

14 May 2020

Department of Planning, Industry and Environment
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Attention: William Hodgkinson

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Dear Mr. Hodgkinson,

Re: State Significant Development Application – SSD-9691 for the construction of two warehouse building, associated office and hardstand/carparking on a suspended concrete platform at 28 McPherson Street, Banksmeadow

Thank you for providing NSW Ports with the opportunity to comment on SSD-9691 for the construction of two warehouse buildings, associated office and hardstand/carparking on a suspended concrete platform at 28 McPherson Street, Banksmeadow.

NSW Ports is responsible for managing the port and freight assets of Port Botany, Port Kembla, the Cooks River Intermodal Terminal and the Enfield Intermodal Logistics Centre. These assets, along with the efficient movement of freight to and from these assets, are critical to the future economic growth, liveability, productivity and sustainability of New South Wales.

Port Botany will not be able to deliver its critical port operations role if road connections to and from the port are limited, therefore the cumulative impacts of proposed developments in the vicinity of the port on Port Botany must be carefully considered. The proposed development and associated vehicle and truck movements contribute to the cumulative traffic impacts on Port Botany's road network.

The Botany Road / Foreshore Road / Penrhyn Road is a significant intersection for Port Botany being the key gateway to the Port from Foreshore Road and Metropolitan Sydney. Approximately 90% of all port traffic travels through this intersection. It also provides access to local industrial and port related areas located off Botany Road. The existing traffic volume on this critical intersection is already high, and the existing performance of the intersection is already poor in some directions.

NSW Ports has reviewed the documentation related to this development application and requests that further consideration be given to the below matters in relation to the proposed development.

Intersection Analysis

The Traffic Impact Assessment (TIA) prepared by Traffix dated 11 February 2019 submitted with the development application provides in our view an unsatisfactory assessment of the traffic impacts of the proposed development on the surrounding road network.

Although the TIA identifies the Botany Road / Foreshore Road / Penrhyn Road as a key intersection, the intersection performance analysis over-estimates the current performance and under-estimates the impacts of the additional traffic on this intersection.

Table 1 below provides a summary of the intersection level of service, as provided by the TIA. It suggests that the intersection currently performs as Level of Service B and in the future as Level of Service C.

Intersection	Scenario	Period	Degree of Saturation	Intersection Delay	Level of Service
Botany Road, Foreshore Road and Penrhyn Road	Existing	AM	0.879	28.0	B
	Future		0.919	33.0	C
	Existing	PM	0.763	27.1	B
	Future		0.792	29.8	C

Table 1: Extract from TIA, Existing vs Future Intersection Performance (Source: Traffix)

The TIA represents an average of the whole intersection and does not highlight the performance on specific approaches.

NSW Ports is concerned with the TIA does not provide a true representation of the current poor performance of the intersection in certain approaches, and that the additional traffic from the development will result in the performance of certain approaches to even poorer performance. This can likely result in long delays, long queues and unsafe road user behaviour. It can also impact on the public opinion and reputation of the freight task in this part of the city.

As a result, the TIA concludes that:

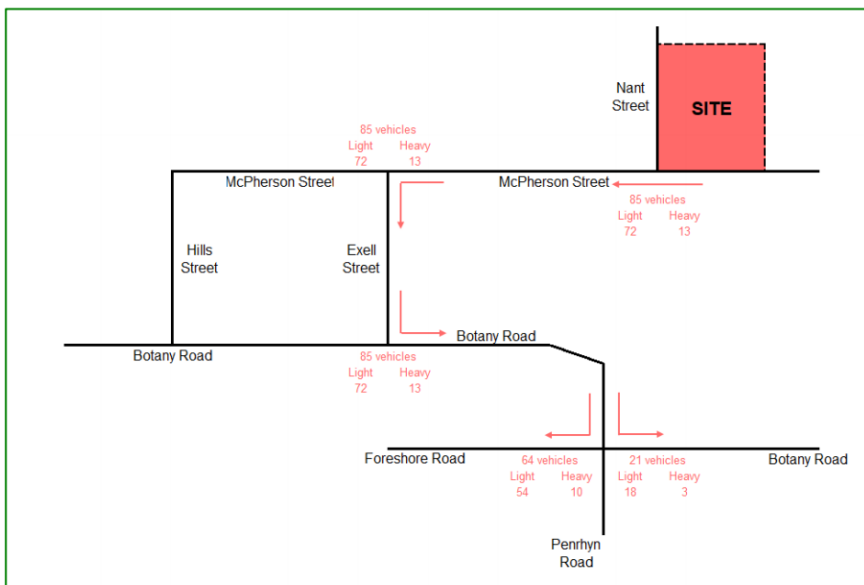
“The SIDRA assessment demonstrates that the majority of the key intersections have minor increases in intersection delays and no change in levels of service. All intersections shall operate satisfactorily with the anticipated traffic generation of the proposed development with no external improvement works considered necessary.”

