

# SUBMISSION to DPIE

PROJECT: 200 ALDINGTON ROAD INDUSTRIAL  
ESTATE

15 December 2020

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**Prepared for**

Pazit Pty Ltd and Mr Dino Seraglio

**Version control**

Issue	Author	Reviewer	Approver	Date approved
A	DJ	MW	DJ	15/12/2020

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## APPENDICES

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# 1. INTRODUCTION

This submission has been prepared in response to the release of the Environmental Impact Statement (EIS) for 200 Aldington Road Industrial Estate (200 ARIE) which is on exhibition from 18 November 2020 to 15 December 2020. We welcome the opportunity to comment on the EIS. We make this submission on behalf of Mr Dino Seraglio and Pazit Pty Ltd, the owner of the land immediately east of 200 ARIE.

For ease of reference this submission has been divided into the following key sections

- The Mamre Road Precinct (MRP): Overview of development in the Mamre Road Precinct (MPR) and the landholdings context of Seraglio.
- Draft Mamre Road Development Control Plan (MRDCP): Overview of the Draft Mamre Road Precinct Development Control Plan and the relevant objectives, controls, and maps.
- The Environmental Impact Statement (EIS): A critical review of the EIS for 200 ARIE, with comment on its consistency with the Mamre Road Precinct planning policies.

In summary, this submission seeks that the 200 Aldington Road Industrial Estate should provide a northern point of access to through the estate to Aldington Road. It is noted that the 200 ARIE has indicated an initial location for a future southern end road connection through the estate. Whilst this is acknowledged, it is critical that a second, northern access is provided which can be delivered as part of Stage one of the Stockland / Fife proposal.

The currently proposed southern end connection is deemed insufficient and will undermine the efficient connectivity of the Mamre Road Precinct. Access to Aldington Road is critical to the development of the Seraglio land holdings.

Without this access to Aldington Road, the Seraglio site is land locked and cannot function.

This submission includes supplementary comments by TTPP commissioned by Seraglio.

## 2. MAMRE ROAD PRECINCT

### 2.1. Seraglio's Land Holding

The Seraglio Estate primarily fronts Bowood Road and Capitol Hill Drive and is located at the eastern edge of the Mamre Road Precinct. The subject land comprises of an area of 108 hectares and is legally described as Lot 1672 in DP 855001, Lot 4132 in DP 857093 and Lot 4131 in DP 857093 Capital Hill Drive, Mount Vernon. This site is largely (83 ha.) zoned 'IN1' General Industrial under the State Environmental Planning Policy (Western Sydney Employment Area) 2009 (SEPP WSEA). The balance of the site is zoned a combination of RE2 and E2 within the SEPP WSEA.

The vision for the Estate is to provide future small to medium sized lot industrial warehousing and employment lands. These industrial uses will fill a gap within the established Western Sydney Employment Area, responding to a current market and pipeline supply shortage for these land uses. Small lot Torrens title lots averaging around 1,500 square metres are very rare in this market. It is in contrast to the larger floorplate leasehold distribution buildings which are provided by the institutional land holders.

Seraglio is currently working to prepare a structure plan, subdivision, and road network solution for the land to accommodate the growth of the site. This solution can only be possible if Government and Industry work efficiently to address current alignment and network issues associated with the Stockland / Fife proposal. This is essential so that the Seraglio development can produce positive economic and employment benefits that underpin the governments objectives for the Precinct.

It is intended that a Development Application will be lodged with Penrith City Council in early 2021 to allow the small lot industrial development to proceed.

#### 2.1.1 Proposed Structure Plan

A draft structure plan has been prepared for the Seraglio Estate. This informs the future land uses and road network for the site. The proposed structure plan is consistent with the government objectives for the Mamre Road Precinct. The structure plan and proposed connection points are shown in the attached diagram.

The draft structure plan proposes a primary north south road connection through the site that connects to Aldington Road to the west at both ends. This is consistent with the road network plan set out in the Draft Mamre Road Development Control Plan. This will allow for north south internal circulation that can be equitably distributed along Aldington Road and further to Mamre Road. This connection has been identified as part of the approach to reduce congestion on the Abbots and Mamre Road intersection. The proposed road layout seeks to promote permeability within the site and even distribution of traffic onto Aldington Road.

#### 2.1.2 Staging of Development

The proposed Seraglio development is planned to be delivered in stages. The subdivision plan sets out that Stage 1 will occur in the north of the estate which is in line with the location of services which will be delivered north to south in the Mamre Road Precinct. This north / south delivery pattern is also recognised by Stockland / Fife in their staging plan. This is the key reason why the Aldington Road access point cannot be pushed into the later stages of delivery, which could take many years to come to fruition. Stockland / Fife have acknowledged that the provision of the roads to the south of their development is tenant demand dependent and therefore no timeframe can be given for the construction of these roads.

## 2.2. Mamre Road Precinct context

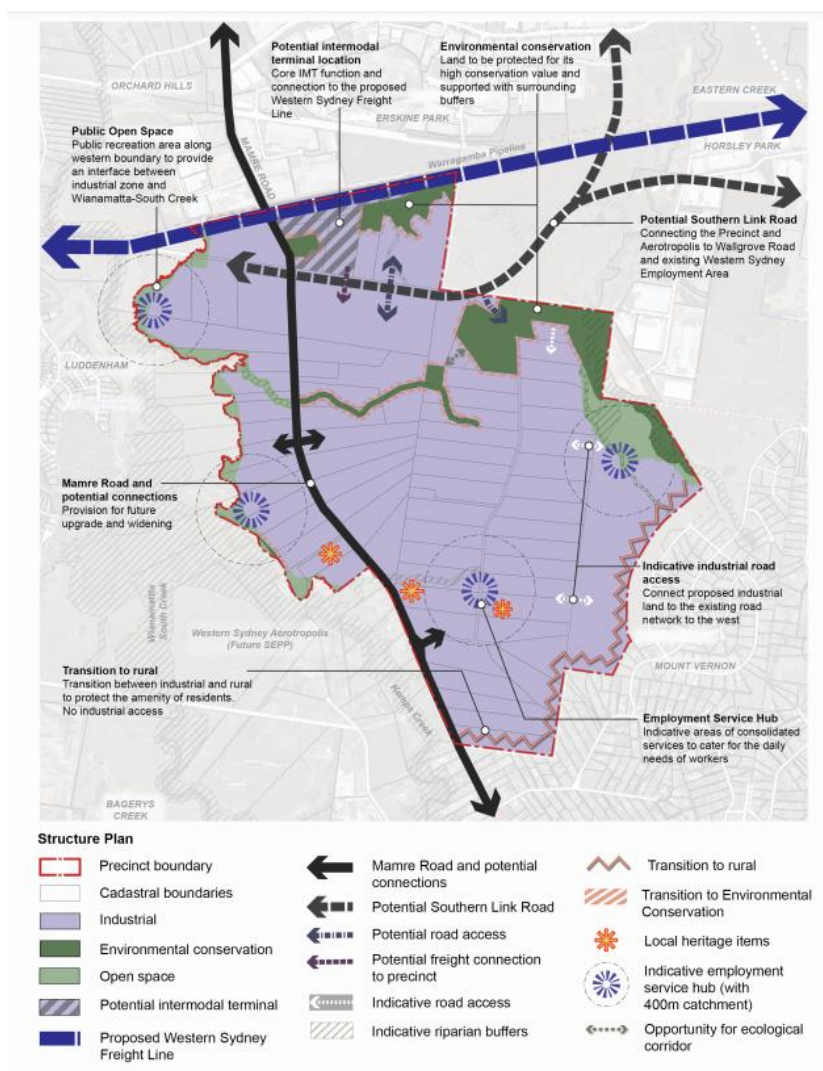
The Mamre Road Precinct was officially recognised as part of the broader Western Sydney Employment Area (WSEA) in June 2020 when it was zoned under the State Environmental Planning Policy (Western Sydney Employment Area) 2009 (SEPP WSEA). The intention of the rezoning was to provide the WSEA with an additional 850 hectares of Industrial land which can potentially provide 5,200 construction jobs and 17,000 ongoing jobs when fully developed. The precinct is additionally within the Aerotropolis Growth Area; however, it will remain under the planning scope of the SEPP WSEA.

### 2.2.1 Draft Mamre Road Structure Plan

The Draft Mamre Road Structure Plan specifies that the precinct will be characterised by important north-south and east-west road and freight connections. Mamre Road has been identified as an integral north-south connection that will service the precinct and connect it to the M4 and M7 Motorway and the future M12 Motorway.

It is noted that Aldington Road will connect land in the east to the road network in the west. Aldington Road connects with Mamre Road by way of Abbots Road intersection to the south and the Bakers Lane intersection to the North. It is noted that both these intersections will require upgrades to accommodate future industrial growth in the area. The Draft Structure Plan identifies an indicative industrial road access that is situated between the Seraglio Estate and the 200 ARIE. At both ends of this indicative road access, the structure plan also indicates locations for east-west road connections. These would likely occur through north and south end of the 200 ARIE. Landholdings in the east will therefore rely on these access points to connect to Aldington Road and the wider Mamre Road Precinct.

