



29 March 2016



Planning Services
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001
Attention: Chris Ritchie, Director – Industry Assessment

Dear Chris

Glenfield Waste Services Resource Recovery Facility (SSD 6249)

Thank you for your letter of the 12 February 2016 inviting Council to make comment on the above development application.

Council is currently processing a Planning Proposal for the Glenfield Waste Services property to allow the majority of the property, (including the site for the proposed Resource Recovery Facility); to be used for industrial purposes and in that regard the above application is consistent with that rezoning request.

Council's technical officers have reviewed the exhibited documents for the Resource Recovery Facility and provide the following comments:

Ecological Assessment – Appendix 10

1. The proponent is to undertake an adequate assessment of the subject site for 'core koala habitat' under State Environmental Planning Policy 44 – Koala Habitat Protection that meets the guideline requirements as specified under Section 2.1 of Planning Circular B35.
2. Prior to the removal of any Cumberland Plain Woodland vegetation from the site, documentary evidence of a suitable Biodiversity offset agreement must be provided to the consent authority and Campbelltown City Council.

Traffic Impact Assessment - Appendix 9

The Traffic Impact Assessment in the EIS dated October 2014 prepared by ARC Traffic and Transport appears to have the wrong date as it has been updated following comments on an earlier document (also dated October 2014) relating to rezoning of the full site for which Council provided previous comments in December 2014. Advice should be sought from the applicant regarding the appropriate date for this document.

- a. The EIS has adopted Council's previous recommendation that the current entrance/exit to the site from Cambridge Avenue be used as the entrance only and

exiting vehicles utilise the roundabout at Railway Parade. It should be noted that this recommendation was made with respect to the Planning Proposal for the entire property and may not be the best outcome for the development application. It should also be noted that as part of the Planning Proposal process it was identified that the current entrance/exit to the site from Cambridge Avenue is flood affected and an additional access point to the site is proposed to be created from Cambridge Avenue, which would appear to conflict with the information exhibited for this application.

- b. B-Doubles accessing the site are proposed to enter and leave via Cambridge Avenue (in the short term). The EIS indicates that a Restricted Access Vehicle Route exists from Campbelltown Road to the Cambridge Avenue entrance to the site. This is confirmed with RMS maps. The EIS proposes to apply to have the RAV route extended to include Railway Parade if B-Doubles "become commonplace". A quantitative limit needs to be placed on B-Double vehicles and it is recommended that this matter is referred to Council's Traffic Committee for advice.
- c. Details will need to be submitted regarding how egress from the site to Cambridge Avenue for vehicles other than B-Doubles will be restricted.
- d. Similarly, as the internal road is designated as a one way road, how will a B-Double navigate back to Cambridge Avenue?
- e. This report indicates that final planning for upgrade works at the intersection of Glenfield Road and Campbelltown Road are still not finalised. This is not correct, and construction under the Pinch Point Program has commenced.
- f. The discussion regarding the Cambridge Avenue Causeway indicates that the proposal will comprise only 1% of the traffic on the Causeway by 2024. It does not acknowledge that this traffic volume comprises of a much higher proportion of heavy vehicles than the through traffic on Cambridge Avenue. This will under estimate the impact on vehicle safety at the Causeway due to the current road geometry and restricted width at the Cambridge Avenue causeway and will result in more heavy-vehicle passing heavy-vehicle conflict. The report cites a similar width bridge on Windsor Road and the high traffic volume it achieves. The report does not discuss heavy vehicle proportions at the two locations, nor does it discuss the accident history at the Windsor Road Bridge. With respect to the accident history for Cambridge Avenue, ARC indicates that "this is not an enviable crash record" and also that "it is difficult to pinpoint why so many accidents have occurred in what is generally a well-defined moderate speed road". As heavy vehicle numbers increase, the conflict and hence safety issues will increase. Added to this is the statement in the report that larger vehicles will be bringing material to the site, which needs to be included in any assessment of the Causeway.
- g. The report indicates that vehicles accessing the landfill will continue to enter and exit the site at Cambridge Ave while traffic accessing the Recycling Facility will enter from Cambridge Avenue and exit via the Railway Parade Roundabout (with the exception of B-Doubles, which will exit via Cambridge Avenue). It is unclear how vehicles will be managed on site to ensure that this happens. Given the need to reduce vehicle

conflict on Cambridge Avenue, this is an essential part of this proposal. The applicant will need to submit a Traffic Management Plan to demonstrate how they will police these vehicle movements to ensure no additional burden on Cambridge Avenue due to turning vehicles.