NSW Ports is aware that Transport for NSW (TfNSW) is undertaking a strategic business case study for the improvement works for this section of Botany Road including the Penrhyn Road / Foreshore Road / Botany Road intersection, based on the existing and future traffic demands for this intersection. The findings of this TIA seem to be in conflict with TfNSW’s initiative.

NSW Ports believes this doesn’t provide a true indication of the impacts of the development. The SIDRA outputs at Appendix B of the TIA raise concern regarding the impact that the development will have on the individual approaches of the Botany Road / Foreshore Road / Penrhyn Road intersection that will be utilised by the development.

The SIDRA analysis highlights that the intersection is heavily utilised by the east-west vehicle volumes and when intersection movements are independently analysed, parts of the existing intersection will be significantly impacted as a result of the anticipated future vehicle movements.

The TIA for the development identifies the key routes to and from the site. In particular, it shows that the movements at the Botany Road / Foreshore Road / Penrhyn Road intersection are Botany Road (north) to Foreshore Road or Botany Road (north) to Botany Road (East) and vice versa. By way of example, Figure 15 of the TIA (copied below) shows the PM outbound movements:



As such, specific attention should be paid to the intersection movements that the proposed development is utilising, rather than the intersection as a whole. The SIDRA analysis provides the following level of service analysis for the movements proposed by the development:

Movement	Demand Total veh/h	Avg Delay (sec)	Level of Service
Botany Rd (east) right turn to Botany Rd (north)			
Existing AM	257	54.3	LOS D
Future AM	267	59.5	LOS E
Existing PM	324	32.1	LOS C
Future PM	328	36.1	LOS C
Foreshore Rd (west) left turn to Botany Rd (north)			
Existing AM	342	8.3	LOS A
Future AM	401	8.2	LOS A
Existing PM	97	8.5	LOS A
Future PM	125	8.2	LOS A
Botany Rd (north) right turn to Foreshore Rd (west)			
Existing AM	124	87.5	LOS F
Future AM	152	95.1	LOS F
Existing PM	272	65.8	LOS E
Future PM	339	62.5	LOS E

Botany Rd (north) left turn to Botany Rd (east)			
Existing AM	402	3.3	LOS A
Future AM	411	3.4	LOS A
Existing PM	386	3.3	LOS A
Future PM	408	3.4	LOS A

As shown above, the critical movement from Botany Road (north) to Foreshore Road experiences significant issues as well as Botany Road (east) to Botany Road (north).

NSW Ports requests that the Traffic Impact Assessment be updated to individually assess the impact the development will have on the approaches of this intersection at the AM and PM peak periods and the specific movements as proposed by the development.

The TIA should also propose upgrade works for those approaches.

The development proposal should be assessed by the future scenario impact that the development has on each approach of key intersections and upgrades as a result of the impact of the development should be imposed by Condition of Approval. The intersection conclusions reached in the TIA are unsatisfactory in managing the cumulative impact of the proposed development on the Port Botany precinct.

Further to the above, there is also no consideration that heavy vehicles will proceed through the intersection to Penrhyn Road, despite this being the access route to Patrick Stevedores – a potential origin / destination for container imports or exports. The Environmental Impact Statement states:

“The warehouse buildings will be used for the storage and distribution of general merchandise including goods arriving from Port Botany.”

As such, consideration should be made for trucks travelling north / south through this intersection.

NSW Ports supports the development of land within the Three Ports SEPP boundary for port related purposes (such as warehousing), however, traffic impacts of such developments should be critically analysed and be required to contribute to road upgrades respective to their portion of traffic.

If you have any questions regarding the above submission, please do not hesitate to contact Adriane Whiley, Planning Officer, on 9316 1151 or adriane.whiley@nswports.com.au.

Yours sincerely,



Adriane Whiley
Planning Officer