Transport
Roads & Maritime
Services

Our ref: STH09/01095/17
Contact: Andrew Lissenden
Your ref: MP09_0131 MOD 1

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BY EMAIL: information@planning.nsw.gov.au

TALLAWARRA LANDS MIXED USE DEVELOPMENT (MP09_0131 MOD 1) – RESPONSE TO SUBMISSIONS

Dear Michelle,

Roads and Maritime Services (RMS) refers to the proponents Response to Submissions (RtS) relating to the above modification that has been forwarded to RMS for comment.

RMS has reviewed the information provided and apologies for the delay in providing its formal comments. RMS' review has focused on the impact to the state road network. RMS as a result of its review/assessment notes the following:

- For this development, the key state road is the Princes Highway;
- The modification (as amended) seeks to:
    - Increase the density of development within the northern and central portion of the site (i.e. increase in the residential and industrial footprints as well as reduce the opens space, commercial and retail footprints);
    - Increase the maximum number of residential lots from 1,010 lots to 1,310 lots (previously the increase was to 1,480 lots). This to occur within the northern and central precincts;
    - Separate the northern and central precincts of the concept approval from the southern precinct; and
    - Amend a number of conditions some of which relate to infrastructure upgrades and state public infrastructure provision;
- RMS is currently undertaking works relating to the extension of the M1 Princes Motorway between Yallah and Oak Flats to bypass Albion Park Rail (i.e. the Albion Park Rail bypass project). Part of the extension works that are being undertaken adjoin the western boundary of the development site; and
- RMS has previously provided advice to the proponent's consultant Cardno on the proposed modification prior to its formal lodgement (RMS letter dated 14 September 2017). Advice has also been provided to the Department of Planning and Environment (DP&E) as part of the proposals public exhibition (RMS letter dated 15 August 2018 and email dated 11 September 2018).

Having regard for the above RMS advises that it still has concerns with the proposal as currently provided for comment. More detailed comments are provided in **Attachment 1** to this letter.

RMS again requests that the determination of the modification request not occur until the proponent has amended the current application to addresses the issues detailed in **Attachment 1**. This ensuring that the modification, if approved, has minimal impacts on the state road network and correctly reflects the works required to be provided by the developer as part of any future development applications lodged.

If you have any questions please contact Andrew Lissenden on 4221 2769.

RMS notes that Transport for NSW has provided separate comments to DP&E in relation to the submitted RtS in relation to bus routes, active transport infrastructure and public transport capable infrastructure.

Please ensure that any further email correspondence is sent to 'development.southern@rms.nsw.gov.au'.

Yours sincerely

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- **Issues to be Addressed:**

  - *Traffic Impact Assessment/Modelling:* RMS from reviewing the updated *Traffic Impact Assessment* (TIA) prepared by Cardno (Job Ref: 8201714202, Version 04, dated 18 April 2019) provides the following comments:

    - The modelling provided in the updated TIA appears to be based on 1,144 proposed lots. The submitted RtS details a lot yield of 1,310 proposed lots (although the figure of 1,320 is also used). It is unclear as to why there is a difference between the lot yields in the TIA and RtS. As such, RMS seeks clarification as to what the correct lot yield is and if the yield in the TIA is incorrect the associated modelling should be updated to reflect the correct yield;
    - The modelling provided indicates that a Level of Service (Los) D will be provided in the AM and PM peak period for the southbound offload. This appears to be due to the fact that the TIA has not modelled a signalised roundabout (eastern roundabout) which RMS has determined is required in 2041. Refer to **Attachment 2** for additional details;
    - RMS disagrees with the conclusion in the TIA that a LoS D is ok. RMS' capacity requirement has always been a LoS C or better. As such, additional details are required on how the proposed development will provide a LoS C or better;
    - It is RMS' understanding that the current Tallawarra Lands Concept Plan approval requires the proponent to upgrade the Yallah Bay Road and Princes Highway intersection. RMS seeks confirmation that this still will be undertaken as part of the approved development. It is unclear to RMS how this intersection will be able to perform at a satisfactory LoS without some changes to its configuration. This should be modelled by the proponent with and required changes being clearly detailed;
    - The increased traffic yield scenarios in the TIA have been modelled with a Haywood Bay link in place, whereas the scenarios within the approve development yield do not appear to have been. As such, any approval for an additional lot yield, as currently sought, should ensure that the Haywards Bay link/connection is provided and should not be deferred until the Lakeside/Southern Precinct is develop. Additional comments on the issue of 'Connectivity' are provided in a separate point below; and
    - RMS is unclear as to how some of the Traffic Impact Assessment/Modelling issues detailed in its response dated 15 August 2018 have been addressed in the RtS and the updated TIA that has been submitted (refer to **Attachment 3** – yellow highlighted sections).

