehicles exiting the site or approaching vehicles on O'Connell Street. ▪ The intersection upgrades identified by Penrith City Council including provision of auxiliary turning lanes and turn treatments are not required. Additional SIDRA intersection modelling has been undertaken to assess the adequacy of the O'Connell Street access point in relation to 2030 development scenario. These results indicate the access point will operate at a Level of Service A during both the AM and PM peak, with a delay of no more than 10.7 seconds during peak time. The access will operate successfully.
	Provision of CTMP (construction traffic management plan) – although it is noted that this could be conditioned.	▪ A condition of consent requiring preparation of a CTMP prior to issue of a Construction Certificate is welcomed. It is noted that a

Item	Agency Comment	Proponent Response
		Preliminary CTMP was submitted as part of the SSDA lodgement in March 2021.
8	*Biodiversity Considerations* *It is noted that the applicant does not agree with Council's recommended conditions regarding biodiversity. The condition recommendations are maintained however it is noted that this is ultimately a matter for the consent authority to consider and make a determination on the finalisation of the assessment.*	▪ As identified in the Submissions Report, TAFE NSW do not consider conditioning the preparation of a Vegetation Management Plan in respect of the Grey-headed Flying Fox and weed management necessary for the site or the project scope. ▪ The BDAR waiver request submitted and accepted by EES and DPIE acknowledged that the proposed works: *"will not result in a significant impact to the species. The footprint lacks geological features, hollow bearing trees, derelict human-made structures or non-native vegetation with the potential to provide nesting or roosting habitat for any threatened fauna species. Therefore, the proposed development will not compromise habitat suitability for threatened species."* ▪ Preparation of a VMP in relation to the Grey-headed Flying Fox is not reasonable.
9	*Waste Management Considerations* *The submitted information and response to submission matters does not sufficiently address the waste matters raised and compliance with Penrith DCP 2014 and the Waste Management Guidelines. It is recommended that the following conditions be imposed to address this:-*	▪ Noted.
	Prior to the issue of a Construction Certificate, the full bin allocation is to be displayed on the architectural plans with demonstration that the waste collection room is of sufficient size to accommodate the full bin allocation.	▪ The full bin allocation is displayed on the revised Architectural Plans. ▪ Refer to Refer to Architectural Plans at **Attachment A**, specifically plan reference DA1300 Revision F.

Item	Agency Comment	Proponent Response
	Prior to the issue of a Construction Certificate, the waste collection room is to be amended to ensure the following detail is provided:- *o 1.8m unobstructed clearance zone between the stored bins and the entrance to permit access and manoeuvrability* *o The floor is to be waterproofed, non-slip and sealed in accordance with the Building Code of Australia to permit the use of wash facilities* *o The floor is to be graded to a central drainage point connected to the sewer, enabling all waste to be contained and safely disposed of* *o The room is to be provided with an adequate supply of water through a centralised mixing valve and hose cock.* *o The room to incorporate adequate lighting and natural/mechanical ventilation in accordance with the Building Code of Australia.*	▪ The design of the waste collection room has been revised to incorporate the following amendments: - Clear annotation of the 1.8m unobstructed clearance zone between the stored bins and the entrance is achieved to permit access and manoeuvrability. - Clear indication that the floor is graded to a central drainage point connected to the sewer, enabling all waste to be contained and safely disposed of. - Confirmation on the Plan that the waste collection room is provided with an adequate supply of water through a centralised mixing valve and hose cock. - Confirmation that the waste room will meet the requirements of the BCA. The room is externally located and is naturally ventilated, and lighting will be provided in the form of an LED Light batten to the underside of the concrete soffit. A roller shutter will be provided to secure the space. - As the Waste Area is located externally, it is not proposed that the slab is waterproofed. The slab will meet a non-slip rating of R12 and be suitable for washing down. Refer to Refer to Architectural Plans at **Attachment A**, specifically plan reference DA1300 Revision F.
Transport for NSW		
10	*GTP* *TfNSW has reviewed the revised Green Travel Plan (GTP) and appreciate the improvements that have been made. However, the GTP still needs further details and improvements to make it an*	▪ An Updated Green Travel Plan is provided at **Attachment E.**