Figure 1 Draft Mamre Road Precinct Structure Plan



Source: Department of Planning, Industry and Environment

## 2.3. Draft Mamre Road Precinct Development Control Plan

The Draft Mamre Road Precinct Development Control Plan is on exhibition from 10 November 2020 to 17 December 2020. The MRDCP provides finer grain controls for the Mamre Road Precinct within the WSEA. It establishes controls for subdivision and the road network.

These controls are summarised in the table below:

*Table 1 Draft Mamre Road Development Control Plan Summary*

Provision	Objective/Control
Subdivision	<p><b>Objectives:</b></p> <ul style="list-style-type: none"> <li>▪ To ensure that development occurs in a logical and staged manner.</li> <li>▪ To minimise the number of road entry points to designated roads, thereby allowing more efficient traffic management.</li> </ul>
Road Network, Hierarchy and Design	<p><b>Objectives:</b></p> <ul style="list-style-type: none"> <li>▪ To create a road network which enables safe and efficient access for all users, while minimising through traffic on minor roads.</li> <li>▪ To provide better connectivity between the precincts and other parts of the WSEA</li> </ul> <p><b>Controls:</b></p> <ul style="list-style-type: none"> <li>▪ The Mamre Road Precinct should be developed generally in accordance with the road network map identified in figure 14 (Figure 2). The external road network will generally comprise the arterial roads of Mamre road and the future Southern Link Road (movement) corridors, Aldington Road/Abbots Road as a distributor road and indicative internal road network. The external road network is carefully designed and planned to ensure that development of the precinct to projected capacity is supported.</li> <li>▪ Internal local roads are to be designed to: <ul style="list-style-type: none"> <li>a. create a permeable network that is based on a modified grid system;</li> <li>b. provide access to adjoining properties and not limit development on adjoining properties, including demonstration of impact on the development of adjoining lots;</li> <li>c. provide for pedestrian and cycle network and minimise travel distances and conflict with industrial traffic;</li> <li>d. maximise connectivity between industrial areas and community facilities, open space and employment hubs;</li> <li>e. take account of topography, view corridors and site drainage, and accommodate significant vegetation;</li> <li>f. provide frontage to and maximise surveillance of open space and riparian corridors;</li> </ul> </li> </ul>

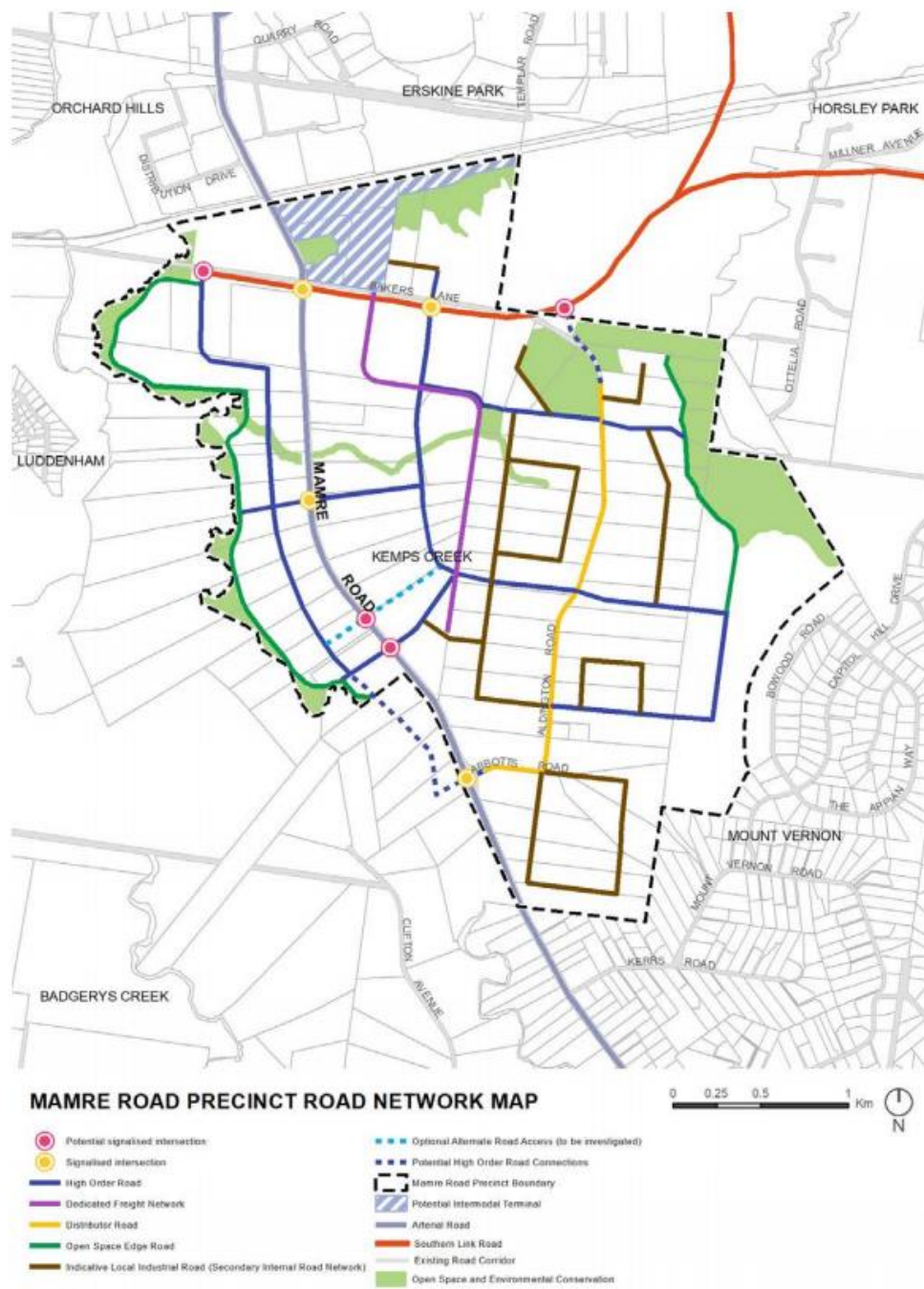


Provision	Objective/Control
	<p>g. provide views and vistas to landscape features and visual connections to nodal points and centres; and</p> <p>h. maximise the effectiveness of water sensitive urban design measures.</p>

Source: Draft Mamre Road Development Control Plan

The objectives and controls mentioned in the table have been considered in the following review of the 200 Aldington Road Industrial Estate Environmental Impact Statement.

**Figure 2 Road Network Map (Site in red)**



Source: Department of Planning, Industry and Environment

It is critical that the east west connections shown in blue are constructed to enable a permeable road system to be achieved. The three east west connections create a strong direct connection to Aldington Road and Mamre Road. These connections are not yet properly recognised in the 200 ARIE proposal and need to be included to allow a fully functioning industrial estate to emerge.

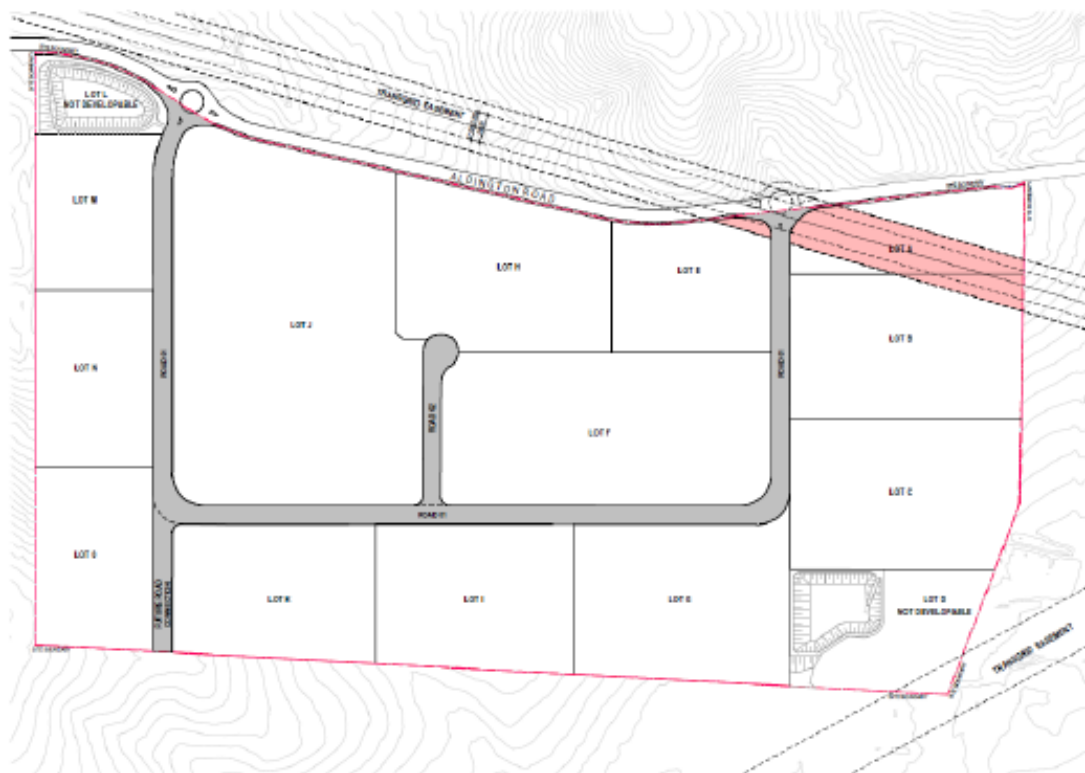
### 3. ENVIRONMENTAL IMPACT STATEMENT

#### 3.1. Subdivision

The proposed subdivision is inconsistent with the Mamre Road Precinct planning policies.

