

LETTER

Transport Engineering

REF: N171072

DATE: 13 August 2020

F & F Properties
C/- Barr Property and Planning
92 Young Street
CARRINGTON NSW 2294

Attention: Mr Stephen Barr (Director)

Dear Stephen

RE: JOHN RENSHAW DRIVE, BLACK HILL

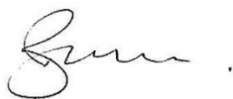
A development application (DA) has been submitted for a proposed large lot industrial development on land at DP1057179 on John Renshaw Drive, Black Hill. GTA Consultants (GTA) completed a transport assessment¹ dated 26 May 2020 to support the DA.

Subsequent to the DA being lodged, Transport for NSW (TfNSW) has raised several traffic and transport matters in a letter addressed to Cessnock City Council dated 12 August 2020. The letter refers to items specific to traffic modelling. This letter has been prepared to specifically provide a response to the TfNSW letter. The relevant submissions from TfNSW are reproduced in Attachment 1 together with detailed responses.

Should you have any questions or require any further information, please do not hesitate to contact me on (02) 8448 1800.

Yours sincerely

GTA CONSULTANTS



Rhys Hazell
Director

encl.

Attachment 1 – Response to TfNSW letter

¹ John Renshaw Drive, Black Hill – Microsimulation Modelling Options Testing, 26 May 2020.

ATTACHMENT 1

Response to TfNSW letter

TfNSW comments

Comment 1: Notwithstanding TfNSW advice and use of its model, Broaden have failed to provide a satisfactory traffic assessment to date, including the most recent traffic impact report by GTA consultants, dated 26 May 2020. The main issues outstanding remain:

- Modelling and reporting that inadequately demonstrates the traffic impact from the precinct development on the existing road network,*
- Inadequate infrastructure proposed to mitigate the impact as demonstrated,*
- No mitigation works, with the exception of the site intersection, prior to 50% precinct development when the report demonstrates that there will be significant reduction in efficiency and significant delay induced into the network (around 8 times delay),*
- No proposed mitigation proposed other than reliance on future TfNSW project, M1 to Raymond Terrace (M12RT), which is expected to be delivered late 2020's.*
- Reporting that indicates kilometres of queuing at full precinct development with no commitments to resolve, including the inability for motorists to leave the precinct. The report states '...significant queuing and delays throughout the network and at the key intersection of M1 / John Renshaw Drive / Weakleys Drive can be expected at the 50% (no M12RT), 75% and 100% developed stages indicating that the network is unable to accommodate the additional traffic demand.'*
- The report fails to address the cumulative impacts of their proposed eastern access location relative to the proposed Stevens site access as contemplated under the approved Part 3A concept plan for the Stevens site (required irrespective of the LEC court refusal).*

GTA Response:

GTA has extensive national modelling experience and capabilities having been involved in both Government and private developer projects over many decades. Throughout our experience, we frequently collaborate with various TfNSW divisions and representatives regarding traffic modelling and as such have a detailed awareness of the process in the review of traffic assessment and traffic models. This includes our current role in providing traffic advisory and support services to the TfNSW Network and Asset Intelligence (NAI) team who deal directly with developments and review of traffic models.

In this regard, the TfNSW inference that the traffic assessment and model itself was “inadequate” is inappropriate at best, with no details provided nor any such justification for such an opinion. Given that no feedback or correspondence has been provided by TfNSW to provide any sort of transparency in their apparent dissatisfaction with the assessment, it is difficult to understand where the perceived shortcomings with the assessment exist. Typically, it is expected that a detailed explanation of any issues followed by a collaborative effort to review and respond, with an opportunity to update the assessment if considered necessary. None of this has been communicated with the project team and indeed GTA as the authors of the traffic assessment on behalf of our client (Broaden).

Further, throughout the application process and as TfNSW confirm, numerous sessions were had with TfNSW representatives to seek guidance on the model inputs/ assumptions and to ensure alignment in the assessment of traffic impacts. This included traffic generation rates, distribution, development and precinct staging, traffic model scenarios, etc. While some details were not entirely agreed, GTA

nevertheless agreed in good faith to all TfNSW requirements. Ultimately, the traffic model reflects TfNSW preferences and was clearly agreed prior to commencing.

