



Contact: Patrick Warren on 9725 0215

Your Ref: 17161650

02 February 2022

David Koppers
Locked Bag 5022
Parramatta NSW 2124

Dear David

OBJECTION - HORSLEY DRIVE BUSINESS PARK – STATE SIGNIFICANT DEVELOPMENT APPLCIATION 17161650

This letter forms an objection to SSD 17161650 due to, the proposed developments potential to create unacceptable impacts on the local road network, safety concerns regarding ingress and egress of heavy vehicles from the warehouse sites and unacceptable internal heavy vehicle circulation at warehouse 3.

The documentation submitted including the Environmental Impact Statement (EIS), Traffic Impact Assessment (TIA) and Operational Traffic Management Plan (OTMP) do not address previous concerns raised by the DPIE and Council officers.

SUBMISSION

1. Traffic Engineering Comments

- a. The applicant's OTMP shows, Warehouse 3 is expected to generate 24 vehicle movements (with 7 heavy vehicle movements i.e. 3-4 trucks are anticipated) during the AM and PM peak hours. Based on the applicants' swept path diagrams, the site in its current form would not have the capacity to support the simultaneous movements of 26m B-Double trucks and another vehicle at/near the driveway areas and at the intersections within the site. Where two-way traffic flows are not feasible, the installation of restrictions to allow one-way traffic flow shall be considered.

Though the use of the site is unknown at this stage, given the site is in the industrial area, the sites shall not restrict the use by 26m B-Double vehicles. Therefore, the applicant has not submitted sufficient information to demonstrate that the site layout functions satisfactorily to accommodate 26m B-Double vehicles.

- b. Unloading/loading along the trafficable area is an issue as it will impact heavy vehicles turning into and out of the recessed loading docks or maneuvering. Consideration hasn't been given to the provision of designated loading bays to accommodate 26m B-Double vehicles to undertake loading and unloading activities. The applicant has not provided a breakdown of the number of heavy vehicles which are anticipated to use the site throughout the day. They have also not provided information on how the potential conflicts between vehicles using warehouse 2 and 3 will be managed.
- c. The swept path analysis shows that it would be difficult for 25m/26m B-Double vehicles to exit the site (turning left out of the site) onto the Estate Road without crossing the Centre of the road particularly with the worst-scenario where vehicles are parking on the Estate Road at/near the site. In this respect the site layout and access arrangement are not satisfactory. Based on the swept path analysis, the development proposal would impact on the surrounding road network's traffic operations and road safety.

- d. Council has not approved the use of traffic signal system within a development site in the past and would not support this treatment unless there is no feasible alternative. No information has been provided regarding the operations of the traffic signal system and about how the potential conflicts between vehicles entering and exiting the site will be managed in the event of a power failure or when the traffic signals are malfunctioning. Unless there are no alternatives and there are justified reasons, the use of traffic signal systems cannot be supported. In addition, Council needs to know how enforcement can be undertaken within a development site (private land) should drivers not comply with the traffic signals.

2. Strategic Land Use Planning Comments

- a. A previous submission by Council (20 April 2021) identified the above identified concerns including potential traffic impacts from the development on the surrounding road network infrastructure, vehicle conflict on the external estate road due to the location of ingress and egress for warehouses 2 and 3 and heavy vehicle circulation in the northwest corner of Warehouse 3. These concerns are not addressed as part of the documentation submitted with the EIS.
- b. SSD 7664 forms the concept plan approval for stage 2 of the HDBP. Conditions B1 and B2 of the approval form requirements relating to traffic and access for the future warehouse 2 and 3 (see Fig 1 below).

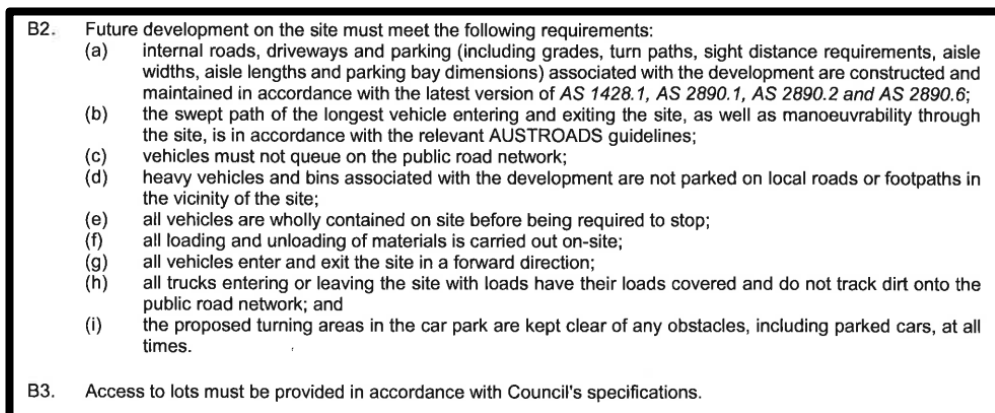


Figure 1 – SSD 7664 Conditions of Consent

It is clear from the EIS that vehicles would be required to stop prior to entering the site and that swept path diagrams submitted with the OTMP show heavy vehicles unable to manoeuvre out of the site without clashing. This forms non-compliance with the conditions of SSD 7664.