The general subdivision layout is shown below in Figure 3

**Figure 3 General Layout of 200 Aldington Road Industrial Estate**



**Figure 14 – General layout – proposed Concept Masterplan**  
Source: SBA Architects

Source: 200 Aldington Road Industrial Estate

The layout shows that the development intends to provide only one point of access through the estate to Aldington Road. The singular connection is proposed through 'Estate Road 01' which is located at the southern end of the site. This entry point is marked with a red circle in Figure 3.

This subdivision layout is inconsistent with the Mamre Road Precinct planning policies and is therefore strongly opposed. This is because the subdivision layout is inconsistent with the Structure Plan and the Road network plan as it does not indicate a northern end access point through the subdivision. Further, the 200 ARIE has not considered the potential staging of the Seraglio Estate development to the east.

The Mamre Road Structure Plan and the draft DCP road network clearly show a road connection point at the northern end of the Stockland / Fife land.

The Seraglio Estate intends to develop in two stages. Stage 1 consists of the development of the northern portion of the estate. This misalignment with the Mamre Road Precinct planning policies subsequently results in the land locking of the Seraglio Estate stage 1 development. The subdivision is therefore counterproductive to the development of the Seraglio Estate and the Mamre Road Precinct.

**Recommendations:**

1. The Department require 200 ARIE to amend their proposal to include the three connection points as shown in the Draft DCP.
2. 200 ARIE should provide a logical subdivision plan that is cognisant of road access requirements for development in the east.

### 3.2. Road Network

The EIS was also reviewed against the road network plan, objectives and controls specified in the MRDCP. It is considered that the 200 ARIE is inconsistent with the specified controls, road network plan and the Draft Mamre Road Structure Plan.

This because the 200 ARIE undermines the proposed north south connectivity of the Seraglio estate outlined in the Road Network Plan, as well as the east west connectivity outlined in the structure plan. This has implications for connectivity and efficiency, as it undermines the connectivity of the site internally and to the broader precinct through Aldington Road. The current arrangements are likely to direct traffic flows south and produce considerable congestion, resulting in traffic efficiency issues along Aldington Road and its intersections with Mamre Road.

It is also noted that the EIS TIA assessment only considered how development along Aldington Road would impact traffic flows on Aldington Road. This shows that development and traffic impacts from the east of 200 ARIE have not been adequately considered. It can be assumed that traffic and congestion will therefore be greater than those outlined in the TIA.

We attach additional comments prepared by TTPP in response to the road network and traffic impact assessment. We note that TTPP identify some significant flaws in the EIS.

**Recommendations:**

1. 200 ARIE be required to provide the DCP stipulated point of access in the northern portion of the estate.

### 3.3. Staging

It is noted that the proposed staging works of the 200 ARIE do not include an initial connection through the estate to Aldington Road as part of stage 1.

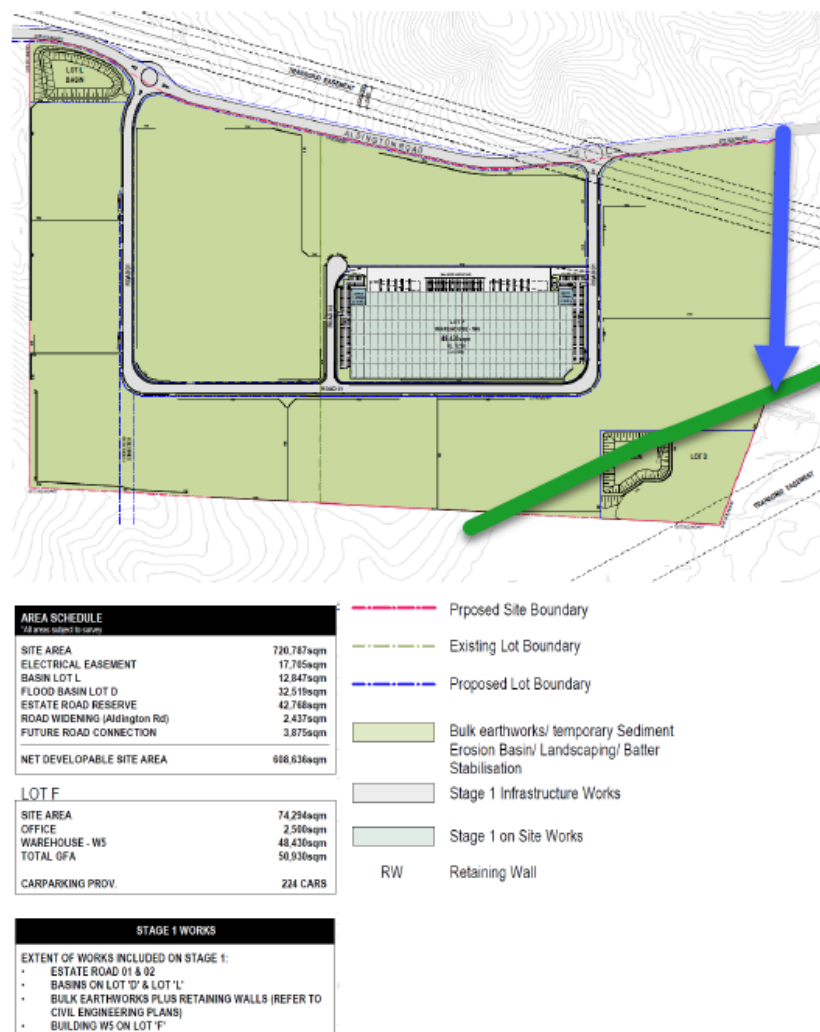
A summary of the Stage 1 works is provided below in

**Figure 4.** Stage 1 infrastructure works involves the construction of the road infrastructure and internal access roads of 'Estate Road 01' and 'Estate Road 02' as referred to in the EIS. It is understood that the summary of the Stage 1 works provides an indicative future connection to the Seraglio Estate. 'Estate Road 01' is marked with the red circle.

It is noted, however, that no indication has been made to a north end connection between the estates and 'Estate Road 01'

It is essential that a condition of consent for the 200 ARIE development is that the connections to the Seraglio land be capable of construction as part of the first stage of the development.

**Figure 4 Stage 1 works of 200 Aldington Road Industrial Estate development**



Source: 200 Aldington Road Industrial Estate EIS

### Recommendation:

1. That provision be made for the northern access point (Open Space Edge Road).
2. A condition of consent be included to ensure that the Seraglio connections are part of the Stage 1 development process to prevent the land being landlocked for an undetermined period of time.

### **3.4. Specific Details on Driveways at Lot o and K**

TTPP have identified some deficiencies in the design and provision for the future access road related to Lot O, at the southern side of the 200 ARIE estate. The proposed driveway locations will be non-compliant with the relevant Australian Standards when the future road is provided. These driveways need to be appropriately shown now considering the extension of the road to the Seraglio land.

#### **Recommendation:**

1. That the proposed access arrangements to Lot O and K be adjusted, by relocating them, or extending road construction, to enable the future road to comply with the relevant AS.

### **3.5. Traffic Report – assumed traffic from Seraglio Land**

It is Seraglio's intention that his land be developed sooner than the generation proposed in the EIS Traffic Report. TTPP sets out the relevant timing.

The EIS traffic Report should be revised to ensure that the relevant traffic flows are considered, and appropriate intersection treatments are included.

### **3.6. Tributary of Ropes creek**

Both the 200 ARIE site and our site are affected by both Ropes Creek and the "unnamed tributary of Ropes Creek".

