

Your Ref: SSD 10313 MOD 1

Contact: Patrick warren on 9725 0215

26 August 2021

Mandana Mazaheri
Locked Bag 5022
Paramatta NSW 2124

Dear Ms Mazaheri

FAIRFIELD COUNCIL COMMENTS P2G FACILITY – STATE SIGNIFICANT DEVELOPMENT (SSD) 10313 MODIFICATION 1

Fairfield City Council officers have been requested to provide comments in relation to SSD 10313 MOD1. Council officers have reviewed the EIS prepared for the site and provide the following comments.

1. UNACCETABLE ACCESS ARRANGEMENTS & IMPACTS ON COUNCIL ASSETS

The critical modification to the P2G facility is changing servicing of the facility by 19-metre semi-trailers from Chandos Road. This represents a significant departure from servicing arrangements approved for the project under the original SSD 10313 approval and is not supported by Council based on the following.

- Chandos Road is a Council owned road and classified as having rural road status. It does not have adequate road shoulders, pavement structure and road widths to support servicing by heavy vehicles.
- Rural roads have a 20 year design life and are designed to take a load of 5×10^5 Equivalent Standard Axle (ESA).
- SSD 10313 Mod 1 proposes HRV access to the site that would increase the load pressure on the rural road surface to at least 2×10^6 .
- According to the traffic Design standards for ESA's, rural residential zone roads with an ESA load of 2×10^6 would be required to be upgraded to a collector road (see table 1.0 below).

Table 1.0 Traffic Design - Equivalent Standard Axles (ESAs)

Zone	Street Type	Design ESA's – 20 year Design Life
Urban Residential	State Roads	1×10^7
	Regional	8×10^5
	Collector	2×10^5
	Local	5×10^5
Rural Residential	Collector	2×10^5
	Local	5×10^5
Industrial	Regional	5×10^5

As Chandos road is currently a rural road with a 5 tonne load limit, the movement of 19 metre semi-trailer vehicles onsite along the proposed operational route would not be supported.

Since Council's previous comments to the Department of Planning Industry and Environment Fairfield, Council has received a planning proposal for industrial rezoning of the Keyhole lands directly to the south the Jemena P2G facility.

The industrial rezoning would facilitate two large industrial precincts within a 60.2 ha site known as the Keyhole lands (directly to the south of Jemena Facility), currently zoned RU2 and proposed to be rezoned IN1 General Industrial. Both the Jemena proposal and rezoning of the Keyhole lands generate a significant traffic implications for Chandos Road.

Council is currently awaiting advice from Frasers Property regarding the upgrading of infrastructure required to support rezoning of the Keyhole lands for employment uses including advice in relation to local and regional roads. Similarly the issue of road upgrades is also relevant to the modification proposed by Jemena who Council officers have recommended discuss these issues further with Frasers Property.

When both developments are operational Frasers and Jemena will be the main road user for Chandos Road. Therefore, the following must be considered at this stage and be implemented prior to operation of the Jemena site:

- Upgrading the road to collector type;
- Consistent road width and standard shoulder in accordance with Austroads Guide Lines;
- Wearing surface be provided with hot mix asphalt and to have suitable sealed road shoulders;
- Relocating table drains including existing culverts widening and adjustment of lead away drainage system to avoid water ponding along the edge of road and the stormwater crossing in towards the proposed development;
- Pavement design shall comply with Austroads Guidelines "A Guide to the Structural Design of Road Pavements" and design for other proposed infrastructures shall comply with Council's design guidelines. Construction is required to comply with Council's Road Works Specifications. These designs will be submitted to council for review and approval, and;
- Street light improvement if required

2. VEHICLE ACCESS

Chandos Road is approximately 6.5m wide and has the speed limit of 60km/h. Double barrier lines and edge lines are installed on Chandos Road to delineate the edges of the carriageway.

Based on swept path analysis undertaken by both the applicant and Council, 19m long articulated vehicles or large vehicles exiting the Jemena site would need to utilise the entire width of Chandos Road (along the site frontage) to make a left turn out of the driveway.

Under NSW Road Rules, vehicles are permitted to cross double unbroken lines to enter or leave the road by the shortest route. The left turn manoeuvre when exiting the site is considered a safety concern. Jemena must consider the option of widening the driveway to accommodate heavy vehicle movements and to install safety measures to minimise traffic and safety impacts on the adjoining road network.

3. PROPOSED HEAVY VEHICLE ACCESS ROUTE

Chandos Road is currently signposted with 5-tonne load limit restrictions. Under the NSW Road Rules, if the total weight of the vehicle and loads exceeds 5 tonnes, it can only use the load limited street if the destination of the vehicle lies in or on the street and there is no alternative route by which to reach that destination.

As previously stated by Transport for NSW utilising Chandos Rd via Wallgrove Road over the M7 overpass is not supported. This would be the shortest route due to the potential impacts of the heavy vehicles on their road infrastructure, including the M7 overpass at the western end of Chandos Road.

TfNSW have also indicated the desire to reduce maintenance costs of the M7 overpass asset. Due to this the applicant has decided to utilise Chandos Road via Ferrers road. The impacts of the 19m long semi trailers (their weight/mass) on pavement and existing culverts along this route are unknown at this stage and per the comments above must be assessed prior to servicing of the site by heavy vehicles.

Should you have any questions please do not hesitate to contact the undersigned on 9725 0215.



Patrick warren
SENIOR STRATEGIC LANDUSE PLANNING