

21 June 2022

asongroup

ESR Australia
Level 29, 20 Bond Street
Sydney NSW 2000

info@asongroup.com.au
+61 2 9083 6601
Suite 17.02, Level 17,
1 Castlereagh Street,
Sydney, NSW 2000
ABN: 81 168 423 872

Attn: Grace MacDonald; Senior Planner

**RE: Westlink Industrial Estate Mamre Road Precinct – SSD-9138102
Response to Submissions**

Dear Grace,

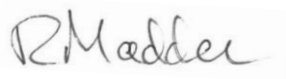
We refer to the relevant submissions received in relation to the aforementioned State Significant Development (SSD-9138102¹). Specifically, reference is made to the submissions by the Department for Planning and Environment (DPE, dated 11 April 2022), which requests further information in regard to the construction traffic generation.

It is reiterated that, prior to Conditions of Consent being, a program for construction cannot be finalised. Hence the preliminary nature of the Construction Traffic Management Plan (CTMP) provided with the submission. However, following discussions with DPE and the relevant land owners (during a meeting held on 11 May 2022), indicative construction traffic numbers have been provided to Ason Group for consideration in this assessment.

The table included in **Attachment 1** therefore provides a response to each the additional matter raised by DPE, with an indicative construction program provided as **Attachment 2**.

We trust this information is of assistance and please contact the undersigned should you have any further queries.

Yours sincerely,



Rebecca Butler-Madden

Senior Transport Planner

E rebecca.bmadden@asongroup.com.au

Attachments 1) Response to Agency Submissions
 2) Construction Traffic Staging

¹ <https://www.planningportal.nsw.gov.au/major-projects/projects/westlink-industrial-estate>

Attachment 1 – Agency Response Tables

TABLE 1: DEPARTMENT FOR PLANNING AND ENVIRONMENT

AG Ref	Agency Comment	Ason Group Response
1	A key consideration in the Mamre Road Precinct is the capacity of the regional and local road network (namely Mamre Road, Aldington Road and Abbots Road) to safely accommodate the number of concurrent developments in the precinct and to ensure the functionality of the roads and associated intersections are maintained at an acceptable standard and level of performance, including during the construction stages of these developments. Your project needs to adequately assess and demonstrate construction traffic can be accommodated to ensure safety, functionality and performance is maintained to acceptable standards. This includes daily construction traffic generation and movement times.	Daily construction traffic flows have been provided within the updated Preliminary CTMP (See Section 1.1 of the attached). Based on the information provided, it is anticipated that during the peak construction periods, there would be a total of 670 vehicle movements per day, which is significantly less than the traffic forecasted for the operational development (3,706 vehicle trips per day).
2	Your Environmental Impact Statement does not include an assessment of cumulative construction traffic impacts on the regional and local road network.	<p>Attachment 2 provides a cumulative assessment of construction traffic impacts, the methodology of which was discussed with DPE. The total cumulative traffic generation of the 3 LOG-E sites, alongside the road works, has been found to be as follows:</p> <ul style="list-style-type: none"> • 102 vehicle movements per hour in the AM peak; • 83 vehicle movements per hour in the PM peak; and • 754 daily vehicle movements. <p>Again this volume of traffic is significantly less than the traffic generation associated with the operational development for the Site. Therefore, outside of the scope of delivering the intersection works associated with the operational developments, as well as the required construction traffic control measures, no further mitigation measures are necessary.</p> <p>As new CTMPs are developed for subsequent stages / development, cumulative construction traffic assessments are to be conducted accordingly.</p> <p>The operational traffic flows associated with the development are as follows:</p> <ul style="list-style-type: none"> • 346 vehicle movements per hour in the AM peak; • 361 vehicle movements per hour in the PM peak; and • 4,376 daily vehicle movements.
3	You are requested to provide detailed information on proposed the staging and delivery of the construction of your development for consideration prior to determination of your application. This should include the timing of necessary external road upgrades as well as construction works on your site. Clarification is sought on what temporary road upgrades may be required to accommodate construction traffic.	Staging information is provided within Attachment 2. No temporary road upgrades are required to accommodate the construction traffic associated with the Site but rather the relevant traffic control measure would be implemented. It is note that the Mamre Road / Abbots Road intersection will need to be subject to temporary control during its upgrade to a signalised intersection. This will need to be subject to the relevant Works Authorisation Deed process with TfNSW (see Section 1.6 of Attachment 2).
4	Details on how construction traffic may impact on the delivery of road infrastructure in the precinct is required, particularly if these road infrastructure works are being undertaken at the same time your project will be generating construction traffic.	The preliminary construction program for the necessary road works has been considered in the cumulative impacts assessment detailed in Attachment 2.

