

28 January 2022

William Hodgkinson  
Team Leader Industry Assessments  
Department of Planning, Industry and Environment  
4 Parramatta Square, 12 Darcy Street  
Parramatta, NSW 2150

**Re: Luddenham Resource Recovery Centre -Response to request for additional information**

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Dear Will,

This letter provides a response to additional matters raised in Department of Planning, Industry and Environment (DPIE)'s request for additional information on the Luddenham Advanced Resource Recovery Centre (ARRC) dated 22 December 2021.

The matters raised by DPIE are provided verbatim in the grey text boxes below with the responses following.

## 1 Heavy vehicle access and transport options

The Response to RFI outlined several transport options for heavy vehicles accessing and exiting the site, including a scenario where upgrades to Adams Road (south of Anton Road) are delayed. The Department notes it is unclear whether the information provided the no left turn sign prohibiting longer heavy vehicles from turning left out of Adams Road onto Elizabeth Drive.

It is requested the Applicant provide additional information detailing any current and future heavy vehicle restrictions, viable and updated SIDRA modelling

The concept design for the interim upgrade to the Elizabeth Drive/Adams Road intersection permits heavy vehicles to turn left out of Adams Road onto Elizabeth Drive. All SIDRA modelling has been carried out on this basis, with the exception of the sensitivity analysis carried out on the TfNSW preliminary concept design as requested by TfNSW and reported in EMM's 16 July 2021 response to matters raised in the letter from TfNSW dated 25 May 2021.

The advice recently received from TfNSW, dated 17 January 2022, notes that the proposed upgrade of the Elizabeth/Adams Road intersection should be consistent with this concept design contained in EMM's 16 July 2021 response, and raises no additional comments in relation to the ARRC further to the post approval requirements outlined in TfNSW's letter to DPIE dated 6 August 2021.

Transport for NSW noted road design for the junction upgrade between Elizabeth Drive and Adams Road discourages heavy vehicle from turning left into Adams Road Elizabeth Drive. It is requested the Applicant investigate transport options in consultation with key stakeholders to ensure heavy vehicles associated with the proposed development can be accommodated by the surrounding road network.

As noted, TfNSW has endorsed the strategic concept design for the interim upgrade to the Elizabeth Drive/Adams Road intersection which permits heavy vehicles to turn left out of Elizabeth Drive onto Adams Road.

It is assumed DPIE are referring to TfNSW's preliminary concept design for the long-term upgrade of the Elizabeth Drive/Adams Road intersection which EMM understands would restrict all turn movements at the intersection except left into Adams Road. The sensitivity SIDRA analysis carried out for this scenario (refer to EMM's 16 July 2021 response) showed there would be significant strain on the at the Northern Road/Adams Road intersection due to the redirected traffic. A LOS F is predicted for this intersection as a result in the change in baseline traffic flow, regardless of whether the project proceeds. This indicates that, regardless of the ARRC, further consideration should be given to the proposed long term Elizabeth Drive/Adams Road intersection or that further road network upgrades would be required (such as construction of the proposed subarterial road connecting Elizabeth Drive to the Anton Road/Adams Road intersection depicted in the draft precinct plan) prior to restricting additional turn movements at the Elizabeth/Adams Road intersection.

As DPIE is aware, there has been extensive consultation with the road authorities, Liverpool City Council and TfNSW, and a wide range of other stakeholders, on these matters.

The Response to RFI stated the subject property readily accessible from major transport links including Elizabeth Drive, M4 Motorway, M7 Motorway, the Northern Road and the future M12 motorway. It is requested the Applicant provide a comprehensive evaluation of the current and future road networks to support this justification, including information regarding road freight hierarchy, classification, functional use and heavy vehicle restrictions across the surrounding road network

It is noted that TfNSW has not raised concerns over the ARRC's impact on the broader arterial road network beyond the Elizabeth Drive/Adams Road intersection and Adams Road/The Northern Road intersections.

Notwithstanding, as noted in the Response to RFI report, Submissions Report and Environmental Impact Statement (EIS), the ARRC will clearly be readily accessible from major transport links. Figure 3.1 of the Submissions Report shows the proposed transport strategy to access Elizabeth Drive and The Northern Road. From these arterial roads the M7 is accessible via Bringelly Road and Camden Valley Way (both arterial B-double routes) or alternatively via Elizabeth Drive. The M4 is accessible via The Northern Road or alternatively via the M7.

Following construction, the M12 would be accessible via The Northern Road or the new interchange on Elizabeth Drive east.

## 2 Comparative analysis

Appendix G of the Response to RFI provided a comparative analysis of typical operating hours, traffic generation and pollution emission rates between the proposed ARRC and specific agribusiness uses permitted under the SEPP (Western Sydney Aerotropolis). The analysis compared the traffic generation and pollution emissions from the ARRC (16 metres above ground level) with a proposed multi-level warehouse and distribution centre in Western Sydney (up to 43.5 metres above ground level). It is unclear whether the objectives of the Draft Western Sydney Aerotropolis Development Control Plan 2021 have been considered in the selection of case studies, noting that an objective for agribusiness is to implement the land use and built form strategy of height, FSR, density, land uses, and activation as outlined in the Precinct Plan. Furthermore, only a single permitted use (that is, warehouse and distribution centre) was considered in the analysis. It is requested the Applicant provide additional information identifying which specific agribusiness uses permitted under SEPP (Western Sydney Aerotropolis) may be comparable to the proposed ARRC in terms of height, gross floor area and daily heavy vehicle generation (excluding 2-axle rigid trucks).

It is noted that pursuant to clause 11 of the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) states that development control plans do not apply to State significant development and accordingly the objectives of the Western Sydney Aerotropolis Development Control Plan 2020 Phase 1 (DCP 2020) or Draft Western Sydney Aerotropolis Plan Phase 2 2021 (Draft DCP 2021) were not considered in the comparative analysis.

It is also noted that the State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (Aerotropolis SEPP) does not contain additional development controls relating to height of buildings (outside of Part 3 to which the ARRC complies) or floor space ratio (FSR). Neither the Draft DCP 2020 or Draft DCP 2021 prescribe building heights or FSR for agribusiness land use but rather one of the objectives of Section 15.2 of the Draft DCP 2021 is to *Implement the land use and built form strategy of height, FSR, density, land uses, and activation as outlined in the Precinct Plan.*

Notwithstanding, the draft Precinct Plan outlines a building height of up to 20 m consistent with the ARRC and the agribusiness land uses assessed in the comparative analysis. The ARRC and agribusiness land uses assessed also generally meet the maximum block size of approximately 12 hectares, employment density and built form outlined in the draft Precinct Plan.

Two separate land uses of a logistics centre (which could service a range of agribusiness industries) and a chilled and fresh produce distribution centre were considered in the comparative analysis. These agribusiness land uses were selected as they were considered comparable in terms of daily heavy vehicle generation and built form. These land uses were also considered representative of the built form depicted for the Agribusiness Precinct in the draft Precinct Plan.

Yours sincerely



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