

19 December 2018

Ms Kelly McNicol  
Team Leader, Industry Assessment  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms McNicol,

**Exhibition of Modification Request for  
Chester Hill Materials Recycling Facility (MP 06\_0052 MOD3)**

Thank you for the opportunity to comment on the modification request for the Chester Hill Materials Recycling Facility.

Canterbury Bankstown Council reviewed the Environmental Assessment (EA) Report prepared by Strategic Planning Services (dated 12 November 2018) and supporting technical reports, and raises the following issues:

**Issue 1: Requirement for detailed plans and drawings**

The plans and drawings in the EA Report do not provide sufficient details for the purposes of assessing this proposal. The EA Report must incorporate the following details:

Site plan and cross-sections

The EA Report must incorporate architectural drawings that include a site plan, cross-sections and elevations showing correct details.

For example, the proposed level differences on the site are not accurately shown on the sections and elevations of the facility. In particular, detailed cross-sections are required to demonstrate the level difference at the north-west section of the building where heavy vehicles would exit the facility and enter the right-of-way. The western elevation also needs to show the level difference along this elevation.

The EA Report must also provide details on the proposed use of the land behind the staff parking area (approximately 4,700m<sup>2</sup>). This area is marked on the site survey as 'an area not surveyed'.

### Landscape plan

According to the EA Report (page 8), *'extensive vegetative screening will be implemented along the southern and eastern elevations where deep root planting can be accommodated. This will be complemented by residual landscaping elsewhere on the site where practical'*.

To support the above statement, the EA Report must include a detailed landscape plan that is consistent with the desired character objectives for the general industrial precincts, and mitigates the visual impacts of the facility to the surrounding residential areas.

The EA Report must also confirm whether the proposal retains the existing trees in the car park area. The survey plan (Appendix M) currently does not show the existing vegetation.

### Visual Impact Assessment

The architectural drawings must show the roof RLs for existing buildings and the proposed facility, together with the colour palette and finishes of the facility. The Visual Impact Assessment Report needs to be updated to incorporate the above details.

### **Issue 2: Requirement for the Traffic Impact Assessment Report to provide further details**

A review of the Traffic Impact Assessment Report identifies the need for further details to assess the impacts on the surrounding road network. The additional information includes, but is not limited to, the following matters:

#### Existing and proposed traffic conditions / generations

- A SIDRA Model based on up-to-date traffic volume data for various intersections to establish the existing traffic conditions.
- Detailed calculation of the projected morning and afternoon peak period trip generation to assess the impacts on the surrounding road network.
- Background data to explain the calculation of the proposed heavy vehicle trip generation (page 11) to assess whether the proposal complies with the daily processing limit of 910 tonnes per day, and to inform the ESA calculation. An appropriate ESA calculation is required to establish the effect of the heavy vehicles on the road surface and whether the proposal would require improving road pavements and /or changing the road geometry to accommodate the influx of heavy vehicles.



## Parking

The proposal is to increase the capacity of the facility from 100,000 to 250,000 tonnes per annum.

However, the Traffic Impact Assessment Report does not consider whether there are sufficient parking spaces to cater for the operational needs of the heavy vehicles and the short-term influxes associated with the anticipated demand.

A parking study is required to:

- Confirm the heavy vehicle parking requirements arising from this facility.
- Confirm future staff numbers to assess whether the proposed 13 additional spaces are sufficient to cater for future demand.

## Proposed routes for heavy vehicles

Council does not support heavy vehicles using Gurney Road to access the site as this would impact on the amenity of surrounding residential areas. The Traffic Impact Assessment Report must avoid the use of Gurney Road to access the site.

## Internal circulation

The Traffic Impact Assessment Report must consider:

- The shared use of the right-of-way with the other user (Logistics Sales and Hire) and demonstrate whether this arrangement is adequate to cater for the needs of both users both currently and in the future. The Traffic Impact Assessment Report must also review the need for a queuing distance within the site in light of this additional information.
- Perimeter access for emergency vehicles around the proposed facility.

## **Issue 3: Requirement to address noise and air quality**

According to the EA Report (page 3), *'given the decision to fully enclose processing activities, the EPA advised that it was not necessary to revisit the noise and air quality modelling undertaken for the initial design'*.

Addressing noise and air quality issues is important given that Council and surrounding residents have raised concerns about the operation of the existing facility particularly in relation to fire hazard, odour, air quality, noise, dust, pollution, visual amenity and heavy vehicles using local residential streets.

Council requests a copy of the EPA advice to assess whether this advice is sufficient to address the concerns raised by Council and residents.

It is also noted that as the project involves the removal of large quantities of potential asbestos contaminated materials from a large continuous concrete slab within the facility, ensuring there are no air quality impacts on the surrounding area during the clearing of the site is important.

A Construction Management Plan must identify appropriate mitigation mechanisms to ensure there are no adverse air quality impacts on the surrounding area.

#### **Issue 4: Hydrology Impact Assessment**

It is noted that the proposed water quality improvement mechanisms would include rainwater tanks and litter baskets/filtration devices within an on-site detention (OSD) tank.

It is recommended that the gross pollutant traps be strategically placed prior to the stormwater entering the OSD tank/Council's stormwater system. The architectural drawings should show these details.

If you have any enquiries in relation to Council's submission, please contact Council officer Ms Amita Maharjan on 9707 9806.

Yours sincerely

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

**Mauricio Tapia**  
**Team Leader Strategic Planning**