Item	Agency Comment	Proponent Response
	effective plan. *Recommendation are as follows:*	
	Provide more details for the active transport facilities around the site including: *o Showing the cycling and walking facilities and site permeability throughout the TAFE site, not just the proposed shared paths adjacent to the new development;* *o Showing permeability for cycling and walking of streets on east side of the campus if available;* *o Explaining why O'Connell Street and Second Avenue are more bicycle friendly than other streets (such as Algie Crescent) if relevant;* *o Considering if there are improvements that could be made to the recommended streets to make them more cycling and/or walking friendly;* *o Identifying any other options required to improve the cycling and walking facilities in the area (with better crossings, footpaths and/or bike paths);* *o Identifying if there is adequate shade and lighting for safe and amenable cycling and walking through the site and its surrounds.*	▪ Additional detail of active transport facilities has been included in the Green Travel Plan at **Attachment E**. ▪ O'Connell Street and Second Avenue connect the subject site with nearby destinations such as Kingswood Railway Station and Caddens Corner Shopping Centre and are therefore more likely to be used by cyclists, hence are more bicycle friendly. ▪ Any improvements to surrounding streets are matters for Council and/or TfNSW to consider independently of the subject application and are not the responsibility of TAFE NSW. ▪ Adequate lighting will be provided to new cycle and pedestrian routes within the site, in addition to natural shading where tree canopy is established.
	Provide further details for the End of Trip facilities: *o Provides details and maps of end of trip facilities, including number (noted there are 26 bike parking spaces in total) and location of all secure bike parking, casual bike parking (including whether there is lighting, shelter and passive surveillance), showers and lockers;* *o Identify whether provision of end of trip facilities is sufficient to meet demand.*	▪ This information has been included in the Green Travel Plan at **Attachment E.** ▪ The end of trip facilities (**EOTF**) accommodates: - 2 x female shower cubicles. - 2 x male shower cubicles. - 1 x accessible shower cubicle. - 30 x lockers in the EOTF. ▪ Application of the long-term bicycle travel mode target for staff and students (4.7%) to the 2030 development scenario staff and student population increase results in a requirement for 23 bicycle parking spaces. The provision of 26 bicycle parking spaces

Item	Agency Comment	Proponent Response
		sufficiently caters for this demand. Based on current utilisation of facilities on campus, TAFE NSW have confirmed that this provision is adequate for the proposed building usage.
	Consider innovative ways to incorporate public transport and active transport into the fabric of life at the TAFE campus. Potential suggestions for inclusion include: *o Regular bike maintenance workshops and bike maintenance tools provided onsite for staff and students to use;* *o Bike club/group to organise rides and bike buddy's etc., potentially in collaboration with similar groups at WSU;* *o Celebrate ride to work day, world car-free day, September and/or organise other regular events to promote active and public transport;* *o Consider how TAFE students can work on projects that are innovative in facilitating and promoting sustainable transport options;* *o A screen with real time information for bus departures, including shuttle buses, in a main area of the development.*	▪ These suggestions are noted. A table of initiatives including identification of method of communication and responsibility is included in the Green Travel Plan at **Attachment E**.
	Improve the TAG with particular consideration for active transport map: *o consider increasing active transport map beyond the 800 m radius from centre of campus, and noting where there are footpaths;* *o provide recommended walking and cycling routes to key destinations – such as Werrington Station, Kingswood Station (consider how they can avoid* *riding next to busy roads for the whole length), and Caddens Corner Shopping Centre;* *o include the WSU internal cycling and walking network as mentioned in the response to previous comments.*	▪ These recommendations have been incorporated into the Transport Access Guide appended to the Green Travel Plan at **Attachment E**.