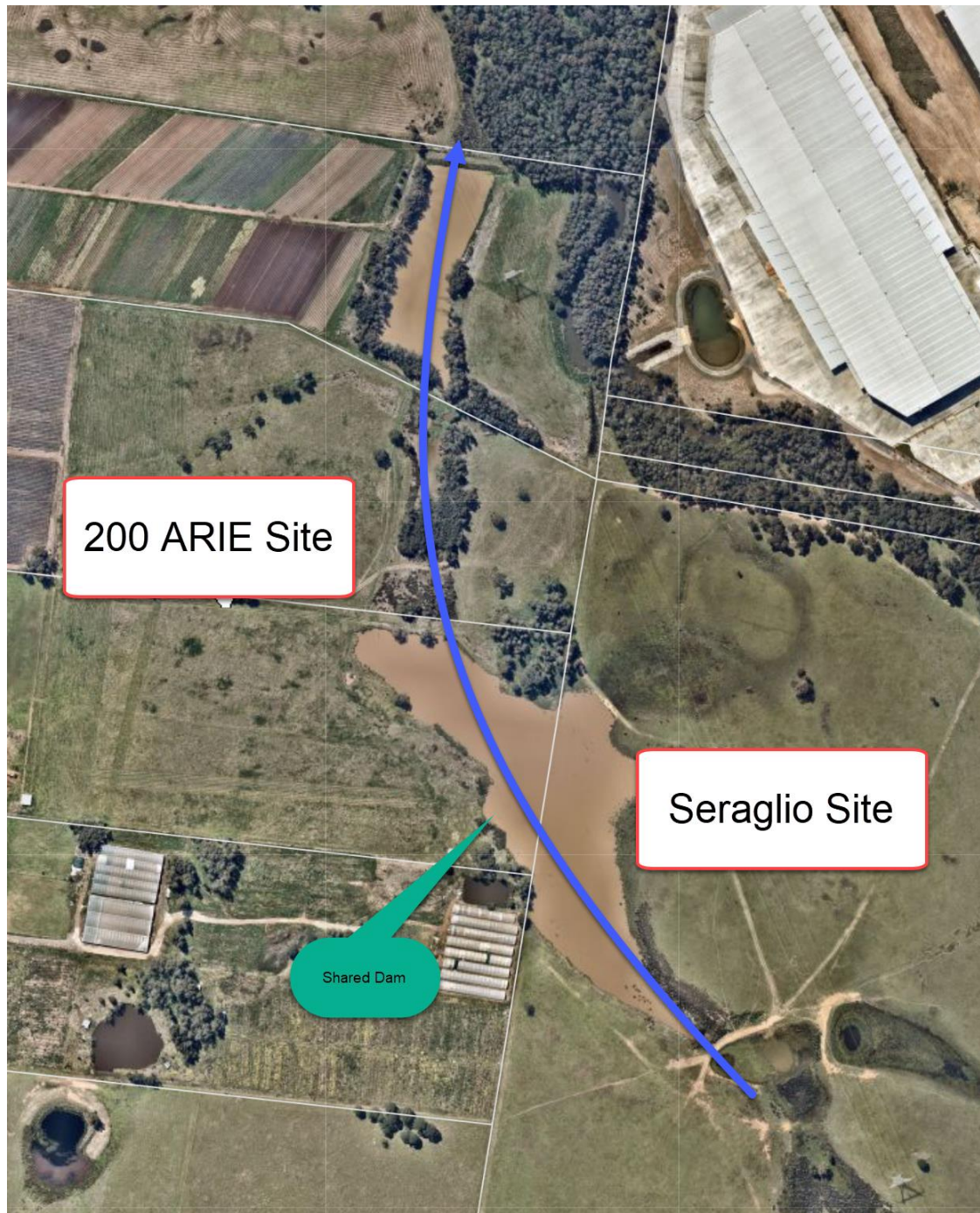
The DCP and its supporting documentation clearly show these (Figure 30 of Appendix F of the Mamre Road Flood Riparian and Integrated water Cycle Management Report)





Figure 30: Ropes Creek and Unnamed Ropes Creek Trib. Field validated watercourse, mapped top of bank and required Vegetated Riparian Zones.

All other documents clearly shown the unnamed tributary continuing through the 200 ARIE site downstream. The attached image shows a detail of this part of the site.



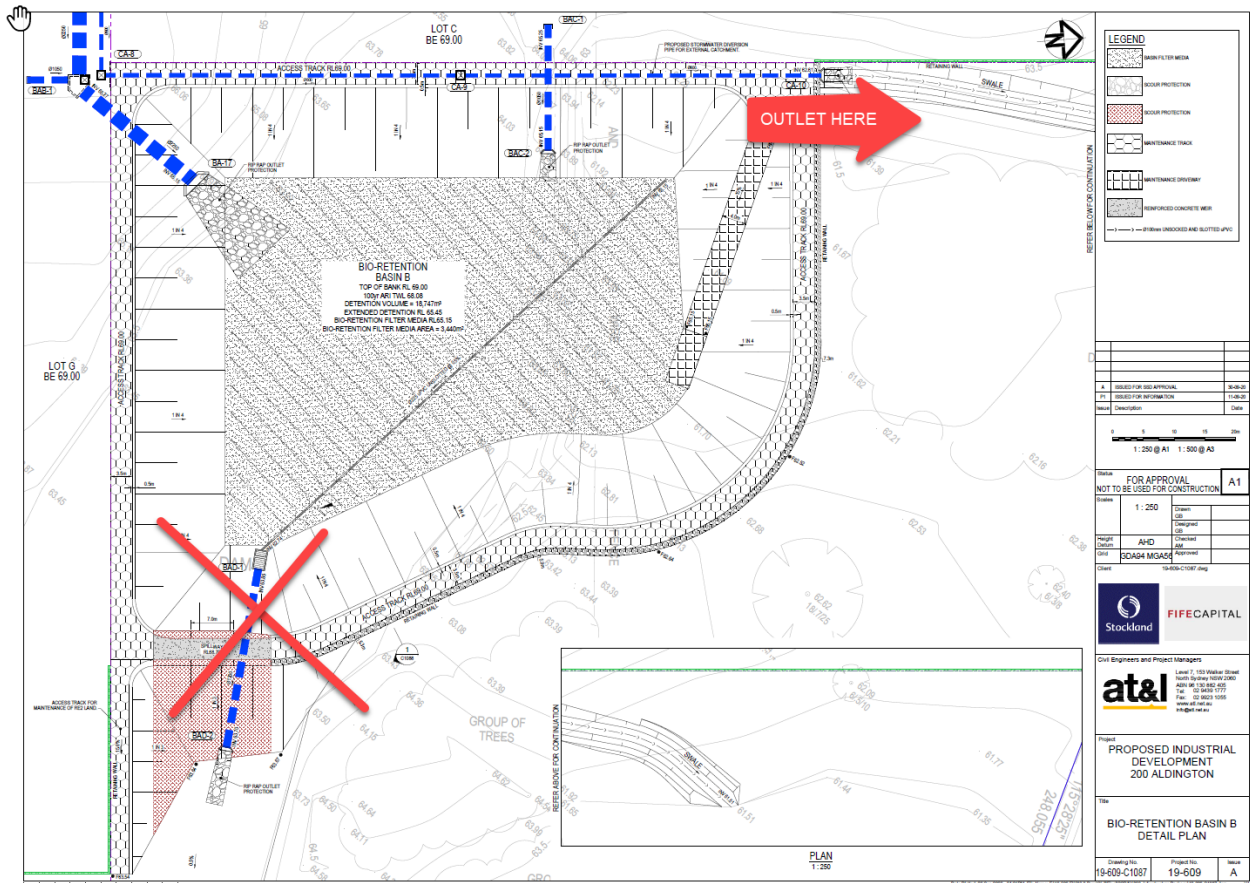
Current Near map image 2020.

The assertions of Appendix R Part 5 and Appendix S of the EIS that the unnamed tributary of Ropes Creek does not proceed to the north are rejected. The original watercourse has elevated the access road and blocked the flows of from proceeding directly downstream to the north on its historic and traditional route. The flows to



north-east to Ropes Creek through the Seraglio land only occur because of the overflow from the constructed dam, not as the original stream flow. Accordingly, the proposed diversion of the stormwater from 200 ARIE onto our site must be rejected. The Seraglio letter attached includes some details of the history of this matter.

