



18 December 2020

TfNSW Reference: SYD19/01363/05
DPIE ref: SF20/103212

Ms Jane Grose
Director, Central (Western)
Greater Sydney, Place and Infrastructure
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124
Attention: Melissa Rassack

Dear Ms Grose,

EXHIBITION OF THE DRAFT MAMRE ROAD PRECINCT DEVELOPMENT CONTROL PLAN

Transport for NSW (TfNSW) appreciates the opportunity to provide comment on the above proposal referred to us by the Department of Planning, Industry & Environment (DPIE) in correspondence dated 10 November 2020.

TfNSW has reviewed the submitted documentation and notes that the Development Control Plan (DCP) seeks to provide additional objectives, controls and guidance to applicants proposing to undertake development in the Mamre Road Precinct, and to guide the assessment of Development Applications (DAs).

Detailed comments on the draft Development Control Plan are provided at **Attachment A** which we recommend are addressed prior to the finalisation of the Development Control Plan.

Thank you for the opportunity to provide advice on the subject planning proposal. Should you have any questions or further enquiries in relation to this matter, Mina Ghanbarikarekani would be pleased to take your call on phone (02) 8849 2702 or email: development.sydney@transport.nsw.gov.au

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Cheramie Marsden'.

Cheramie Marsden
Senior Manager Strategic Land Use
Land Use, Networks and Development, Greater Sydney

**Attachment A: TfNSW detailed comments on draft Mamre Road Precinct
Development Control Plan**
(December 2020)

Freight Access

- References to 26m long B-double (PBS level 2 type B) - The NSW Heavy Vehicle Access Policy Framework identifies 30 metre PBS Level 2B Vehicles as the next PBS vehicle to be permitted wider access on NSW roads. This should be the design vehicle for the precinct. The reference vehicle in the DCP is also confusing as a 26m B-double is a PBS 2A vehicle. All references to this should be replaced with 30m PBS Level 2 Type B.
- References to 36m long B triple (PBS Level 3 Type A) - When referring to PBS vehicles, avoid reference to specific combinations like b-triples. Also a PBS 3A vehicle is 36.5m long, not 36m. All references to this should be replaced with 36.5m PBS Level 3 Type A.
- Page 51 states that Industrial roads are to achieve the following performance objectives: *Provide dedicated on-street parking on both sides of the road.* It is unclear why this performance objective is required. Every industrial development should provide adequate on-site parking for light and heavy vehicles and should not rely on the public road system for development parking and service vehicle demands.
- Regarding the integrated freight network at Section 4.3 Clauses (6) and (8), TfNSW recommends the removal of Cl(6) and leave Cl(8) as is: “(8) *All fire compliant access roads are to be a minimum of 8.0m wide to safeguard for a precinct-wide integrated freight network unless development applications can demonstrate how an integrated freight network can be safeguarded within their development.*”

Network Development and Safety

- Section 3.4.1 Objectives should emphasise that minimising points of conflict along Mamre Road is imperative.
- Section 3.4.1 Objectives should emphasise that safe and efficient access to Mamre Road is required for all road users (light vehicles, heavy vehicles, pedestrians, cyclists etc.). However, vehicular access is to be obtained via the local road network wherever possible. Direct vehicular access points to Mamre Road are to be avoided.
- Section 3.4.1 Objectives: consideration should be given to adding ‘to create a road network that is future proofed for potential upgrades’.
- Section 3.4.1 – Control #9: heavy vehicles are not to traverse through Bakers Lane especially along the vicinity of the existing school.
- Section 3.4.1 Road design: sealed shoulders should be considered in order to cater for broken down vehicles, incident response etc.
- Section 3.4.2 Objective B: promote and facilitate the use of Active and Public Transport.
- Section 3.4.3 Table 9: adequate width for shoulders should be provided to cater for broken down heavy vehicles and incident response, while still allowing through traffic to traverse the road.
- Section 4.7.1 Control 16: all vehicles must be able to enter/exit the site in a forward facing direction only, without the need to do a three-point turn or more. Turnaround areas must be provided within the site and be kept clear at all times.