  - *Noise Mitigation:* As the average annual daily traffic (AADT) along the adjoining section of the Princes Highway is greater than 20,000 vehicles per day, RMS acknowledges that appropriate measures must be identified that will ensure noise levels as specified in Clause 102 of *State Environmental Policy (Infrastructure) 2007* are not exceeded. RMS from reviewing the updated Noise Assessment prepared by Pacific Environmental (Doc No. ACO-NSW-000-21909, Version I, dated 26.10.2018) still has concerns that the updated report only mentions treatment of future receivers by way of architectural treatment. There is no mention of considering noise walls which are preferred as they provide noise reduction for both the external and internal areas.

    In addition, concern is raised in regards to the mapped zones for acceptable areas (refer to Figure 8.1 in Section 8). The updated report shows a "Provisional Zone" (in orange) where mechanical ventilation and upgraded façade elements such as windows, doors and roof insulation may be required. It is however acknowledged that it does set the area where noise mitigation would be considered. RMS believes that the area shown is indicative only and as such some additional wording should be added to this figure advising that this zone is only indicative and that further investigation

would be required at the detailed design stage of Tallawarra Lands to determine the extent of the area where noise mitigation would be considered/required.

RMS maintains its position that the responsibility for noise mitigation lies with the developer when approval for the road project is determined prior to the approval for the construction of the dwelling (as is the current situation). As has been previously advised the approval for a sub-division is not enough to relinquish responsibility of noise mitigation for the developer. Only if the developer has approval for the construction of the dwelling prior to the determination of the road project then RMS would be responsible for mitigation and this would depend on the stage of construction for the dwelling. Noise mitigation by way of the hierarchy outlined in EPA's "*Road Noise Policy*" would be provided when the dwelling has already been constructed however in the situation where construction has not commenced then RMS' obligation is to provide at-source mitigation assuming a single storey residence (Practice Note 2 of RMS' "Environmental Noise Management Manual".

Having regard for the above the Albion Park Rail Bypass project would not be responsible for noise mitigation for the Tallawarra Lands Concept Plan Approval Modification. It is up to the determining authority/DP&E to ensure that the relevant requirements (e.g. *Development Near Rail Corridors and Busy Roads – Interim Guideline*) are adhered to.

- *Connectivity:* RMS notes that the RtS still seeks to separate the northern and central precincts from the southern precinct, which is currently owned by a different land owner, however forms part of the same major project approval.

  RMS maintains its objection to this split and that connectivity of the development, as approved, to Haywards Bay that adjoins the southern boundary of the site is vital to minimise local trips on the state road network. As such, from a network perspective it is important that this link is provided prior to the creation/registration of the neighbourhood centre land and industrial land which are employment generating and will provide services and employment opportunities to the communities that exist to the south (i.e. Haywards Bay). This connectivity ensuring suburbs are appropriately connected. Without this link, local trips between Haywards Bay and Tallawarra will need to be made via the Princes Motorway and Princes Highway which is considered inappropriate. Connected neighbourhoods are also desirable from a comprehensive bus network perspective and given the focus required on alternative modes of transport it is considered that this link should be provided as part of the creation of the employment lands in the central precinct. Given the proposed lot layout the majority of traffic that would use this link would be residential traffic rather than heavy vehicles as the commercial and industrial precincts have more convenient access to the freeway/highway. RMS does not accept the proponent's position that "*this road corridor will not be feasible until such time as the Lakeside precinct is developed (owned by Energy Australia).*" The proponents submission noting that at that the Tallawarra Lands development will provide a mix of services that will be required residents in Haywards Bay on a day to day basis as well as stating that Energy Australia representatives have confirmed that the development of their land (i.e. the southern/lakeside precinct) will not be in place by 2026 and most unlikely by 2041.

  Previous advice provided by RMS to both the proponent and DPE has detailed the RMS concerns on the non-provision of connectivity to/from Haywards Bay for vehicles (cars, buses, etc), pedestrians and cyclists. With the above advice on the timeframe for future development of the southern/lakeside precinct unlikely by 2041, the proposed non provision of the road link between Haywards Bay and the neighbourhood centre land, industrial land in the central precinct until after 2041 is not supported. RMS maintains that connectivity to Haywards Bay is vital to minimise local trips on the state road network.

