

Department of Planning, Housing and Infrastructure



Our ref: Waste Management Facility, Botany (SSD-62855708)

Ms Nellie O'Keeffe
Executive Development Director
The Trustee for Coombes Family Trust No.16
2-4 Hale Street
BOTANY NSW 2019

13 September 2024

Subject: Request for Information in Submissions Report

Dear Ms O'Keeffe

I refer to the above State significant development (SSD) application and the Department of Planning, Housing and Infrastructure's (the Department) previous correspondence dated 4 September 2024, which requested the provision of a Submissions Report for the proposal.

In addition to responding to the submissions and advice already received, you are required to submit additional information that addresses the issues identified by the Department in **Attachment 1**. Please include your response to the Department's issues in the Submissions Report.

Noting issues raised in the public submissions and advice from Bayside Council, the Department has concerns regarding the potential traffic impacts associated with the development. When preparing the Submissions Report, the Department requests particular consideration be given to reviewing the suitability of the proposed site access arrangements having regard to the existing constraints. This includes queuing of vehicles on Hale Street, on-street parking and proximity to the Hale Street / Luland Street intersection.

The Department would be happy to meet with you to discuss the issues raised at a mutually convenient time.

If you have any questions, please contact Sally Munk, Principal Planner, on 9274 6431 or via email at sally.munk@planning.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Joanna Bakopanos'.

Joanna Bakopanos

A/Director, Industry Assessments

as delegate for the Planning Secretary

Waste Management Facility, Botany Request for Further Information

1. Traffic Impact Assessment

Public submissions and Bayside Council have raised significant concerns regarding the potential for traffic impacts and the robustness of the Traffic Impact Assessment (TIA). The Department requests a revised TIA addressing the issues raised by the community, Council and the matters outlined by the Department below.

Impact on Road Safety

The TIA has not assessed the predicted impacts of construction and operational traffic on road safety, as required by the Planning Secretary's Environmental Assessment Requirements (SEARs) and the RTA *Guide to Traffic Generating Developments* (2002).

Recommendation: An assessment of the predicted impacts of construction and operational traffic on road safety in accordance with relevant Transport for NSW guidance. This should include an assessment of the safety and efficiency of access between the site and the adjacent road network and consideration of queuing on Hale Street.

Site Access Performance

The RTA *Guide to Traffic Generating Developments* recommends that driveways with high traffic volumes are not positioned close to intersections. The proposed site access is positioned very close (approximately 15-20 metres) to the Luland Street / Hale Street roundabout. Slowing down and queuing of eastbound vehicles at this roundabout has the potential to impact on the performance of the proposed site access. The performance of this intersection and its impact on the efficiency of the site access has not been considered in the TIA.

Recommendation: Further analysis of the site access intersection, including SIDRA modelling, must be undertaken to evaluate the performance of Hale Street at the proposed future site access location.

Operational Traffic Management

While B-doubles are limited to accessing the site from Foreshore Road based on NHVR B-double approved routes, there does not appear to be any restriction for smaller trucks accessing the site from Botany Road and then traveling west along Hale Street to the site access. It is not clear how smaller trucks will be prevented from turning right from Hale Street into the access driveway. This movement has the potential to obstruct through traffic travelling West on Hale Street.

Section 6.12 Queuing of the TIA states that on-site staff will be trained to re-direct trucks should vehicle queues extend near the site access on Hale Street. Insufficient information has been provided to demonstrate the movements of re-directed trucks on-site.

Recommendation: Additional details of how operational traffic will be managed to prevent right-hand turns from Hale Street and how on-site truck movements will be managed in the event of vehicle queues near the site access, is required.

Future Traffic Growth

SIDRA modelling has not been carried out for a future traffic scenario accounting for background traffic growth on the surrounding road network.

Recommendation: SIDRA modelling must be carried out for a future traffic scenario with a 10-year horizon that predicts the performance of key intersections, including the intersections of Foreshore Road / Hale Street, Hale Street / site access and Hale Street / Luland Street. The impact of queue lengths and delays on the safety and efficiency of the future road network must be assessed. Details of any required mitigation measures, such as road widening, must be provided.

Swept Path Analysis

The swept path analysis for the site access driveway provided at Appendix D of the TIA is unclear and indicates there may be conflict between two B-doubles travelling eastbound and westbound on Hale Street.

Recommendation: Revised swept path analyses are required for 20 metre articulated vehicles and B-doubles accessing the site that clearly demonstrates the centreline of Hale Street will not be crossed and there will be no conflict with on-street parking. All line marking on Hale Street must be clearly marked.

Daily Heavy Vehicle (HV) Movements

Section 6.10: Truck Frequencies of the TIA outlines the anticipated truck volumes for the development. It is not clear how these vehicle numbers have been determined. Bayside Council has also raised several queries regarding the traffic generation analysis.

