

TfNSW Reference: SYD20/01025/05  
Departments Reference: SSD 9138102

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

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**ESR KEMPS CREEK LOGISTICS PARK STAGE 1 – 290-308 ALDINGTON  
ROAD, 59 – 62 ABBOTTS ROAD KEMPS CREEK SSD - 9138102**

19 December 2022

Dear Mr Schwebel,

Reference is made to the Department's referral dated 21 October 2022 with regard to the abovementioned State Significant Development Application, which was referred to Transport for NSW (TfNSW) Services for comments.

The proposal seeks development approval for the concept SSD under section 4.22 of the Environmental Planning and Assessment Act (EP&A Act), which establishes the framework for future development and works of an industrial estate known as Westlink (formerly known as the Kemps Creek Logistics Park).

TfNSW requests the information with Attachment A must be addressed for further assessment prior to the determination of the application. TfNSW will further review and provide response upon receipt of the additional information.

If you have any further questions, Mr James Douglas would be pleased to take your call on (02) 8849 2480 or please email [development.Sydney@TfNSW.nsw.gov.au](mailto:development.Sydney@TfNSW.nsw.gov.au). I hope this has been of assistance.

Sincerely,



David Rohloff  
**Senior Manger Land Use Assessment West and Central  
Planning and Programs  
Greater Sydney**

## Attachment A

### 1. A Response Table

TfNSW has reviewed the commentary provided for the abovementioned development and the outstanding matters previously requested and in order to facilitate an accurate assessment please prepare a response table that addresses TfNSW previous correspondence and identifies current document iterations.

### 2. Aldington Road signals

Aldington Road/Abbotts Road indicates in the interim there will be a 4 way intersection. However, as part of this SSD the land does not extend to this location. In addition, it is noted that this land falls within a separate SSD (Westlink Stage 2) which has not been approved and therefore may change pending formal planning review process. It is recommended that this intersection under Stage 1 be designed and constructed as a T-Intersection in the interim to retain consistency with the approved 2026 model undertaken by Ason Group. Please provide the updated design to TfNSW for review.

### 3. Mamre Road/Abbotts Road signals

Please detail how the current design has considered the significant level difference between the existing road and the ultimate Mamre Road Stage 2 upgrade. Given the vertical difference, any interim works are likely to be considered sacrificial given the deviation from the ultimate design.

The AIP letter issued to Log East identified that the shift of the intersection to the north would affect an additional land owner that was not included within the current application. Please demonstrate how the current proposal addresses the impacts to the adjoining land owners on the western side of Mamre Road (under the ultimate 4-way arrangement) and those affected by the revised design.

Please note that as the current intersection design deviates from the Voluntary Planning Agreement, the revised design will be required to be amended and adopted prior to the initiation of the WAD process.

### 4. Traffic Report

- a. 1.2 Interim Intersection Requirements – The provided report references the Ason Group 2026 model as being 17th June 2022. The approved model is dated 19 September 2022. TfNSW requires the traffic report to be updated accordingly to ensure the modelling reflects the approved model as dated 19 September 2022 and current traffic volume expectations.
- b. 4.2.3 Abbots Road & Bakers Lane Intersection Upgrades – the report states *While the capacity requirements have been determined as part of the MRP modelling assessment for the future years of 2031 and 2036 (which has been confirmed as part of the finalisation of the MRP DCP), it is not currently understood what the finalised design will be.*

*As such, the LOG-E, represented by ESR, Fife Kemps Creek and Frasers Property Australia, are proposing a staged upgrade to the intersection. The approval of the upgrade will form part of the initial SSD consent to be*

*provided of the 3 land owners (expected to be either the subject SSD or SSD 10479 ). A letter of offer was submitted by the LOG-E jointly to upgrade the intersection, with the intent to go on exhibition in late-2022:*

Please be advised that TfNSW has a strategic plan for this intersection which identifies a 4way intersection. The report remains unclear in defining the reference to the final design and appears to deviate from the overall Mamre Road intersection strategic plan as noted above. Therefore, TfNSW would recommend that the final design be clearly designated within the appropriate report and confirmation of if the intersection is to be designed to match the ultimate completed design. If the intention is to provide an interim solution the Proponent is advised that the works may be considered sacrificial.

