

Our Ref: 17322

28 March 2019

Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Mr Bruce Zhang

Dear Bruce,

**RE: CHESTER HILL MATERIALS RECYCLING FACILITY MP 06_0052 MOD 3
RESPONSE TO CANTERBURY BANKSTOWN COUNCIL SUBMISSION**

The Transport Planning Partnership (TPPP) prepares this letter in response to comments made by Canterbury Bankstown Council (CBC) in relation to the above development application.

TPPP has undertaken a review of the comments provided by CBC in their letter dated 18 March 2019. Our review of the comments appears to indicate that Council may not have the relevant information when conducting the review as the majority of the information they requested for have been included in the submitted traffic assessment report as Appendix D in the Environmental Assessment. For example, Council in their letter referenced the previous traffic impact assessment report for a processing facility of 100,000 tonnes per annum (tpa) which included SIDRA modelling, and requested for a revised traffic impact assessment to include SIDRA modelling. However, the traffic impact assessment report in Appendix D does include SIDRA modelling.

In light of the above, TPPP attempted to make contact with CBC using the contact details provided in their letter to confirm if Council has made the comments based on the relevant documents. However, they refused to engage with us, and requested for TPPP to direct the queries to the Department instead. Council also alluded to multiple traffic reports provided by the applicant, but it is noted only one traffic impact assessment report has been prepared for this application which is the traffic assessment report in Appendix D.

Notwithstanding the above, TPPP provides below for each item of information requested by CBC where and how it has been addressed in the submitted traffic report. This is presented in Table 1.

Table 1: Response to Council's Comments

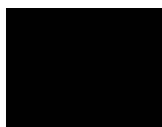
Council's Comments	TTPP's Response	Report Reference
SIDRA Model based on up-to-date traffic volume data for various intersections to establish the existing traffic conditions.	SIDRA modelling results have been provided in Tables 4.2, 4.3 and 4.4 in the submitted traffic assessment report. The SIDRA models have been prepared based on traffic surveys conducted at nearby intersections for the two weekday peak periods in November 2017. The future case models include growth of the background traffic obtained from Roads and Maritime Services.	Section 2.4 and Section 4.
Detailed calculation of the projected morning and afternoon peak period trip generation to assess the impacts on the surrounding road network.	The submitted traffic impact assessment includes details on the projected morning and afternoon peak period traffic generation arising from the proposed development. In relation to truck movements, the submitted report explained that development traffic has been forecast based on the proposed tonnage of materials to be processed and the expected size of vehicles used to transport the materials. It is noted that the previous traffic report (for the 100,000 tpa proposal) arbitrarily estimated the development would generate approximately 40-50 trucks per day, but adopted a worst case of 100 trucks per day which equates to 18 truck movements per hour. Based on operational requirements, TTPP has estimated the current proposal would generate 22 truck movements per hour. In relation to staff traffic, TTPP's assessment has adopted the same number of staff traffic as that estimated by the previous traffic assessment despite the current proposed development would employ only 13 staff.	Section 3.3 and Section 4.1.
Background data to explain the calculation of the proposed heavy vehicle trip generation (page 11) to assess whether the proposal complies with the daily processing limit of 910 tonnes per day, and to inform the ESA calculation. An appropriate ESA calculation is required to establish the effect of the heavy vehicles on the road surface and whether the proposal would require improving road pavements and /or changing the road geometry to accommodate the influx of heavy vehicles.	As explained above, the submitted traffic report estimated the calculation of heavy vehicle trip generation has been based on operational requirements of the proposed development. The application seeks approval to increase the tonnage of materials to be processed from 100,000 tpa to 250,000 tpa. In summary, the heavy vehicle trip generation has been estimated as follow: • 250,000 tpa • 275 operational days per year • 910 tonnes per day • 10 working hours per day • 91 tonnes per hour • incoming materials transported by 12.5 tonne rigid trucks (12.5m HRV) – 8 trucks or 16 truck movements per hour • outgoing processed materials transported by 42 tonne articulated trucks (19m semi-trailers) – 3 trucks or 6 truck movement per hour. ESA calculations have been undertaken by others.	Section 3.3 and Section 4.1.
The proposal is to increase the capacity of the facility from 100,000 to 250,000 tonnes per annum. However, the Traffic Impact Assessment Report does not consider whether there are sufficient parking spaces to cater for the operational needs of the heavy vehicles and the short-term influxes associated with the anticipated demand.	As indicated in the submitted traffic report, trucks are not expected to remain on the site for any extended period of time as the trucks would be processed as they come in. Therefore, parking for trucks would not be required. In addition to the above, the proposed enclosure where the materials are proposed to be processed can accommodate up to five 19m long articulated trucks and nine 12.5m long trucks. In addition, there are other residual areas within the enclosure to "stack" park the trucks if required. It is noted the proposed development has been estimated to generate three articulated trucks and eight rigid trucks per hour. As such, parking of heavy vehicles can be accommodated within the enclosure.	Section 3.6.