All the modelling outcomes, together with agreed inputs and scenario testing through to 100 per cent development of the site and the precinct are detailed in full in the GTA Consultants report dated 26 May 2020. As such, it is unclear as to the basis for the view that the traffic assessment is considered sub-standard by TfNSW, and clarification by TfNSW as a minimum is necessary in this regard.

Responses to other specific comments made by TfNSW include:

- The model and reporting tested options for both the site only development and precinct. Adopting TfNSW' own traffic generation rates for industrial precincts (TDT 2013/04a) shows definitive and justified reasons for adopting a lower traffic generation rate than the 0.4 trip rate imposed on the site by TfNSW. Specifically, the Erskine Park and Eastern Creek industrial estates which are considered similar to the proposed development in terms of size and accessibility have an average traffic generation rate of 0.185 trips per 100 square metres.
- This is more than half the 0.4 trip rate imposed by TfNSW. Nevertheless, while the 0.4 trips rate is inappropriate to apply to such a large scale heavy industrial development, this too was included in the model.
- Adopting the 0.185 trip rate to the site results in about 770 vehicle trips rather than the 1,600 as stated by TfNSW. There is a clear difference between the two, and in turn, the extent of road upgrades. This was all modelled and detailed in the traffic report.
- It is also inappropriate to compare current traffic volumes on John Renshaw Drive with full precinct development traffic in 2032. With TfNSW stipulated background growth, John Renshaw Drive would carry about 1,500 vehicles in 2032 rather than 1,200.
- The traffic model and report detail several modelling options and scenario testing. Each scenario demonstrates the traffic impacts on the existing road network at the agreed development (and precinct) stages within the TfNSW agreed study area. Confirmation on how this is in some way inadequate is requested.
- Significant road infrastructure works to mitigate the impacts are detailed in the model and at the agreed development stages – this was one of the key reasons for developing the model.
- Several mitigating works along John Renshaw Drive and the John Renshaw Drive/ Weakleys Drive/ M1 signalised intersection have been detailed in the model. Questions remain however over the actual extent of impact based on the applicable traffic generation rates.
- Inclusion of the TfNSW M1 to Raymond Terrace upgrade is clearly critical to the model (and the basis for the model prepared by TfNSW). Such a significant national road project will certainly be justifiably relied upon as part of the modelling scenarios (as requested by and agreed with TfNSW). Mitigation works outside this were also included in the scenario testing (as per the comment above).
- The TfNSW letter fails to recognise that the model includes (and the report discusses) an additional option for grade separation of the John Renshaw Drive/ Weakleys Drive/ M1 signalised intersection (at 100 per cent development of the precinct). It is clearly not the applicant's sole responsibility to resolve all traffic related matters in the study area and justification for TfNSW comments is required in this regard.
- TfNSW has repeatedly indicated that they would not support more than one signalised intersection to provide access to the eastern section of the precinct. Whether this new signalised intersection is on the boundary between the two sites (as defined in the DCP) or further east on the Stevens Group site is not relevant to the model per se given that the intersection would accommodate the same traffic volumes irrespective of location. It is therefore not appropriate for the model to

contemplate alternative intersection locations nor any such cumulative impacts relative to another.

Comment 2: The outcomes of the modelling have been inconsistent with RMS Traffic Modelling Guidelines, RTA Guide to Traffic Generating Developments, and Austroads Guide to Traffic Management, Part 12, Integrated Transport Assessments for Developments.

GTA Response:

Based on this brief comment by TfNSW, it is difficult to understand what is meant by this without any context on what the perceived shortcomings are. The modelling adopted inputs and assumptions specifically informed by TfNSW and included the release of TfNSW models to GTA Consultants that formed the agreed starting point of the modelling assessment. Again, no transparency on the TfNSW comments without opportunity to respond and update has been offered following submission of the latest traffic assessment report and model.