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	Communications strategy is required and should include communication activities associated with all the initiatives, what channels will be used, who will be responsible for delivery and when will it be scheduled.	▪ The Green Travel Plan has been revised to include communication activities associated with all the initiatives including what channels will be used, who will be responsible for delivery and when will it be scheduled. ▪ A table of initiatives including identification of method of communication and responsibility is included in the Green Travel Plan at **Attachment E**.
11	*Transport Assessment* *TfNSW notes that the updated SIDRA Intersection 9 modelling indicates that the queue length of the right turn bay at the Great Western Highway / French Street / O'Connell Street intersection exceeds the length of the bay by approximately 10 metres during the 95th percentile in 2030 + development. Whilst it is understood that the GTP car driver target of 69.3% by 2030 is being proposed, there is a current project as part of the Federal Stimulus Program at the intersection of Great Western Highway / French Street / O'Connell Street. The project scope will provide right turn red arrow pedestrian protection for traffic turning from French and O'Connell streets as well as providing the missing pedestrian legs. The project designs are currently being developed, however the abovementioned scope has been identified. These changes to the intersection will likely result in longer delays and queue lengths. Which when including the extra development traffic predicated this may result in the queues for the right turn bay* *exceeding the length of the bay earlier than expected.* *It is therefore recommended that the right turn bay on the western leg of Great Western Highway (GWH) is extended to accommodate the increased traffic expected as a result of this development. Subject to DPIE's approval, TfNSW requests that the following requirement to be included in the development consent:* *The extension to the right turn bay on the western leg of GWH at the intersection of GWH /French Street / O'Connell Street shall be designed to meet TfNSW requirements, and endorsed by a*	▪ TAFE NSW do not consider the recommended condition is reasonable or equitable, as the recommended condition would have no nexus with the development (SSD-8571481) and the estimated 2030 performance scenario as illustrated in the revised traffic modelling. ▪ Refer to further discussion in **Section 2.1.1** and the Traffic Assessment at **Attachment E**.

Item	Agency Comment	Proponent Response
	suitably qualified practitioner. The design requirements shall be in accordance with AUSTROADS and other Australian Codes of Practice. The certified copies of the civil design plans shall be submitted to TfNSW for consideration and approval prior to the release of the Construction Certificate by the Principal Certifying Authority and commencement of road works. Please send all documentation to is development.sydney@transport.nsw.gov.au. *The developer is required to enter into a Works Authorisation Deed (WAD) for the abovementioned works.* *TfNSW fees for administration, plan checking, civil works inspections and project management shall be paid by the developer prior to the commencement of works.*	
12	*Swept Path Analysis* *The swept path movements for a 12.5 metre vehicle at O'Connell Street indicate that simultaneous entry/exit cannot be achieved. This can lead to conflict points at the access where 2 opposing vehicles are attempting to use the access at the same time. It is noted that minor works to remove the median (in driveway) and widening of the internal road are proposed. This could extend to the widening at the entrance of the driveway to allow for simultaneous entry exit.* *Recommendations are as follows:* *The design of the access point should be widened to allow for simultaneous entry/exit movements of the largest vehicle with a passenger vehicle.* *However, as O'Connell Street is a Local Road, Council is to determine if the development risks raised by TfNSW is satisfactorily addressed by the applicant. Should the driveway be widened the swept path of the longest vehicle entering and exiting the subject site, shall be in accordance with AUSTROADS and to the satisfaction of Council*	▪ As discussed in **Section 2.1.2,** it is proposed to increase the access point by 1m from 7.9m to provide a total width of 8.9m. ▪ The amended access driveway has been designed in accordance with AS2890.1 (2004) and AS2890.2 (2018), as Austroads Guidelines are not applicable due to the driveway's location on private land. ▪ As illustrated in the revised swept paths appended to the Traffic Impact Assessment (**Attachment D**), the widened driveway will accommodate the largest size vehicle (12.5m heavy rigid vehicle) passing a B99 design vehicle at the site boundary.