- c. 5.2.2 Surveyed Trip Rates: The Applicant is advised that the Approved trip generation rate for IN1 warehousing and the current development application is as follows:

- Daily trips/100m2 GFA - 2.91
- AM Peak - 0.23
- PM Peak - 0.24

The approved trip generation rate as shown above is less than what is represented in the Guide to Traffic Generating Developments (GTGD). The GTGD rates are as follows:

- Daily vehicle trips = 4 per 100m2 gross floor area
- Morning peak hour vehicle trips = 0.5 per 100m2 gross floor area

The approved trip rate was determined following an extensive review of various developments within Western Sydney Employment Area (WSEA) and the approved and operational intermodals at Moorebank and Enfield. The proposed site is zoned IN1 – General Industrial under the Penrith Local Environmental Plan 2010 and is not restricted to generally Warehousing and Logistics. Therefore, the transport and traffic infrastructure is to be designed and constructed to accommodate all permissible uses.

TfNSW does not support the use of the terminology in which trip rates are referred to as 'conservative' given the deviations from TfNSW minimum requirements GTDT and requires the report and future references (Stage 2 and Stage 3) be revised accordingly to match. In addition TfNSW would expect the worst-case scenario should be modelled to support and justify the use of the reduced rates in reference to the potential impact on the Concept Masterplan.

- d. 5.4 Traffic Assessment – Ultimate Road Network – the report states the Proposal is the assumption that 55% of the Site area represents developable Gross Floor Area (GFA). The current site area is identified as 320,258m<sup>2</sup>, which equates to a GFA of 176,142m<sup>2</sup>. The current Proposal is seeking a GFA of 81,642m<sup>2</sup> (noting the EIS provides an amended plan (3.0 Figure 1 & 2 of the report)) which exceeds the identified GFA and does not address the

residue lots only the two warehouses. It appears that the take up rate has far exceeded the anticipated growth. This is likely due to the limited land available for this type of land use. In order to establish the overall impact of the development and further stages TfNSW requests the following information be details within a revised EIS or addendum were relevant:

- I. What is the yield of the residue lots?
  - II. Is the proposed GFA – based on 2026 model?
- e. The provided swept paths and manoeuvring diagrams include turning path plans that are designed for 30m PBS type 2B. According to the Mamre Road Precinct Development Control Plan 2021 (DCP) design item (16), the manoeuvring diagrams should demonstrate that the longest vehicle to utilise the site is able to function in accordance with Austroads Standards (i.e. 36.5m PBS Level 3 type A vehicles). It is recommended that the plans be revised and demonstrate that the proposal satisfies the DCP.
- f. The design as proposed includes vehicle parking numbers that exceed the minimum required under the DCP. TfNSW is concerned that in exceeding the minimum required additional trip rates will increase and place increased pressure on the traffic systems and intersections. TfNSW recommends parking provisions should be in line with the DCP with a focus on Green travel to reduce the number of vehicle trips. If additional vehicle spaces are required further justification for the exceedance and the additional vehicle movements should be provided within the report.

## 5. Framework Sustainable Travel Plan

Please note that the following section is provided as a preliminary step to assist in subsequent staging of the required information. TfNSW would ask that you submit your updated STP, with sufficient time for TfNSW to review, prior to occupation.

TfNSW have reviewed the updated version of the Framework Sustainable Travel Plan (STP – version V dated 24 August 2022) which is included in the overall Transport Management & Accessibility Plan prepared by Ason Group.

Travel Plan Terminology: TfNSW would advise you change the name from *Framework Sustainable Travel Plan* (FSTP) to be called a Sustainable Transport Plan (STP) or Green Transport Plan (GTP) to ensure consistent terminology.

