



26 August 2021

Our Reference: SYD21/00989/01
Departments Reference: DA 9876

Michelle Niles
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Niles

**EXHIBITION OF SEE - PENRITH LAKES EMPLOYMENT LANDS SUBDIVISION AND WORKS
- 14-278 CASTLEREAGH ROAD, CASTLEREAGH**

Reference is made to the Department's referral dated 13 August 2021 with regard to the abovementioned Development Application (DA), which was referred to Transport for NSW (TfNSW) Services for comments.

The proposal seeks development approval for the for Torrens title subdivision (3 lots into 93, with 4 residual lots), earthworks, roads, stormwater infrastructure and landscaping under section 4.15 of the Environmental Planning and Assessment Act (EP&A Act). The DA sets out the concept proposal, establishes the framework for future development and Stage 1 -5 works for the proposed Nepean Business Park.

TfNSW notes the subject DA envisages up to 4,000 operational jobs on the Employment zoned land.

It appears that a Satisfactory Arrangements Clause (SAC) and Development Control Plan (DCP) requirement clause in the Penrith Lakes SEPP apply to the site; we understand the development is required to address these.

The DCP clause requires (among other matters) *“(a) a staging plan for the timely and efficient release of urban land, making provision for necessary infrastructure and sequencing, and (b) an overall transport movement hierarchy showing the major circulation routes and connections to achieve a simple and safe movement system for private vehicles, public transport, pedestrians and cyclists.”*

The SAC Clause requires that *“(2) Development consent must not be granted for the subdivision of land in an urban release area unless the Planning Secretary has certified in writing to the consent authority that satisfactory arrangements have been made to contribute to the provision of designated State public infrastructure in relation to that land.”* and **“designated State public infrastructure means public facilities or services that are provided or financed by the State (or, if**

provided or financed by the private sector, to the extent of any financial or in-kind contribution by the State) of the following kinds—

- (a) State and regional roads,*
- (b) bus interchanges and bus lanes...*

Further to this, Clause 22 of the Penrith Lakes SEPP states:

22 Development on land zoned Employment

Development consent must not be granted for development on land zoned Employment unless the consent authority has considered the following...

- (c) a traffic and transportation plan that includes proposals about the management of traffic impacts caused by the development..."*

TfNSW has reviewed the documentation in support of the proposal and does not provide support at this time. TfNSW comments and recommendations are provided in **Attachment A**.

Following receipt of the requested information, TfNSW will complete its assessment and advise its support (or) otherwise. Further information may be requested following completion of the review.

If you have any further questions, Ms Laura van Putten would be pleased to take your call on (02) 8849 2480 or please email development.sydney@rms.nsw.gov.au. I hope this has been of assistance.

Yours sincerely



Pahee Rathan

A/Senior Manager Land Use Assessment West & Central

Attachment A

Transport Study

1. Comment

The proposed development should be supported by a transport study to identify the cumulative traffic impacts and mitigation measures to support the development, and an infrastructure implementation plan. TfNSW is of the view that a cumulative impact assessment needs to be undertaken to assess the impacts of the full development uplift envisaged for the Penrith Lakes site in order to address the DCP and SAC requirements as the infrastructure requirements may be cost-prohibitive and development may need to be capped at a sustainable level.

It is recommended that an assessment is undertaken of the forecast impacts on traffic volume generated on road safety and capacity of road network including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model as prescribed by TfNSW. This is to include the identification and consideration of approved and proposed developments/planning proposals/road upgrades in the vicinity. This should also include a midblock Volume Capacity Ratio assessment on Castlereagh Road as well as modelling of key intersections on the surrounding road network. The assessment needs to consider the impact on Castlereagh Road for the duration of the works because traffic growth in this area is expected to increase more quickly than standard growth rates.

2. Comment

TfNSW raises concerns to the Department with regard to the adopted trip generation rate. The adopted trip generation rate for this development of 0.2 vehicle trips per hour (vtph) per 100m² of GFA for the AM and PM network peaks is considered very low.

The Employment zoned land permits significant traffic generating uses which have not been considered in the assessment to date. This may include Business premises; Food and drink premises; Function centres; Garden centres; Hardware and building supplies; Markets; Office premises. These may generate significantly higher traffic demands if pursued in future Development Applications.