Council's Comments	TTPP's Response	Report Reference
A parking study is required to: - Confirm the heavy vehicle parking requirements arising from this facility. - Confirm future staff numbers to assess whether the proposed 13 additional spaces are sufficient to cater for future demand. - Parking for emergency vehicles.	It is TTPP's opinion that a parking study will not be required as the expected parking would be minimal and can be fully accommodated on-site. - In relation to heavy vehicle parking, see discussion above. - In relation to future staff numbers, the submitted traffic report indicates that the proposed development would employ up to 13 staff. The submitted traffic report also indicates that the existing car park with 74 car parking spaces will be retained to satisfy the parking requirements of the proposed development. - Parking of emergency vehicles can occur within the car park.	Section 3.6. Section 3.2 and Section 3.5.
Whilst the Response to Submissions Report comments that 'there will be no permanent heavy vehicle parking available on site given that all heavy vehicles arrive and leave the site almost immediately after unloading/loading', there is no information to support this statement.	It is an operational requirement that trucks are processed immediately upon arrival at the site. It is not necessary for trucks to remain on the facility. The loading and unloading process of trucks is straight forward and is unlikely to require up to an hour to be processed. In addition, truck drivers are paid based the tonnage of the materials rather than based on time spent. Therefore, it would not be in the interest of the truck drivers for them to stay longer than they need to.	N/A
Whilst the Response to Submissions Report suggests imposing load limits along Gurney Road, Council does not support heavy vehicles using Gurney Road to access the site as this would impact on the amenity of surrounding residential areas. The Traffic Impact Assessment Report must avoid the use of Gurney Road to access the site.	As indicated in the submitted traffic report, the traffic generated by the proposed development has been distributed based on the same distribution adopted by the traffic assessment for the 100,000 tpa proposal. That traffic assessment was accepted by the consent authorities including Canterbury Bankstown Council. Notwithstanding, if heavy vehicles generating by the subject proposed development were to be re-directed from using Gurney Avenue, TTPP is of the opinion that it would not create any noticeable adverse traffic effects to the operation of the surrounding intersections for the reasons explain below. As discussed in the submitted traffic report, the subject proposed development is expected to generate approximately 22 heavy vehicle movements per hour (two-way). Also discussed in the submitted traffic report, the heavy vehicles have been distributed to the road network as follow: 25 per cent inbound - access the site from the north via Christina Rd and Miller Road 25 per cent inbound – access the site from the north via Gurney Rd and Miller Road 50 per cent inbound – access the site from the south via Miller Road 25 per cent outbound – travel to the north via Miller Road and Christina Road 25 per cent outbound – travel to the north via Miller Road and Gurney Road, and 50 per cent outbound – travel to the south via Miller Road and Hume Highway. As indicated before, the above distribution is consistent with those used in the traffic assessment that accompanied the previous application which was subsequently approved by the Department. From the above, Gurney Road is expected to receive approximately 6 heavy vehicle movements per hour (two-way). The 6 heavy vehicle movements is considered to be	Section 4.3.

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	low. In addition, there are multiple route choices for these vehicles to access the site to and from the north. For example, instead of using Gurney Road the heavy vehicles could travel north using Woodville Road via Christina Road. Alternatively, they could access Woodville Road via Hume Highway. As such, these 6 heavy vehicle movements would be distributed across multiple routes further diluting the traffic effects of these heavy vehicle movements. Furthermore, intersection capacity analysis results as reported in the submitted traffic assessment report indicates that the assessed intersections in the future would operate with good level of service (i.e. LoS C or better in all peak periods in all scenarios). As such, there would be adequate intersection capacity to accommodate the re-directed heavy vehicles if required.	
The Traffic Impact Assessment Report must consider the shared use of the right-of-way with the other user (Logistics Sales and Hire) and demonstrate whether this arrangement is adequate to cater for the needs of both users both currently and in the future. The Traffic Impact Assessment Report must also review the need for a queuing distance within the site in light of this additional information.	It is noted that the existing right of way has been measured using aerial imagery to be less than 11m. The architectural site layout plan indicates that the right of way adjacent to the proposed enclosure would have a width of 12.85m (at its nearest location) excluding kerb/footpath widths. As such, in the future the right of way would be wider than it currently exists. Furthermore, a width of 12.85m is capable of providing three traffic lanes (two inbound lanes plus one outbound lane) at 4.3m each noting that main arterial roads including those used by heavy vehicles has traffic lane width of 3.5m. As such, it is expected the right of way will continue to adequately cater for the needs of the users. In relation to queuing distance, as indicated above queuing of trucks would occur within the enclosure. In the unlikely event that vehicle queues extend beyond the enclosure, the right of way (with two inbound and one outbound traffic lanes) would permit vehicles from the adjoining development to travel past vehicles waiting to enter the enclosure.	N/A

We trust the above is to your satisfaction. Should you have any queries regarding the above or require further information, please do not hesitate to contact the undersigned on 8437 7800.

Yours sincerely,



Michael Lee
Director