3. Development Engineering Comments

- a. The truck exit point for Warehouse 2 and Combined Entry / Exit for Warehouse 3 are too close and likely to create confusion to the truck drivers servicing the sites. The access points need to be separated with adequate distance to enable safe entry and exit from the sites.
- b. The B-Double trucks shown at the loading docks at Warehouse 3 appear to encroach onto the manoeuvring areas. The truck manoeuvring areas shall be clear of loading unloading areas.

Recommendation

Fairfield Council officers object to the proposal in its current form based on the points raised above. It is recommended that the applicant submit a significant redesign to address issues raised in this submission.



Patrick Warren
Senior Strategic Land Use Planner



4 February 2022

TfNSW Reference: SYD21/00412/03
DPIE Reference SSD-17161650

Department of Planning, Industry and Environmental
GPO Box 39
SYDNEY NSW 2001

Attention: David Koppers

Dear Sir/Madam,

EXHIBITION OF EIS - HORSLEY DRIVE BUSINESS PARK STAGE 2 BUILDINGS 2 & 3 - CNR COWPASTURE ROAD & TRIVET STREET, WETHERILL PARK

Reference is made to the Department of Planning, Industry and Environment (DPIE) correspondence dated 9 December 2021, regarding the abovementioned application which was referred to Transport for NSW (TfNSW) for comment.

TfNSW has reviewed the submitted documents and provides the following comments at Attachment A.

If you have any further inquiries in relation to this development application Mr Simon Turner would be pleased to take your call on 8265 6363 or e: development.sydney@transport.nsw.gov.au. I hope this has been of assistance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Z. Alamouti'.

Ms Zhaleh Alamouti
A/Senior Manager Land Use Assessment (West&Central)

Attachment A

Construction Traffic Management Plan

A Construction Traffic and Pedestrian Management Plan (CTMP) must be prepared prior to the issue of the construction certificate with details of predicted construction traffic movements, routes and access arrangements, and outline how construction traffic impacts on existing traffic, pedestrian and cycle networks would be appropriately managed and mitigated.

TfNSW would welcome further discussions with the proponent regarding the preparation the CTMP and can be contacted directly at Development.Sydney@transport.nsw.gov.au.

Access and Manoeuvring

The proposed access and manoeuvring arrangements must be in accordance with the following requirements:

- a. The swept path of the longest vehicle (including garbage trucks, building maintenance vehicles and removalists) entering and exiting the subject site, as well as manoeuvrability through the site, shall be in accordance with AUSTRROADS. In this regard, a plan shall be submitted to Council for approval, which shows that the proposed development complies with this requirement.
- b. The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements in relation to landscaping and/or fencing, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1-2004, AS2890.6-2009 and AS 2890.2-2018 for heavy vehicle usage. Parking Restrictions may be required to maintain the required sight distances at the driveway.
- c. All vehicles are to enter and leave the site in a forward direction.
- d. All vehicles are to be wholly contained on site before being required to stop.
- e. The proposed development will generate additional pedestrian movements in the area. Pedestrian safety is to be considered in the vicinity.

Operational Traffic Management Plan (OTMP)

An Operational Traffic Management Plan (OTMP) is required to be prepared prior to occupancy.

The OTAMP is to be prepared for the site by a suitably qualified person, in consultation with Transport for NSW.

TfNSW would welcome further discussions with the proponent regarding the preparation the OTAMP and can be contacted directly at Development.Sydney@transport.nsw.gov.au.

Green Travel Plan (GTP)

A Green Travel Plan (GTP) is required to be prepared prior to occupancy.

The GTP must consider the following matters in its preparation:

- (a) objectives and modes share targets (i.e. site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the GTP;
- (b) specific tools and actions to help achieve the objectives and mode share targets;
- (c) measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the GTP;
- (d) quantification and analysis of staff shift times and numbers on the Site and analysis of workforce residential post code data to properly understand public transport and car parking demand and develop effective strategies in response, as well as help to inform service planning considerations;
- (e) consideration of a staff travel survey and workforce data analysis to inform likely staff travel patterns and resultant travel plan strategies to / from the Site;
- (f) strategies for promoting higher mode share targets for alternate transport use, particularly amongst day shift and administrative staff;
- (g) identification of a responsible party (or Committee) for the ongoing implementation of the Travel Plan and its initiatives;
- (h) confirmation of extent and nature of end of trip facilities and bike parking, including their location, and how they will be promoted to staff;
- (i) encourages the use of carpooling through the implementation of a carpooling scheme for staff;
- (j) considers the potential for fleet bikes to be used for travel within the site and its surrounds;
- (k) identification of a communications strategy for conveying Travel Plan information to staff, and visitors, including for the Travel Access Guide;
- (l) consideration of car parking management strategies that may be required to encourage sustainable transport use / mode share targets (such as pricing, prioritisation for those that carpool, use of wait lists, etc);
- (m) a detailed action plan comprising specific tasks needed to complete the proposed actions, the person/s responsible for completion of the task, completion date and anticipated costs;
- (n) an implementation checklist to achieve the proposed initiatives;
- (o) alternative actions to undertake where targets are not achieved;
- (p) the set-up of a steering group or committee of relevant internal and external stakeholders to inform future targets and the ongoing monitoring and revision of the GTP for five years; and
- (q) details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the GTP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of users of the development.

TfNSW would welcome further discussions with the proponent regarding the preparation the GTP and can be contacted directly at development.sco@transport.nsw.gov.au.