

Ref No.: Contact: Ph: Date: SSD1-1/2023 Brianna van Zyl 8711 7940 18 Janaury 2023

Department of Planning and Environment Resource Assessment Parramatta NSW 2124

Sent via email: <u>carl.dumpleton@planning.nsw.gov.au</u>

Re: Bringelly Brickworks Extension Project – SSD5684 Modification 2

Dear Carl Dumpleton,

Thank you for your correspondence dated, 3 January 2023 requesting Liverpool City Council's comments on the State Significant Development Application 'SSD5684-Mod-2' located at 60 Greendale Road, Bringelly (Lot DP 1203966).

On the 13 September 1991, Camden Council granted development approval at the abovementioned site which permitted extraction of up to 200,000 Tonnes Per Annum (TPA), and brick production of up to 160,000 TPA.

In March 2015, the Minister for Planning approved an expansion of the site and continuation of brickmaking through the State Significant Development (SSD) approval pathway. Following this, the SSD was modified in October 2016 to increase the extent of raw materials imported to the site.

The subject modification application proposes several amendments to the SSD to facilitate further expansion of quarry and brick making operations, including:

- Extending the consent period of quarry operations;
- Increasing the extraction of clay from 200,000 TPA to 350,000 TPA;
- Increasing the production and quantity of brick movements from the site, from 263,500 TPA to 330,000 TPA;
- Increasing the delivery of raw materials from 321,000 TPA to 350,000 TPA;
- Increasing truck movements from the site from 180 to 400 truck movements per day, and increase the cap on hourly truck movements; and,
- Various other changes relating to expansion of site boundaries, relocation and reconfiguring of driveway access and weighbridge, vegetation clearing, and site management etc.

It is acknowledged that the subject site is located entirely within the Camden Local Government Area (LGA). However, as the site adjoins the Liverpool LGA boundary, Council appreciates the opportunity to comment on this application.



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The amendment report and supporting documentation have been reviewed, and recommendations are attached to this letter. Given the extent of the proposed modification and subsequent increase in traffic movement, the attached submission raises Councils concerns regarding traffic movement, access arrangements at the impacts on Bringelly Primary School and residents.

Should you wish to discuss this matter further, please contact Brianna van Zyl, Strategic Planner on (02) 8711 7940 or <u>vanzylb@liverpool.nsw.gov.au</u>.

Yours sincerely,

Nancy-Leigh Norris Executive Planner

Liverpool City Council comment on Bringelly Brickworks Extension Project SSD5684– Modification 2

1. Traffic and Transport

It is noted that Greendale Road is classed as a rural road, and the section of Greendale Road between The Northern Road and Dwyer Road forms part of the boundary between Liverpool City and Camden Council. As such, both Councils are the relevant road authorities. Liverpool City Council maintains the northern side of the half road from The Northern Road up to Dwyer Road. Camden Council maintains the southern half of the road section. The remaining section of Greendale Road (full road) from Dwyer Road up to Wallacia is owned and maintained by Liverpool City Council.

a. <u>Traffic Movement</u>

The proposed development is forecasted to increase heavy vehicle movements from 113 to 400 heavy truck movements daily. These heavy vehicle movements will damage the existing road pavement between 60 Greendale Road and The Northern Road. If the application is approved, a condition of consent is to be imposed to strengthen the existing road section. This involves the placement of deep lift asphalt (230mm minimum). In addition, a road maintenance regime is to be agreed upon between the applicant, Liverpool City Council and Camden Council for this section of road.

b. Access Arrangements

The existing access arrangement to the site off Greendale Road comprises of the auxiliary left turn lane. The proposed development will generate increased traffic movements into/out of the site, which, per the Austroads design guide, requires auxiliary right-turn bays into/out of the development site.

Design of the required auxiliary right turn/left turn treatments and associated signage and line marking is to be submitted to Liverpool City and Camden Council's for approval. The approved treatment is to be constructed at no cost to the two Councils, and prior to the occupation of the development.

c. Impacts on Bringelly Public School

Bringelly Primary School is in close proximity to the development, and it is understood stakeholder engagement has previously occurred where the school has raised objections. It is acknowledged that the forecast traffic increase could affect road safety along the road section fronting the school.

It is recommended that:

- A condition of consent is imposed to maintain the existing heavy truck movements during school peak hours between 60 Greendale Road and the Northern Road;
- Further consultation should occur with Bringelly Public School, and any concerns they raise must be considered; and,

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 An Operational Traffic Management Plan (OTMP) be prepared in consultation with both Liverpool City and Camden Council's which demonstrates how to maintain heavy vehicle movements to the existing level during peak school hours. The OTMP is to be submitted to both Council's for endorsement.

d. <u>Street Lighting</u>

The applicant is to engage a Level 3 street lighting designer to review street lighting along Greendale Road, specifically between The Northern Road and the development site. If additional lighting is required, the applicant should install the required lighting at no cost to either Council before the occupation of the development.

e. <u>Signpost</u>

TfNSW should be consulted on the opportunity to reduce the currently signposted 60km/h along the road section between the development site and the Northern Road including the school frontage to 50km/h, as a way of managing increased traffic from this development.

f. <u>Other</u>

Any damage to Council's assets must be repaired to the Council's satisfaction at the applicant's costs. Council's Restoration Officer must be contacted on the phone (1300 36 2170) for dilapidation reports and restorations before commencing works.

2. Flooding

As per Liverpool City Council's overland flood data, a major overland flow path/waterway (referred to as Thompson Creek in the Civil design report by AT&L) traverses along the eastern boundary of the site. There is also an overland flow path running through the site and crossing into Liverpool LGA through Greendale Road via an existing pipe crossing. This overland flow path also joins the main Thompson Creek within the Liverpool LGA.

The subject development proposes to modify the catchment characteristics and increase the impervious area on the site. This is likely to affect the existing flood regime down the waterways.

The proposed development is to have no detrimental impacts on the flooding and water quality on the existing waterway north of the site. The proposal is not accompanied by a flood impact assessment, and it is therefore difficult to ascertain the affects of the proposal on the flooding and water quality on the existing waterways Therefore, a flooding impact must be submitted to both Councils for assessment.

Council makes the following recommendations:

• An Overland Flood Study is to be undertaken to demonstrate that the proposal will have no adverse flooding impacts in the vicinity in terms of increase of flows, flood levels, extent, and velocities on the existing waterways north of the development due to the

proposed work. The study should be undertaken through 2D flood modelling for pre & post-development scenarios for the 20%, 5% and 1% AEP storm events.

- A Flood Impact Assessment report should be provided with necessary flood maps (depth, velocity & extent) and flood difference mapping.
- Stormwater quality treatment facilities are to be incorporated into the proposal as proposed, to treat stormwater pollutants and all contaminants generated from the development during construction and operation stages, before discharging into the existing waterways flowing to the Liverpool LGA north of the site.

3. Environmental Health

The following recommendations are provided for this modification:

- a. All mitigation and management practices recommended in the Air Quality Impact Assessment and the Noise Impact Assessment are to be implemented;
- b. The operator shall be responsible for the maintenance of an up-to-date noise complaint register. Residents shall be able to contact the operator regarding noise concerns 24 hours and 7 days a week; and,
- c. The relevant consent authority is to apply all relevant noise and environmental conditions of consent.