<p>5</p>	<p>You are strongly encouraged to consult and coordinate with other landowners in the Mamre Road Precinct on the management of cumulative construction traffic from development sites within the Precinct and coordination with road upgrade works. Details of precinct-wide, coordinated traffic control measures (short and longer term), timeframes for commencing and completing construction works, traffic generation, consideration of other proposed developments and the potential overlap of works is required.</p>	<p>ESR Australia are currently part of the LOG-E working group, who are working on behalf of a number of developers on Aldington to lead the construction of the upgrades to Aldington Road. This would continue throughout the construction period until the road upgrades are delivered.</p> <p>Once the road upgrades are delivered, it is anticipated that there would be a further working group established, as a required by the Conditions of Consent associated with the recently approved SSD-10448² (located west of the Site). In this regard, Condition C34 states:</p> <p><i>Within three months of the commencement of construction of the Stage 1 Development and until all components of the Stage 1 development are constructed and operational, the Applicant must establish and participate in a working group with relevant consent holders in the MRP, to the satisfaction of the Planning Secretary. The purpose of the working group is to consult and coordinate construction works within the MRP to assist with managing and mitigating potential cumulative environmental impacts.</i></p>
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² <https://www.planningportal.nsw.gov.au/major-projects/projects/aspect-industrial-estate>

Attachment 2 – Construction Staging and Traffic Generation

12 April 2022



ESR Australia
Level 29, 20 Bond Street
Sydney NSW 2000

info@asongroup.com.au
+61 2 9083 6601
Suite 17.02, Level 17,
1 Castlereagh Street,
Sydney, NSW 2000
ABN: 81 168 423 872

Attn: Grace MacDonald; Senior Planner

**RE: Westlink Industrial Estate Mamre Road Precinct – SSD-9138102
Further Construction Traffic Information**

Dear Grace,

The following provides the additional information requested by the Department for Planning and Environment (DPE) in regard to the construction traffic generation associated with the development of the proposed Westlink Industrial Estate (the Site).

Specifically, the below considers the cumulative impact of construction of the Site, alongside delivery of the road and intersection upgrades proposed by the Land Owners Group East (LOG-E), who are represented by ESR Australia, Frasers Property Industrial (FPI) and Fife Capital.

It is noted that the below should be treated as preliminary, as construction is subject to securing the relevant authority approvals for each project, which will impact on the current anticipated timeframes. It is expected that the final Construction Traffic Management Plan (CTMP) will be implemented as part of a relevant Condition of Consent, which will be developed in construction with DPE, Transport for New South Wales (TfNSW) and Penrith City Council.

We refer to the current Conditions of Consent associated with the recently approved development at 788-882 Mamre Road, to the west of the Site (SSD-10448¹). The Conditions require landowners within the Mamre Road Precinct (MRP) to coordinate construction activities to ensure suitable management of construction traffic, it is expected that a similar Condition would be included for any approval associated with the Site. Therefore, alongside the other statutory approvals that are required to enable construction of development sites and road network upgrades, the relevant mechanisms are in place to ensure that construction activities are coordinated across the MRP.

Specifically, Condition C34 associated with SSD-10448 states:

Within three months of the commencement of construction of the Stage 1 Development and until all components of the Stage 1 development are constructed and operational, the Applicant must establish and participate in a working group with relevant consent holders in the MRP, to the satisfaction of the Planning Secretary. The purpose of the working group is to consult and coordinate construction works within the MRP to assist with managing and mitigating potential cumulative environmental impacts.

¹ <https://www.planningportal.nsw.gov.au/major-projects/projects/aspect-industrial-estate>

1.1 Overview of Works

1.1.1 Site Works

In advance of a Development Consent, the construction strategy and staging has not yet been finalised. However, preliminary advice from ESR Australia and a Contractor has been used to inform the potential staging of the development. Based on this, it is anticipated that construction works for the preliminary stages would commence in September 2022 and be completed over a duration between 12-18 months, subject to authority approvals and inclement weather delays.

The following summarises key aspects of the construction phases:

- Early works are set to have a duration for 8-12 weeks.
- Internal civil and site road works would continue for 13 months.
- General Construction works are estimated to continue for 13 months.