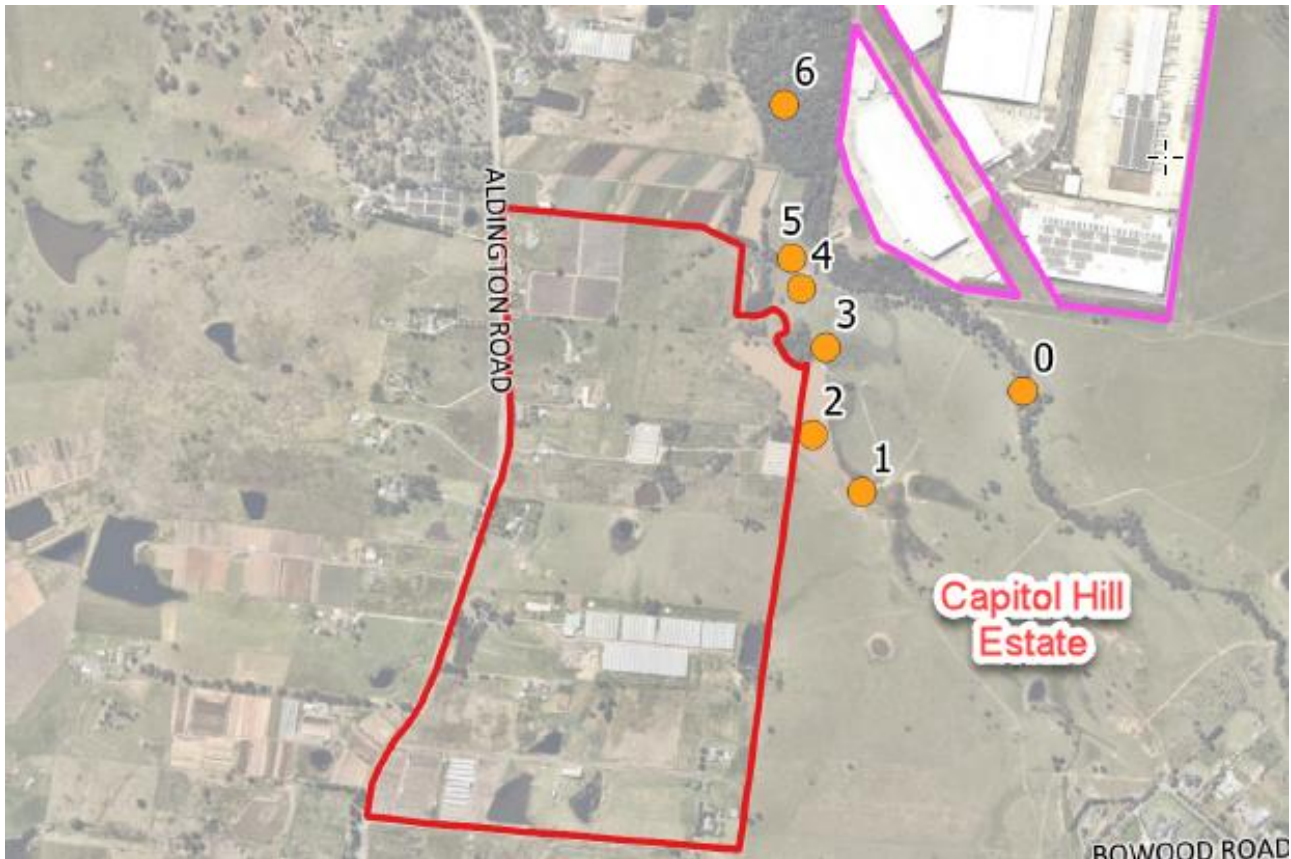
Specifically, even if the Department does not require the basin to be relocated out of the floodplain as recommended below, then the basin outlet as shown in Appendix F of the EIS must be relocated as shown in the image below.



### 3.7. Flooding

The EIS does not explicitly state the full extent of the flooding impacts on the Seraglio land caused by the filling of the floodplain and flowpath of Ropes Creek and its tributary. Appendix F of the EIS indicates that the significant encroachment into the floodplain by the development, particularly with the construction of Lot G, but also Lot C (to a lesser degree).

The EIS Appendix Q and R seem to indicate that the development does have an impact downstream of the development on Ropes Creek, but they also indicate that the proposed development does have at least an 80mm impact upstream of 200 ARIE (i.e. within our site). This is totally unacceptable and contrary to the provisions of the DCP. To be clear, this outcome is entirely unacceptable, and we will pursue every avenue (legal if necessary) to protect our rights to prevent 200 ARIE from increasing the flooding on our site.



*Extract from Appendix Q Flood Impact Assessment Report from EIS*

Reference location	2 yr ARI Flood Level (m AHD)		Flood Level Difference (cm)
	Revised Okdale South + Okdale West (E2) Benchmark	Revised Okdale South + Okdale West + FKC (200 Aldington Industrial Estate)	
0	63.93	63.93	0
1	63.81	63.82	1
2	63.76	63.77	1
3	63.73	63.73	0
4	62.52	62.54	2
5	62.19	62.26	7

Reference location	20 yr ARI Flood Level (m AHD)		Flood Level Difference (cm)
	Revised Okdale South + Okdale West (E2) Benchmark	Revised Okdale South + Okdale West + FKC (200 Aldington Industrial Estate)	
0	64.22	64.22	0
1	63.96	63.98	2
2	63.85	63.9	5
3	63.79	63.82	3
4	62.6	62.63	3
5	62.58	62.6	2

Reference location	100 yr ARI Flood Level (m AHD)		Flood Level Difference (cm)
	Revised Okdale South + Okdale West (E2) Benchmark	Revised Okdale South + Okdale West + FKC (200 Aldington Industrial Estate)	
0	64.3	64.3	0
1	64.07	64.09	2
2	63.91	63.99	8
3	63.83	63.88	5
4	62.76	62.78	2
5	62.74	62.76	2

Extract Table 2 from Appendix Q Flood Impact Assessment Report from EIS

**Recommendation:**

1. That the Department require 200 ARIE to adjust their application to ensure no impact on the upstream flood levels.

### 3.8. Water Quality

200 ARIE have provided in Appendix F Civil Infrastructure Report of the EIS an assessment of the proposed water quality treatment measures. While we accept that the water quality treatment proposed might well meet the normal reduction standards, it does not meet the proposed standards as stipulated in the Draft Mamre Road DCP. It appears that 200 ARIE has not attempted to meet the requirements of the Draft DCP, or if they have, have not provided the evidence that they have met those requirements.

We note also that the proposed water quality basin does not meet the standards adopted by Penrith Council regarding bio-retention basins. (Refer to Penrith Council's Water Sensitive Urban Design Technical Guidelines – particularly Appendix 2 – Standard drawings) We note that while the standards that they do meet provide for a "Reduction" in pollutant loadings, this is a reduction from the fully developed industrial site without any water quality treatment measures. It is contended that the site will still release a significant quantity of pollutants, in our view, probably more pollutants than are currently being discharged from the site.

As described above, the outlet from this water quality basin is currently proposed to be directed into the Seraglio site. This additional pollution load and this redirection are unacceptable and must be addressed by DPIE and 200 ARIE

## **4. CONCLUSION**

The Stockland Fife – 200 ARIE proposal is clearly inconsistent with the draft Development Control Plan. There is significant need for a northern connection to allow the proper functioning of the Sergalio site. There needs to be a condition of consent which ensures that this connection point is included in Stage 1 of the development to ensure certainty for the delivery of the new estate.

There are important water management issues which need to be carefully managed to ensure that there are no adverse impacts on the Seraglio site.

We would welcome the opportunity to meet to discuss our concerns. The achievement of an effective connection to Aldington Road is essential to ensure that the Seraglio site is not landlocked.

## **APPENDIX A – TTPP LETTER DATED 10<sup>TH</sup> DECEMBER**

Our Ref: 20477

10 December 2020

Pazit Pty Ltd  
c/o J. Wyndham Prince  
580 High Street  
PENRITH NSW 2750

**Attention: Mr David Johnson**

Dear David,

**RE: 200 ALDINGTON ROAD INDUSTRIAL ESTATE – TRANSPORT REVIEW  
CAPITOL HILL INDUSTRIAL ESTATE SUBMISSION**

As requested, please find herein The Transport Planning Partnership's (TPPP) assessment of the State Significant Development Application, SSD-10479 at 106-228 Aldington Road, Kemps Creek on behalf of the adjoining land owner at Capitol Hill Industrial Estate.

The SSDA consists of a staged development including a Concept Proposal and Stage 1 Development Application comprising estate-wide earthworks, infrastructure and services, construction, fit-out and operation of Stage 1 warehouse building.

The following documents have been reviewed:

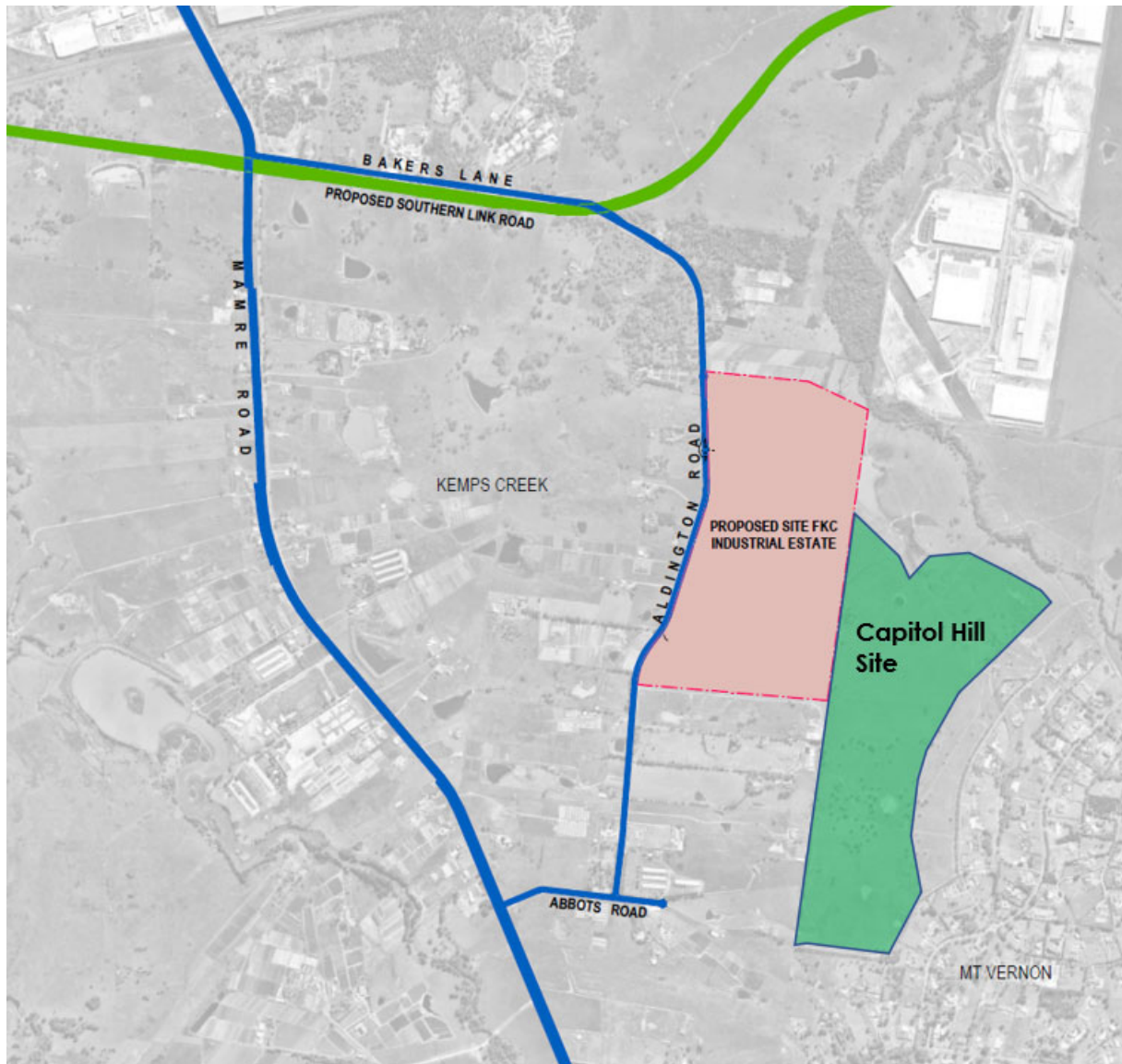
- Draft Mamre Road Precinct Development Control Plan, November 2020 (Department of Planning, Industry and Environment)
- Environmental Impact Statement - 200 Aldington Road Industrial Estate, 11 November 2020 (Ethos Urban)
  - Appendix A - Indicative Concept Masterplan and Stage 1 Plans (SBA Architects)
  - Appendix E – Traffic Impact Assessment, 20 October 2020 (Ason Group)
  - Appendix F - Civil Plans (AT&L).

