Appendix M

Responses to submissions related to the east-west public access road

Notwithstanding that the preferred access has now changed (refer Section 4.1), for completeness, responses to issues raised in submissions relating to the east-west public access road (identified in the EIS as the preferred access) are provided in this Appendix.

M-1 DPE

Issue

Please provide additional design detail for the proposed access road, particularly the intersection treatment for the intersection with Lackey Road. The design will need to include all road infrastructure improvements required and demonstrate the proposed vehicles can safely use the access road and intersection. Any proposed design also needs to demonstrate the relevant roads authority is satisfied with the proposed design.

Response

The east-west public access road was designed in accordance with Austroads standards.

The current right hand turn from Lackey Road, performed by light and heavy vehicles, into the Australian Bioresources driveway (located where the new intersection would be), does not rely on a dedicated right turn lane. According to the Transport for NSW Centre for Road Safety website (crash and casualty statistics), no accidents have occurred at this location in the previous five-year period.

A preliminary assessment of sight distances was undertaken, and further analysis during detailed design was also proposed to be undertaken to ensure that adequate sight distance is provided from the crest to the north of the intersection to vehicles waiting to turn right onto the east-west public access road.

If required to improve sight distances, it was identified that a grade correction of Lackey Road could be undertaken to raise the road level to tie in with the new public east-west access road. The intersection upgrade works would cover an approximate 60 metre length of Lackey Road. A dedicated right turn lane could also be provided for southbound vehicles turning into the new east-west public access road. This would improve safety and intersection performance, by ensuring that through travelling vehicles can pass vehicles waiting to turn. Figure K.1 shows a possible future arrangement for the upgraded intersection, if a dedicated right hand turning lane was to be required.

The east-west public access road alignment was identified by Wingecarribee Shire Council in the 'Moss Vale Enterprise Corridor Development Control Plan 2012 (MVEC DCP) as an area reserved for a collector public road. The previously proposed corridor design is consistent with the MVEC DCP.

Consultation continued with Wingecarribee Shire Council in relation to the east-west public access road during preparation of this RTS report. An updated concept design (including possible upgrading to the intersection with Lackey Road) was provided to Council for comment. A response was received on 13 September 2022 which stated the following:

"In response to the preliminary drawings of the intersection of the east-west access road and Lackey Road, the provision of a CHR(S) appears to be an appropriate treatment however final support would be contingent upon receipt of a design report providing confirmation of its adherence to relevant standards and guidelines."

Wingecarribee Shire Council's response acknowledged that the east-west public access road is generally consistent with the final transport network proposed for the SHIP and noted that the delivery of various upgrades required to achieve the final transport network are not currently programmed. The response also advised that Plasrefine Recycling is to demonstrate that the new access road can be of safe operation until such a time that all the transport network upgrades are delivered at an undefined future date and Council envisaged that this will, as a minimum, require upgrades to the Douglas/Berrima Road intersection.

The operation of the Douglas Road/Berrima Road intersection was reviewed by GHD traffic specialists, and they confirmed that the proposed haulage route, including this intersection, could be safely operated. A response was provided to Wingecarribee Shire Council in relation to this issue on 20 September 2022.

A summary of the review findings is as follows:

– The intersection configuration on the haulage route for the proposal between Berrima Road and Douglas Road aligns with Austroads Guidelines (left into the minor road / right out of the minor road)

– The haulage route for the proposal aligns with approved heavy vehicle road network routes
– The crash history in the previous five year period indicates that no accidents have occurred at the Berrima Road / Douglas Road intersection, and it is considered that the intersection is operating safely within the current environment
– Based on up to an anticipated additional five semi-trailers per hour in each direction, the proposal is not anticipated to adversely alter the current safety levels