The preliminary construction staging is provided in **Table 1**.

TABLE 1: STAGING OVERVIEW

Stage	Early Works and Bulk Earthworks	Internal Road and Civil Works	Main Construction
Timeframe	3 months (September 2022 to November 2022)	13 months (September 2022 to October 2023)	13 months (November 2022 to November 2023)
Peak Workers On-site Numbers	50	60	150
Light Vehicle Movements / Day	94	70	300
Truck Movements / Day	500	600	560

1.1.2 Additional External Road and Intersection Works

It is noted that LOG-E, are working to deliver interim upgrades to the Aldington Road / Abbots Road corridor, as well as to the Mamre Road / Abbots Road intersection.

A preliminary programme and staging plan has been developed to inform the preliminary construction traffic information. It is noted that this will need to be updated at the at the time that all the relevant approvals have been gained from the relevant roads authorities to allow the road works to commence.

In considering the road upgrades, the staging suits various factors including:

- Maximising cut / fill site areas to ensure the project is utilising directly cut material to an area of the Site that requires fill material. This will minimise overall construction traffic as it does not require material to be transported to a staging compound area and be double handled to Site at a later date.

- Directly loading and hauling material off site that is not being utilised on the site. This minimises construction traffic by not hauling the material to a staging yard to be re-loaded at a future date to be disposed of off-site.
- Providing maximum work area possible whilst maintaining two-way traffic on the roadways, this strategy will minimise the overall project duration.
- Relocating utilities as early as possible to ensure efficient work areas are available to the subsequent work activities.
- Maintaining at all times access to existing properties along the alignment.

Error! Reference source not found. **Table 2** details the proposed staging. It has been developed to incorporate the previously defined staging considerations. This is subject to change following detailed design and engagement of the roadworks contractor however the overriding principle of minimising construction traffic volumes whilst maintaining constant 2-way traffic flow on the roads.

TABLE 2: INTERSECTION WORKS STAGING OVERVIEW			
Stage	Name	Description	Approximate Timing
1	Utility Relocations	<p>Utility relocations will be undertaken along the full alignment of the works during this stage. The relocations consist of electrical assets being moved from overhead to underground, water assets being relocated behind the new kerb line, communication assets being relocated from overhead to underground behind the new kerb line.</p> <p>These works will be undertaken in a combination of day shift (primarily) and during approved out of hours periods where required, to minimise disruption to the local consumers.</p> <p>The works will be undertaken where possible behind concrete barriers, and where this is not possible under traffic management utilising approved Road Occupancy Licenses via the road authority.</p> <p>This stage will run concurrently with other stages as the works progress.</p>	6 Months (April 2023 to September 2023)
2.1	Abbotts Rd – Southern Carriageway, Mamre Rd Southbound Carriageway	<p>Construct temporary pavement where required, realign traffic, construct half road width. These works will be a combination of interim works and ultimate works.</p> <p>During this stage, there will be a temporary intersection established via an approval pathway with the road authority to better control the traffic flow at the intersection.</p> <p>During these works, the existing configuration of the Mamre Road / Abbotts Road intersection is maintained. All access to residential properties is maintained. The construction contractor will directly co-ordinate with the residential properties to agree access conditions.</p>	3 Months (June 2023 to August 2023)
2.2	Abbotts Rd – Northern Carriageway, Mamre Rd Northbound Carriageway	<p>Traffic is realigned to the newly constructed pavement, construct half road width. These works will be a combination of interim works and ultimate works.</p> <p>During this stage, there will be a temporary intersection established via approval pathway with the road authority to better control the traffic flow in the intersection.</p> <p>During these works, the existing configuration of the Mamre Road / Abbotts Road intersection is maintained. All access to residential properties is maintained. The construction contractor will directly co-ordinate with the residential properties to agree access conditions.</p>	3 Months (September 2023 to November 2023)
2.3	Abbotts Rd / Mamre Rd Completion Works	<p>During this stage, any works that were not possible to be constructed in stage 2.1 and 2.2 will be constructed. Completion works will also include pavement wearing course works which will be primarily completed during nights under traffic management.</p> <p>Traffic signals for both the Mamre Road / Abbotts Road and Abbotts Road / Aldington Road intersections will be commissioned during this stage. Permanent Linemarking will be the final step in this stage with a handover to the road authority signalling the completion of both Mamre Road / Abbotts Road intersection and Abbotts Road upgrade.</p>	2 Months (December 2023 to January 2024)