- **Other General Comments:**
  - *Albion Park Rail Bypass:* As noted above RMS is currently undertaking works for the upgrade of the Princes Highway as per the planning approval that has been issued. A portion of these works occurring in the vicinity of the subject sites western boundary.

    Based on the information that has now been provided RMS is satisfied that the amended subdivision layout in the southwestern portion of the Central Precinct as detailed in the RtS (i.e. as shown in Figure 5.6 on Page 45 of the *Tallawarra Lands - Response to Submissions* prepared by Cardno Job Ref: 82017142-02, Version 5, dated 13 May 2019) has now been adjusted to have regard for the latest road boundaries for the Albion Park Rail bypass project. As such, no proposed lots and/or works associated with the proposed modified development appear to be in the area required by RMS for RMS Albion Park Rail bypass project. Noting the comments above it is recommended that any approval, when issued, is conditioned such that no works associated with the development are to occur within the Albion Park Rail bypass project boundaries (inclusive of the future Stage 3 Yallah Interchange) and must be wholly located outside the currently identified and required road reserve area as has been advised by RMS. This including, but not limited to, proposed local roads, bicycle paths, noise mitigation measures, landscaping works and infrastructure required to service the proposed development.
  - *Open Space/Landscape Plans:* RMS from reviewing the updated landscape plans prepared by Cardno (with reference Project No.82017142-02, Drawings L1002, L1003, L1006, Issue 4, dated 10.5.19) notes that land in the vicinity of the sites western boundary that is affected by the Albion Park Rail Bypass is no longer shown as containing tree planting and bicycle path linkages or identified as open space lands that are being provided to service the proposed development. As such, RMS raises no concerns with the amended plans that have been submitted with the RtS. It is however recommended that any approval, when issued, is conditioned such that no works associated with the development are to occur within the Albion Park Rail bypass project boundaries (i.e. new tree planting, bicycle path linkages, noise attenuation, etc).
  - *Amendments to Conditions:* As per RMS' previous advice (RMS letter dated 15 August 2018), it is noted that the current modification still seeks to amend the requirements of Conditions 15, 16 and 25 of the concept approval. On the basis that the comments above under the dot point 'Issues to be Addressed' can be satisfactorily addressed the following comments are provided:
    - *Condition 15 - Upgrade of the junction of the Princes Highway and Yallah Bay Road to a roundabout:* This modification seeks to amend the requirements of Condition 15 to provide clarity on when the design for the upgrade of the junction of the Princes Highway and Yallah Bay Road to a roundabout is required. RMS raises no objection with the proponent's proposal to amend the timing of the design to be required in connection with the future subdivision of the Central Precinct and not as part of the DA for superlot subdivision;
    - *Condition 16 - Requirements for a Concept Design for the Closure of Cormack Avenue:* This modification seeks to amend the requirements of Condition 16 to provide clarity on when the design for the closure of Cormack Avenue is to be provided. RMS raises no objection with the proponent's proposal to amend the timing of the design so it is required in connection with the future subdivision of the Central Precinct and not as part of the DA for superlot subdivision; and
    - *Condition 25 - Satisfactory Arrangements for the provision of designated State public infrastructure:* The modification seeks to amend the requirements of Condition 25 so as to enable the lodgement of a DA for superlot subdivision that "*does not include any physical works or subsequent applications*" prior to satisfactory arrangements for the provision of designated State public infrastructure in accordance with Clause 6.1 of WLEP 2009 being demonstrated. Subject to

the land within the development site that is required for the Albion Park Rail Bypass project being identified as a separate lot on any superlot subdivision plan that is lodged for the central precinct and written approval being obtained from RMS prior to registration of the superlot for the central precinct confirming that sufficient land has been provided for the works required for the Albion Park Rail Bypass project, RMS raised no objection.