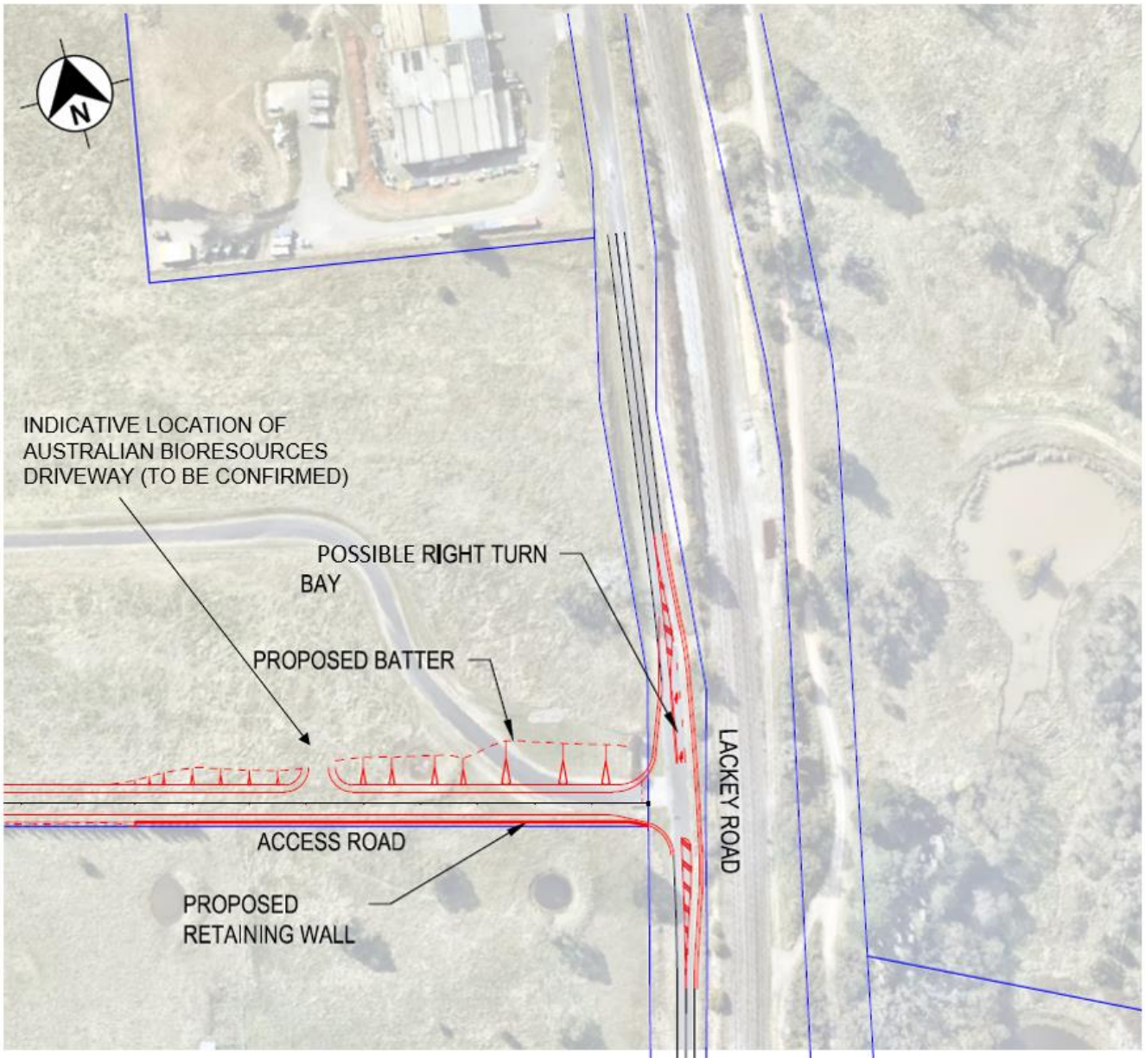

Figure M.1 Road configuration showing possible right hand turning lane

Issue

Justify the assumed trip distribution where 60% of the trucks would come from and leave to the south.

Response

As outlined in Section 4.2.3 of *Technical Report 6 – Traffic and Transport*, the trip distributions of construction and operation light vehicle traffic were based on the existing 2020 survey date turn movements to and from the access road onto Lackey Road. For assessment purposes, light vehicle trips were distributed with 60 percent arrival and departure from the south and 40 percent arrival and departures from the north. In the modelling undertaken for the EIS, all (100 percent of) heavy vehicles associated with the proposal were assumed to arrive and depart from the north. This was not made clear in the EIS and technical report.

M-2 NSW Environment Protection Authority

Issue

The applicant should clarify the status of the access road with respect to its being part of the EPA regulated premises (if approved). If the access road is considered part of the premises, then noise generated on the access road must be included in the operational noise assessment with the rest of the premises. In this case, the access road should be assessed using the Noise Policy for Industry (EPA, 2017) (NPfI) and be considered cumulatively with noise emissions from the whole premises.