3.1	Aldington Rd Southbound / Aldington Rd Northbound	Construct temporary pavement where required, realign traffic, construct half road width. These works will be a combination of interim works and ultimate works. During this stage, all access to residential properties is maintained. The construction contractor will directly co-ordinate with the residential properties to agree access conditions.	3 Months (June 2023 to August 2023)
3.2	Aldington Rd Northbound / Aldington Rd Southbound	Traffic is realigned to the newly constructed pavement, and construction of the remaining half road width is completed. These works will be a combination of interim works and ultimate works. During this stage, all access to residential properties is maintained. The construction contractor will directly co-ordinate with the residential properties to agree access conditions.	3 Months (September 2023 to November 2023)
3.3	Aldington Rd Northbound / Aldington Rd Southbound	During this stage, any works that were not possible to be constructed in stage 3.1 and 3.2 will be constructed. Completion works will also include pavement wearing course works which will be primarily completed during nights under traffic management. Permanent Linemarking will be the final step in this stage with a handover to the road authority signalling the completion of both Mamre Rd / Abbots intersection and Abbots Rd upgrade	2 Months (December 2023 to January 2024)

1.2 Construction Traffic Generation

1.2.1 Site Peak

Based on the staging, as shown in Table 1, the peak cumulative construction period for the Site would be during the month of November 2022, when all 3 stages of construction would overlap. Based on the expected staff shift patterns and delivery requirements, the peak hour traffic generated during this period would be as follows.

- 42 light vehicle movements and 16 heavy vehicle movements per hour in the AM peak; and
- 45 light vehicle movements and 12 heavy vehicle movements per hour in the PM peak.

Based on the proposed staging of construction works for the Site, **Table 4** compares the peak construction traffic generation to the operational traffic generation assessed within the traffic report supporting the development (Ason Group reference: 1323r04).

As shown the traffic associated with construction is significantly lower than that assessed for the operational development.

TABLE 3: SITE PEAK CONSTRUCTION TRAFFIC VS DEVELOPMENT TRAFFIC

Vehicle	Construction			Operational			Difference		
	AM	PM	Daily	AM	PM	Daily	AM	PM	Daily
Light	42	45	474	253	264	3,194	-211	-218	-2,720
Heavy	16	12	196	93	97	1,182	-77	-85	-985
Total	58	57	670	346	361	4,376	-288	-304	-3,706

The vehicle access routes will see all construction traffic access the Site by the way of Mamre Road / Abbots Road intersection. Vehicles are to enter from the north (left-in at Abbots Road) and exit to the south (left-out at Abbots Road). It is noted that this intersection is already subject to a right turn ban during the

peak periods. Therefore, prior to the additional traffic control which will be in place at the intersection during the intersection upgrade work (which are due to commence in June 2023), it is anticipated that the intersection would continue to operate in a similar fashion to the existing conditions.

Further, the design of the existing intersection provides for tapers at the entry and exit which will allow heavy vehicles to be removed from through flows on Mamre Road when conducting the necessary turn manoeuvres.

1.2.2 Cumulative Construction Traffic – Site Works plus Road and Intersection Works

As noted above, at such a time that the intersection works will commence, a temporary intersection will be established via an approval pathway with the relevant road authority to control the traffic flow. Further consideration to the operation of the intersection will be provided during the relevant Works Authorisation Deed process required prior to the commencement of works.

When considering the cumulative impacts of the road / intersection works and the Site construction traffic, the peak period would be during June 2023. **Table 4** compares the peak construction traffic generation during this period to the operational traffic generation of the development.

As shown the traffic associated with construction would remain significantly lower than that assessed for the operational development.

Additional traffic control would be in place at this stage following provision of a temporary intersection, which is subject to the relevant road authority approval process.

TABLE 4: PEAK CONTRSRUCTION TRAFFIC VS DEVELOPMENT TRAFFIC

Vehicle	Construction			Operational			Difference		
	AM	PM	Daily	AM	PM	Daily	AM	PM	Daily
Light	75	75	500	253	264	3,194	-178	-188	-2,694
Heavy	27	8	254	93	97	1,182	-66.42	-89	-927
Total	102	83	754	346	361	4,376	-244	-278	-3,622

1.3 Cumulative Traffic Assessment

In addition to the road works being undertaken at the same time as the Site construction, it is also expected that the other landowners in LOG-E will also be undertaking construction works at a similar time. Preliminary construction staging and traffic generation numbers have been provided by these parties to inform this assessment. The relevant sites are:

- The Fife Capital site at 200 Aldington Road (200 Aldington), SSD-10479²;
- The FPI site at 99-111 Aldington Road (FPI North); and
- The FPI site at 155-217 Aldington Rd (FPI South), SSD-17552047³).

