

Kelly McNicol
Team Leader
Industry Assessments
GPO Box 39
Sydney NSW 2001

Attention: Sheelagh Laguna

Dear Ms McNicol

**Notice of Exhibition
St Marys Resource Recovery Facility, 21 & 25 Dunheved Circuit, St Marys (SSD 8200)**

Thank you for your letter dated 11 September 2017 requesting Transport for NSW (TfNSW) comment on the subject State Significant Development Application.

Roads and Maritime will provide a separate response.

TfNSW has reviewed the Environmental Impact Statement (EIS) and traffic impact assessment report (TIA) supporting the proposed development and provide the following comments:

- The proposed changes to Dunheved Circuit would require approval from Penrith City Council who is the Roads Authority.
- The new facility would have the operating capacity to process up to 350,000 tpa of waste; an increase over the former facility. As presented within the TIA, the former facility generated an average of 220 two-way vehicle trips per day. However, the new facility is estimated to generate an average of 194 two-way vehicle trips per day. The proponent should provide further information, which justifies the decrease in expected average daily traffic volumes having regard for the increase in capacity.
- The TIA does not provide an assessment of the traffic generated by staff vehicle movements. The traffic assessment should be revised to include the impacts of staff vehicle movements.
- Section 3.3 of the TIA states that empty 25/26m B-double trucks would enter the site to collect waste and leave the site loaded. However, Section 6.2.1 of the report states that 25m B-double trucks would arrive loaded. Should the latter be adopted within the TIA, there is the potential that the daily traffic movements may have been underestimated if 25m B-double trucks arrive empty. The proponent should clarify the processing of B-double truck movements and revise the estimated traffic movements, if necessary.

If you require any further information regarding the above, please contact Ken Ho, Transport Planner on (02) 8202 2426 or via email at ken.ho@transport.nsw.gov.au.

Yours sincerely



9/10/17

Mark Ozinga
**Principal Manager, Land Use Planning and Development
Freight, Strategy and Planning**

CD17/10538

TAB A – Detailed Comments on State Significant Development Application

Modifications to Dunheved Circuit

Comment

The proposed changes to Dunheved Circuit would require approval from Penrith City Council who is the Roads Authority.

Existing and Estimated Future Traffic Volumes

Comment

The proposed development would increase the operating capacity of the previously approved resource recovery facility to process up to 350,000 tonnes per annum of general solid waste (non-putrescible).

The results of the 24-hour seven-day traffic counts, which is summarised in Section 2.4 of the Transport Impact Assessment (TIA) (The Transport Planning Partnership, July 2017), states that former operations generated a total daily average of 220 two-way vehicle trips. However, the new facility with increased processing capacity is estimated to generate an average of 194 two-way vehicle trips.

Recommendation

TfNSW recommends that the proponent provide further information to DP&E, which justifies the decrease in expected average daily traffic volumes having regard for the increase in processing capacity.

Staff Vehicle Trips

Comment

The TIA does not provide an assessment of the traffic generated by staff vehicle movements. The issued Secretary's Environmental Assessment Requirements (SEARs) states that the EIS must provide *"details of all traffic types and volumes likely to be generated during construction and operation"*.

Recommendation

TfNSW advises that the traffic assessment should be revised to include the traffic impacts of staff vehicle movements.

Inconsistency in Site Operations

Comment

Section 3.3 of the TIA states that under Scenario 4 empty 25/26m B-double trucks would enter the site to collect waste and leave the site loaded. However, Section 6.2.1 of the report states that 25m B-double trucks would arrive loaded. Should the latter be adopted within the TIA, there is the potential that the daily traffic movements may have been underestimated if 25m B-double trucks arrive empty.

Recommendation

TfNSW advises that the proponent should clarify the processing of B-double truck movements and revise the estimated traffic movements, if necessary.