- h. The internal road is quite narrow and the proposed vehicles accessing the site are very large. It will be necessary to demonstrate that the vehicles can safely negotiate the internal road network. Turning path diagrams for applicable vehicle sizes and speed environments are required.
- i. To ensure that the vehicles from the Recycling Facility utilise the Railway Parade exit, it may be necessary to impose a condition of consent that requires the new weigh bridges (aligned to the new route) to be installed prior to operation.
- j. The proposal is for 450,000 tonnes of material to be recycled. Current (2013) amount of recycled material is -140,000 tonnes of material. Hence the proposal will triple the site recycling. The Executive Summary of the report indicates that this will NOT result in a tripling of the vehicle movements associated with moving the material to the site as larger vehicles will be used. This argument is not supported with any reasons in the report. In fact, the discussion in the report seems to take a different approach. Unless there is a real reason for this assumption, it is considered reasonable that a tripling of the recycled materials will result in a tripling of the vehicles delivering such materials. This matter needs to be clarified.
- k. The traffic surveys undertaken do not break down vehicle types other than cars and trucks. As such, it is impossible to determine if the argument regarding larger vehicles (above) is feasible.
- l. Tables 4.3.1, 4.3.2.1, 4.3.2.2 and 4.3.3 indicate inbound and outbound trips. It is reasonable to assume that these should be equal. This would account for the minimum traffic generation of all exiting vehicles carrying a back load. While some vehicles may not leave the site fully laden, they will still leave the site. As such, the traffic generation will need to be re-assessed, giving regard to the number of back load trips and the number of empty vehicles arriving to fill up. Perhaps the current distribution of such vehicles may provide some guidance in this split.
- m. The TIA indicates that at least one of the concept designs for the high level bridge across the Georges River on Cambridge Avenue would necessitate closing access to the site via GWS Road 1. As such, it is recommended that this road connection is granted only until such time as bridge works commence. No permanent connection to Cambridge Avenue is to be permitted that may prejudice future bridge options.
- n. The TIA focuses on traffic. Another road related issue that will need to be addressed will be the road pavement of Cambridge Avenue. With the marked increase in heavy vehicle traffic, a road pavement assessment will need to be undertaken and the suitability of the existing pavement evaluated in light of the increased loading. Any works, or contribution, required as a result of this increase will need to be apportioned to the GWS site.

- o. The physical impact on the existing roundabouts either side of the rail bridge on Cambridge Avenue needs to be assessed. The significant increase in heavy vehicle movements will lead to additional shear forces on the pavement which will decrease the useful pavement life.
- p. Generally the report dismisses the traffic impact of this proposal by indicating that it is dwarfed by the greater impact of the Intermodal proposal and indicates that there is spare capacity at many of the existing intersections. While this may be accurate to some extent, this development still has a measurable impact and should contribute to any required road and traffic facility works required in proportion to the increase in road traffic load in the adjoining network. This should also include any contribution required for works on Moorebank Ave. Such apportionment of responsibility will need to be undertaken taking into account the impact of the Intermodal proposal and any other significant traffic generating developments proposed for the roads in this area.
- q. The proposal has analysed the intersections and a Give Way control is all that is proposed for the intersection of Cambridge Avenue and GWS Road 1 (the existing entrance to the landfill site). The traffic impacts of all intersections will need to be reassessed in light of the issues raised above.

Environmental Report- Contamination, Soil and Water - Appendix 8

- 1. The EIS does not contain any real information regarding flooding on the site with the exception of a couple of statements regarding proximity of the Georges River. It is unlikely that the site would be impacted by flooding from the Georges River in the 1% AEP event.
- 2. Assessment of the overland flow on the site should be undertaken given the nature of the proposed site use and the proximity of the Georges River. It is considered essential that measures are in place to protect water quality. This assessment is to take into account the site proposals and define where overland flow is directed, conveyed, treated and discharged.
- 3. The structural design of the retention ponds is to be in accordance with the applicable engineering standards. Details of keying in, geotechnical properties of materials used, compaction standards, landscaping and all other details are to be provided for comment.
- 4. The document indicates that "overflows will not occur or pumping-off site be (sic) required" (Page 32). This is not considered plausible and a time series approach to water balance using a model like MUSIC will be required to demonstrate that a suitable design has been achieved.
- 5. It appears the performance criteria (section 5.6) may be based on the document Managing Urban Stormwater - Soils and Construction which provides requirements for the construction phase (i.e. short duration) of works rather than permanent facilities. It will be necessary to take a first principles approach to water quality. This is particularly important given the proximity of the site to the Georges River.

6. The plans provided are very basic but indicate that there is a single swale on the north and western side of the haul road, directing flows to the water quality control ponds. The site generally grades in this direction. There are concerns that to get to this swale, surface flows will traverse the whole site, maximising the mobilisation of sediment and other pollutants. It also means that in times of continuing rain, the haul road will be subjected to surface flows, which may increase the amount of material picked up on vehicle wheels and transported off site. Details of the stormwater system are to be provided and must address the above concerns.
7. The document proposes that the roads within the site will be unsealed. This then necessitates the haul road to be wetted down multiple times a day to suppress dust. This is not seen as a viable option and the internal haul road is to be a fully engineered pavement and sealed to minimise the transport of material on vehicle wheels to the public road system. As the storage areas will not be sealed, it will also be necessary to provide a system to remove material from vehicle wheels before leaving the storage areas and entering the haul road.
8. The proposed basins are intended to be kept as full as possible to maximise water reuse on site. While this is a good objective in terms of minimising potable water usage, it is at odds with water quality objectives. Maximising water storage will lead to the basins overtopping when periods of extended rainfall occur. The applicant is to ensure that the water quality objectives are met at all times.
9. The stormwater quantity and quality are being treated and stored in combined basins. This is not considered appropriate (as the requirements are contradictory) and it may be necessary to separate these two processes to ensure that each is adequately addressed.

Council would appreciate your consideration of the above matters in your assessment of the subject application and would be happy to clarify and or expand upon the above comments in a suitably scheduled meeting. Should you require any further information or to arrange a meeting please contact Council's Manager Environmental Planning, Andrew Spooner on 4645 4833.

Yours sincerely



Jim Baldwin
Acting Director Planning and Environment