² <https://www.planningportal.nsw.gov.au/major-projects/projects/200-aldington-road-industrial-estate>

³ <https://www.planningportal.nsw.gov.au/major-projects/projects/155-217-aldington-road-estate>

Table 5 summarises the relevant time for each construction activities on each site.

TABLE 5: CONSTRUCTION TIMEFRAMES

Site	Estimated Commencement	Estimated Completion	Time
Subject Site	September 2022	November 2023	15 Months
Road Works	April 2023	January 2024	10 Months
200 Aldington	August 2022	October 2023	15 Months
FPI North	May 2023	August 2024	15 Months
FPI South	November 2023	March 2025	17 Months

The construction traffic forecasts for each site provided have been overlaid to establish the peak *cumulative* construction period, with the peak flows provided in Table 6. The peak period for construction is anticipated to be during June 2023, when additional traffic control will already be in place at the Mamre Road / Abbots Road intersection.

As part of the relevant approvals process for the road and intersection works, the below volume of traffic will be considered. However, through the relevant traffic control measures which are required under the TfNSW Traffic Control at Work Sites Technical Manual (Issue No. 6.1, Feb 2022) would ensure that the impact to the safety and efficiency of the road network is minimised during this period.

TABLE 6: PEAK CUMULATIVE TRAFFIC MOVEMENTS

Site	AM	PM	Daily
Subject Site	46	38	544
Road Works	18	15	70
200 Aldington	35	35	271
FPI North	76	19	15
FPI South*	0	0	0
Total	118	103	830

*Construction on FPI South is not due to commence until November 2023, after the June 2023 peak cumulative period.

1.4 Road Occupancy License

For any works that will impact the traffic flows on the external road network, a permit will need to be obtained from the relevant road authority (Council and / or TfNSW) by the Contractor.

Any Road Occupancy License (ROL) would need to ensure that the impact of construction activities on the efficiency of the road network is minimised. It provides another method for direct communication of construction activities to the road authorities and allows for further coordination of possibly conflicting demands on the road network.

1.5 Traffic Control

A site-specific Traffic Guidance Scheme (TGS) must be developed where the road environment is temporarily changed. Therefore, any temporary access to the Site, as well as the road works themselves, will need to be subject to a TGS. Further, it should be noted that an accredited Traffic Controller shall be on-site to supervise construction vehicles passing general traffic.

In regard to the external road and intersection works, the Construction Contractor will have a traffic management team who will ensure the relevant CTMP is effectively implemented. The CTMP will document how the below items will be managed throughout the works:

- Resident access – resident access will be constantly maintained throughout the works. There will be times when access will be impeded, however this will be managed through direct consultation with the resident by the contractor to ensure a positive outcome is achieved for both the resident and the project. Examples of this would be, constructing 50% of the driveways at a time to maintain access.
- Temporary signage – Temporary signage plans will be developed by suitably qualified traffic engineers for each stage of the project. These plans will identify resident driveways, construction access gates, temporary linemarking and lane configurations. These plans will utilise swept path analysis to ensure that satisfactory access is always maintained for the required vehicles throughout the works.
- Vehicle Management Plan – The CTMP will document the VMP for each stage of the works. The VMP will outline construction traffic routes, entry gates and exit gates, truck turning bays and speed limits within the area. The VMP will outline that there is to be no access for construction traffic along Bakers Lane.

1.6 Works Authorisation Deed

As well as the ROLs and TGSs that need to be approved and implemented, a Works Authorisation Deed (WAD) will also need to be agreed with TfNSW for the delivery of the signalised intersection. Part of the WAD will be to ensure that impacts to road users is minimised during construction and to ensure that works are completed in a safe and timely fashion.

Through the WAD process, TfNSW will provide LOG-E with the requirements and conditions under which the intersection can be delivered. It is another approvals process whereby cumulative impacts will be considered.

We trust this information is of assistance and please contact the undersigned should you have any further queries.

Yours sincerely,



Rebecca Butler-Madden

Senior Transport Planner

E rebecca.bmadden@asongroup.com.au