PENRITH

Our reference: 7722617
Contact: Gavin Cherry
Telephone: (02) 4732 8125

4 August 2017

Ms Nikki Matthews
Department of Planning & Environment

By email: Nikki.matthews@planning.nsw.gov.au

Dear Ms Matthews

Re: **Proposed State Significant Development - Benedict Penrith Resource Recovery Facility (SSD 7733)**
Property: **Nos. 46-48 Peachtree Road Penrith**

I refer to your email dated 27 June 2017 regarding the above application and thank you for providing Council with an opportunity to comment on the proposal.

Please find below comments from Penrith City Council for consideration in the assessment of the application.

Traffic Management

- Appendix D (Traffic Impact Assessment) proposes 134 "daily truck movements", but it is not clear whether these are return trips or single trips. This needs to be clarified as it is not possible to assess the traffic impacts of this proposal without this information / clarification.

- The proposed daily traffic movements appear to be based on a 10-hour day operation, however the proposal raises the possibility of 24-hour / 7-day-week operation. A summary of site-generated daily traffic trips for this level of operation is required to be submitted for assessment if this operation is sought as part of the current application.

- The queue distances in the SIDRA analysis (in Appendix B) doesn't appear to reflect the percentage of heavy vehicles in the mix (as a 19m heavy vehicle effectively takes up a queue length of 4 or more cars). For example, the proposed queue distance for right-turn movements from Castlereagh Road into Peachtree Road (i.e. from the northern approach), after operation of the facility commences, is forecast to be 14.7m in the AM peak, and 6.1m in the PM peak. As both distances are less than the length of a single 19m heavy vehicle, and given the numbers of heavy vehicles proposed to access the site at these times, clarification of the application of data in determining these queue distances is required.

- The SIDRA analysis (in Appendix B) of the PM peak indicates that average delay times (on the western approach to the intersection) will actually decrease after all their additional traffic is added to the road network. This does not seem realistic and requires further explanation.

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- The survey data provided in Table 2.2 of Appendix D (Traffic Impact Assessment) indicates that the western leg of the Peachtree/Castlereagh Road intersection has an existing AM peak of 30 heavy vehicles and an existing PM peak of 14 heavy vehicles, yet Table 4.1 indicates existing daily heavy vehicles at this leg of the intersection is calculated to be 360. This needs to be clarified, since an over-estimation of the existing heavy vehicle count tends to minimise the proportion of increase in the proposed numbers of heavy vehicles on this leg of the intersection.

- As mentioned in the paragraphs above, the Traffic Impact Assessment shows Level Of Service (LOS) 'C' for the Peachtree/Castlereagh Rd intersection both before and after the proposal, but this is because the report has used the LOS for the entire intersection (all legs), when actually the critical leg of the intersection (the western leg) is LOS 'F' (or at best 'E', depending on the time period). It would unacceptable (in terms of safety, amenity and accessibility), without some level of upgrade, to have this scale of increase in heavy vehicle traffic at an intersection leg that is already failing.

- The applicant should be requested to consult with RMS on the scope for upgrading the western leg of the intersection in association with the proposed intersection upgrade for the other intersection legs. The applicant should demonstrate that upgrade proposal/s would result in LOS 'C' or above for the western leg of the intersection.

- As requested in the SEARs, plans of any proposed road upgrades/infrastructure works required for the development must be provided (specifically with regard to the above point).

- The heavy vehicle swept paths provided (in Appendix B) indicate that both ingress (right-turn in) and egress (left-turn out) require the vehicle to take up the full road width kerb-to-kerb, which is unsafe and would also eliminate parking on both sides of the street. This is unacceptable and access driveways would need to be widened to ensure that swept paths can be safely accommodated from/within the travel lanes.

- The heavy vehicle swept paths provided (in Appendix B) also indicate that truck manoeuvring onsite is in conflict with proposed structures onsite.

- The proposal does not clearly state the size and type of the largest vehicle proposed to enter the site, however I have assumed it to be a 19m general access vehicle. If anything larger (or heavier) is proposed or anticipated (or is even a possibility) it needs to be stated.

- The Traffic Impact Assessment mentions the provision of truck parking onsite, but it is not clearly shown on the plans provided unless it is referring to the truck manoeuvring area (which cannot be counted as a truck parking area).

- The Traffic Impact Assessment addresses road network peaks, but does not give any indication of the operational peaks of the proposal. This information is required.

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- The proposal is for 8 staff members on-site, however the GFA for the site needs to be provided for parking calculation purposes, as Penrith DCP 2014 requires that the greater rate be applied.

- The Traffic Impact Assessment does not consider the capacity and impacts on the Mullins/Castlereagh Road intersection, nor does it provide analysis of this intersection as a possible alternative route to/from the site. This analysis is required in order to fully determine the traffic impacts on the local road network (and any remedial measures that may need to be undertaken).