Shuttle bus: TfNSW recommend that, given the current lack of public and active transport in the area, the applicant should strongly consider use of shuttle buses basis to move workers to and from the nearest train station. This will be a viable way to move workers more sustainably. It is noted that there is a future METRO station proposed - Luddenham Station which will be located approximately 4km to the west of the site and will undoubtedly improve public transport accessibility to the wider area. This provides an opportunity for bus services (or shuttle buses) to combine with the METRO to improve connectivity to/from the residential areas to the site.

Bicycle parking and End of Trip (EoT) facilities: Bicycle parking is included in 7.3 of the Transport Management & Accessibility Plan, but should also be included in the STP. TfNSW appreciates there are 65 bicycle spaces for Warehouse 1 and 18 for Warehouse 4. TfNSW recommend that the bicycle parking be increased, to encourage more cycling use, particularly as the cycling infrastructure is improved in the future. TfNSW notes that only limited end of trip (EoT) are provided (one shower per warehouse with no mentions of lockers etc) and recommend that more EoT are provided to further encourage cycling as a viable mode of transport. This could include providing incentives for e-bikes for longer distances, and well as emerging micro mobility options. TfNSW recommend that this bicycle parking and any EoT be monitored over time to ensure sufficient supply to encourage active transport both to/from the site, for employees and visitors. Bicycle parking should be located at convenient locations, be safe, secured and under cover. Some further guidance on bicycle parking and end of trip facilities can be found in the [cycleway design toolkit](#).

Parking management: TfNSW request that you consider providing charging stations for EVs, and a parking management plan that prioritises use by staff on a needs basis to further reduce car use – this could include providing dedicated spaces for those who are carpooling / car sharing to encourage carpooling.

Mode share: TfNSW would ask that the mode share targets (Table 3 - preliminary 2026 mode share targets) are for both the short term and longer term (given the improvements in infrastructure and METRO and public transport connections. The proposed mode share of car as driver in 2026 is still 88% which is considered high – even given the more rural nature of the site – and mode share targets could be more ambitious if other more sustainable options are considered. This could include car pooling in the short term with a much larger increased in ‘car as passenger’ which remains at 3%.

Implementation Plan: TfNSW asks that the STP includes an implementation plan. The Implementation Plan should include all of the initiatives and incentives within the STP, timing and completion dates to ensure the overall effectiveness of the STP as an implementation strategy. Each part of the Implementation Plan should be managed overall by a Travel Plan Coordinator/Steering Committee. The Implementation Plan should:

- Identify the party or parties responsible for delivery and implementation of each element of the updated STP throughout various stages of the development lifecycle, including for its ongoing implementation, monitoring and review, for a period of at least 5 years post-OC;
- Be updated both on an annual basis, and when future transport services are upgraded.
- Include your current communication strategies and initiatives.

Travel Access Guide: TfNSW appreciates a TAG is provided (Appendix A) in the STP. We would ask that you provide employees and visitors additional information about service routes and timetables for buses and trains being available on Trip Planner at [transportnsw.info/](https://transportnsw.info/). The TAG should also include the following:

- Provide information on shuttle including proposed times for pick up and drop off from train stations and bus stops.
- Provide information on car share, car-pooling and priority parking for people that car pool.
- Once longer term pedestrian active and public transport infrastructure is in place, the TAG can promote these connections.
- Provide promotion of end of trip facilities, including any new cycling infrastructure available, and update number and location of bike parking facilities and End of Trip facilities, and locate on TAG.
- For further helpful information – please check this link [How to Create a Travel Access Guide doc here](#).
- We also would also discourage you from promoting car park areas on the TAG.

Travel Survey: TfNSW appreciates a short Travel Survey is provided in Appendix B, and advise the following additional steps. The survey will need to be distributed 3 months post-occupancy (this will need to be included in the proposed action strategies). Employees and visitors travel surveys should include questions to ask obtain workforce data analysis (including staff residential postcodes) to identify the actual staff travel origin and destination patterns, to inform strategies that help to encourage more sustainable transport choices to/from the site. The Travel Survey should be promoted and included in the implementation plan. The Travel Survey should also be promoting any initiatives or strategies that encourage sustainable transport routes.