



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).

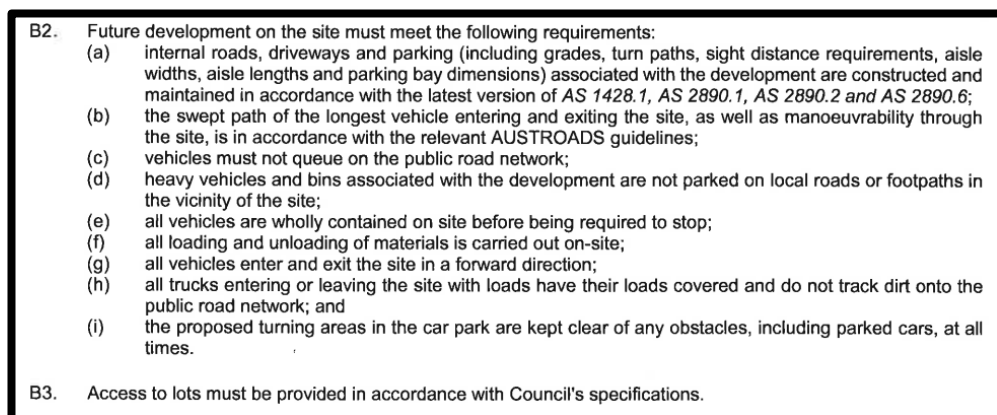


Figure 1 – SSD 7664 Conditions of Consent

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