3. Comment

TfNSW currently has no funding commitment in its forward works program to upgrade Castlereagh Road north of Museum Drive. The developer would be responsible for delivering upgrades to mitigate the traffic impacts of the development. The upgrades will likely require third party land acquisition in order to be delivered. Question is raised as to whether the upgrades to support this level of development would be feasible from a cost perspective, and whether the works are constructible noting that third party land would need to be acquired by the developer. The developer would need to demonstrate that they have legal agreements in place to acquire any third party land required to facilitate the upgrades to support the development.

4. Comment

The Transport Study should address measures to ameliorate any adverse traffic and transport impacts due to the development based on the above analysis, including:

- i. travel demand management programs to increase sustainable transport (such as a Green Travel Plan);

Construction traffic impacts:

5. Comment

TfNSW notes that the report identifies 1,500 direct jobs during construction. In this regard the preparation of a preliminary Construction Pedestrian and Traffic Management Plan (CPTMP) to demonstrate the proposed management of the impact in relation to construction traffic addressing the following is to be provided for review:

- ii. assessment of cumulative impacts associated with other construction activities (if any);
- iii. an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity;
- iv. details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process;
- v. details of anticipated peak hour and daily construction vehicle movements to and from the site;
- vi. details of on-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle;
- vii. details of temporary cycling and pedestrian access during construction.

Operational traffic impacts:

6. Comment

We note that an amendment to the SEPP is also currently on exhibition which proposes additional permitted uses on the land which would allow for a film production development with up to 2,000 operational jobs on the site. This combined with the 4,000 jobs envisaged under the subject DA cannot be supported by the existing road and transport network. Infrastructure to support the cumulative traffic demands from the Penrith Lakes site (6,000+ jobs) is likely to be cost-prohibitive due to third party land acquisition required to facilitate mid-block road and intersection upgrades required. The overall proposed yield needs to be assessed and capped at a sustainable level prior to individual developments being approved across the site.

7. Comment

We note that the subject DA may generate up to 4,000 jobs on the site post-construction. Based on a first principles assessment of the vehicle trip generation potential, this has the potential to generate upwards of 3,500 veh trips per hour in weekday peaks. This may generate over 1,500vtph in each direction on Castlereagh Road. This development alone may warrant the need for an additional lane in each direction on Castlereagh Road to cater

for the development trips. Furthermore, this demand would require upgrades to a number of intersections on the surrounding road network.

Pedestrian Infrastructure

8. Comment

While the application did advise of the construction of footpath on all verges and shared path on southern side of Lugard Street, the report did not indicate if this is within the development land or if it would link up to Castlereagh Road. TfNSW would encourage the developer to consider linking the new foot and shared path onto Castlereagh Road's shared path network to encourage customers from this development to use active transport as their mode of transport.

It is further suggested that the developer to consider the upgrade of the Castlereagh Road/Lugard Street intersection to include a pedestrian/cyclist crossing on the southern leg, especially if the developer plans to install shared path on the southern side of Lugard Street.

There are currently no footpaths linking to the bus stop adjacent to Lugard Street along the northbound direction of Castlereagh Road (Stop ID: 2750449). We would encourage the developer to consider installing a footpath from Lugard Street to this bus stop to encourage and improve customers experience to use public transport as their mode of transport to access this site. We would also encourage the developer to consider upgrading this bus top and the opposite bus stop (Stop ID: 2750450) with improve bus stop facilities such as shelter and seating.

Flood impacts:

9. Comment

The Penrith Lakes precinct is situated in the Hawkesbury-Nepean floodplain and immediately adjacent to the Nepean River, with a high flood risk with widespread extent and depth of inundation. Expanding urban development across the Hawkesbury-Nepean Valley means that flood exposure will increase in the future, and so growth will need to be carefully managed in the Valley to reduce the flood risk. The impact of the proposed development on the cumulative evacuation task should be assessed to ensure that the proposal does not result in increased risk to life during a flood evacuation. As flood evacuation will predominantly be by private vehicles, the capacity of the road network to cater for flood evacuation events should be carefully considered. To assess the impacts of the proposed development, information for pre and post-development scenarios including modelling of the local overland flows are to be provided to allow assessment of the impact of the development.