- As requested in the SEARs, plans of any proposed road upgrades/infrastructure works required for the development must be provided (specifically with regard to the above point).

- An accurate description of haul routes is required (as per SEARs) in order to determine any additional traffic impacts on our local roads, whereas the Traffic Impact Assessment states only that 50% of vehicles will travel north via Andrews Road and 50% will travel south via Mulgoa Road. More information is required with regard to where heavy vehicles are travelling from and where their destination points will be.

- The application requires comment from the NSW Roads and Maritime Service and it is requested that the NSW Department of Planning and Environment discuss the above traffic management concerns with the RMS.

- If the application is supported, it must be that the above issues have been resolved and / or suitable intersection upgrades are included within the scope of works to ensure a satisfactory service level is provided without adverse impact on the local road network.

Environmental Management

- The EIS states that stockpiles shall be 5m high with stockpile separation walls being 4m high. The maximum height of stockpiles should be reduced to no greater than 4.0m to coincide with the height of the separating walls.

- Concern is raised at the proposed reliance upon sprinkler systems as the main method of control of outdoor dust generation, particularly in regard to operational practicality (giving consideration to onsite activities) as well as the resultant wastewater that may be generated. Given the proximity of existing surrounding commercial/industrial receptors and the potential for dust to impact these receptors, it must be assured that the dust control system for the site is compatible with site operational needs and will not create other adverse environmental impacts such as water pollution.

- The EIS refers to the installation of a gross pollutant trap however does not provide details of the proposed device and the range of contaminants that the device will satisfactorily treat prior to disposal to the stormwater system. It is requested that this aspect of the application be reviewed by the EPA with assurance given that all potential contaminants (including nutrients, heavy metals and

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hydrocarbons etc), not just sediment, are appropriately captured and disposed of and not directed to Council's stormwater system.

- Whilst the air quality impact assessment assesses the potential for odour from green waste it does not discuss the potential for odour from the presence of cloths, plastics and the like. It is requested that the EPA in conducting its assessment, consider all potential sources of odour within the waste stream, as appropriate.

- The EIS discusses the storage of asbestos in a 240L wheelie bin which is then removed when there is sufficient amount to make up a small load. Further clarification and detail is required from the applicant to confirm the storage location and quantity of asbestos and confirming what quantity is actually stored on site and where, before it is of a quantity considered to be a "small load" for disposal.

- The EIS states that materials with the potential to generate leachate will be processed in the processing shed. It is requested that appropriate controls be required to ensure the satisfactory capture, treatment and disposal of any leachate or contaminant impacted runoff and wastewater.

- The application does not detail whether any servicing and maintenance of plant and machinery shall be carried out on site. Confirmation is required as to whether any servicing or repairs of vehicles and/or equipment is proposed on site, and if so, details of management and pollution controls need to be provided for consideration.

- The Preliminary Contamination Assessment identifies that subsurface contamination is likely on the site and that minor ground disturbance works could expose contractors to potentially contaminated soil, and soil vapour. The Contamination Assessment makes a number of recommendations to be implemented during construction activities, including the use of a photoionization detector during excavations to monitor volatiles. Whilst the Contamination Assessment report states that "no contamination issues have been identified that would preclude the proposed future land use as a waste recycling and transfer facility", it does not conclusively state that the site is suitable in its present state for the proposed use. As the Contamination Assessment identifies that the presence of subsurface contamination is likely and that workers could be exposed to contamination, it is considered appropriate that further site investigation works be required prior to determination of the application. Further investigation works will identify and delineate the extent of contamination, if any, and will guide any required remediation process at the site, as well as construction activities and necessary environmental and health controls. Furthermore, the Contamination Assessment recommends a procedure (refer to dot point 3 of section 6.1) should subsurface contamination be identified during excavation works. Importantly, it does not acknowledge that should contamination be present on site and should remediation be required, that consent is required for those remediation works as all remediation work in the Penrith Local Government Area is Category 1 work in accordance with SEPP 55 – Remediation of Land and SREP 20.

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Landscaping

- The proposed landscape plan and planting detail is inadequate. The indicated 'lomondra' and 2 x native trees is inadequate planting to suitably treat the existing streetscape in front of the exposed building and setback east of the driveway. An embellished landscape plan is to be provided which outlines embellishment of the front setback zone with specific species, pot size and quantities including a mix of tree and shrub plantings. At a minimum 3 trees across the frontage should be proposed with understorey shrub landscaping to supplement. This could be addressed through conditions of consent if the application was supported.

Should you require any further information or clarification on the above comments, please don't hesitate to contact me on (02) 4732 8125.

Yours sincerely

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Development Assessment Coordinator

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