

Key Sites and Industry Assessments  
Department of Planning, Industry & Environment  
GPO Box 39  
SYDNEY NSW 2001

**ATTN: Ellen Luu**

Dear Madam/ Sir,

**New Request for Advice – Luddenham Resource Recovery Facility (SSD-10446)  
(Liverpool City) - Environmental Impact Assessment**

Thank you for your request via Major Projects Planning Portal (ref: PAE-8659732) dated 27 July 2020 requesting Transport for NSW (TfNSW), review and comment on the above. Legislation came into effect on 1 December 2019 that brings together Roads & Maritime Services and TfNSW. This response reflects the advice from the new organisation.

The proposed development is located at 275 Adams Road, Luddenham, NSW and legally defined as Lot 3, DP 623799. The proposal is to develop an advanced resource recovery centre (ARRC), that will process up to 600,000 tonnes per annum (tpa) of general solid waste.

There is an existing clay and shale quarry on the subject property approved under Development Consent DA 315-7-2003, as modified. The proponents of this SSDA have commenced the application process to modify the quarry's consent to allow quarry operations to recommence, in parallel to this SSDA. It is proposed to develop the project in an area to the north of the existing quarry void with both projects sharing the Adams Road access with the quarry.

The supporting documentation provided in support of the proposed development application has been reviewed, and comments on the following matters are provided:

- Further consideration to the Traffic Impact Assessment;
- Further consideration to Road Network requirements; and
- Need for a Construction and Traffic Management Plan.

Detail on the above matters is provided in **TAB A**.

Should you require clarification of any issue raised, please don't hesitate to contact Robert Rutledge, Principal Transport Planner, Land Use Planning and Development at [Robert.rutledge@transport.nsw.gov.au](mailto:Robert.rutledge@transport.nsw.gov.au).

Yours sincerely



26/8/2020

**Mark Ozinga**  
Principal Manager, Land Use Planning & Development  
Customer Strategy and Technology

CD20/06258

## **TAB A – TfNSW Comments – SSD 10446 EIS Luddenham Resource Recovery Facility**

### **Traffic Impact Assessment**

#### Comment

- Transport for NSW has noted some minor discrepancies in the Environmental Impact Statement (EIS), and Traffic Impact Assessment (TIA):
  - Car parking spaces varying between 45 and 47 spaces in the EIS, TIA and site plan;
  - In TIA, 514 vehicles carrying average load of 4.4 tonne, but generating 1,082 trips. The numbers provided also do not add up to 1,368 movements; and
  - Daily heavy vehicles (4.4t vehicles + larger trucks) number provided in the EIS is 585 (page 43), however, in TIA (page 23) the number used is 612.

#### Recommendation

It is requested the proponent clarify the above discrepancies, and take into consideration all the following comments when updating the TIA modelling and required improvements to support the development.

#### Comment

Truck marshalling area is not identified in the site plan. The TIA states that the access road from Adams Rd to ARRC is over 200m long and should be able to accommodate waste vehicles without queuing on the public road. It is not clear if this area will also be used for heavy vehicle staging/queuing. If so, then the proponent should consider upgrading the access road wide enough to accommodate parked heavy vehicles as well as incoming and outgoing heavy vehicles.

#### Recommendation

It is requested the updated TIA demonstrate the ability of the access road to accommodate waste vehicles without queueing on the public road, and if the access road will be used for staging/queuing heavy vehicles, the internal road design be able to accommodate a heavy vehicle of Performance Based Standards (PBS) Level 2B. This aligns with the NSW Heavy Vehicle Access Policy Framework.

#### Comment

The TIA fails to demonstrate how outgoing vehicles exiting via the western exit will be managed (both in terms of weight and compliance) as these will bypass to the outbound weighbridge and wheel-wash area.

#### Recommendation

It is requested the updated TIA demonstrate how outgoing vehicles exiting via the western exit will be managed (both in terms of weight and compliance) as these bypass to the outbound weighbridge and wheel-wash area.

#### Comment

The TIA does not project a realistic and factual picture of the projected traffic volumes for future scenarios in the Western Sydney Aerotropolis including:

- The projections used in the TIA seem very low with little growth from 2029 to 2039 and in some cases volumes even going down. With all the proposed development in the area this seems unlikely;
- The TIA modelled the STFM (Model TZ11LU 16V 151STMV 362) forecasts for the 2029, 2034 and 2039 traffic modelling. As the version of the STFM model used in the assessment is based on known data in 2016 it is not representative of all known proposals and developments approved after this date;

## **TAB A – TfNSW Comments – SSD 10446 EIS Luddenham Resource Recovery Facility**

- Page 24 makes the assumption that Elizabeth Drive will be upgraded as part of the M12 and completed before the airport opening. TfNSW met with the proponent last year at which time it was clearly advised that there is no funding to upgrade Elizabeth Drive and it is not envisioned to be completed before the opening of the airport. The mid-block capacity also assumes that Elizabeth Drive will be upgraded and would be sufficient; and
- The TIA does not include the traffic generated by the fuel farm that would use Adams Road for the Nancy Bird Walton Western Sydney Airport. This was also communicated in the meeting with TfNSW to the proponents.

### Recommendation

It is requested that the proponent revisit and provide an updated TIA which:

- Addresses the above comments and recommendations;
- Demonstrates Traffic Modelling and analysis for the application considers the cumulative traffic impact of the development on the surrounding roads and intersections in the context of any other known planning proposals and developments in the precinct and surrounds; and
- Provides for the need for upgrades or improvement works including consideration to timing and funding (if required). The updated TIA is to consider the impact on Elizabeth Drive.

### **Road Network Considerations**

#### General Comment

Any road upgrade including internal road design should be able to accommodate a heavy vehicle of Performance Based Standards (PBS) Level 2B. This aligns with the NSW Heavy Vehicle Access Policy Framework.

#### Comment

The turning paths provided for Adams Road entrance indicate that a 19m vehicle cannot turn left-in at the same time that another 19m vehicle is turning right-out.

#### Recommendation

As Adams Road is a local road under the care and control of Penrith City Council, this should be raised with Council to ensure that Council is satisfied with the design limitations.

#### Comment

The intersection of Adams Road and Elizabeth Drive is likely to require some upgrades to facilitate the turn movements of the larger vehicles using this intersection related to this development.

#### Recommendation

It is requested that the proponent review the intersection on safety grounds and provide a short term safety upgrade to facilitate the additional traffic from this development accessing Adams Road.

### **Construction and Traffic Management Plan**

#### Comment

The TIA presented a Concept construction traffic management plan (CTMP), and stated a detailed CTMP will be prepared following project approval in consultation with the relevant authorities and the nominated construction contractor.

The CTMP should investigate the use of vehicles that carry higher capacity such as PBS combinations, or those enrolled in the Safety, Productivity and Environment Construction Transport Scheme. Using vehicles with a higher carrying capacity will reduce the number of heavy vehicle movements for the given freight task.

## **TAB A – TfNSW Comments – SSD 10446 EIS Luddenham Resource Recovery Facility**

### Recommendation

It is requested that the applicant be conditioned to prepare a detailed Construction and Traffic Management Plan (CTMP), in accordance with TfNSW requirements, detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control.

The CTMP should be submitted to the relevant consent authority for approval prior to the issue of a Construction Certificate.