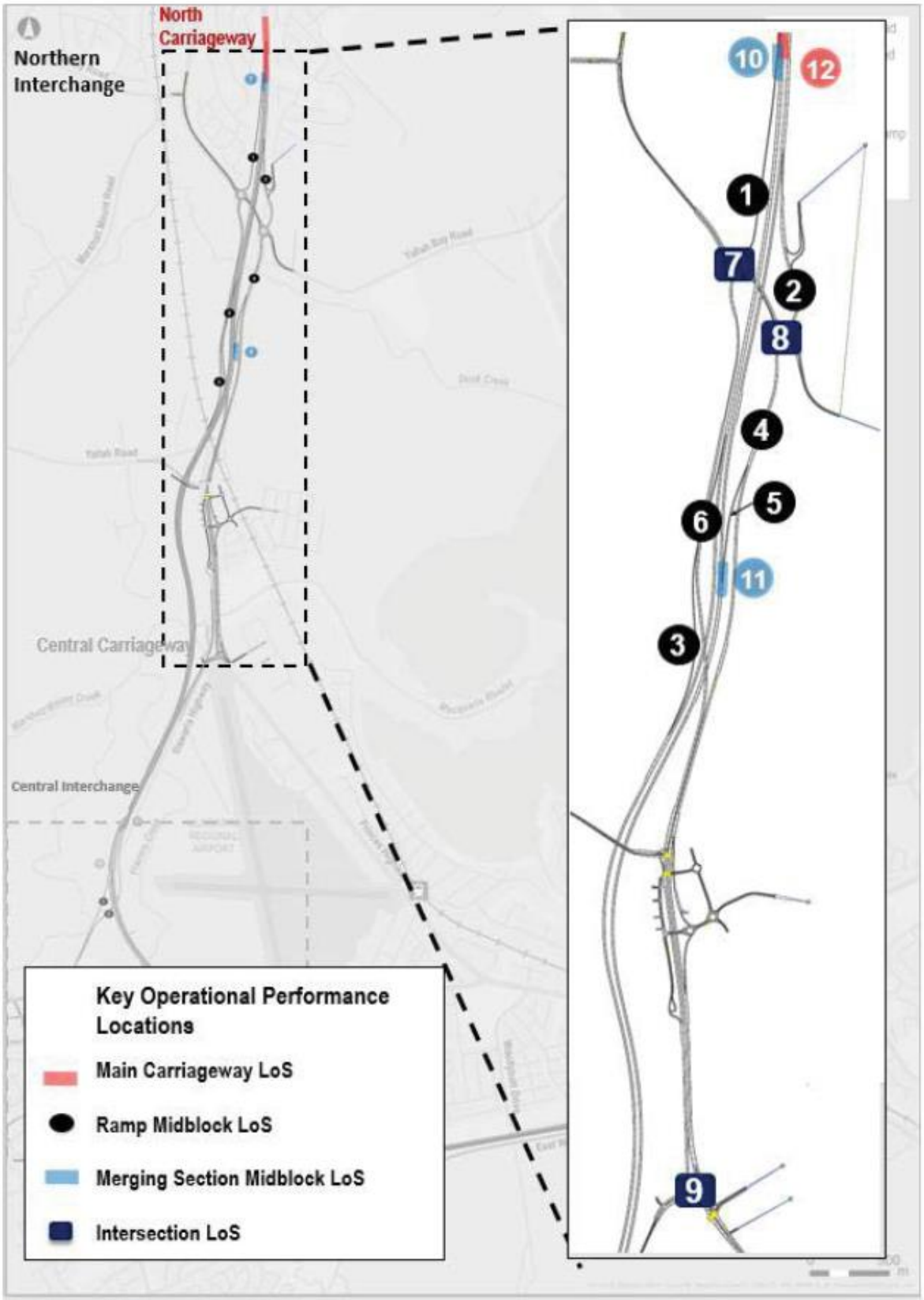

Figure 5-7 Northern Interchange Performance Locations

Table 5-4 and Table 5-5 summarise the results for the Northern interchange in the 2041 Aimsun model in comparison with the 2041 EIS results.

This is 'C' in the updated Traffic Report submitted which is a change from current.

Table 5-4 Northern Interchange Performance Results – AM Results

ID	Location		EIS		Current Design	
Ramp Midblock Level of service		**No. of lanes**	**LoS**		**LoS**	
1	Northbound entry ramp	1	A		A	
2	Southbound exit ramp	1	C		B	
3	Northbound exit ramp	1	B		C	
4	Southbound entry ramp	1	A		C	
5	Southbound entry ramp	1	-*		B	
6	Northbound exit ramp	1	C		C	
Intersection Level of service		**Type**	**Average Delay (seconds)**	**LoS**	**Average Delay (seconds)**	**LoS**
7	Western roundabout	Roundabout	11	A	13	A
8	Eastern Roundabout	Signalised	17	B	25	B
9	Illawarra Highway / Princes Hwy	Roundabout	7	A	15	B
Merging Section Level of Service			**LoS**		**LoS**	
10	Northbound entry ramp		B		C	
11	Southbound entry ramp		C		B	
Main Carriageway Sections Midblock LoS			**LoS**		**LoS**	
12	North		Northbound: C Southbound: C		Northbound: C Southbound: B	

Source: Aimsun Model (2016).

