

Mr. Bruce Zhang
Environmental Assessment Officer
Industry Assessment
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr. Zhang,

Pick n Payless Metal Recovery and Recycling Facility SSD 8375

Thank you for your correspondence via Major Projects Planning portal (ref: PAE-1027) on 1 November 2019, requesting Transport for NSW (TfNSW) to review and comment on the subject State Significant Development (SSD) Application. Legislation came into effect on the 1 December 2019 that brings Roads & Maritime Services and Transport for NSW together into one organisation. This response represents the views of the new organisation.

The proposal seeks approval for the operations of a metal recovery and recycling facility with a processing capacity of 130 000 tonnes per annum of scrap metal located at 57 – 69 Tattersall Road, Kings Park (the Site). This is an increase of 100 000 tonnes per annum from the existing operations at the facility. The proposal also seeks to amend the internal site layout and circulation.

On this note, the exhibited documents have been reviewed and it is recommended that the EIS and Appendix M – should be updated to:

- Provide details of the daily heavy vehicle composition by vehicle types and the traffic generation during construction, as specified in the issued SEARs.
- Consider whether the internal road network should be designed to accommodate B-double vehicles to improve the efficiency of the development in future.
- Specify whether OSOM loads will be transported to the site and describe the route or strategy proposed to transport OSOM loads.
- Include a performance analysis of the Vardy Road/ Tattersall Road and a revised traffic analysis which more accurately depicts the peak traffic generated by the development.

These comments have been expanded upon and are provided in **TAB A**.

If you require clarification of the above, please do not hesitate to contact Ken Ho, Transport Planner, via email at ken.ho@transport.nsw.gov.au.

Yours sincerely



5/12/2019

Mark Ozinga

Principal Manager, Land Use Planning & Development
Customer Strategy and Technology

Objective Reference: CD19/08873

TAB A – Detailed Comments on State Significant Application SSD 8375

The following comments have been provided based on the review of the exhibited Environmental Impact Statement (EIS).

Heavy vehicle types

Comment

Both the EIS (at page 137) and Appendix M – Traffic and Parking Impact Assessment (at page 8) only provide detail of the daily heavy vehicle composition by vehicle mass. The SEARs issued for the development also specifies that the EIS should include details of all traffic types. Accordingly, the heavy vehicle composition of the site should also be broken down by vehicle type.

Furthermore, it is noted that the site is located within an existing 25 m B-double approved area, whilst the design vehicle for the internal road network is limited to a 19 m semi-trailer. This may restrict the ability of the site to take advantage of more productive vehicles in future.

Recommendation

Update the EIS and Appendix M to provide detail of the daily heavy vehicle composition by vehicle types.

Consider whether the internal road network should be designed to accommodate B-double vehicles to improve the efficiency of the development in future.

Construction traffic generation

Comment

The Traffic Assessment provided in Part 4 of Appendix M only considers the operational traffic generated by the development. The issued SEARs specify that the construction traffic generated by the development should also be detailed in the EIS.

Recommendation

Update the EIS and Appendix M to provide details of the traffic generation during construction.

Oversize and/or overmass load carrying vehicles

Comment

It is noted that some of the construction traffic generated may include the transport of Oversize and/or Overmass (OSOM) loads, such as the facility's metal recycling machinery. OSOM loads must be transported along the approved roads for OSOM Load Carrying vehicles. The NSW OSOM Load Carrying Vehicles Network Map can be found at: <https://www.rms.nsw.gov.au/business-industry/heavy-vehicles/maps/nsw-load-carrying-network/index.html>.

Recommendation

The EIS should be updated to specify whether OSOM loads will be transported to the site and describe the route or strategy proposed to transport OSOM loads.

Traffic Distribution

Comment

Appendix M (Page 12, Figure 7) provides proposed traffic distribution based on an existing driveway survey. Approximately, 2/3 of the proposed development traffic in the morning peak is shown to arrive from the west and all proposed development traffic in the afternoon peak is shown to depart to the west. Traffic entering or leaving the site in this direction will most likely be using the Vardys Road/ Tattersall Road intersection. However, no analysis of the performance of this intersection is provided in the EIS.

Furthermore, Page 8 of Appendix M states that it is expected that the vehicle movements will be evenly distributed throughout the day. It is unlikely that the traffic generation will be evenly distributed over the proposed 12-hour operation period of the development, which is supported by Figure 7, Page 12 in Appendix M. Accordingly, it is likely that the peak traffic generation provided in Appendix M is understated.

Recommendation

The EIS should be updated to include a performance analysis of the Vardy Road/ Tattersall Road and a revised traffic analysis which more accurately depicts the peak traffic generated by the development.