In particular, the above documents have been reviewed for potential traffic impacts on the adjoining land at Capitol Hill Industrial Estate.

The site location with the proposed SSD and adjoining Capitol Hill site is shown in Figure 1.



**Figure 1: Site Location**



Sourced from Appendix A - Indicative Concept Masterplan (SBA Architects)

### **Timing of SSD-10479 Lodgement**

It is noted that Transport Assessment Report was finalised on 20 October 2020. However, the Draft Mamre Road Precinct (MRP) Development Control Plan (DCP) was placed on public exhibition for comments on 10 November 2020.

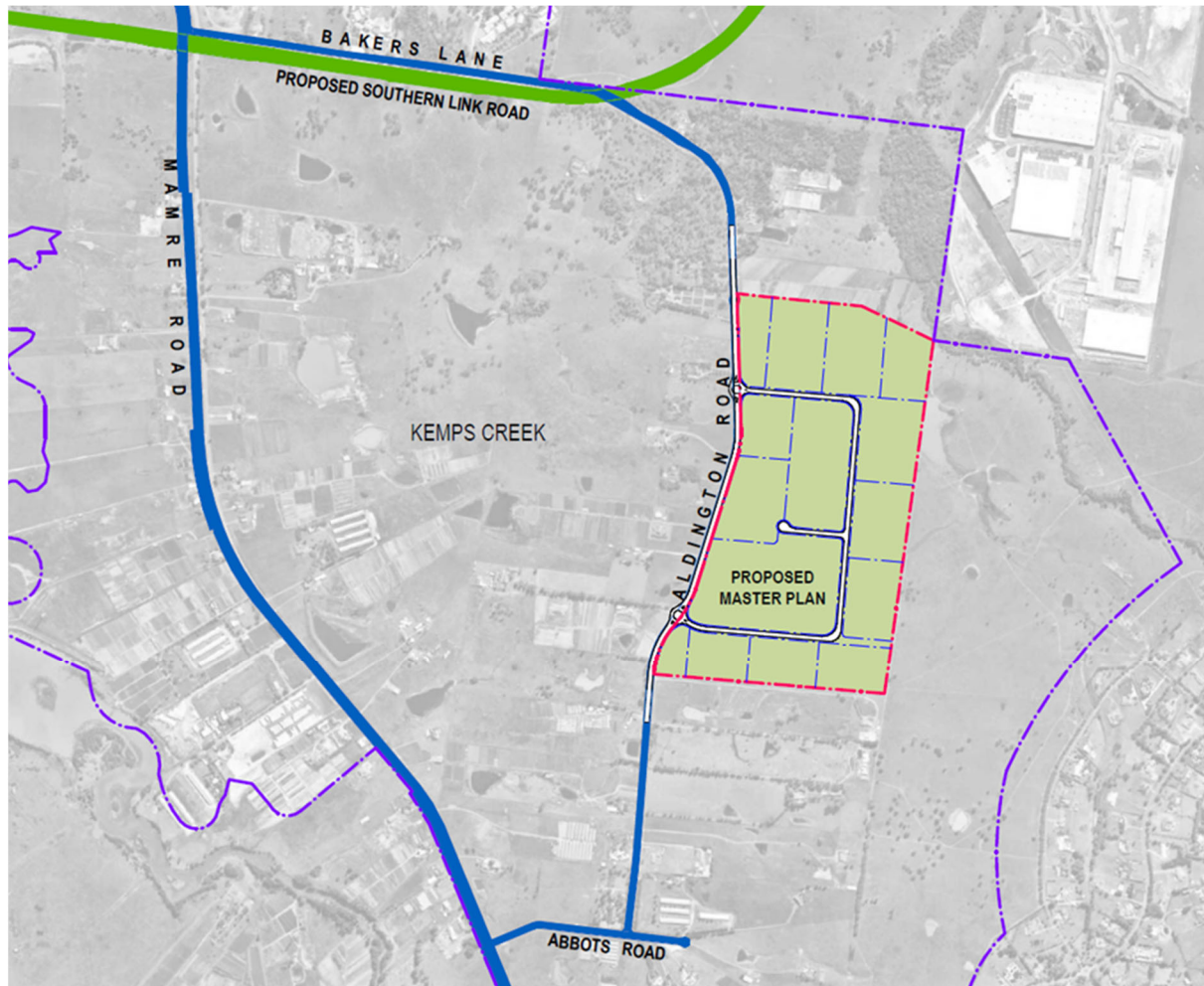
Hence there are a number of inconsistencies between the proposed concept plan and the Draft MRP DCP, in particular, the proposed road network.



## Proposed Road Network

The proposed road network for the SSD-10479 (refer to Figure 2) is not consistent with Figure 14 -Precinct road network and hierarchy map in the Draft MRP DCP (refer to Figure 3).

**Figure 2: Indicative Concept Master Plan for SSD-10479**



Source: Appendix A - Indicative Concept Masterplan (SBA Architects)

Figure 3: Precinct road network and hierarchy (Draft MRP DCP)