- Section 4.7.1 or 4.7.3 Controls: Design of vehicular access/driveways must consider/include swept path assessment of the largest vehicle that will access a particular site.
- Section 4.7.3 Control 4 – consider the following points:
 - Direct access across the boundary with a major road is to be avoided wherever possible.
 - Auxiliary lanes, (deceleration and acceleration lanes), may need to be provided to minimise conflicts between entering / leaving traffic and fast moving through traffic. In many cases, right turn movements into a site may need to be banned, unless an exclusive right turn bay is provided.
 - When locating driveway access near intersections, refer to AS2890.1: *Off-Street Car Parking for further information on the positioning of driveways from intersections.*
 - Fencing and landscaping should not obstruct driver sightlines to/from other road users.
- Section 4.7.3 General Requirements – consider the following points:
 - Where possible, avoid positioning driveways with high traffic volumes in the following locations:
 - on major roads.
 - close to intersections.
 - opposite other developments generating a large amount of traffic (unless separated by a median).
 - where there is a heavy and constant pedestrian movement along the footpath.
 - where right turning traffic entering the facility may obstruct through traffic.
 - where traffic using the driveways interferes with or blocks the operations of bus stops, taxi ranks, loading zones or pedestrian crossings.
- Page 28: To mitigate any overland flow on Mamre Road, the precinct's Trunk Drainage needs to build for the capacity of Flood Event 1% AEP, and the outlet flow needs to be managed so that it is similar to the inlet capacity of the drainage infrastructure of Mamre Road.
- Page 48, 53: The Road Network needs to align with the access strategy of the proposed Mamre Road Upgrade strategic design.
- Page 49: It is recommended that point 5 is amended to “Upgrading of Mamre Road shall be undertaken to accommodate the overall road network needs and the increase in the traffic generated by this development.”
- Page 53: Figure 14: Potential signalised intersections must be determined based on the traffic modelling outcomes and with consideration to the overarching access strategy and traffic signal warrants. Those shown in Figure 14 are not in line with the current Mamre Upgrade Strategic design. It should be noted that any proposed traffic signals (on any road) requires TfNSW approval under Section 87 of the *Roads Act, 1993*. The installation of new traffic signals is subject to the intersections meeting the warrants as outlined under Section 2 (Warrants) of the former RMS *Traffic Signal Design Manual*. It should be noted that even if the site satisfies the warrants, it does not necessarily mean that traffic signals are the best solution. All traffic data should be analysed and alternative treatments considered to determine the optimum treatment. Intersection modelling in SIDRA would be required for proposed treatments to demonstrate satisfactory operation and determine design requirements.

Transport Planning

- Section 3 - Precinct and Subdivision Design, Band 3.4.2 - Traffic and Transport Assessments, Studies and Plans:
 - Control 1 should be removed. This control is redundant to Control 2, and could be confusing.
 - Control 2 needs to be modified as follows: “Development applications for major development proposals should be accompanied by an appropriate Traffic and Transport Report. The Traffic and Transport Report should include a Green Travel Plan and Travel Access Guide, and detail the assessed impact of projected pedestrian and vehicular traffic associated with the proposal, with recommendations on the extent and nature of the traffic facilities necessary to preserve or improve the safety and efficiency of the adjacent road system.

- Regarding Section 3 - Precinct and Subdivision Design, Band 3.4.4 – Public Transport, Pedestrian and Cycle Network, the following Bicycle parking (and associated facilities) requirements should be included:
 - 21) Commercial Premises (over 1200m² GFA) will provide 1 space per 600m² (GFA) for staff. Developments with a gross floor area over 2500m² will provide end of destination facilities for staff in the form of at least 1 shower cubicle with ancillary change rooms.
 - 22) Industrial Developments (over 2000m² GFA) will provide 1 space per 1000m² (GFA) for staff. Developments with a gross floor area over 4000m² should provide end of destination facilities for staff in the form of at least 1 shower cubicle with ancillary change rooms.

- Section 4 - Access and Parking, Band 4.7.1 – Parking:
 - Table 12. Minimum parking rates – Bicycle Parking Requirement – see above, as per Section 3.4.4, Controls 21 and 22.
 - The clause: “~~Bicycle parking in accordance with the suggested bicycle parking provision rates for different land use types in the document ‘Planning Guidelines for Walking and Cycling’ (NSW Government 2004)~~” needs to be removed. Bicycle parking spaces should comply with AS2890.3:1993 Bicycle Parking Facilities.

- Pedestrian sections of the DCP could also reference TfNSW’s 2020 publication *Walking Space Guide - Towards Pedestrian Comfort and Safety*.