The Department of Planning and Environment (DPE) considers the appropriate classification of the road as it pertains to noise assessment under the NSW Road Noise Policy (DECCW, 2011) (RNP), if the access road does not form part of the EPA regulated premises. If the road is not considered part of the premises and not regulated by the EPA, then it is recommended that the DPE consider the following during its determination:

– The function/category of the road being assessed using the NSW Road Noise Policy (DECCW, 2011) (RNP). The NVIA has designated the road as "sub-arterial" but assessed it as a "local" road. Using the RNP's "local" road assessment criteria appears appropriate in this instance.
– The method and inputs used to predict impacts from the road such as an appropriate calculation method for small volumes of traffic.

Response

The east-west public access road was to be a proposed public collector road, consistent with the road proposed in Wingecarribee Shire Council's MVEC Development Control Plan. Plasrefine Recycling and the Garvan Institute of Medical Research would have been the initial users of the east-west public access road, until land to the west of the proposal site is developed and requires access. Therefore, under this assumption, the more conservative peak 1-hour criteria (for a new local road) was assumed for the assessment of traffic noise along the previously proposed new east-west public access road.

M-3 Wingecarribee Shire Council

Issue

Council does not support any access via Beaconsfield Road at any stage of the development. This is a significant issue for the community and Council. Council expects all development in the SHIP, not just this proposal, to be consistent with the infrastructure plans outlined in the MVEC DCP, and Beaconsfield Road does not feature in these Plans.

Response

Beaconsfield Road was proposed to be used for up to three months for the purpose of constructing the east-west public access road. The main activities were proposed to occur during this period included initial delivery of earthmoving and road making equipment, removal of vegetation associated with clearing the site and access road route, establishing a construction compound on the site, and delivery of roadmaking materials.

The delivery of materials and removal of vegetation waste were to be scheduled outside of peak childcare drop off and pick up hours, which would be confirmed with the Southern Highlands Early Childhood Centre. The use of Beaconsfield Road for this limited period would have reduced the potential construction period for the east-west public access road and thereby minimise potential disruption to Lackey Road, which is currently used by many residents and businesses to access the Hume Highway, Berrima and Moss Vale town centre.

To ensure safe access of Beaconsfield by users and construction vehicles, the road was proposed to be resurfaced and shoulders established prior to commencing construction works. This would also have benefitted existing residents and users of Beaconsfield Road once complete. Once the new east-west public access road was in place, Beaconsfield Road was to no longer have been used for heavy vehicles.

Issue

There is insufficient detail in the EIS to determine if the proposed road and intersections can be built to Council's requirements. Council has not received enough information to determine if it is prepared to take over the completed road, or to enter into a voluntary planning agreement (involving the road). The proposal should not be approved until this has been resolved.

Response

The east-west access public access road was designed in accordance with Austroads standards.

In June 2022, a draft voluntary planning agreement was provided to Council in relation to the previously proposed new east-west public road being dedicated to Council, for its consideration – the Braddon Road East Extension Planning Agreement, prepared under section 7.4 of the EP&A Act.

An updated concept design (including possible upgrading to the intersection with Lackey Road) was provided to Council for comment. A response was received on 13 September 2022 which stated the following:

"In response to the preliminary drawings of the intersection of the east-west access road and Lackey Road, the provision of a CHR(S) appears to be an appropriate treatment however final support would be contingent upon receipt of a design report providing confirmation of its adherence to relevant standards and guidelines."

Issue

Levies through the MVEC Contributions Plan have been collected exclusively for land acquisition along identified road corridors, but not for the construction of the roads. The proponent would therefore need to construct the road at their expense, but to Council's standards, as a condition of consent.

Response

Plasrefine Recycling acknowledges that the acquisition of the land required for the east-west public access road would have been funded through the MVEC Contributions Plan.

Plasrefine Recycling was proposing to initially fund the design and construction of the east-west public access road, noting that discussions were being held with Council in regard to the public roadworks being considered as 'works in kind' and therefore potentially able to offset developer contributions. Once constructed, the new east-west access road was proposed to be dedicated to Council for maintenance and use as a public road.