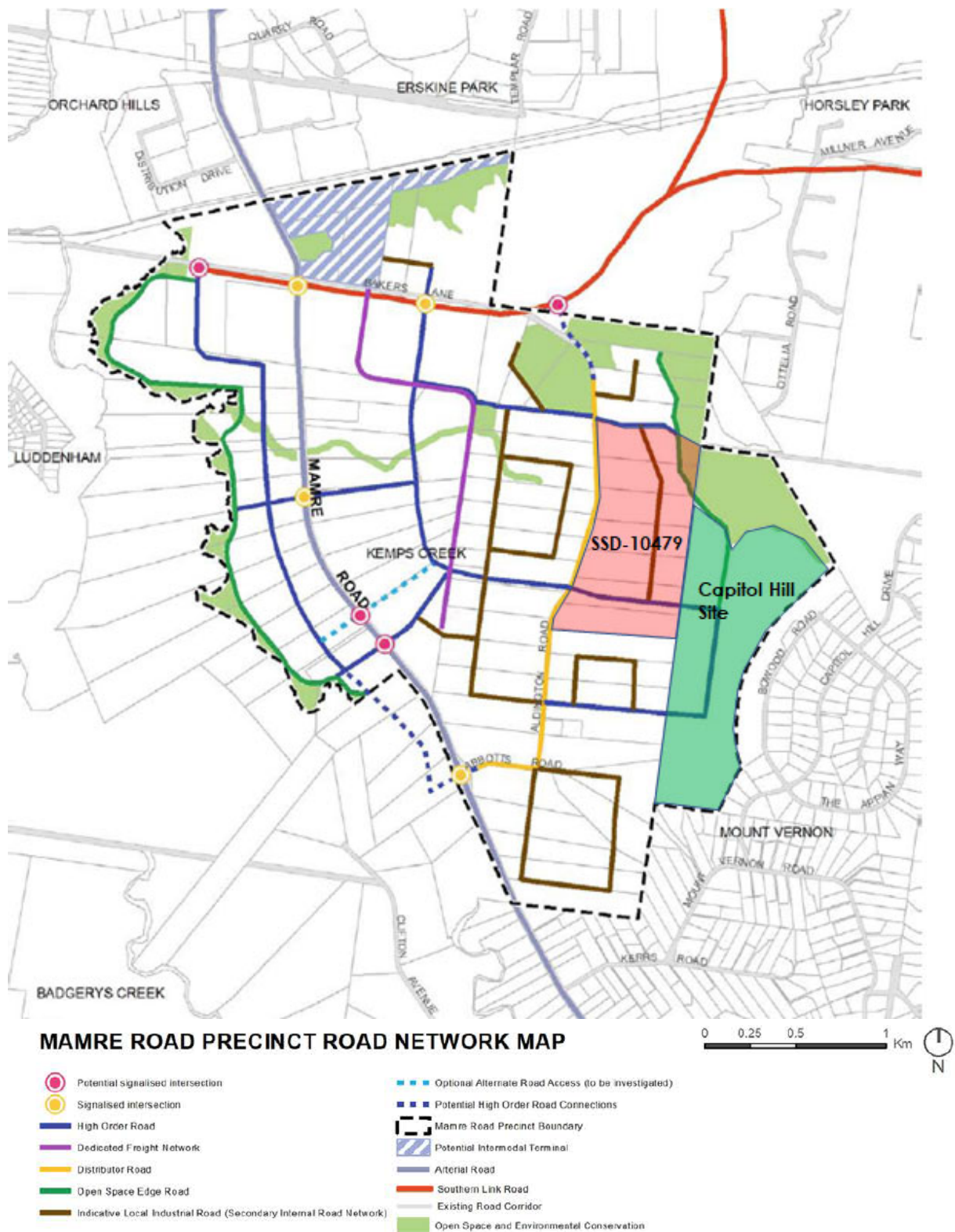


Figure 14. Precinct road network and hierarchy

Sourced from Figure 14 - Draft MRP DCP

Section 3.4.1 Road Network, Hierarchy and Design of the Draft MRP DCP has specified that:

*1) **The Mamre Road Precinct should be developed generally in accordance with the road network map identified in Figure 14.** The external road network will generally comprise the arterial roads of Mamre Road and the future Southern Link Road (Movement Corridors), Aldington Road/ Abbots Road as a distributor road and indicative internal road network. The external road network is carefully designed and planned to ensure that development of the precinct to projected capacity is supported.*

Figure 14 -Precinct road network and hierarchy map in the Draft MRP DCP (refer to Figure 3) shows three road connections to the Capitol Hill site, which are:

- 'High Order Road' south of the proposed SSD
- 'High Order Road' through the proposed SSD, near its southern boundary
- 'Open Space Edge Road' through the north-eastern corner of the SSD, which will connect to the 'High Order Road' along the northern boundary of the SSD.

Hence, according to the Draft MRP DCP, the proposed SSD site is responsible for providing **two road connections**, which will accommodate vehicular access for the Capitol Hill site.

However, the proposed road plan for the SSD (refer to **Error! Reference source not found.**) only provides **one road connection** to the Capitol Hill site, which will be disadvantaged by the lack of road connections.

Furthermore, the timing of future development for the land south of the proposed SSD site is unknown. Hence, the Capitol Hill site cannot rely on provision of only one road connection for the scale of development at Capitol Hill.

On that basis, the proposed road network for the SSD should be modified to reflect the precinct road network as per Figure 14 of the Draft MRP DCP, in particular:

- Southern 'High Order Road' to extend to the eastern site boundary, providing a frontage road with Lot O
- Northern 'High Order Road' to align with the northern site boundary
- 'Open Space Edge Road' to be included in the Concept Plan.

## Road Reserve

Figure 14 Precinct road network and hierarchy map in the Draft MRP DCP (refer to Figure 3) indicates that Higher Order Roads will run east-west direction within the site boundary as well as a north-south Local Industrial Road. Also Figures 12 and 13 of the Draft MRP DCP provided the following road reserve width:

- Typical Distributor/Collector Road – 26.4m
- Typical Local Industrial Road – 24m.

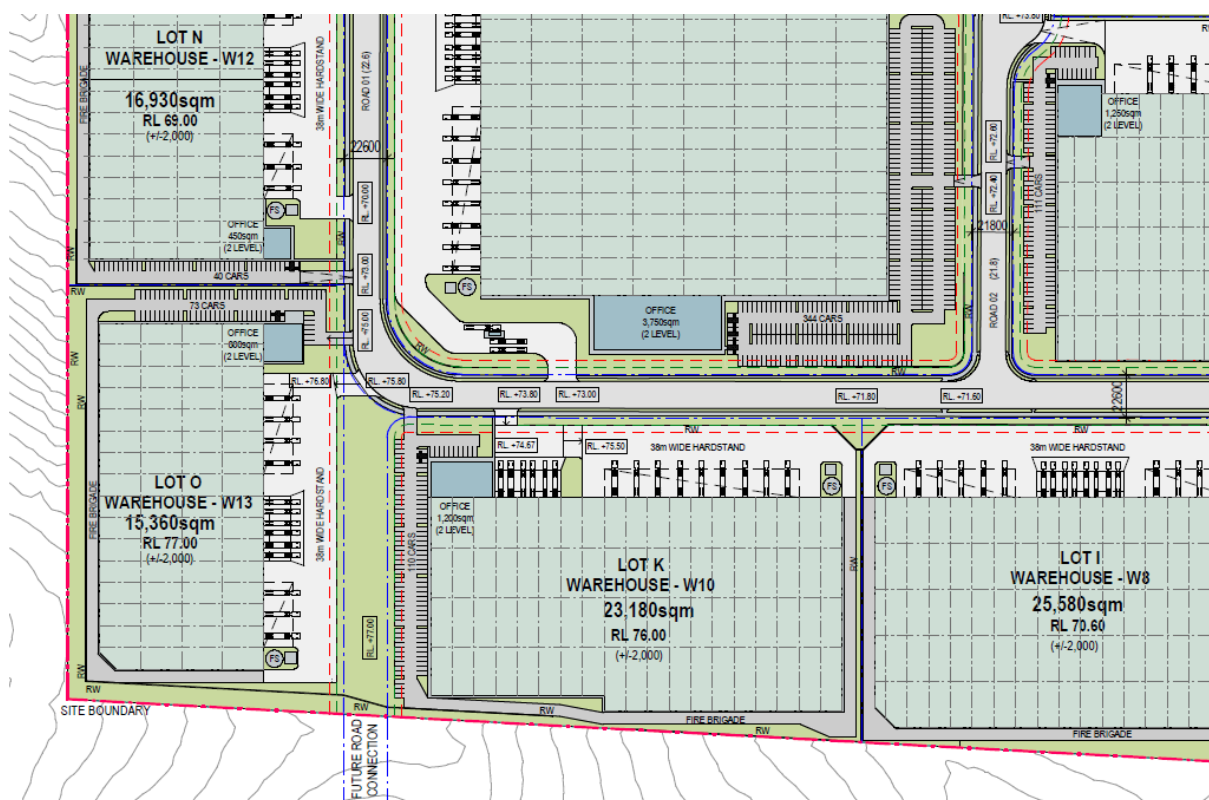
A loop road (i.e. Road 01) is proposed on the Concept Plan, which is inconsistent with the Draft MRP DCP. Road 01 has 22.6m road reserve.

The proposed east-west Higher Order Roads should be amended to have a road reserve width of 26.4m instead of 22.6m, to be consistent with the Draft MRP DCP.

### Driveway Access Location for Lot O and Lot K

Proposed driveway locations for Lot O and Lot K are shown in Figure 4.

**Figure 4: Master Plan for SSD-10479**



Source: Appendix A - Indicative Concept Masterplan (SBA Architects)

Section 4.7.3 Access and Driveways of the Draft MRP DCP has specified that:

#### 4) Driveways should be:

- Provided from lanes and secondary streets rather than the primary street, wherever practical;
- Located taking into account any services located within the road reserve, such as power poles, drainage inlet pits and existing street trees;
- **Setback a minimum of 6m from the perpendicular of any intersection of any two roads;** and

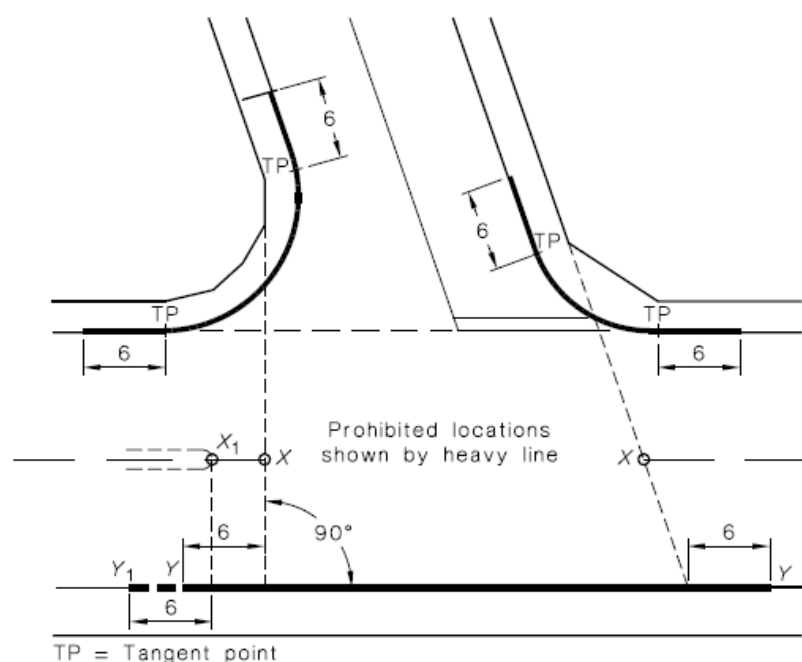


- Located to minimise noise and amenity impacts on adjacent residential development.