Recommendation: Additional information is required to justify the predicted truck volumes, including the breakdown of vehicle types.

Peak Period Vehicle Movements

Section 8.4.1: Critical Intersection of the TIA states that the proposed development is expected to generate 35 vehicle trips per hour during both the morning and afternoon peaks. This is inconsistent with the statement made in Section 8.2.3: Combined Generation of the TIA, which states that the development is predicted to generate 41 vehicle trips per hour.

Recommendation: The TIA must be revised to ensure traffic volumes used are consistent throughout the report. All updated SIDRA modelling must be based on the correct traffic volumes.

Street Parking

Section 9.1.3 Loss of On-Street Parking notes the development will result in a loss of five on-street parking spaces on the northern side of Hale Street. The impact of this has not been assessed and no mitigation measures or offsets have been proposed.

Recommendation: The TIA must be revised to assess the impact of the loss of five on-street parking spaces and confirm how this reduction in parking will be mitigated or offset. Evidence of in principle support from the local traffic committee for the removal of the on-street parking spaces should be provided.

Construction Traffic

The SEARs require impacts of all key stages of construction and operation of the development to be assessed. This is a standard requirement for all SSDs. A construction traffic impact assessment cannot be carried out post-determination, as proposed in the Preliminary Construction Traffic & Pedestrian Management Plan (CTPMP) prepared by TRAFFIX, dated 15 July 2024.

Recommendation: A construction traffic impact assessment must be provided, particularly given existing traffic issues in the area.

2. Noise and Vibration Impact Assessment

The EPA has raised several concerns regarding the Noise and Vibration Impact Assessment (NVIA) prepared by E-Lab Consulting, dated 16 April 2024. The Department is concerned the NVIA does not provide a representative assessment of potential noise impacts associated with the Development.

Recommendations: A revised NVIA is required addressing all matters raised by the EPA.

3. Integrated Water Management Strategy

The Integrated Water Management Strategy (IWMS) prepared by CJ Arms, dated 3 April 2024, provides a conceptual description of the proposed water, sewer and stormwater infrastructure for the development. Where water and drainage infrastructure works are required that would be handed over to the local council, full hydraulic details and detailed plans and specification of the proposed works must be provided for assessment. Bayside Council has advised the information presented in the EIS and IWMS is insufficient for assessment purposes.

Civil Engineering Report

The level of detail provided regarding the proposed earthworks and stormwater drainage design is insufficient to enable an assessment of these works.

Recommendations: A civil engineering report is required that provides design drawings for the proposed stormwater drainage system and bulk earthworks, including the proposed flood storage tank design and finished levels plan(s).

Extension to Council's Stormwater System

The IWMS states a new stormwater discharge point and inlet pit will be installed at the front of the site on Hale Street, with a proposed 22 metre extension to Council's stormwater drainage system on Hale Street. Insufficient design details have been provided regarding this extension and the environmental impacts of these works have not been assessed.

Recommendation: Additional information is provided regarding the design of the proposed stormwater discharge point and extension, including consideration of any associated environmental impacts.

4. Air Quality Impact Assessment

Incorrect References

The Air Quality Impact Assessment (AQIA) prepared by Northstar, dated 13 May 2024, incorrectly states an Environment Protection Licence (EPL) is not required for the development (section 3.1). Section 4.1.2 also incorrectly states the proposal site is located in a rural area.

Recommendations: The AQIA should be corrected to state an EPL will be required as the activity is a scheduled activity under the *Protection of the Environment Operations Act 1997* and is in an urban area.

5. Landscape Concept Design

Inconsistencies

The Landscape Concept Design prepared by CJ Arms dated 19 April 2024 includes inconsistencies with respect to the number of semi-mature *Casuarina glauca* (She Oaks) to be removed, in some places it says four trees will be removed, and in others it indicates five trees will be removed.

Recommendations: The Landscape Concept Design must be revised to confirm the total number of trees to be removed as a result of the development.

6. Social Impact Assessment

Issues Raised in Public Submissions

Public submissions have raised significant concerns regarding the potential health and amenity impacts associated with the development.

Recommendation: The Social Impact Assessment prepared by Astrolabe Group, dated 16 March 2024, should be reviewed and updated as necessary to address the key issues raised in public submissions.

7. Fire Safety Assessment

Deviations from FRNSW Guidelines

The Fire Safety Assessment prepared by GHD dated 22 March 2024 states there are several deviations from the NSW Fire and Rescue (FRNSW) *Fire Safety Guideline – Fire Safety in Waste Facilities* (2020). While the Department notes FRNSW has not objected to these, FRNSW has requested a Fire Safety Study be prepared should the development be approved to confirm the suitability of the fire safety strategy.

Recommendation: Note that any performance based solution proposed as part of the fire safety strategy for the site will be considered by FRNSW as part of the FSS process, including the Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ).