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**Proposed Increased Throughput at an Existing Resource  
Recovery Facility- Wood/Plasterboard Recycling  
25 Dunheved Circuit, St Marys**

**SSD 10474**

**Response to Submissions Report**

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**We declare that:**

The statement contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and the information contained in the statement is neither false nor misleading.

Report version	Authors	Date	Reviewer	Approved for issue	Date
v1.0	Dr J.Lethlean	19/07/2021	Dr M.Jackson	Dr M.Jackson	20/07/2021
FINAL	Dr J.Lethlean	27/07/2021	Dr M.Jackson	Dr M.Jackson	27/07/2021

## Executive Summary

This Response to Submissions report has been prepared on behalf of ReDirect Recycling Pty Ltd as part of its application to increase the throughput at its recycling facility at 25 Dunheved Cct, St Marys (SSD 10474).

The application, including Environmental Impact Statement (EIS), was exhibited from 5 March 2021 to 1 April 2021. Eight (8) submissions were received, with seven from government agencies and one submission from a private organisation. Several issues were identified as requiring further clarification.

This report addresses the comments received during the exhibition period and describes any changes made to the project or application documentation as a result of the feedback received.

Comments were received from the following agencies:

- Department of Planning, Industry and Environment (Industry Assessments);
- Sydney Water;
- Transport for NSW;
- SafeWork NSW;
- Environment Protection Authority;
- Penrith Council; and
- Endeavour Energy.

In addition, one submissions was received from a private organisation:

- JSE Properties Pty Ltd, which owns a number of properties within the St Marys industrial area. JSE Properties Pty Ltd submitted a peer review of the Traffic Impact Assessment.

No submissions were received from private individuals.

The key issues identified in submissions were waste management and traffic. In addition, clarification was sought on matters relating to air quality and water. A list of each of the comments received and how they have been addressed is provided in a table at Appendix A.

The only change to the development design is to allocate one of the internal concrete storage bunkers to the on-site storage of scrap metal.

The site plans, waste management plan and stormwater management plan have been updated and are attached as appendices to this report. Comments on air quality and traffic issues have been addressed in Appendix A of this report.

Overall, the project meets the environmental criteria in the relevant standards and guidelines and now meets the additional requirements listed in the agency comments. The environmental and social impact on the local area will be negligible. The project is consistent with the objectives of the land use zoning and with the Council development strategies for the area. The new facility will provide employment, economic benefit and sustainable recycling services for Western Sydney.

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Appendix F – Letter from Jackson Environment and Planning regarding hazards posed by and to electricity infrastructure

# 1. Introduction

This Response to Submissions report has been prepared on behalf of ReDirect Recycling Pty Ltd as part of its application to increase the throughput at its recycling facility at 25 Dunheved Cct, St Marys (SSD 10474).

The application, including Environmental Impact Statement (EIS), was exhibited from 5 March 2021 to 1 April 2021. A number of submissions were received, mainly from government agencies. Several issues were identified as requiring further clarification.

This report addresses the comments received during the exhibition period and describes any changes made to the project or application documentation as a result of the feedback received.

## 2. Overview of Exhibited Project

This chapter provides a brief summary of the project, as exhibited, and the assessment of the related environmental issues and mitigation measures proposed.

### 2.1. Project description – as exhibited

The proposed site is identified as being 25 Dunheved Circuit, St Marys, Lot 143 in DP 1013185. An existing approved Resource Recovery Facility is currently located on site. The subject site is situated 45 kilometres (km) west of the Sydney central business district (CBD). The site is located within the City of Penrith Local Government Area (LGA), within the electoral district of Londonderry and the federal Division of Lindsay. The proposed site is located approximately 6.5 km from Penrith CBD.

The subject site is located within an established industrial precinct that covers an area of approximately 1,000 hectares (ha) and comprises a mix of general, light and storage-based industries; including steel and sheet metal fabrication workshops, oil and lubricant storage facilities, transport depots, plant and equipment hire facilities and mechanical repair workshops. The industrial precinct also has several existing waste management and resource recovery facilities and other similar activities licensed under the *Protection of the Environment Operations Act 1997* (POEO Act).

25 Dunheved Circuit was included in a previous SSD application (SSD-8200), along with the adjoining property at 21 Dunheved Circuit, that was approved by Department of Planning, Industry and Environment (DPIE) on 6/11/2018. The approval allowed the site to be used a resource recovery facility with a throughput of 350,000 tonnes per annum of non-putrescible waste. This approval has recently been surrendered.

The proposal is for the increase of throughput/volume of waste to the existing Resource Recovery Facility at 25 Dunheved Circuit. The site currently has approval for the sorting and processing of 18,000 tonnes of waste per annum (DA01/1034 as approved by Penrith Council). It is proposed to increase this throughput to 150,000 tonnes per annum, consisting of 110,000 tonnes wood/timber waste and 30,000 tonnes of plasterboard. As a result of processing the timber materials, a small amount of waste metals (10,000 tonnes) will be collected on site and transferred elsewhere for recycling. Importantly, please note that no works are proposed to the existing site or buildings on the site. The only works proposed are the installation of additional plant and equipment in the existing building.

Processing of timber and wood waste and plasterboard will be conducted in the existing building by way of compaction and shredding/grinding. The majority of the processed wood waste will be transferred to the Borg Manufacturing site in Oberon, NSW, to be used in the manufacture of particle board and MDF products or will be used in the production of animal bedding or mulch. The typical types of wood waste include clean pallets, particle board & MDF, LOSP & T2 pine and laminated MDF with coatings, along with other urban and raw wood materials. These waste materials will

come from a number of sources including Borg Panels customers, framing and truss builders, freight companies, other resource recovery facilities and other timber companies.

Plasterboard will be minimised and ground, with paper removed during the grinding process. The gypsum generated by processing will be supplied to others for likely use in agricultural soil conditioning or re-used in plasterboard production.

Waste metals recovered during the timber processing will be manually sorted and separated, and then taken off-site to other waste facilities to be processed or disposed of.

The proposed development will provide a broader range of recycling options and make progress towards the NSW Government's recycling targets. It will also deliver on key priorities of the NSW Government to develop new recycling infrastructure to boost the recovery of commercial / industrial and construction waste in Western Sydney. The project will also provide 10 full time jobs and involve an investment of \$2,820,120 in site upgrades alone.

## 2.1. Key issues – as exhibited

### 2.1.1. Hazard and Risk

A Preliminary Hazard Analysis and Environmental Risk Assessment has been performed to identify key potential impacts of the development, as well as potentially offensive or hazardous issues that need to be considered as part of the EIS process.

The assessment has been performed according to AS/NZS ISO 31000: 2009 *Risk Management – Principles and Guidelines and the Preliminary Hazardous Analysis* (Australian Standards) has been informed by the *Hazardous and Offensive Development Application Guidelines - Applying SEPP 33* (NSW Department of Planning, 2011).

As a result of this analysis, it is suggested that the worst-case scenarios modelled with risk prevention, treatment and detection measures are all moderate or low risks. All risks are low except those that involve fire caused by vehicle collisions, excess dust and some other form of ignition. While there are no dangerous goods stored on site, there will be stockpiles of combustible material.

The proposed development is not considered a potentially hazardous development as per the SEPP 33 Guidelines, therefore, no further Preliminary Hazard Analysis or Multi-Level Risk Assessment has been performed.

### 2.1.2. Fire Safety

The current ReDirect Recycling proposal does not propose any changes to the building, and seeks to continue the use as a resource recovery facility, with throughput increased to 150,000 tonnes per annum, with a mix of materials including wood and timber, plasterboard and metals. As per the previous approvals and certificates issued for the building and the use, the building suitable for the proposed increase in throughput.

The existing building has appropriate fire services to be able to deal with a fire event at the facility, and the proposed increase in throughput is consistent with the guidelines published by NSW Fire and Rescue (2020) *Fire Safety in Waste Facilities Guidelines* (FRNSW, 2020).

### 2.1.3. Air Quality

Wilkinson Murray prepared an Air Quality Assessment for the proposal. The assessment also included air quality modelling.

The land use immediately surrounding the site is industrial. The nearest sensitive receptors are residents located in the nearby suburbs of Werrington County, North St Marys, Ropes Crossing and Central Precinct and the Dunheved Golf Course.

Dust emissions during operation of the Proposal have been estimated based on information provided by the client, using emission factors sourced from both locally developed and US EPA developed documentation.

The significant sources of dust/particulate emissions associated with the operation of the Proposal are identified as follows:

- Loading/unloading of material;
- Processing (grinding/crushing and screening) material;
- Truck movements on paved roads; and,
- Diesel exhaust from mobile plant.

No material handling, processing or stockpiling would occur outside the building. Therefore, wind-blown dust emissions would be negligible. A control factor of 70% has been applied to all sources located inside the building.

Air quality impacts associated with the operation of the Proposal are predicted to comply with relevant impact assessment criteria. Notwithstanding, an effort to minimise air quality impacts associated with the Proposal, the following mitigation measures are proposed should be implemented where reasonable and feasible:

- Engines of vehicles and plant to be switched off when not in use;
- Vehicles and plant to be fitted with pollution reduction devices where practicable;
- Vehicles and plant to be maintained in accordance with manufacturer's specifications;
- Reduce drop heights when handling dusty material;
- Dampen excessively dusty material during handling;
- Trafficable areas to be swept/cleaned regularly;
- Vehicles restricted to designated routes;
- On-site speed limits enforced; and
- Vehicle loads to be covered when travelling off-site.

### 2.1.4. Noise and Vibration

Wilkinson Murray prepared a Noise and Vibration Impact Assessment for the proposal. The objective of the assessment was to assess potential noise and vibration impacts associated with the operation and transport impacts of the facility.

Noise criteria were established in accordance with procedures in the *Noise Policy for Industry, Road Noise Policy and Assessing Vibration: a technical guideline* (NSW EPA, 2017).

The dominant noise would be generated internally within the processing shed by the processing line as well as mobile plant including operations of frontend loaders, telehandler and tipping operations from trucks. External noise will be dominated by trucks entering and leaving the site.

The operational scenario considered all equipment to be simultaneously and continuously operating throughout the 15-minute assessment period. A review of results indicates compliance for 24-hour operations will be easily achieved and that no mitigation measures are warranted.

Road traffic noise impacts on Forrester Road during daytime is considered negligible due to the existing high traffic volume.

The noise impact associated with operational activities is predicted to comply with the noise criteria at all considered residential receivers.

Potential noise impacts from traffic on the surrounding road network, arising from additional truck movements associated with the operation of the recycling facility are predicted to be negligible.

### 2.1.5. Cultural Heritage

An Aboriginal and Historic Heritage Desktop Due Diligence Assessment was conducted by Archaeological Risk Assessment Services.

The due diligence desktop assessment, based on the existing and proposed legal requirements of the NSW *National Parks and Wildlife Act (1974)*, *NSW Heritage Act 1977* and the type of archaeological evidence found on: LOT 143 DP 1013185, 25 Dunheved Circuit St Marys, found that:

- The assessment area is located within the City of Penrith Council's IN1 General Industrial land;
- The proposed SSD modification activities will not cause any sub surface ground disturbance impacts or visual amenity impacts;
- The assessment area is considered to have no Aboriginal heritage value potential;
- The assessment area is considered to have no Historic heritage value potential; and
- The above conclusion is reached based on background archaeological/historical research, and land-use history.

### 2.1.6. Waste Management

A Waste Management Plan was prepared by Jackson Environment and Planning Pty Ltd. The major changes to the site operations as a result of the development will be an increase in waste accepted at the site to 150,000tpa and the installation of processing equipment.

The updated facility will accept mainly wood waste ( $\approx 110,000\text{tpa}$ ) and plasterboard ( $\approx 30,000\text{tpa}$ ). The wood waste will be sorted and shredded. The plasterboard will be processed in a turbo-separator, which will separate the paper from gypsum, and pulverise the gypsum.

Some metal will be received at the site ( $\approx 10,000\text{tpa}$ ), either as scrap metal or embedded in the wood. Metal will be separated and sent for recycling.

Small quantities of non-recyclable waste may be received at the site as contamination in loads. The contaminants will be stored in a skip bin and removed periodically for disposal to landfill. It is estimated that contaminants will comprise 2-3% (by weight) of incoming waste.

Overall, the recovery rate for the facility is expected to be 97-98% (by weight).

All waste materials and processed products will be stored in separate concrete bays with three sides or in dedicated hook lift bins. Storage of incoming waste in dedicated areas and sorted materials and products in dedicate bays helps in inventory control, good housekeeping, reduces potential for cross contamination and is critical for quality control.

By accepting and processing the waste, the facility will contribute towards the recycling targets as set out in the *NSW Waste Avoidance and Resource Recovery Strategy 2014-21*.

### 2.1.7. Traffic

A Traffic Impact Assessment (TIA) was prepared by The Transport Planning Partnership (TPPP). Due to the irregular traffic climate caused by the COVID-19 pandemic at the time of this assessment, traffic surveys undertaken in 2020 would not be reflective of typical traffic conditions. As such, historic traffic survey data has been utilised from the Traffic Impact Assessment which was prepared as part of the application for SSD-8200 (submitted by Bingo Industries, former owners of the site).

Deliveries to the site are proposed across a 24-hours/ 7-day period. The majority of small to medium deliveries (around 95%) will be undertaken by rigid trucks during the day between 7am-4pm while most larger deliveries (around 80%) will occur at night between 6pm-3am. Most of the processed material (around 80%) will be dispatched from the site after 6pm.

Delivery and collection vehicles will range in size from a 12.5 m heavy rigid vehicle (front lift truck/ hook-lift truck/ skip bin truck) to a 19 m semi-trailer (walking floor trailer).

Using the tonnage data for the facility, a total of 126 daily vehicle trips are anticipated to be generated by the future RRF on a typical day.

In the context of the wider road network, heavy vehicles will use Great Western Highway, M4 Western Motorway and M7 Westlink Motorway when travelling to/from the site. Within the vicinity of the site, heavy vehicles would travel to/from the site via Forrester Road, Links Road and Dunheved Circuit.

The results of the intersection modelling analysis indicate that the intersection would continue to operate at a LoS A in the AM peak period and LoS B in the PM peak period, with no increase in average delay in the opening year of the proposed development. The worst performing movement remains as the right turn movement from Links Road (western approach) to Forrester Road (southern approach), experiencing the same average delay as under the existing conditions.

Modelling results for the future 2030 scenario indicates that background traffic growth which is unrelated to the proposed development would cause the intersection to operate poorly (LoS F) in the AM and PM peak periods. Inclusion of the development generated traffic results in a marginal increase in average delay; that is, plus 2 seconds in the AM peak hour and plus 4 seconds in the PM peak hour. As such, the impact to the intersection operation caused by the proposed development would be negligible.

The provision for 10 car parking spaces will sufficiently accommodate all staff on-site. The proposed car parking layout is satisfactory.

### 2.1.8. Stormwater Management and Water Quality

A Stormwater Management Plan was prepared by Eclipse Consulting Engineers. DRAINS model was used to review the on-site detention system used to control discharge of stormwater from the site. A Horton/ILSAX hydrological model was used to determine the pre-development discharge rates from the site. The MUSIC model was used to assess water quality of stormwater leaving the site.

A flood analysis was conducted by reviewing the site location to flood prone land identified in the report *Updated South Creek Flood Study* prepared by Worley Parsons on behalf of Penrith City Council in 2015.

Stormwater is collected in four (4) 50kL hydraulically connected on-site detention (OSD) tanks. Stormwater from the roof of the main warehouse building and the paved areas around the site is captured in the OSD tanks, via a Ecosol GPT 4200 gross pollutant trap.

To improve the performance of the existing stormwater treatment train, an Ocean Protect Storm Filter will be installed after the Ecosol GPT. According to the MUSIC modelling, the updated system will meet the requirements of Penrith City Council for pollution reduction in stormwater.

According to the DRAINS modelling, the post-development flows have been reduced to match the pre-development flows at a maximum in all rainfall events less frequent than the 0.5EY event.

The site is located outside the mainstream and overland flooding events for the 100-year ARI events. As such, a quantitative flood impact assessment is not required.

## 3. Analysis of Submissions

### 3.1. About submissions

A total of eight (8) submissions were received. Seven (7) of these submissions were from government agencies:

- Department of Planning, Industry and Environment (Industry Assessments);
- Sydney Water;
- Transport for NSW;
- SafeWork NSW;
- Environment Protection Authority;
- Penrith Council; and
- Endeavour Energy.

In addition, one submissions was received from a private organisation:

- JSE Properties Pty Ltd, which owns a number of properties within the St Marys industrial area. JSE Properties Pty Ltd submitted a peer review of the Traffic Impact Assessment.

No submissions were received from private individuals.

### 3.2. Key issues

The key issues identified in submissions were waste management and traffic.

In addition, clarification was sought on matters relating to air quality and water.

A list of each of the comments received and how they have been addressed is provided in a table at Appendix A.

#### 3.2.1. Waste Management

Most of the comments relating to waste management were seeking technical details of the operations of the facility. Most of the issues raised would normally be addressed at a later stage of the development process, such as when applying for an Environmental Protection Licence. However, they have been addressed in this report, for completeness.

#### 3.2.2. Traffic

Comments on traffic related to volume of additional traffic to be generated on surrounding streets, and the on-site access and traffic management.

#### Off-site traffic

One of the submissions from a private organisation expressed concern about additional traffic generated by the facility, stating that the road network servicing the industrial area was already under stress.

Most of the comments from government agencies requested more details about the numbers and types of vehicles to be used, and details about how traffic levels were estimated.

#### On-site traffic

DPIE requested more details of on-site traffic management and parking arrangements. DPIE also requested more information about the site access driveway. The proponent was also required to seek information from Penrith Council on the timing of the construction of the proposed extension of Links Road to Christie Street.

## 4. Actions Taken During and After EIS Exhibition

The site plans have been updated to ensure they are consistent with the description in the EIS, the technical studies and to address several comments from government agencies.

The Waste Management Plan was updated to provide the requested additional detail, and to ensure information was consistent.

The stormwater management plan was updated to clarify information, addressing comments received from government agencies.

The Traffic Impact Assessment (TIA) was reviewed. Responses to the comments received, including the peer review, are provided at Appendix A. Penrith Council was consulted to obtain information about the timing of the Links Rd extension.

## 5. Updated Project Description

The proposed site is identified as being 25 Dunheved Circuit, St Marys, Lot 143 in DP 1013185. An existing approved Resource Recovery Facility is currently located on site. The subject site is situated 45 kilometres (km) west of the Sydney central business district (CBD). The site is located within the City of Penrith Local Government Area (LGA), within the electoral district of Londonderry and the federal Division of Lindsay. The proposed site is located approximately 6.5 km from Penrith CBD.

The subject site is located within an established industrial precinct that covers an area of approximately 1,000 hectares (ha) and comprises a mix of general, light and storage based industries; including steel and sheet metal fabrication workshops, oil and lubricant storage facilities, transport depots, plant and equipment hire facilities and mechanical repair workshops. The industrial precinct also has several existing waste management and resource recovery facilities and other similar activities licensed under the *Protection of the Environment Operations Act 1997* (POEO Act).

25 Dunheved Circuit was included in a previous SSD application (SSD-8200), along with the adjoining property at 21 Dunheved Circuit, that was approved by Department of Planning, Industry and Environment (DPIE) on 6/11/2018. The approval allowed the site to be used a resource recovery facility with a throughput of 350,000 tonnes per annum of non-putrescible waste. This approval has recently been surrendered.

The proposal is for the increase of throughput/volume of waste to the existing Resource Recovery Facility at 25 Dunheved Circuit. The site currently has approval for the sorting and processing of 18,000 tonnes of waste per annum (DA01/1034 as approved by Penrith Council). It is proposed to increase this throughput to 150,000 tonnes per annum, consisting of 100,000 tonnes wood/timber waste, 30,000 tonnes of plasterboard and up to 10,000 tonnes of scrap metal. As a result of processing the timber materials, an additional minor amount of waste metals (approximately 1,700 tonnes) will be extracted for recycling. Scrap metal delivered as separate loads will not be processed on site, but exported to a nearby metal recycler. Importantly, please note that no works are proposed to the existing site or buildings on the site. The only works proposed are the installation of additional plant and equipment in the existing building.

Processing of timber and wood waste and plasterboard will be conducted in the existing building, and will consist of compaction and shredding/grinding. The majority of the processed wood waste will be transferred to the Borg Manufacturing site in Oberon, NSW, to be used in the manufacture of particle board and MDF products. Some processed wood will be used in the production of animal bedding or mulch. The typical types of wood waste include clean pallets, particle board & MDF, LOSP & T2 pine and laminated MDF with coatings, along with other urban and raw wood materials. These waste materials will come from a number of sources including Borg Panels customers, framing and truss builders, freight companies, other resource recovery facilities and other timber companies.

Plasterboard will be minimised and ground, with paper removed during the grinding process. The gypsum generated by processing will be supplied to others for likely use in agricultural soil conditioning or re-used in plasterboard production.

Waste metals delivered as scrap metal loads or recovered during the timber processing will be manually sorted and separated, and then taken off-site to other waste facilities to be processed or disposed of.

The proposed development will provide a broader range of recycling options and make progress towards the NSW Government's recycling targets. It will also deliver on key priorities of the NSW Government to develop new recycling infrastructure to boost the recovery of commercial / industrial and construction waste in Western Sydney. The project will also provide 10 full time jobs and involve an investment of \$2,820,120 in site upgrades alone.

## 6. Response to Submissions

A table listing each comment received and where it has been addressed is provided at Appendix A. This section provides a brief summary of how the issues have been addressed.

### 6.1. General

The site plans have been updated to address the inconsistencies noted in the comments and to clarify the operational areas. The main change to the site design has been to allocate a dedicated storage bunker to scrap metal storage, instead of proposing to store metals in a skip bin. A copy of the updated site plans is provided at Appendix C.

A copy of the landowner's consent is provided at Appendix B.

### 6.2. Waste Management

Most of the comments regarded consistency and clarification. The Waste Management Plan has been updated to address the specific comments. The updated Waste Management Plan is provided at Appendix D.

### 6.3. Air Quality

The proponent confirms that wet plasterboard will not be accepted at the site.

The air quality consultant confirmed that the air quality modelling was conducted as if the warehouse doors were open.

### 6.4. Traffic

Some of the comments regarded consistency and clarification. These have been addressed in the table in Appendix A.

The main issue was whether the development would exacerbate the already congested traffic in and around the industrial park. The traffic numbers have been confirmed. The modelling confirms that the development will not add significantly to the heavy traffic in the area, and would result in substantially less traffic than the previous occupants.

Several comments related to access and manoeuvring of heavy vehicles on site. Updated swept paths have been prepared, which show there is adequate space for heavy vehicles to access and manoeuvre around the site.

## 7. Project Evaluation

The comments from agencies and the public received during the exhibition period have been considered and addressed in detail.

Where appropriate, the development design has been adjusted to incorporate the comments received. Additional mitigation measures will be put in place to ensure the impacts of the facility are minimal.

The relevant technical studies have been reviewed and, where appropriate, updated to address the comments. All technical studies conclude that the final design will result in the facility having minimal impact on the environment and surrounding land users.

Overall, the project meets the environmental criteria in the relevant standards and guidelines and now meets the additional requirements listed in the agency comments. The environmental and social impact on the local area will be negligible. The project is consistent with the objectives of the land use zoning and with the Council development strategies for the area. The new facility will provide employment, economic benefit and sustainable recycling services for Western Sydney.

## 8. References

Australian Standards. (n.d.). *AS/NZS ISO 31000: 2009 Risk Management – Principles and Guidelines and the Preliminary Hazardous Analysis* .

FRNSW. (2020). *Fire Safety Guidelines: Fire safety in waste facilities*. Sydney: NSW Government.

NSW Department of Planning. (2011). *Hazardous and Offensive Development Application Guidelines - Applying SEPP 33* . Sydney: NSW Government.

NSW EPA. (2017). *Noise Policy for Industry*. Sydney: NSW Environment Protection Authority.

# Appendix A – List of comments received and responses

**Table A1.1. List of comments received and overview of how these comments have been addressed in the report.**

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
1	Plans	DPIE	The tip and spread area for the wood waste appears to overlap with the storage bays and truck manoeuvring area. Please clarify whether waste tipped in this area will impact on the storage capacity of these bays or impede truck movement through the building	ReDirect Recycling Pty Ltd has changed the site layout plans to show tip and spread area as the first half of the wood waste bays.	Updated site plans (Appendix C)
2	Plans	DPIE	Section 8.2.5 of the EIS identifies that the chemical storage cabinet will be located inside the warehouse, however, the cabinet appears to be shown outside the warehouse on the Proposed Ground Floor Plan (Drawing No. DA03).	ReDirect Recycling Pty Ltd has clarified that the chemical storage cabinet will be outside.	Updated site plans (Appendix C)
3	Owner's consent	DPIE	Provide landowner's consent for lodgement of the application	ReDirect Recycling Pty Ltd has obtained landowner's consent.	Landowner's consent provided (Appendix B)
4	Waste Management	DPIE	Table 3.1 of the Waste Management Plan (WMP) suggests the wheel wash will be in-ground, however the EIS identifies the proposed wheel was as above-ground and portable. Please clarify and confirm whether any excavations will be required to install	Wheel wash will be above ground. Waste Management Plan amended.	Updated Waste Management Plan (Appendix D)
5	Waste Management	DPIE	The storage capacity for unprocessed wood waste identified in the Table 1 of the EIS and Table 3.6 of the WMP is conflicting, including the dimensions of the storage bays. The dimensions of the unprocessed storage bays in Table 1 also conflicts with some dimensions shown on the plans. Ensure all dimensions and capacities are consistent between the plans, EIS and WMP	Waste Management Plan has been updated. It should be noted that the storage capacity reflects the maximum amount, not necessarily the amount that will be normally stored on-site.	Updated Waste Management Plan (Appendix D)
6	Waste Management	DPIE	It is noted that the storage capacity in Tables 1 and 2 of the EIS and Table 3.6 of the WMP are based on heights of 4m. However, Section 3.2.4 of the WMP	Stockpiles will be up to 4 m high, as permitted in the Fire Safety Guidelines. This has been amended in the Waste Management Plan.	Updated Waste Management

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			states that stockpiles will be a maximum 3m high. Recalculate storage capacity based on the maximum 3m height of stockpiles		Plan (Appendix D)
7	Waste Management	DPIE	Clarify the purpose of the spare wood storage identified in Table 3.6 and whether this is the two storage bays identified on the plans as “wood for particle board”	The spare storage bay will be used for different processed wood products, as required, including wood for particle board.	Updated Waste Management Plan (Appendix D)
8	Waste Management	DPIE	Identify on the plans where the scrap metal skip bin identified in Table 3.6 of the WMP will be located	Scrap metal now to be stored in a storage bay.	Updated Waste Management Plan (Appendix D)
9	Waste Management	DPIE	Identify where non-conforming waste that is found during processing will be stored on site prior to removal and how often it will be removed	A 20 m <sup>3</sup> residual bin is located in the tip and spread area. As all sources are clean, source-separated streams, the amount of residuals is expected to be minimal.	Updated Waste Management Plan (Appendix D)
10	Waste Management	DPIE	Clarify the sources of other metal waste (not sourced during the processing of wood waste) and how it will be brought to site.	Per Table 3.3, some scrap metal may be delivered to the site by customers.	Updated Waste Management Plan (Appendix D)
11	Waste Management	DPIE	Table 3.4 of the WMP identifies the development will have an output of 11,700 tpa of scrap metal. This conflicts with the 10,000 tpa of metal waste proposed to be processed in the EIS and Table 3.3 of the WMP	Up to 10,000 tpa of scrap metal will be delivered separately by customers. Up to 1,700 tpa will be recovered from pallets and timber in the form of nails and staples.	Updated Waste Management Plan (Appendix D)
12	Waste Management	DPIE	The EIS doesn't include a throughput analysis of the proposed 10,000 tpa of metal waste (as in Tables 1 and 2). If the 10,000 tpa of metal waste is to be processed on site over 355 days in a year (as per daily throughput analysis in Tables 1 and 2), then this equates to approximately 28 tonnes per day.	A storage bay has been allocated to the storage of scrap metal, providing storage capacity of 389 m <sup>3</sup> or 47 tonnes. The intention is to transfer scrap metal to a nearby metal recycler daily.	Updated Waste Management Plan (Appendix D)

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			Clarify how this amount of waste will be stored on site if there is only one skip bin with a capacity of 2.4t, as identified in Table 3.6 of the WMP		
13	Waste Management	DPIE	Appendix 1 of the WMP has not been provided	In the waste management plan, it was called "Appendix A", instead of "Attachment 1". Waste management plan has been updated.	Updated Waste Management Plan (Appendix D)
14	Waste Management	SafeWork NSW	Of note is the inclusion of reference material to the NSW EPA (2014) Draft Protocol for managing asbestos during resource recovery of construction and demolition waste. This document is not current or accessible to the public, and the applicant should seek advice from the Environment Protection Authority.	It is understood that the Protocol is still in force and is in the public domain. It is located at: <a href="https://www.environment.nsw.gov.au/resources/waste/140345-asbestos-draft.pdf#:~:text=This%20protocol%20covers%20the%20receipt%20of%20waste%20at,WorkCover%2C%20asbestos%20is%20inadvertently%20present%20in%20the%20waste.">https://www.environment.nsw.gov.au/resources/waste/140345-asbestos-draft.pdf#:~:text=This%20protocol%20covers%20the%20receipt%20of%20waste%20at,WorkCover%2C%20asbestos%20is%20inadvertently%20present%20in%20the%20waste.</a>	N/A
15	Waste Management	SafeWork NSW	Training of workers in Asbestos Awareness The Plan mentions trained personnel will inspect incoming loads from an elevated inspection point using video cameras and at spread inspection areas. <ul style="list-style-type: none"> <li>• Ensure trained personnel have received training as per Clause 445 of the WHS Regulation 2017.</li> <li>• Training must include identification, safe handling and suitable control measures for asbestos or asbestos containing material.</li> <li>• Consider the types of instances where asbestos may present at the facility in training i.e.             <ul style="list-style-type: none"> <li>o asbestos sheeting attached to timbers</li> <li>o asbestos debris stuck behind nails in timber</li> <li>o asbestos containing mastics and membranes adhered to timbers.</li> </ul> </li> </ul>	Noted.	N/A
16	Waste Management	SafeWork NSW	Personal Protective Equipment for asbestos	Noted. The non-conforming waste procedure (see Appendix A of the Waste Management Plan) does not exclude the use	N/A

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			<p>The Plan infers that any asbestos identified either at the weigh bridge or because of spreading in an inspection area that the load and the asbestos waste will be rejected. The plan also directs that only non-conforming materials other than asbestos can be handled, removed, and disposed of wearing appropriate personal protective equipment (PPE).</p> <ul style="list-style-type: none"> <li>• Consider asbestos PPE being available if asbestos is identified during processing.</li> <li>• What asbestos PPE would be required as a minimum?</li> <li>• Removal and waste disposal.</li> <li>• Decontamination procedures for workers, plant and the affected area.</li> <li>• Clearance inspections.</li> </ul>	<p>of PPE if asbestos is detected. The emphasis is on the swift identification and removal of contaminated loads. Appropriate procedures are also addressed in the site's current Operational Environmental Management Plan (OEMP), as approved under EPL 21487.</p>	
17	Waste Management	SafeWork NSW	<p>Non-Conforming Waste Procedure Sections 6.4, 6.5, 6.6 and 6.7 of the Non-Conforming Waste Procedure in Appendix A, refers to asbestos waste suspected in stockpiles. Sections 6.5 and 6.7 infer that these stockpiles are soil as the testing and sampling analysis is for soils.</p> <ul style="list-style-type: none"> <li>• Review the above sections with regards to the term stockpiles as they relate to wood waste which the facility has proposed will be processed and not soil as listed.</li> <li>• Develop a procedure for where asbestos is identified or suspected throughout the facility processes with regards to identification, safe handling, and suitable control measures.</li> </ul>	<p>Noted. The non-conforming waste procedure is not specific to soils and includes in this context piles of incoming wastes or processed stockpiles.</p>	N/A
18	Waste Management	SafeWork NSW	<p>Management of hazardous, toxic and liquid waste Section 4 of the Non-conforming Waste Procedure is the management of hazardous, toxic and liquid wastes. It infers that Attachment 1 contains the procedures for managing these hazards in an</p>	<p>In the waste management plan, it was called "Appendix A", instead of "Attachment 1". Waste management plan has been updated to include procedure if it is suspected that asbestos has been processed in the shredder.</p>	Updated Waste Management Plan (Appendix D)

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			<p>emergency. Attachment 1 was not able to be located within the Plan.</p> <ul style="list-style-type: none"> <li>• Ensure if asbestos is unexpectedly processed through a shredder or other processes that make safe procedures are implemented immediately with regards to worker safety.</li> <li>• Include dust suppression, signage and barricades.</li> <li>• Engagement of suitably qualified asbestos consultant ie: Licensed Asbestos Assessor or an Occupational Hygienist to inspect and determine contamination.</li> <li>• What remediation actions are required to decontaminate the site?</li> <li>• Decontamination of plant, equipment, site and workers.</li> <li>• Clearance inspections deeming safe to re-occupy areas, plant etc.</li> </ul>		
19	Traffic	DPIE	<p>It is noted that the Traffic Impact Assessment (TIA) states that the site is serviced by a shared driveway with 21 Dunheved Circuit. It is also noted that the EIS proposes creation of an easement on 21 Dunheved Circuit to ensure 20vehicle access for the site. Please identify the use of the site at 21 Dunheved Circuit and how this may be impacted by the operation of vehicles servicing the development across the property. Provide swept paths for vehicles manoeuvring between the two sites. Please also clarify whether the proposed development can operate with heavy vehicles only using the driveway of the subject site (25 Dunheved Circuit)</p>	<p>It is ReDirect Recycling’s intention to use the existing driveway at No. 25 Dunheved Circuit to access the subject site, with use of the easement. No. 21 Dunheved Circuit is under the same ownership and is currently vacant, as such, there will be no impact to operations. Notwithstanding this, No. 21 Dunheved Circuit has another two access driveways which could be utilised for future operations.</p> <p>The easement has been created to remove any conflicts should they arise at the entry. The easement will cover the small part of the shared driveway that is in front of the secure site fence as shown below.</p> <p>The site currently operates as described above, and there are no conflicts between the adjacent properties.</p>	Swept paths provided in updated site plans (Appendix C)

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
					
20	Traffic	DPIE	<p>Section 3.2 of the TIA states that storage for 2,000-2,500 tonnes of material will be provided on site. This substantially exceeds the storage capacity identified in the EIS and WMP</p>	<p>The information presented in the TIA is amended within this RtS in-line with the correct information presented by the EIS. Namely, the site would provide 704 tonnes of material storage on site as follows:</p> <ul style="list-style-type: none"> <li>- Unprocessed waste timber wood – 137 tonnes</li> <li>- Processed timber/ wood – 299 tonnes</li> <li>- Unprocessed plasterboard – 114 tonnes</li> <li>- Gypsum – 82 tonnes</li> <li>- Paper – 3 tonnes</li> <li>- Metals – one of the extra wood storage bays has been divided in half and will be used for metals delivered to site. The bay is will hold approximately 389 m<sup>3</sup> when stored to a height of 4 m, which is approximately 47 tonnes.</li> <li>- MSW generated by employees – 0.2 tonnes</li> </ul>	

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed								
				<p>It is noted that this bay will only be used when metals are scheduled to be delivered to the facility.</p> <p>Amendments to the material storage capacity would not impact the future site trip generation as assessed in the TIA since the analysis is based on the average annual waste throughput.</p>									
21	Traffic	DPIE	Provide details on how processed material (including paper and metal) and residual waste will be collected from site, including types and numbers of vehicles. Clarify whether trucks dropping off material will then collect processed material prior to leaving the site or whether different trucks will be used to collect processed material	<p>The majority of processed material is picked up by larger fleet vehicles including 19 m truck and dogs and 19 m walking floors (95% of the time). These trucks arrive at the St Marys facility empty to collect the processed material. A small number of hook bin trucks will also take processed waste back to Oberon (remaining 5% of the time).</p> <p>The majority of waste originates from within Sydney, therefore, deliveries are from Sydney-based waste delivery fleet (hook bins, front lifts trucks, semi-trailers) and from other waste facilities. For example, Bingo (recycling operator) will deliver timber waste to the subject site (i.e. waste that has been previously separated at a Bingo facility).</p> <p>Very rarely will a truck arrive with waste, and leave with a load of processed timber back to Oberon. As such, the majority of vehicles accessing the site would either deliver waste or collect material.</p> <p>The amount of wood/ timber (containing metal) and plasterboard and the vehicle proportion transporting each has been amended from the TIA in accordance with the EIS. The amendments are as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Direction and vehicle type</th> <th colspan="2">Throughput (tonnes)</th> </tr> <tr> <th>Traffic Impact Assessment</th> <th>Amended Data (in-line with EIS)</th> </tr> </thead> <tbody> <tr> <td><b>Inbound:</b></td> <td></td> <td></td> </tr> </tbody> </table>	Direction and vehicle type	Throughput (tonnes)		Traffic Impact Assessment	Amended Data (in-line with EIS)	<b>Inbound:</b>			Addressed here.
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22	Traffic	DPIE	The TIA identifies that the proposed development will generate a total of 126 daily vehicle trips compared to 220 per day in 2016 (page 21). Please clarify why the vehicle count is decreasing while the proposed throughput is increasing from 18,000 tpa to 150,000 tpa	<p>The TIA has been carried out based on the previous approval for the site for 350,000 tpa (under Bingo ownership) in comparison with the proposal which seeks approval for a throughput of 150,000 tpa (Proponent is ReDirect Recycling Pty Ltd).</p> <p>During the former site operation, the delivery vehicles accessing the site mostly comprised Bingo's own fleet which included predominately small, medium vehicle movement and heavy rigid trucks (e.g. single axle marrel trucks, double axle marrel trucks, hook bin trucks). These trucks made up approximately 80-85% of the total vehicles generated by the site operations. These types of vehicles have a much lower carrying capacity (payload) in comparison with the types of trucks which the Proponent will operate the future facility. Therefore, the number of vehicles generated by the former facility would have been greater.</p> <p>Also, the types of waste being processed varies greatly between the former site operation and the current (and future) site operation which impacts the site traffic generation. The former site processed non-putrescible waste which included over 20 different waste types which</p>	Addressed here.						

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
				<p>originated from several different sources. Waste types included:</p> <ul style="list-style-type: none"> <li>- Glass, plastic, rubber, plasterboard, ceramics, bricks, concrete, metal</li> <li>- Paper, cardboard</li> <li>- Household waste from municipal clean up that does not contain food</li> <li>- Waste collected by, or on behalf of local councils from street sweepings</li> <li>- Garden and wood waste</li> <li>- Building and demolition waste</li> <li>- Asphalt waste</li> <li>- Virgin excavated natural material</li> <li>- Non-chemical waste generated from manufacturing and services (including metal, timber, paper, ceramics, plastics, thermosets and composites)</li> <li>- Grit, sediment, litter, gross pollutants collected in and removed from stormwater treatment devices and/or stormwater management systems (dewatered)</li> <li>- Grit and screenings from potable water and water reticulation plants (dewatered)</li> <li>- Bulky goods waste containing building de-fit fittings, fixtures and furniture</li> <li>- Non-putrescible vegetative waste from agriculture, silviculture or horticulture</li> <li>- Cured concrete waste from a batch plant.</li> </ul> <p>Comparatively, the existing ReDirect Recycling Pty Ltd operation (and future site operation) processes only wood/timber and plasterboard. This waste arrives from a smaller number of sources i.e. Bingo, Benedict, and Cleanaway. Processing a smaller range of waste types creates</p>	

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
				<p>efficiencies for the site operation as well as waste/ material transportation, therefore reducing the site trip generation.</p> <p>Notwithstanding the above, as part of the previous SSD Application (SSD-8200) the site operator was also proposing to shift towards using larger trucks ranging in size from 12.5 m heavy rigid vehicles to 25 m b-double trucks. In the SSD Application, the future site was proposed to generate a reduced number of vehicle trips in comparison to the existing site at the time; namely, 194 trips at 350,000 tonnes per annum compared with 220 trips at 18,000 tonnes per annum.</p>	
23	Traffic	DPIE	<p>Tables 1 and 2 of the EIS identifies up to 25 daily inbound trucks delivering wood and plasterboard waste. Please clarify the breakdown of the other heavy vehicles predicted to be generated daily by the development, both delivering waste and collecting processed material (total 46 heavy vehicles in Table 4.3 of the TIA)</p>	<p>To clarify, there has been a minor amendment to the truck volumes presented in the TIA (refer to response to comment No. 21 for full details). Namely, the future facility is estimated to generate 44 trucks per day (88 vehicle movements) which has been reduced from 46 trucks per day (92 vehicle movements) as assessed in the TIA. Based on the amendments, it is estimated that there would be:</p> <p>Inbound:</p> <ul style="list-style-type: none"> <li>- 14 rigid heavy vehicles per day.</li> <li>- 14 articulated vehicles per day.</li> </ul> <p>Outbound:</p> <ul style="list-style-type: none"> <li>- 18 articulated vehicles per day.</li> </ul> <p>These vehicle volumes have been estimated based on:</p> <ul style="list-style-type: none"> <li>- the total annual throughput of each type of material (see response to comment No. 21),</li> <li>- the payload of the incoming vehicles transporting the</li> </ul>	Addressed here.

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed								
				<p>material (11 tonnes for Hook truck and 20 tonnes for semi-trailer as per TIA report),</p> <ul style="list-style-type: none"> <li>- the outgoing vehicles transporting wood and gypsum have a payload of 24 tonnes, and</li> <li>- 355 operational days per year.</li> </ul> <p>As explained in the TIA and EIS, deliveries to the site are proposed across a 24-hours/ 7-day period. However, the majority of small to medium deliveries (around 95%) will be undertaken by rigid trucks during the day between 7am-4pm while most larger deliveries (around 80%) will occur at night between 6pm-3am. Timber waste material will come from other resource recovery centres, such as Bingo, Benedict, and Cleanaway.</p> <p>Most of the processed material (around 80%) will be dispatched from the site after 6pm. Processed materials may be sent to the Borgs Manufacturing facility in Oberon to be used in the manufacture of particle board and MDF products or to be used as fuel for dryers in the manufacturing process. The gypsum generated by waste material processing is also used for agricultural soil conditioning or re-used in plasterboard production, and therefore, processed material may also be sent to agricultural sites in Forbes and the CSR Gyprock facility in Wetherill Park.</p> <p>Since the delivery and collection areas are separate and operate independently of each other, the following breakdown is based on the respective operations.</p> <p><u>Inbound (deliveries):</u></p> <table border="1"> <thead> <tr> <th></th> <th>Between 7am-4pm</th> <th>Between 6pm-3am</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Between 7am-4pm	Between 6pm-3am	Total					
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24	Traffic	DPIE	It is noted that the TIA states that no visitor or accessible parking spaces will be provided (page 31),	It is noted that the EIS contained the incorrect site plan. The corrected plan indicates 10 regular car parking spaces on-site	Updated site plans																				

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			but one visitor and one accessible space is shown on the Proposed Traffic and Signage Plan (Drawing No DA04). Please clarify whether these spaces will be provided	<p>i.e. there would be no visitor parking and accessible parking as detailed in the TIA.</p> <p>The corrected site plan is provided in the updated site plans.</p>	provided at Appendix C.
25	Traffic	DPIE	Clarify whether there will be sufficient parking spaces to accommodate staff arriving on site during a shift change during a 'busy period' where there may already be 10 staff on site	<p>The TIA states the following:</p> <p><i>"During the operation of the facility, there will be 15-18 full-time employees spread across three shifts throughout the day; 6:30am-2:30pm, 2:30pm-10:30pm, and 10:30pm-6:30am. Standard daily operation would involve 5-6 employees on-site at any one time. During busy processing periods, there may be up to 10 employees on-site at a time. Therefore, provision for 10 car parking spaces will sufficiently accommodate all staff on-site."</i></p> <p>To clarify, the 10 employees on-site at a time would be due to a purposely scheduled short-term overlap of shifts (where there is 5-6 employees per shift) i.e. either an overlap of Shift 1 with Shift 2, Shift 2 with Shift 3, or Shift 3 with Shift 1.</p>	Addressed in the Traffic Impact Assessment. Clarification provided here.
26	Traffic	DPIE	Please clarify whether there is sufficient room in the warehouse building for heavy vehicles to manoeuvre, particularly when collecting processed material including from the gypsum silo and while front-end loaders or other machinery is in operation	<p>Plasterboard vaac trucks will be loaded closer to the silo with a vaac hose connection.</p> <p>It should also be noted that front end loader use/other machinery use will be restricted during loading of trucks.</p> <p>A swept path is provided in the updated plans at Appendix C showing a heavy rigid vehicle manoeuvring towards the silo to be loaded. The heavy vehicle has sufficient space within the shed to undertake the necessary turning manoeuvres to be loaded beside the silo, even whilst there is a semi-trailer in the tipping area.</p>	Addressed here and in updated site plans provided at Appendix C.

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
27	Traffic	DPIE	Please clarify whether there is sufficient space on site for heavy vehicle circulation if there is a vehicle breakdown, including within the warehouse building	A swept path showing a heavy vehicle adequately manoeuvring past a 19m semi-trailer, which could be potentially broken down within the shed, is provided in Appendix C.	Updated site plans provided at Appendix C.
28	Traffic	DPIE	Clarify whether heavy vehicles can safely exit the site if vehicles are parked on the road in front of 21 Dunheved Circuit	<p>The eastern side of Dunheved Circuit is signposted as 'No Stopping'.</p> <p>The western side of Dunheved Circuit is also signposted as 'No Stopping' immediately north and south of the subject site access driveway. A swept path analysis provided in Appendix C indicates the location of No Stopping areas in proximity to the site access driveway, as well as a 2.1 m wide kerbside parking lane where on-street parking is currently permitted. The swept path analysis indicates that a 19 m semi-trailer is able to exit the site by turning left-out of the driveway and avoid parked cars on-street.</p>	Updated site plans provided at Appendix C.
29	Traffic	DPIE	Clarify whether any heavy vehicles will be parked or stored on site at any time	ReDirect Recycling Pty Ltd trucks will not be required to be parked on-site given the 24-hour operations. ReDirect Recycling Pty Ltd collections vehicles would park/ store off-site at the respective Borg site destination, and would travel back to St Marys in time for their next scheduled collection. All other waste delivery operators would not be permitted, nor would they be required, to park/ store their vehicles on-site.	N/A
30	Traffic	DPIE	It is noted the TIA relies on traffic data from 2016. Provide further consideration of the current traffic conditions in the Dunheved Business Park, particularly the Ropes Crossing Boulevard-Forrester Road-Links Road intersection during peak periods, including shiftchanges on site	In order to avoid the traffic impact due to the COVID-19 pandemic at the time of preparing the TIA, traffic data was sourced from the previous SSD Application traffic report. Historic traffic data has been extrapolated from 2016 to 2021 to create the existing "base case" for the Proposal based on TfNSW STFM forecast data in the region, as explained in the TIA.	N/A

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
				Given the turbulent traffic climate due to COVID-19 restrictions being enforced throughout Sydney Metropolitan, the recent and current traffic conditions have not been reflective of “normal” traffic conditions for the area. Hence, historic data during pre-pandemic conditions have been appropriately considered in the traffic analysis.	
31	Traffic	DPIE	Provide more detail on the timing of the construction of the proposed extension of Links Road to Christie Street identified in Section 4.4 of the TIA.	<p>As of 23 May 2021, Federal Government funding has been committed for the Dunheved Road Upgrade project between Richmond Road and the Werrington Road/Christie Street intersection according to Penrith City Council’s website. However, it is unclear whether the Links Road extension is proposed to be delivered as part of the Dunheved Road Upgrade project. The Ordinary Meeting of Penrith City Council endorsed the awarding of the tender for site investigation, concept and detailed design to Cardno for this initial stage of works.</p> <p>Christie Road is classified as a Regional Road, and according to TfNSW’s website there are currently no projects (of planning, construction, or operation stages) designated at this location. Also, Penrith City Council’s website provides no indication of a committed delivery timeline such project.</p> <p>Notwithstanding the above, it is noted that the former SSD (SSD-8200) Application was approved without such road upgrade projects in the pipeline.</p>	N/A
32	Traffic	TfNSW	The Traffic Impact Assessment (TIA), identifies the GML for a semi-trailer as 35 tonnes, with a payload of 20 tonnes. However the TIA uses a semi-trailer combination with a prime mover with a single drive axle group that has a maximum load of 9 tonnes. A more common combination is a semi-trailer with a prime mover that has a tandem drive axle group	The TIA has been prepared based on a 6-axle semi-trailer which is the vehicle that has been assessed in the vehicle swept path analysis. This vehicle has a General Mass Limit (GML) of 42.5 tonnes according to the National Heavy Vehicle Regulator Common Heavy Freight Vehicle Configurations. According to the <i>Australian Trucking Association Truck Impact Chart Advisory Procedure</i> , a four-axle rigid vehicle has	N/A

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			<p>which has a maximum load of 16.5 tonnes at GML, and a total GML mass of 42.5 tonnes. The difference in payload is approximately 4 tonnes.</p> <p>It is requested that the applicant confirms whether the lower payload of 20 tonnes is correct for a semi-trailer, as identified in the TIA (e.g. if the processed material is volumetric) as this may over estimate vehicle movements.</p>	<p>a payload (mass of load) of 24.04 tonnes. To be conservative, a payload that is rounded down to 20 tonnes has been adopted in the TIA. The revised figures for outgoing vehicles for wood and gypsum assume a payload of 24 tonnes.</p> <p>In Table 4.2, reference to the 5-axle semi-trailer and corresponding pictorial is to be replaced as follows:</p> <p><b>5-axle semi-trailer (35t)</b></p>  <p><b>6-axle semi-trailer (42.5t GML)</b></p>  <p>As a result, there would be no change to site-generate traffic flows in the TIA.</p>	
33	Traffic	TfNSW	<p>The TIA states that the proposal will generate 92 one-way heavy vehicle trips per day, but does not break down this figure into the number generated by inbound (mostly heavy rigid vehicles), or outbound vehicles (mostly semi-trailers).</p> <p>It is requested that the proponent detail how the daily heavy vehicle trips were calculated, and show that the number of heavy vehicle trips can handle the proposed throughput of 150,000 tonnes per annum.</p>	<p>As per response to comment No. 21, there has been a minor amendment to the truck volumes presented in the TIA based on information in accordance with the EIS. Namely, the future facility is estimated to generate 46 trucks per day (92 vehicle movements). Based on the amendments, it is estimated that there would be:</p> <p>Inbound:</p> <ul style="list-style-type: none"> <li>- 11 rigid heavy vehicles per day.</li> <li>- 14 articulated vehicles per day.</li> </ul> <p>Outbound:</p> <ul style="list-style-type: none"> <li>- 14 articulated vehicles per day.</li> </ul>	See response to comment No. 21. Further clarification provided here, in response to comment No. 33.

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
				<p>These vehicle volumes have been estimated based on:</p> <ul style="list-style-type: none"> <li>- the total annual throughput of each type of material (see response to DPIE Item 3),</li> <li>- the payload of the vehicle transporting the material (11 tonnes for Hook truck and 20 tonnes for semi-trailer as per TIA report), and</li> <li>- 355 operational days per year.</li> </ul> <p>As explained in the TIA and EIS, deliveries to the site are proposed across a 24-hours/ 7-day period. However, the majority of small to medium deliveries (around 95%) will be undertaken by rigid trucks during the day between 7am-4pm while most larger deliveries (around 80%) will occur at night between 6pm-3am. Timber waste material will come from other resource recovery centres, such as Bingo, Benedict, and Cleanaway.</p> <p>Most of the processed material (around 80%) will be dispatched from the site after 6pm. Processed materials may be sent to the Borgs Manufacturing facility in Oberon to be used in the manufacture of particle board and MDF products or to be used as fuel for dryers in the manufacturing process. The gypsum generated by waste material processing is also used for agricultural soil conditioning or re-used in plasterboard production, and therefore, processed material may also be sent to agricultural sites in Forbes and the CSR Gyprock facility in Wetherill Park.</p> <p>Since the delivery and collection areas are separate and operate independently of each other, the following breakdown is based on the respective operations.</p>	

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed																								
				<p><u>Inbound (deliveries):</u></p> <table border="1"> <thead> <tr> <th></th> <th>Between 7am-4pm</th> <th>Between 6pm-3am</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td><b>Rigid Vehicles</b></td> <td>10</td> <td>1</td> <td>11</td> </tr> <tr> <td><b>Articulated Vehicles</b></td> <td>2</td> <td>12</td> <td>14</td> </tr> <tr> <td><b>Total</b></td> <td>12 (across 9 hours)</td> <td>13 (across 9 hours)</td> <td>25</td> </tr> </tbody> </table> <p>In total, there would be 12 deliveries between 7am-4pm, and 13 deliveries between 6pm-3am. On average, the operation is expected to generate to 1-2 inbound deliveries per hour.</p> <p><u>Outbound (collections):</u></p> <table border="1"> <thead> <tr> <th></th> <th>Between 7am-6pm</th> <th>Between 6pm-7am</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td><b>Articulated Vehicles</b></td> <td>4 (across 11 hours)</td> <td>14 (across 13 hours)</td> <td>18</td> </tr> </tbody> </table> <p>It is expected that there would be 4 collections between 7am-6pm, which generates one vehicle every three hours on average. Between 6pm-7am, there would be an estimated 15 collections. On average, that is one vehicle every hour and occasionally two vehicles in one hour.</p> <p>Generally, there would be 1-2 delivery vehicles accessing the tip floor, and 1 collection vehicle accessing the loading bay within a 60-minute period. The stacking analysis contained in the TIA report demonstrates that the future facility has sufficient space on-site to accommodate these vehicles immediately upon arrival.</p>		Between 7am-4pm	Between 6pm-3am	Total	<b>Rigid Vehicles</b>	10	1	11	<b>Articulated Vehicles</b>	2	12	14	<b>Total</b>	12 (across 9 hours)	13 (across 9 hours)	25		Between 7am-6pm	Between 6pm-7am	Total	<b>Articulated Vehicles</b>	4 (across 11 hours)	14 (across 13 hours)	18	
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34	Traffic	TfNSW	The TIA uses traffic survey data undertaken in 2016 which is outdated. It is not clear why more recent traffic survey counts were not undertaken	<p>As stated in Section 2.3 of the TIA, due to the irregular traffic climate caused by the COVID-19 pandemic at the time of this assessment, traffic surveys undertaken in 2020 would not be reflective of typical traffic conditions. As such, historic traffic survey data has been utilised from the TIA which was prepared as part of the application for SSD-8200.</p> <p>In addition, the 2016 traffic counts have been extrapolated to Year 2020 based on background traffic growth data for the SIDRA modelling existing “base case” conditions.</p>	N/A
	Traffic	TfNSW	A Construction Pedestrian Traffic Management Plan (CPTMP) detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council for approval prior to the issue of a Construction Certificate.	Noted and agreed.	N/A
35	Traffic	TfNSW	<p>The TIA states that bicycle parking should be provided in accordance with the suggested bicycle parking provision rates for different land use types in NSW Government’s Planning Guidelines for Walking and Cycling (2004). The NSW Planning Guidelines for Walking and Cycling has been superseded by Cycling Aspects of Austroads Guides, 2017, which recommends that bicycle parking for all-day use on a regular basis should be expected to be combined with end-of-trip facilities such as showers, lockers etc.</p> <p>It is requested that prior to the issue of the Construction Certificate, the applicant be conditioned to provide bicycle parking and end of trip facilities for staff and visitors in accordance with Australian Standard AS1742.9:2018 Manual of</p>	<p>The <i>Cycling Aspects of Austroads Guides (2017)</i> provides an indication of the levels of bicycle parking needed to be provided for various land uses. For “general industry” land uses, employee bicycle parking provisions are provided as 1 space per 150 m<sup>2</sup> GFA. Based on an office GFA of 153 m<sup>2</sup>, there would be a requirement to provide 1 bicycle space.</p> <p>A bicycle storage space would be provided within the site office, and would be accessible to all staff at the facility.</p> <p>Employees would be provided with an area within the site office to securely store personal belongings.</p>	N/A

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			<p>Uniform Traffic Control Devices - Bicycle Facilities, and Cycling Aspects of Austroads Guides including:</p> <p>a. Locate bicycle parking and storage facilities in secure, convenient, accessible areas close to the main entries incorporating adequate lighting and passive surveillance and in accordance with Austroads guidelines.</p>		
36	Traffic	TfNSW	<p>Current NSW policies state the importance of walking and cycling to increase access to local centres and integrating transport with land use as part of the whole customer journey, including recommendations related to walking and cycling, including managing travel demand; unlocking capacity in existing assets; and improving population health outcomes through more active transport.</p> <p>It is requested the applicant prepare a Green Travel Plan in consultation with TfNSW. The applicant shall submit a copy of the final plan to TfNSW for endorsement at <a href="mailto:development.sco@transport.nsw.gov.au">development.sco@transport.nsw.gov.au</a>, prior to the issue of the first occupation certificate. The Green Travel Plan should include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• be prepared by a suitably qualified traffic consultant;</li> <li>• include objectives and staged modes share targets (i.e. site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and</li> </ul>	<p>Notably, the facility would employ a workforce of 10 full time staff. For context, the standard daily operation would involve 5-6 employees on-site at any one time. Given the small workforce, the staffing traffic impacts associated with the proposed development would be minor in nature.</p> <p>In addition to the above, the future staffing arrangements at the proposed facility would be reduced in comparison with the previously approved development, which proposed to have 30 full time staff and 15 staff on-site at any one time. Technically, the proposed development would generate only half of the traffic impacts of the former approved SSD for the site.</p> <p>Notwithstanding, the proponent appreciates the importance of promoting more sustainable means of travel and would be open to encouraging measures proportionate to the staffing traffic impacts of the proposal. Such measures could include car-pooling amongst staff, using existing nearby bus services, and active travel for any staff living within walking/ cycling distance to the site. A member of staff could be responsible for promoting and engaging with other employees to encourage more sustainable travel. However, appointment of a Travel Plan Coordinator, implementation of a Transport Access Guide, development of a communication strategy and</p>	Response provided here.

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			<p>purpose of the GTP;</p> <ul style="list-style-type: none"> <li>• consideration of a staff travel survey and workforce data analysis to inform likely staff travel patterns and resultant travel plan strategies to / from the site;</li> <li>• implementation strategy that commits to specific actions (including operational procedures to be implemented along with timeframes) to encourage the use of public and active transport and car sharing to discourage single occupant car travel to the site;</li> <li>• details of bicycle parking and dedicated end of trip facilities including but not limited to lockers, showers and change rooms and e-bike charging station(s) for staff to support an increase in the non-car mode share for travel to and from the site;</li> <li>• a Transport Access Guide for staff and visitors providing information about the range of travel modes, access arrangements and supporting facilities that service the site;</li> <li>• a communication strategy for engaging with staff and visitors regarding public and active transport use and car sharing to the site and the promotion of the health and wellbeing benefits of active and non-car travel to the site;</li> <li>• include a mechanism to monitor the effectiveness of the measures of the plan; and</li> <li>• the appointment of a Travel Plan Coordinator responsible for implementing the plan and its</li> </ul>	<p>monitoring plan, and conducting annual surveys is considered to be excessive for the number of employees at the future facility and given the minor impacts on the surrounding traffic/ transport network.</p>	

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			<p>ongoing monitoring and review, including the delivery of actions and associated mode share targets.</p> <p>The plan shall be reviewed annually for at least the first five years and involve surveys, evaluation and review.</p> <p>The plan (and any updates to the plan), shall be implemented and adhered to at all times by the applicant following the issue of the first occupation certificate.</p> <p>Transport for NSW has developed a Travel Plan Toolkit designed for the person or group responsible for developing and implementing a Travel Plan. This toolkit provides the steps, templates and resources for developing a comprehensive Travel Plan and may be accessed at: <a href="https://www.mysydney.nsw.gov.au/travelchoices/t dm">https://www.mysydney.nsw.gov.au/travelchoices/t dm</a></p>		
37	Traffic	Penrith Council	The development is proposed to be serviced by vehicles only up to 19m in length (no provision for B-Double vehicle movements). B-Double swept paths to/from the proposed access points don't appear to have been provided.	B-doubles are not proposed to be used as part of the future site operation. Hence, B-double swept path analysis has not been provided.	N/A
38	Traffic	Penrith Council	It is noted that the proposed development will generate approximately half the amount of daily vehicle trips when compared to that of the former site operation. Furthermore, the proposed development is estimated to generate a third less vehicle trips during the site peak period.	Noted.	N/A

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
39	Traffic	JSE Properties Pty Ltd (Public submission)	<p>Commissioned a peer review of the TIA.</p> <p>We own and operate significant businesses within the Dunheved Business Park and have so for many years. We are also substantial owners of industrial property within the Dunheved Business Park.</p> <p>We strongly object to the State Significant Development Application for 25 Dunheved Rd on the basis that the road infrastructure is already inadequate to cope with the amount of traffic coming in and out of the business park.</p> <p>Operation of the proposed facility at 25 Dunheved Rd at the throughput levels stated will be severely detrimental to existing businesses like ours due to increased traffic congestion, particularly at the single entry/exit to the business park which has been failing to cope for some time. Should the proposal go ahead, we expect that our businesses will incur substantial losses due to increased distribution costs and an inability to continue to meet customer delivery requirements.</p> <p>In support our submission, we engaged our traffic consultants (GTA) to perform a peer review of the Traffic Impact Assessment. Attached is their report which identifies a number of items that should have been concerned and also highlights some inconsistencies in the assessment relative to standards. Page 5 of their report provides a summary and recommendations.</p> <p>There have been long standing plans for a second entry/exit point for the business park via Links Rd and we don't believe that the proposed facility at 25 Dunheved Rd should be allowed to operate until the</p>	Responses to Peer Review are provided separately below.	See below

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			second entry/point is built and operational to alleviate the traffic issues.		
40	Traffic	JSE Properties Pty Ltd (Public submission)	GTA agrees that traffic generation associated with the development is best linked to the operation of the facility as opposed to GFA.	Noted.	N/A
41	Traffic	JSE Properties Pty Ltd (Public submission)	Table 4.3 of the TIA (TTPP, 2020) provides a summary of the anticipated traffic generation profile of the site over a typical day. Table 4.4 provides a comparison of the anticipated traffic generation profile of the proposal with comparison to the traffic generation estimates for a typical day and busy day for the previous approval of the site. It is understood that busy processing periods will occur as part of the proposal, as referenced in Section 5.1 of the TIA (TTPP, 2020), however there are no details on the anticipated traffic generation of the site for a 'busy day' under the proposal. This detail is important and should be included to ensure accurate assessment is possible of the future traffic impacts of the proposal.	Day to day operation will be determined by the allowable on-site storage i.e. 740 tonnes of material storage. Therefore, it is unlikely that there will be a significant difference between typical day and a busy day operation i.e. both scenarios would be consistent.	N/A
42	Traffic	JSE Properties Pty Ltd (Public submission)	Section 4.3 of the TIA (TTPP, 2020) indicates the proposal is estimated to generate 2 vehicle trips in the AM peak hour and 4 vehicle trips in the PM peak hour, however Table 4.3 indicates 4 vehicle trips in the AM peak hour and 2 vehicle trips in the PM peak hour. While minor, it does call into question overall accuracy of the data and information presented. And should be clarified.	Throughout the TIA, it is stated that the Proposal would generate 4 trips in the AM and 2 trips in the PM peak periods, except in one occurrence which is due to a minor typographical error.  Such typographical error is minor in nature and would not have any material impact on the analysis findings or accuracy of the data presented.	N/A

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43	Traffic	JSE Properties Pty Ltd (Public submission)	Figure 4.1 of the TIA (TTPP, 2020) indicates that the proposal would generate less vehicle trips than the existing use for the site for most of the day except in the afternoon shift changeover period (site peak hour). On-site observations confirm extensive queuing on Dunheved Circuit and Links Road on approach to the Forrester Road/ Ropes Crossing Boulevard/ Links Road roundabout from early afternoon (see Figure 3). This is a result of vehicles departing the area and is typical for industrial precincts where the peaks occur earlier than the broader road network peaks. Given the afternoon peak generation of the site (including the 16 vehicle spike around 2pm and 2:30pm), traffic modelling would appear appropriate at these times at these key intersections to understand the true traffic related impacts of the proposal.	<p>As identified by the historic traffic survey data and site observations, the surveyed peak periods (i.e. the hour carrying the greatest traffic volumes) at the intersection occurs at 7.15am - 8.15am and 4.15pm - 5.15pm.</p> <p>Further to this, the 16 vehicle trips are broken down into 8 inbound trips and 8 outbound trips into the business park i.e. not 16 vehicle trips in one direction. Whilst there may be some activity on the road network as a result of vehicles departing the area, the impact of 8 outbound vehicle trips (6 light vehicle trips plus 2 heavy vehicle trips) across one hour would be expected to be minimal.</p>	N/A
44	Traffic	JSE Properties Pty Ltd (Public submission)	Penrith DCP 2014 states that Accessible car spaces should be in accordance with the Access to Premises Standards, Building Code of Australia (BCA) and AS2890. The Clause D3.5 of the BCA states that for the proposed development, accessible parking should be provided at a rate of one space per 100 car parking spaces or part thereof. This would indicate that one accessible parking space would be required for use by visitors and employees.	<p>As assessed within the TIA, applying the BCA accessible parking rate is to provide 1 accessible space for every 100 car parking spaces at the development. Adopting this parking rate generates a provision for 0.1 of an accessible parking. This generates a miniscule accessible parking provision for a site which rarely has any demand for use of accessible parking spaces on-site. Based on the operation and functionality of the site, as well as the low visitation rate of disabled persons at the site currently, the accessible space would not be required to facilitate future site operation.</p> <p>The BCA accessible parking rate is acknowledged, and the function it serves is providing accessible parking for developments with a significant off-street parking provision. However, within the context of the proposed development:</p>	N/A

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				<ul style="list-style-type: none"> <li>- the low number of car parking spaces to be provided on-site to begin with (i.e. 10 spaces, as calculated based on first principles), and</li> <li>- the minimal number of accessible parking spaces to be provided as a result of applying the BCA rates (i.e. 0.1 of a space)</li> </ul> <p>It is considered not necessary to provide an accessible parking space on-site for operation of the proposed development.</p>	
45	Traffic	JSE Properties Pty Ltd (Public submission)	The TIA (TTPP, 2020) states that the largest design vehicle would be a 19 metre articulated vehicle/ semi-trailer. As a new DA, the proposal should consider the requirements of AS2890.2:2018. Clause 2.1 of AS2890.2:2018 states that unless a commercial vehicle facility is to be designed specifically for a nominated vehicle type, the facility shall be designed to accommodate the standard vehicle types appropriate to the use required by the operator of the facility. As such, the facility should be designed to the design vehicle specifications in AS2890.2:2018 for an articulated vehicle, which has an overall length of 20 metres, rather than the 19 metre design vehicle referenced in the TIA. This also means that vehicle swept paths provided in Appendix D of the TIA may need to be updated to ensure appropriate design.	<p>As advised by the owner and operator of the site, the largest vehicle scheduled to access the facility under this proposal would be a 19 m semi-trailer. Accordingly, the 19 m semi-trailer vehicle has appropriately been assessed.</p> <p>Notably, the previously approved SSD assessed the swept path of a 19 m semi-trailer since this too was the vehicle that was proposed to access the previously approved facility.</p>	N/A
46	Traffic	JSE Properties Pty Ltd (Public submission)	The queuing assessment states that the driveway access is about 100 metres long, allowing the site to accommodate up to seven semi-trailers or nine rigid trucks at any one time, including one vehicle on the inbound weighbridge and one vehicle in the facility. That said, the swept path assessment indicates two-	As discussed above, day to day operations at the future facility are unlikely to generate a significant difference between a typical day and a busy day operations; namely, both scenarios would be consistent. As such, heavy vehicle queueing would be adequately accommodated wholly within	N/A

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			way passing between inbound and outbound articulated vehicles is likely not possible at each end of the driveway and along the driveway itself. As such, the site would likely only be able to accommodate up to four articulated vehicles at one time, as shown in Figure 4. While this would still suitable accommodate the anticipated demand for a typical day, no assessment has been completed for a 'busy day' and therefore the potential higher traffic generation associated with busy processing periods may result in vehicles queuing on Dunheved Circuit.	the site and queues extending onto Dunheved Circuit would not be expected.	
47	Traffic	JSE Properties Pty Ltd (Public submission)	The swept path assessment included in Appendix D of the TIA indicates articulated vehicles exiting the site onto Dunheved Circuit would conflict with existing on-street parking currently permitted along the 21 Dunheved Circuit site frontage. The TIA does not mention any proposed loss of on-street parking as a result of the proposal or the associated impacts. This is a critical detail and should be appropriately addressed – vehicles parking in this location would be struck or trucks would mount the kerb on the other side to avoid such conflict. The issue primarily arises due to the larger size of vehicle required to access the site when compared with previous uses.	<p>The eastern side of Dunheved Circuit is signposted as 'No Stopping'.</p> <p>The western side of Dunheved Circuit is also signposted as 'No Stopping' immediately north and south of the subject site access driveway. A swept path analysis provided in Attachment Two indicates the location of No Stopping areas in proximity to the site access driveway, as well as a 2.1 m wide kerbside parking lane where on-street parking is currently permitted. The swept path analysis indicates that a 19 m semi-trailer is able to exit the site by turning left-out of the driveway and avoid parked cars on-street.</p>	N/A
48	Traffic	JSE Properties Pty Ltd (Public submission)	Articulated vehicles also need the full width of Dunheved Circuit to exit the site. With Dunheved Circuit being narrow (about 7.5m wide) and somewhat unique for an industrial precinct where road widths are typically 10m to 13m wide, this further constrains the site access requirements and on-street parking conflicts. There would clearly be	Articulated vehicle movements at the site are expected to occur after 6pm and before 3am, which is when background traffic movements in Dunheved Circuit are lowest (approx. 90% lower than the peak period). Therefore, there would be minimal conflict with general traffic at such time.	N/A

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			conflicts with arriving and departing vehicles and through traffic on Dunheved Circuit should any small delay occur and/ or an articulated vehicle has difficulty exiting the site.	<p>Furthermore, there is adequate driver visibility at the site access driveway towards oncoming vehicles. As such, the operator of a heavy vehicle would not enter the roadway unless there is adequate road space to manoeuvre safely.</p> <p>Australian Standards AS2890.2 Off-street commercial vehicle facilities which states that a vehicle is permitted to use the entire width of a two-way driveway when entering or exiting a site from a minor road, which Dunheved Circuit is. Please refer to 3.2.4 (b) below.</p> <div data-bbox="1205 619 1877 868" style="border: 1px solid black; padding: 5px;"> <p>AS 2890.2—2002 12</p> <p><b>3.2.4 Regular service—Minor road</b></p> <p>Requirements and recommendations for providing for regular service from a minor road are as follows:</p> <p>(a) Manoeuvring on-street, if permitted by the relevant authority, shall be strictly limited to one reverse movement either onto or off the street, and furthermore, shall be subject to consideration of both safety and obstruction to other on-street traffic.</p> <p>(b) The swept path of the maximum size design vehicle using the facility may be allowed to occupy the entire width (less specified clearances) of a two-way access driveway when the vehicle is entering or leaving the minor road.</p> </div>	
49	Traffic	JSE Properties Pty Ltd (Public submission)	The swept path assessment indicates that an articulated vehicle exiting the site would also be required to traverse the 21 Dunheved Circuit driveway when turning left onto Dunheved Circuit. Such arrangements are typically not accepted given one site is reliant on the adjacent site to maintain their access arrangements. While it is understood that the 21 Dunheved Circuit is owned by the same organisation as the subject site, the 21 Dunheved Circuit site could be sold in future and potentially redeveloped and hence again, alter the current access arrangements.	<p>Per the response to DPIE comment above, it is the client’s intention to use the existing driveway at No. 25 Dunheved Circuit to access the subject site, with use of the easement. No. 21 Dunheved Circuit is under the same ownership and is currently vacant, as such, there will be no impact to operations. Notwithstanding this, No. 21 Dunheved Circuit has another two access driveways which could be utilised for future operation.</p> <p>The easement has been created to remove any conflicts should they arise at the entry. The easement will cover the small part of the shared driveway that is in front of the secure site fence as shown below.</p> <p>The site currently operates as described above, and there are no conflicts between the adjacent properties.</p>	N/A

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50	Traffic	JSE Properties Pty Ltd (Public submission)	A 300 mm clearance is shown on the swept path assessment for articulated vehicles which is not in accordance with the general 600mm requirements of AS2890.2:2018. This further shows the inappropriateness of the driveway to accommodate passing trucks along its 100 m length.	<p>AS2890.1:2018 states:  <i>“The following manoeuvring clearances shall be applied: Two vehicles passing one another — 300 mm on both sides of both vehicles plus a further 300 mm.”</i></p> <p>Swept paths along the driveway have been amended to show clearances in accordance with Austroads, which stipulates 500mm clearance on both sides of a vehicle, as well as Australian Standards 2890.1:2018 (as above).</p> <p>In the amended swept paths, a passing clearance of 1.0m has been shown between the vehicles. AS2890.1 requires 0.9m to be provided. Therefore, the amended swept path analysis is in-line with both Austroads and the Australian Standards. Furthermore, the swept path analysis shows that there is sufficient width for two passing semi-trailers along the driveway. Refer to Attachment Two for this swept path.</p>	Updated swept paths provided at Appendix C.

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
51	Traffic	JSE Properties Pty Ltd (Public submission)	Relevant images illustrating such congestion in this part of Dunheved Road as a result of the narrow width and on-street parking constraints are included in Figure 5 and Figure 6. It is clear that the passing of two articulated vehicles is not practical and causes delay and associated risk.	As shown by the swept path analysis, two semi-trailers are able to pass one another within the driveway.  Notwithstanding this, there is a low probability that two semi-trailers would be passing one another within the driveway due to the low number of semi-trailers generated by the site activities.	Updated swept paths provided at Appendix C.
52	Air Quality	DPIE	Please clarify whether the Air Quality Impact Assessment considered emissions from openroller doors and the roof ridge vent	The air quality modelling was conducted as if the doors were open.	N/A
53	Air Quality	DPIE	Please clarify whether the receipt and storage of potentially wet plasterboard would result in any unacceptable odour emissions	Plasterboard will not be accepted at the site if wet.	N/A
54	Water	Sydney Water	Water and Wastewater Servicing <ul style="list-style-type: none"> <li>Sydney Water has no objection to the development, however, we request that the proponent lodges a Feasibility study with Sydney Water for the proposed development which accurately details water and wastewater demands.</li> <li>The proponent should contact a Water Servicing Coordinator to lodge this study on their behalf.</li> <li>Any potential upsizing of our local assets or limitations in our system will be defined with the Feasibility process.</li> </ul>	Noted.  ReDirect Recycling Pty Ltd to engage a Water Servicing Coordinator to conduct a feasibility study for the development once approved.	N/A
55	Water	Sydney Water	Trade wastewater requirement (if required) <ul style="list-style-type: none"> <li>If this proposed development is going to generate trade wastewater, the developer must submit an application requesting permission to discharge trade wastewater to Sydney Water's wastewater system.</li> </ul>	Noted.	N/A

Comment No.	Subject	Agency / submission	Comment	Response	Where addressed
			<p>Applicant must wait for approval and issue of a permit before any business activities can commence.</p> <ul style="list-style-type: none"> <li>The permit application can be made on Sydney Water's web page through Sydney Water Tap In. <a href="http://www.sydneywater.com.au/tapin/index.htm">http://www.sydneywater.com.au/tapin/index.htm</a></li> </ul>		
56	Water	Penrith Council	<p>It is understood that the development does not involve any significant changes to the buildings on site but rather, the proposal is for the increase of throughput/volume of waste to the existing Resource Recovery Facility. As such, in relation to Council's Water Sensitive Urban Design (WSUD) Policy, no additional treatment of stormwater would be required. However, due to the nature of the development, the proposal should comply with the water conservation requirements outlined in Council's WSUD Policy. The applicant should be requested to demonstrate (by way of a report or statement) that the development meets any non-potable water requirements (i.e. 80% of non-potable demand with the use of harvested rainwater). It is requested that the applicant provide this information, including what measures are proposed to meet any additional non-potable water demand as a result of the increased volumes of waste being processed.</p>	<p>Stormwater Management Plan has been updated to describe how the development will comply with the water conservation aspects of the WSUD Policy. See Appendix E.</p>	<p>Updated Stormwater Plan (Appendix E).</p>
57	Hazards	Endeavour Energy	<p>Endeavour Energy noted the potential for risk to the electricity infrastructure near the development.</p>	<p>The comment has been addressed in a letter from Jackson Environment and Environment provided at Appendix F.</p>	<p>Appendix F</p>
58	Hazards	Endeavour Energy	<p>Endeavour Energy noted the potential for electricity infrastructure to be a fire ignition source.</p>	<p>The comment has been addressed in a letter from Jackson Environment and Environment provided at Appendix F.</p>	<p>Appendix F</p>

## Appendix B – Owner’s consent

## Appendix C – Updated site plans

## Appendix D – Updated waste management plan

# Appendix E – Updated stormwater management report

# Appendix F – Letter from Jackson Environment and Planning regarding hazards posed by and to electricity infrastructure