M-4 Community

Issues

Several submissions raised concern about the east-west public access road. Issues raised included concern with:

– The appropriateness of site access
– Construction methodology, staging and costing
– Relocation of existing services
– Swept path analysis for Lackey Road intersection
– Wingecarribee Shire Council's position on the proposed alignment.

Response

The proposed east-west public access road was to extend from Lot 11 DP 1084421 to Lackey Road via the currently unformed Braddon Road (paper road), traversing Lot 10 DP 1084421 (the 'Proposed Braddon Road east extension). The land required for the section of road from the paper road to Lackey Road is privately owned.

The new east-west public access road was proposed to be located within a corridor with a width of about 20 metres. The western end of the new east-west public access road was proposed to commence near the western entrance of the facility and connect to Lackey Road in the east. The corridor was proposed to be about 915 metres in length, with an area of about 1.8 hectares. It was proposed to be located mostly on disturbed land, with a small area of existing native vegetation. This corridor was previously identified by Wingecarribee Shire Council in the *Moss Vale Enterprise Corridor Development Control Plan* (2012) as an area reserved for a collector public road.

Prior to selecting the alignment for the proposed new public road access, three options were considered and assessed. These are detailed in section 4.3 of the EIS. The three road access options were discussed with Wingecarribee Shire Council at a meeting on 18 June 2021, at which analysis of each of the three options from a traffic, environment, safety and strategic perspective was presented. At the same meeting, Council advised that it can compulsorily acquire land where an agreement has not been achieved through negotiation and the need for the land access/road is identified in WSC's Section 94 Developer Contributions Plan.

Following this meeting, Council agreed that Option 2, the east-west connection with Lackey Road (Braddon Road east extension), was the preferred option for the public road. Two sub options were assessed - Option 2a (impacting one lot) and Option 2b (impacting two lots). Option 2b, which traverses Lot 1 DP 26490 and Lot 10 DP 1084421 would have permitted a straighter road alignment than Option 2a, however Option 2a was identified as the preferred proposed route, as it would have impacted fewer land holders. Council advised in August 2021 that the proposed '*access through Braddon Road is in accordance with the Council's adopted traffic network for the Enterprise Corridor/SHIP and Council's preference is that access is in accordance with the DCP/s94 Plan for that area'*.

Construction of the proposed east-west access road was expected to take up to three months. Further design information for the proposed east-west public access road is provided in Section M-1. The construction methodology was proposed to be finalised during pre-construction planning for the works, upon consultation with the Australian Bioresources facility and engagement of the construction contractor.

The work method for construction of the east-west access road including identification and relocation of existing services was expected to generally involve the stages detailed in Table K.1. Use of Beaconsfield Road was only proposed for use by heavy vehicles during construction of the east-west public access road, for up to three months.

Table M.1 Proposed construction methodology for the east-west public access road

Construction stage	Duration	Description
Stage 1	2 weeks	– Mobilisation of plant via Beaconsfield Road – 20 tonne excavators – Bulldozers – Road Rollers – Asphalt Mixers – Tippers – Site establishment works including clearing and construction of hardstands for construction compound and laydown areas and access road along road alignment to facilitate construction access via Lackey Road
Stage 2	4 weeks	– Bulk earthworks – Existing services relocation – Retaining walls and stormwater drainage structures – Road paving – Dewatering and reshaping of the northern bio-retention basin – Alternative Australian Bioresources facility access
Stage 3	4 weeks	– Bulk earth works – Retaining walls – Road paving – Lackey Road intersection upgrade (if required)
Stage 4	2 weeks	– Demobilisation of road construction plant via Lackey Road – Decommissioning of temporary alternative Australian BioResources facility access road – Decommissioning of construction laydown area 2

The revised overall construction program based on this east-west public access road construction methodology is presented in Table K.2.

Table M.2 Proposed construction timeline for proposal with east-west public access road

Stage	Activity	Estimated duration
Stage 1 – site establishment	– Site establishment – Access road construction	3 months
Stage 2 – Ground works and excavation	– Bulk earthworks for site shaping and surface water – drainage and the bioretention pond – Pouring concrete foundation slab, footings, hardstand – and slabs for the buildings – Construction of pavement areas for the truck and car – park, internal roads and the site entrance/egress points	1 month
Stage 3 – Construction of the main structures	– Installation of steel truss framework for structures – Erection of pre-cast concrete panels for external and – internal partition walls and metal roof for site buildings – Installation of firewater and other tanks – Installation of weighbridges	7 months
	– Installation of processing equipment	2 months
Stage 4 – Testing and commissioning	– Testing and commissioning	3 months

Costs associated with construction of the east-west access road were estimated by a quality surveyor to be of the order of $1.38 million. This information was provided in Appendix H of the EIS.

Council's position on the east-west public access road design is provided in Section M-1.

Issues

Some submissions raised concerns about the proposed construction process. Issues raised related to the east-west public road included concerns with:

– Detail regarding the road design and constructability
– Detail regarding the timing and staging of construction, including detail on how impacts to local utilities would be avoided
– How construction plant and equipment would access the site
– Impacts to the Australian Bioresources facility during construction.

Response

Information regarding the design of the east-west public access road is provided in Section M-1.

Information regarding the proposed construction staging and timing for the east-west public access road is also provided in Section M-1.

Relocation of existing utilities located within the east-west public access road corridor was proposed to be undertaken in the initial stages of construction. Construction plant for roadworks was proposed to be mobilised to the proposal site via Beaconsfield Road during Stage 1 of construction.

Access to the Australian Bioresources facility was proposed to be maintained throughout the construction phase. Consultation was undertaken with Australian Bioresources regarding temporary access during construction and options for the relocation of the existing driveway. As identified in chapter 1 of the EIS, the new driveway for the Australian BioResources facility was proposed to be undertaken as a separate development application.

During development of the EIS and the design of the facility, regular engagement with the Australian Bioresources facility, as the nearest sensitive receiver, was carried out in relation to:

– Site access for environmental investigations
– Potential and perceived impacts to its daily operations
– Noise monitoring and modelling

– Construction of the proposal
– Fire risk and management
– Site layout
– Access to the proposal site (including land acquisition and valuation)
– Services and utilities within proximity to the proposal site and within the proposed road corridor.

Draft copies of the following technical reports were provided to Garvan Institute of Medical Research for its review and discussion:

– Technical Report 2 – Noise and Vibration
– Technical Report 3 – Air Quality and Odour
– Technical Report 6 – Traffic and Transport.

Garvan Institute of Medical Research was contacted in November and December 2021, to discuss the potential purchase of land by Plasrefine Recycling to enable the new public access road to be built, to connect the proposed facility to Lackey Road, and avoid the use of Beaconsfield Road.

Following exhibition of the EIS, consultation with Garvan Institute of Medical Research continued and is proposed to continue during future stages of the proposal (see Section 2 of this report).

Issue

The highest number of traffic issues submitted related specifically to use of Beaconsfield Road and associated noise, air quality and safety impacts to surrounding residents and road users.

Response

During the construction phase, as discussed in Section M-1, heavy vehicles were proposed to access the proposal site via Beaconsfield Road for mobilisation of construction plant and equipment for the east-west public access road (Braddon Road and the proposed Braddon Road east extension to Lackey Road). This was expected to be undertaken over a period of approximately three months.

Following completion of the new east-west public access road, Beaconsfield Road was not proposed to be utilised by heavy vehicles and no connection between Beaconsfield Road and the new Braddon Road was proposed. This is consistent with the Transport Infrastructure plan for the SHIP.

During operation of the facility all heavy vehicles were proposed to access the facility via the east-west public access road (Braddon Road and the proposed Braddon Road east extension to Lackey Road). Beaconsfield Road was not proposed to be used for heavy vehicles during operations.

Issue

There were a number of comments regarding congestion on the existing local road network and capacity of the existing network to accommodate additional traffic movements generated by the proposal.

Response

Technical Report 6 - Traffic and Transport assessed potential impacts on the local road network and found that local roads including Beaconsfield and Lytton Road have sufficient mid-block capacity and would be able to cater for traffic flow associated with construction of the proposal, with negligible impact to road operation. Following the construction of the east-west public access road, site construction access was proposed to use Lackey Road and the newly constructed east-west public access road.

Intersection modelling at Lackey Road / new east-west public access road and Berrima Road / Lytton Road indicated that under the existing (2020) and future (2030) scenarios both intersections were expected to perform at an acceptable Level of Service with additional capacity in both the weekday morning, evening and weekday.

Issue

Further clarification was requested regarding assurances as to how trucks would be managed to ensure that proposed traffic routes in the EIS are adhered to during construction and operation.