* This ramp location has been changed equivalent performance results not comparable to the EIS

This is 'D' in the updated Traffic Report submitted which is concern for RMS.

Table 5-5 Northern Interchange Performance Results – PM Results

ID	Location		EIS		Current Design	
Ramp Midblock Level of service		**No. of lanes**	**LoS**		**LoS**	
1	Northbound entry ramp	1	A		A	
2	Southbound exit ramp	1	C		B	
3	Northbound exit ramp	1	B		B	
4	Southbound entry ramp	1	B		C	
5	Southbound entry ramp	1	-*		B	
6	Northbound exit ramp	1	C		C	
Intersection Level of service		**Type**	**Average Delay (seconds)**	**LoS**	**Average Delay (seconds)**	**LoS**
7	Western roundabout	Roundabout	12	A	11	A
8	Eastern Roundabout	Signalised	22	B	26	B
9	Illawarra Highway / Princes Highway	Roundabout	7	A	11	A
Merging Section Level of Service			**LoS**		**LoS**	
10	Northbound entry ramp		B		B	
11	Southbound entry ramp		C		C	
Main Carriageway Sections Midblock LoS			**LoS**		**LoS**	
12	North		Northbound: B Southbound: D		Northbound: C Southbound: C	

Source: Aimsun Model (2016).

RMS assumed this was a signalised roundabout in 2041 and as a result RMS has 'B' not 'D' as contained in the updated Traffic Report submitted.

* This ramp location has been changed equivalent performance result

The midblock performance of the ramps (ID 1-6) all operate at an adequate LoS C or better in both AM and PM peak periods.

The merging sections (ID 10 and 11) on the motorway for the northbound and southbound entry ramps operate at LoS C or better in both peak periods.

The eastern roundabout at the Northern interchange (ID 8) is forecast to operate at LoS B in both AM and PM peak periods, with an average delay of 25 seconds in the AM peak hour and 26 seconds in the PM peak hour.

Ramp metering has been implemented at this roundabout on the northern and western approaches to allow sufficient opportunity for Yallah Bay Road traffic to exit. As shown in Table 5-6, all approaches perform at LoS C or better. It is anticipated that this metering will be further considered and refined at detailed design, including consideration of delaying the implementation of metering until it is necessary.

Noting the concerns above, RMS requests that the plans submitted (e.g. Figures 3.1, 3.4, 3.5, 5.3, etc) are updated to clearly show the current Albion Park Rail bypass project boundaries so as to demonstrate that all works proposed and required as part of this concept approval are wholly located outside the currently identified/required road reserve area (e.g. local roads, bicycle paths, noise mitigation measures, etc).

- *Traffic Impact Assessment/Modelling:* RMS from reviewing the Traffic Impact Assessment (TIA) prepared by Cardno (Job Ref: 8201714202, Version 02, dated 8 September 2017) provides the following comments:

  - No traffic volume changes have been documented. The models provided assess the modified land use scenarios, but nothing has been shown as to how this translated into volume increases across the network. RMS requires additional information to enable it to understand the volume changes resulting from the modification;
  - The Tallawarra Lands development, based on the information in the TIA, will generate an estimated 2,760 jobs (1,640 direct jobs and 1,121 indirect jobs - as noted in the TIA). Only direct jobs have been considered in the updated TIA. While it is noted that the TIA states that "*indirect jobs would have been included in the overall regional employment growth applied in TRACKS for the 2026 and 2041 design horizon years*", RMS requires confirmation that this was the case and if not, the modelling for this modification needs to be updated to reflect the traffic impacts for both the direct and indirect employment opportunities;
  - The updated employment numbers show that in the northern precinct there will be 612 jobs (refer to Figure 3.5 – Employment Distribution revised). Noting that this precinct only contains residential lands and open space/environmental land with no employment lands it is unclear as to how the number of jobs shown in the northern precinct has been determined. RMS requires clarification;
  - By 2041 there are some Level of Service (LOS) changes as well as intersection capacity issues, particularly in the PM peak at the northbound offload to Princes Highway (LOS B to E). LOS B was with the original approved 1010 lot residential yield. LOS E/F was with the full modified 1494 lots at 2041. RMS notes that this intersection was sensitive to volume changes when the APRB models were being worked on. RMS also notes that this may require an intersection upgrade to roundabout or signals if northern interchange is not built. RMS requires details on any proposal as part of this modification to make improvements at this intersection to ensure it operates at a satisfactory level;