**5) The driveway crossing and access roads shall be designed in accordance with the provisions of AS2890.1 and 2 - 2004 for car parking and commercial vehicles respectively.**

An extract of Figure 3.1, Prohibited Locations of Access Driveways of AS2890.1:2004 is shown in Figure 5.

**Figure 5: Prohibited Locations of Access Driveways**



**NOTES:**

- 1 Accesses to domestic driveways are excluded from the prohibition in respect of the kerb section marked Y-Y (see Clause 3.2.3(a)).
- 2 The points marked  $X_1$  and  $X$  are respectively at the median end on a divided road and at the intersection of the main road centre-line and the extensions of the side road property lines shown as dotted lines, on an undivided road. On a divided road, dimension Y-Y extends to Point  $Y_1$ .

DIMENSIONS IN METRES

**FIGURE 3.1 PROHIBITED LOCATIONS OF ACCESS DRIVEWAYS**

Source: Figure 3.1 of AS2890.1:2004

It is noted that the following driveways are located within the prohibited locations:

- Lot O – car park access
- Lot O – loading dock access
- Lot K – car park access.

Whilst the location of car park and loading dock access can be determined as part of subsequent development applications, Figure 4 shows that Lot O has a limited frontage road length, which make it difficult to achieve compliant driveways for the car park and the loading dock access. Therefore, as specified previously, the proposed road network for the Concept Masterplan should be modified to include the southern 'High Order Road' to extend to the eastern site boundary, providing a frontage road to Lot O.

## Traffic Assessment

Traffic report indicated that:

### 5.5 Mamre Road Precinct Rezoning Status

As discussed, the MRP has been recently rezoned, and based on our discussions with key authorities, it is anticipated that a Precinct DCP will be released in the near future which responds to the rezoning and provides governance for the future growth across the MR Precinct. **Concurrently, the detailed traffic modelling of the MRP being undertaken by TfNSW will specifically determine:**

- Sub-regional connections to the regional road network, with a specific focus on Mamre Road and Southern Link Road;
- **The road network within the MRP to ensure efficient and equality of access to these sub-regional connectors;**
- **Road and intersection upgrade requirements and the timing of such in line with the staged development of the MR Precinct; and**
- **An appropriate apportionment of infrastructure costs.**

It is noted that Figure 14 -Precinct road network and hierarchy map in the Draft MRP DCP (refer to Figure 3) does not recommend future upgrades at key internal intersections within the Mamre Road Precinct. Provision of suitable intersection upgrades along Aldington Road where it intersects with High Order Roads would be crucial for the future development potential of the Capitol Hill Industrial Estate.

Furthermore, the traffic report stated that:

*Given that the MRP and the wider network upgrades would significantly alter future conditions beyond 2026 it is suggested that forecasting beyond 2026 should not be conducted at this stage (therefore, detailed consent is sought for Stage 1 only, with the remainder of the Concept Masterplan being considered as part of the wider MRP modelling). (Section 8.2)*

**Therefore, for assessment of 2036, the flows along Aldington Road are required to be confirmed as part of the wider precinct modelling** (which is currently being conducted). Any conclusions based on the currently available information would not provide an accurate assessment of the requirements of the road network and therefore have not been

documented. **Assessment beyond 2026 is required once the background modelling has been completed.** (Section 8.4)

Nevertheless, the assessment has demonstrated that the Stage 1 development could be accommodated by the road network in 2026, subject to the interim upgrades identified to be required to Aldington Road. It is therefore concluded that the **Stage 1 development is acceptable from a traffic and transport perspective.** (Section 8.4)

The traffic report relies heavily on the TfNSW traffic modelling of the wider Mamre Road Precinct, which is currently being undertaken by TfNSW. The requirements for the ultimate intersection configuration within the Mamre Road Precinct will not be known until completion of this study.

The traffic report concluded that the Stage 1 development is acceptable from a traffic and transport perspective. Therefore, detailed consent is sought for Stage 1 only, with the remainder of the Concept Masterplan being considered as part of the wider MRP modelling.

It is our understanding that prior to Department of Planning, Industry and Environment granting an approval of the Concept Masterplan, an infrastructure staging plan is required showing proposed road upgrades at each stage of the development.

Therefore, an appropriate condition should be provided so that the approval of Concept Masterplan includes staging of intersection upgrades and interim/ultimate configuration of key intersections along Aldington Road.

### **Future Year Assessment**

According to Section 7.4.1 of the traffic report, the following development assumptions have been adopted for the Capitol Hill site, which is shown as Precincts 3 and 7 in Figure 13 of the traffic report:

- Scenario 1 – 2026: no development at Capitol Hill site
- Scenario 2 – 2031: 50% of Capitol Hill site
- Scenario 3 – 2036: 100% of Capitol Hill site.

It is likely that future development of Capitol Hill site will proceed much earlier than what was assumed in the traffic report. Hence, it is requested that the traffic modelling be updated to include the full potential for Capitol Hill site for 2026 and 2031.

### **Parking Provision**

Proposed car parking rates adopted in the traffic report are consistent with minimum parking rates specified in the Draft MRP DCP (Table 12).

## Other Matters to be Considered

Whilst the following matters are not specifically related to traffic impact on the adjoining land at Capitol Hill Industrial Estate, these items could be considered by Department of Planning, Industry and Environment in their assessment:

- Section 3.4.1 Road Network, Hierarchy and Design of the Draft MRP DCP has specified that *the internal road pattern is to facilitate 'through-roads' with cul-de-sac to be avoided unless dictated by topography or other constraints*. Stage 1 development consists of Road 02, which is a cul-de-sac.
- Section 3.4.2 Traffic and Transport Assessments, Studies and Plans of the Draft MRP DCP has specified that *a Transport Management and Accessibility Plan (TMAP) is to be prepared for all significant developments. The TMAP is to address the objectives and controls in this section*. It is noted that a TMAP was not submitted for the Concept Plan.

## Summary and Conclusions

TTPP has undertaken a review of the documents and plans for 200 Aldington Road Industrial Estate, SSD-10479.

The findings of TTPP's review of the traffic report are summarised as follows:

- According to the Draft MRP DCP, the proposed SSD site is responsible for providing **two road connections**, which will accommodate vehicular access for the Capitol Hill site. However, the proposed road plan for the SSD only provides **one road connection** to the Capitol Hill site, which will be disadvantaged by the lack of road connections.
- Therefore, the proposed road network for the SSD should be modified to reflect the precinct road network as per Figure 14 of the Draft MRP DCP, in particular:
  - Southern 'High Order Road' to extend to the eastern site boundary, providing a frontage road to Lot O
  - Northern 'High Order Road' to align with the northern property boundary
  - 'Open Space Edge Road' to be included in the Concept Plan.
- The proposed east-west Higher Order Roads to have a road reserve width of 26.4m instead of 22.6m, to be consistent with the Draft MRP DCP.
- Whilst the location of car park and loading dock access can be determined as part of subsequent development applications, it is noted that Lot O has a limited frontage road length, which would be difficult to achieve a compliant driveways for the car park and the loading dock access.
- Precinct road network and hierarchy map in the Draft MRP DCP does not recommend future upgrades at key internal intersections within the Mamre Road Precinct. Provision of suitable intersection upgrades along Aldington Road where it intersects with High Order



Roads would be crucial for the future development potential of the Capitol Hill Industrial Estate.

- Traffic report concluded that the Stage 1 development is acceptable from a traffic and transport perspective. Therefore, detailed consent is sought for Stage 1 only, with the remainder of the Concept Masterplan being considered as part of the wider MRP modelling.
- It is our understanding that prior to Department of Planning, Industry and Environment granting an approval of the Concept Masterplan, an infrastructure staging plan is required showing proposed road upgrades at each stage of the development. Therefore, an appropriate condition should be provided so that the approval of Concept Masterplan includes staging of intersection upgrades and interim/ultimate configuration of key intersections along Aldington Road.
- It is likely that future development of Capitol Hill site will proceed much earlier than what was assumed in the traffic report. Hence, it is requested that the traffic modelling be updated to include the full potential for Capitol Hill site for 2026 and 2031.

We trust the above is to your satisfaction. Should you have any queries regarding the above or require further information, please do not hesitate to contact the undersigned on 8437 7800.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ken Hollyoak', written over a light grey rectangular background.

**Ken Hollyoak**  
**Director**