Response

The proposed haulage routes for heavy vehicles during construction and operation of the proposal were identified in the EIS as:

– From Sydney: Hume motorway, Medway Road, Taylor Avenue, Berrima Road, Douglas Road/Collins Road, Lackey Road and the east-west public access road
– From Canberra: Hume motorway, Old Hume Highway, Taylor Avenue, Berrima Road, Douglas Road/Collins Road, Lackey Road and the east-west public access road
– From Wollongong: Princes Highway, Mount Ousley Road, Picton Road, Hume motorway, Medway Road, Taylor Avenue, Berrima Road, Douglas Road/Collins Road, Lackey Road and the east-west public access road.

These routes are approved for use by heavy vehicles. Monitoring of heavy vehicle transport routes is addressed is Section 5.9.2. The OEMP would specify heavy vehicle routes and this information would be communicated to haulage companies and drivers to ensure that these routes are adhered to by delivery and despatch vehicles.

Issue

The following issues were raised associated with the traffic survey undertaken by GHD as part of the traffic and transport assessment:

– The survey was undertaken in 2020 during a period of significantly reduced traffic flows due to the COVID pandemic. It is requested that the survey is repeated once traffic flows return to normal to allow for an accurate assessment of impacts. It is also noted that there has been an increase in migration from Sydney to the Southern Highlands area following 2020.
– The automatic tube count assessment of traffic on Beaconsfield Road seems to have been conducted in the vicinity of Trotter's Lane. Local experience would suggest that the majority of traffic on Beaconsfield Road after Lytton Road turns onto Roche Cl or Stables Place. The tube will not have detected that traffic.
– No assessment of Lackey Road was undertaken.

Response

While the comments regarding the timing of the traffic survey undertaken by Matrix Traffic and Transport Data Pty Ltd on behalf of GHD are noted, the analysis shows the road network analysis is well within capacity limits with the available capacity to cater for the changes in traffic that may result relating to the comments. In addition, Beaconsfield Road is planned to be used for mobilisation of construction plant for construction of the new access road only and would not be used by heavy vehicles during operation of the facility.

In regard to the location of the automatic tube count on Beaconsfield, the traffic count was placed in this location to ascertain general mid block traffic flow along Beaconsfield Road to gain an understanding of potential "typical" traffic along Beaconsfield Road. The tube counter was positioned generally within the "built up area" of Beaconsfield Road and at the mid block positioning. Given the land use /density in the area, positioning of the traffic counter and review of the data obtained in previous survey, it is anticipated that the road network would remain within road network capacity.

Traffic counts were undertaken at the Lackey Road intersection as part of the intersection assessment to ascertain both the operation of the existing intersection (to the private road) and future operation of the Lackey Road / east-west public access road intersection. The existing traffic numbers were based on traffic counts undertaken as part of the assessment. The SIDRA model analysis indicated that the existing/future intersection operated well within operational capacity. Furthermore it is noted that the SIDRA modelling was undertaken as a worst case layout configuration (BAR treatment – single lane each way).

A comparison of two possible intersection configurations is shown in Figure K.1. The CHR(S) layout would further improve intersection operation above what was modelled (the BAR) due to the CHR(s) having a proposed designated right turn lane from Lackey Road (southbound) into the access road (westbound). This would allow south bound vehicles to pass a waiting righting turn vehicle without obstruction. This unimpeded through traffic flow is not afforded in the BAR modelled configuration, as the south travelling vehicle would have to slow and stop if a vehicle ahead was turning right into the east-west public access road.

