

Our ref: DA 9876 MOD 1

Great River NSW Pty Ltd
Edward Sutton
12 Barrack Street,
Sydney NSW 2000

17 August 2023

Subject: Request for Information – DA 9876 MOD 1

Dear Mr Sutton,

I refer to the above modification application to the Penrith Lakes Employment Lands Subdivision and Construction Works (DA 9876).

The Department has reviewed the RtS package and has received advice from Transport for NSW (TfNSW) on the RtS package (letter dated 16 August 2023).

The Department raise concern with the assumptions made within the traffic modelling, as well as the conclusions reached, as detailed in **Appendix A**.

Please note, that at this stage the Department does not support the modification as it is currently presented, and it is recommended that the application be withdrawn as further assessment would likely result in a refusal. Alternatively, additional information can be provided to address the issues raised in **Appendix A** and the issues TfNSW raised in their letter dated 16 August 2023.

TfNSW have advised that the left turn deceleration lane could be delivered within the existing road reserve without the need for land acquisitions via a lateral shift of the existing lanes on Castlereagh Road. It is recommended that this be explored.

The Department requests a response by 31 August 2023 via the NSW Planning Portal. If you cannot meet this deadline or do not intend to withdraw or provide the additional information, please advise the Department via the NSW planning portal. At the date of this letter, 119 days in the assessment period have elapsed.

If you have any questions, please contact Chris Eldred on 02 8289 6855 or via email at christopher.eldred@planning.nsw.gov.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "K T" followed by a stylized flourish.

Keiran Thomas

Director

Regional Assessments

as delegate for the Planning Secretary

APPENDIX A

1. Traffic Distribution

- There appears to have been a significant change in the assumptions around traffic distribution between the January 2023 Report and June 2023 Report prepared by McLaren Traffic Engineering:

January 2023 Report

TABLE 4: TRAFFIC DISTRIBUTION

Peak Time	Direction	North Approach Castlereagh Rd		South Approach Castlereagh Rd		West Approach Lugard St	
		Right Turn	Through	Through	Left Turn	Right Turn	Left Turn
AM	IN	15%		5%	25%		
	OUT		5%			15%	25%
PM	IN	15%		5%	25%		
	OUT		5%			15%	25%

June 2023 Report

TABLE 2: TRAFFIC DISTRIBUTION

Peak Hour	Direction	North Approach Castlereagh Rd		South Approach Castlereagh Rd		West Approach Lugard St	
		Right Turn	Through	Through	Left Turn	Right Turn	Left Turn
AM	IN	5%		0%	30%		
	OUT		0%			30%	5%
PM	IN	5%		0%	30%		
	OUT		0%			30%	5%

- It appears that 65% of traffic is proposed to enter the precinct via the Andrews Road roundabout and Old Castlereagh Road (as opposed to the 55% previously modelled). The report has not substantiated the rationale for the change but attributed it to *'the existing poor performance of the road corridor'*. The traffic report has not explored the impacts of this traffic distribution to the roundabout or surrounding road network.
- No rationale for the changes in traffic distribution has been provided, noting that no changes are proposed to the subdivision layout that could influence a change in vehicle movements. The traffic report should also include an assessment of the impacts on the roundabout, including queue lengths for Andrews Road, Castlereagh Road and Old Castlereagh Road.

2. Queue Lengths and Intersection Performance

- The submitted Traffic Report prepared by McLaren Traffic Engineering dated 1 June 2023 indicates that the introduction of the left turn lane would result in a significant reduction in queue lengths (84.6m to 22.4m in AM and 136.1m to 8.6m in PM), yet it was concluded that *“the addition of a dedicated left turn lane provides no performance improvements for either the left turn or the overall performance of the intersection”*.
- The Department does not support this finding and contends the significant reduction in queue lengths would result in an improvement of the intersection performance.

3. Traffic Generation

- The use of the traffic volumes by TTPA is not supported. Whilst the figures have been utilised for ‘sensitivity testing’, the traffic volumes generate significantly less traffic volumes than the other figures which stem from a Roads and Maritime Services Technical Direction (RMS TDT2013/04a).
- The TTPA figures represent a significant underestimation beyond the standard industry measures used in traffic modelling and the Department requires that these figures are not used in any further report submitted.

4. TfNSW Advice 16 August 2023

- The Department concurs with all comments raised by TfNSW.