



9 September 2020

TfNSW Reference: SYD18/00825/09
Departments Reference: DA 2 MOD 11

Lillian Charlesworth
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Charlesworth

SECTION 4.55 (1A) MODIFICATION TO APPROVED PENRITH LAKES DEVELOPMENT SCHEME – RESPONSE TO SUBMISSIONS

Reference is made to the Department's correspondence dated 28 August 2020, regarding the modification to the abovementioned application which was referred to Transport for NSW (TfNSW) for comment.

TfNSW notes that the response to submissions did not include TfNSW submission letter. Therefore, TfNSW previous correspondence of 14 January 2020 is being reiterated to be addressed (see **Attachment A**).

The applicant is advised that the information outlined in Attachment A is required to allow TfNSW to complete the assessment of this Application. TfNSW may also request further information once the assessment is carried out.

If you have any further questions, Laura van Putten, Land Use Planner at TfNSW, would be pleased to take your call on (02) 8849 2480 or please email development.sydney@rms.nsw.gov.au.

Yours sincerely

Pahee Rathan
Senior Land Use Assessment Coordinator

Attachment A



Transport
for NSW

14 January 2020

TfNSW Reference: SYD18/00825/06

Departments Reference: DA 2 MOD 11

Silvio Falato
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Falato

SECTION 4.55 (1A) MODIFICATION TO APPROVED PENRITH LAKES DEVELOPMENT SCHEME – [REDACTED]

Reference is made to the Department's correspondence dated 28 November 2019, regarding the modification to the abovementioned application which was referred to Transport for NSW (TfNSW) for comment.

TfNSW notes that the modification seeks consent to undertake site rehabilitation works which includes moving approximately 3 million tonnes of fill (approximately 1 million tonnes above the existing approval) onto the Penrith Lakes Employment land which is bounded by Old Castlereagh Road and Castlereagh Road at Penrith. TfNSW has reviewed the submitted documentation and cannot provide an informed comment based on the information provided.

The Traffic Impact Assessment (TIA) does not provide adequate information to ensure that there will be no impacts to the intersections of Castlereagh Road/Lugard Street and Castlereagh/Old Castlereagh/Andrews roads as a result of the proposed modifications and the additional traffic expected. Detailed comments are provided in **Attachment A - Traffic Impact Assessment comments**.

The applicant is advised that the information outlined in Attachment A is required to allow TfNSW to complete the assessment of this Application. TfNSW may also request further information once the assessment is carried out.

If you have any further questions, Laura van Putten, Land Use Planner at TfNSW, would be pleased to take your call on (02) 8849 2480 or please email development.sydney@rms.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Pahee'.

Pahee Rathan
A/Senior Manager Land Use Assessment

Transport for NSW

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Attachment A -Traffic Impact Assessment comments

The documentation including *Transport and Traffic Planning Associates* Traffic Impact Assessment (TIA) June 2019 (Issue B) in support of the proposal has been reviewed and the following comments are to be addressed by the applicant:

1. *Comment:*

The report makes reference to the proposed upgrades to Castlereagh Road. The proposal to upgrade this section of Castlereagh Road is not included in TfNSW current programs and no funding has been allocated.

Recommendation:

The report is to acknowledge that the upgrades are not progressing further at this stage and any future modelling for this report is to assume that these upgrades will not be constructed during the time of this developments fill operations.

2. *Comment:*

The TIA states the following:

The site will be accessed via the following 2 locations:

- a. *Old Castlereagh Road via a left in, right out only arrangement; and/or*
- b. *Lugard Street via a right in, left out only arrangement at the intersection of Castlereagh Road and Lugard Street.*

However there is no information provided detailing the vehicle routes. Although it is noted that the Statement of Environmental Effects (SEE) states there is no proposed change to the haulage route which will be in accordance with the current consent condition

Recommendation:

A traffic assignment diagram should be provided detailing the vehicle routes for this modification.

3. *Comment:*

Following on from the above the TIA Section 6.2 Option 2 should be updated to reflect the previous point with the site access being left in right out via Old Castlereagh Road.

It is assumed that this is a typing error and that Option 1 is intended to be left in right out as per point 2.

Recommendation:

The report is to be updated to reflect the correct direction.

4. *Comment:*

It is noted that there are 2 different traffic projections provided, "intended fill importation" and "conservative/scaled up fill importation." However it is unclear if both have been modelled and what the purpose is for the 2 traffic projection options.

Recommendation:

Clarification is required explaining the inputs for the "intended fill importation" and "conservative/scaled up fill importation." All SIDRA models are to be provided for review.

5. *Comment:*

A sensitivity analysis based on a conservative annual background traffic growth of 1.5% was undertaken, however it should be noted that the background growth in this area is should be calculated at around a 2% linear growth as per STM ref. STM BV3.62 Lu2016 V1.51.

Recommendation:

The future year model is to be updated utilising an annual growth of 2%.

6. *Comment:*

The report makes reference to 2 separate traffic surveys. It is unclear which counts were used in the SIDRA outputs. Clarification is required as to what the purpose is for displaying both counts.

The traffic counts dated 16 October 2018 were undertaken in close proximity to the school holidays/long weekend and may not indicate normal traffic conditions. Ideally vehicle counts should be undertaken during a typical day, to include Thursday (or Wednesday), Friday and Saturday for the study (not near school/public holidays). This will provide the departments with an accurate understanding of the existing traffic conditions and the actual impact of this development application to the surrounding network.

In addition the counts do not provide a breakdown of light and heavy vehicles. it is important that counts provide a breakdown of light and heavy vehicles to accurately model the queue lengths.

Recommendation:

New counts are to be undertaken at more appropriate dates and are to include a breakdown of light and heavy vehicles.

7. *Comment:*

TIA Section 6.3 states the following:

- a. *The Old Castlereagh Road traffic flows are adopted from the surveyed link flows*
- b. *The recent traffic flows at the intersection of Castlereagh Road and Lugard Street are based on the turning count surveys*

And;

Details of the SIDRA model results are provided in Appendix C and summarised in the following:

- 2019
 - Old Castlereagh Rd. Access
 - Lugard St/Castlereagh Rd
 - Andrews/Castlereagh RAB Opt 1
 - Andrews/Castlereagh RAB Opt 2
- 2022
 - Old Castlereagh Rd. Access
 - Lugard St/Castlereagh Rd
 - Andrews/Castlereagh RAB Opt 1
 - Andrews/Castlereagh RAB Opt 2

The SIDRA output headings are not consistent with the above and therefore it is difficult to understand what has been modelled. There appears to be no base models. In addition the input numbers are not consistent with either traffic surveys provided in the report. It is important to understand the existing traffic conditions to determine if there are any safety and efficiency impacts to the road network as a result of this development.

Traffic Modelling and analysis for the application should consider the cumulative traffic impact of the development on surrounding roads and intersections in the context of any other known planning proposals and developments in the precinct and surrounds, and the need for upgrades or improvement works including consideration to timing and funding (if required). The traffic study is to consider the impact on Castlereagh Road for the duration of the works.

Recommendation:

Clarification is required as to what inputs were used and why. All SIDRA files are to be provided to TfNSW for review.