Figure A 6: Basic right (BAR) turn treatment on a two-lane rural road

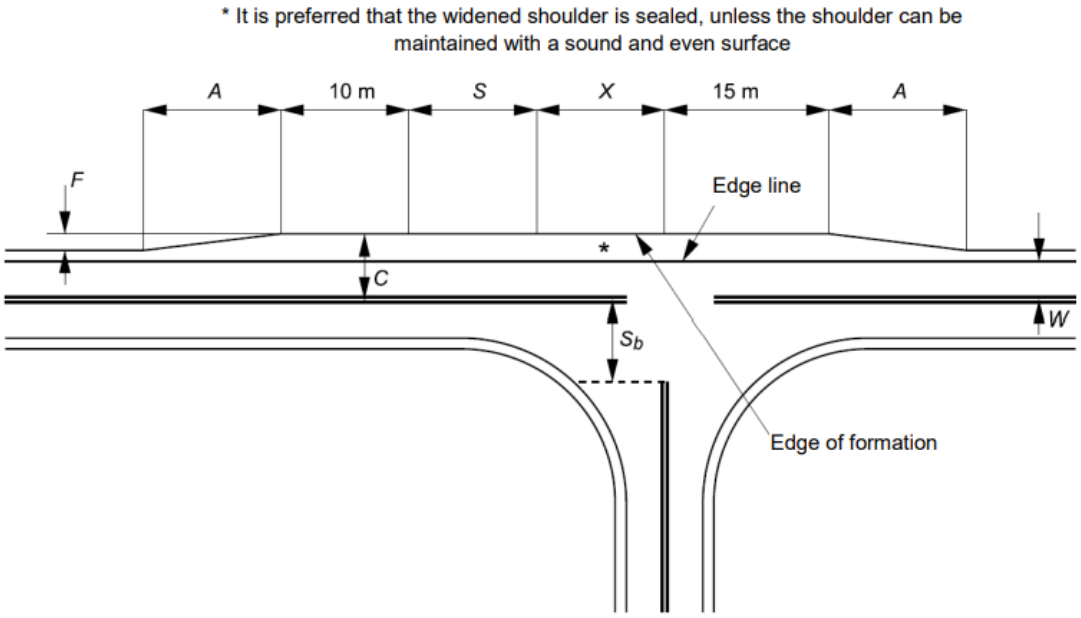

Figure A 7: Channelised right-turn treatment with a short turn slot [CHR(S)] two-lane rural road

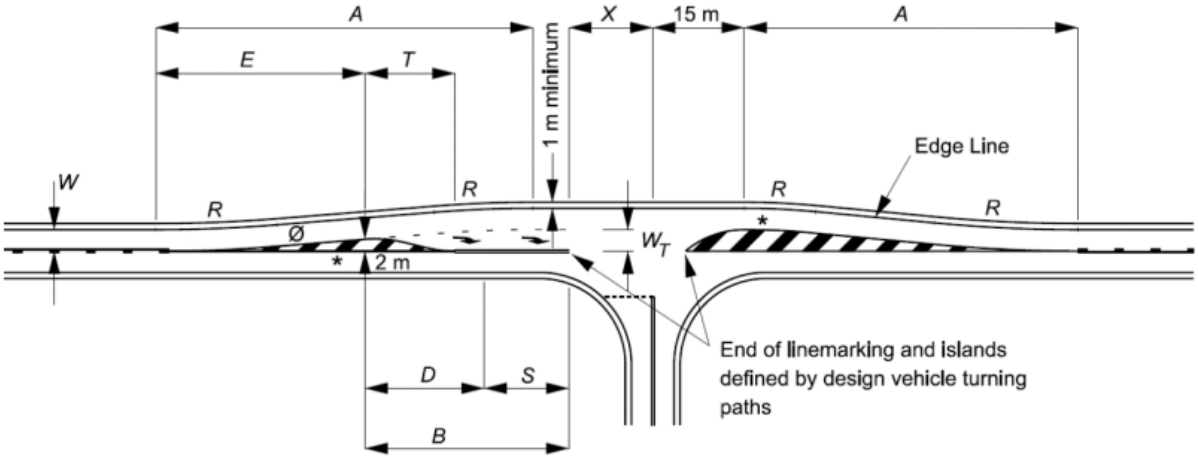

Figure M.2 BAR and CHR(S) intersection configuration (source Austroads Guide to Road Design Part 4: Intersections and Crossings – General (2021))

Issue

Disruption to existing services to neighbouring properties during construction in particular the Australian BioResources facility.

Response

A Before You Dig Australia survey has already been undertaken. Australian BioResources services were identified at the end of Beaconsfield Road that the east-west public access road would have traversed. This includes underground electrical cables, fibre optic cable, 210 kPa gas distribution line and a sewer rising main. There is also a water main along the south of the lot up to Beaconsfield Road including some stop valves and a hydrant that would have needed to be relocated.

During detailed design, potential interaction with existing services would have been further assessed by using on-site service location techniques.

After the route is surveyed, exploratory excavation would have been undertaken to confirm the presence or absence of buried services, and enable them to be marked and identified, and if necessary, relocated.