

16 December 2019

The Manager  
Department of Planning Industry & Environment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Bruce Zhang

## **SSD-6619 MOD 1 – PROPOSED EXPANSION OF BATTERY RECYCLING FACILITY - EXHIBITION**

I refer to your correspondence regarding the subject Application which was referred to Transport for NSW (TfNSW) for assessment and comment.

From the information provided it is understood the proposal is for the seeking a modification to allow for the expansion of the approved Used Lead Acid Battery (ULAB) Facility to incorporate a Battery Formation Plant (BFP) and an acid mixing facility plus ancillary site improvements including an increase to the existing carpark to include an additional 40 spaces. The subject site is located within the Bomen Industrial area to the north of Wagga Wagga. The site has frontage and access to Byrnes Road within a 100 km/h speed zone. Byrnes Road is classed as a local road under the provisions of the Roads Act.

It is proposed to construct a BFP with a processing capacity for 90,000 actual battery units (ABU) per month on the subject site. It is intended to operate the facility 24 hours a day, seven days per week, and it is anticipated that approximately 37 additional employees would be required to operate the BFP, working on a number of shifts. The ULAB facility will be developed substantially in accordance with the approved development, with the works proposed as part of the modification providing added value to project through incorporation of a battery formation process as an additional element of the lead acid battery manufacturing life cycle.

The supporting documentation identifies that the proposed development will generate approximately 25 (25 inbound and 25 outbound) trucks per week for delivery of “green batteries”, and 25 (25 inbound and 25 outbound) trucks for dispatch of “wet batteries”. Acid deliveries, for the battery formation process, would be required at a rate of approximately 5 trucks per week. The submitted documentation only refers to 19 metre semi-trailers as accessing the subject development. In addition to the additional truck movements consideration also needs to be given to the peak additional staff movements.

Access to the proposed facility is to be via the existing access driveway to the development site from Byrnes Road. The current proposal does not propose to alter the current access arrangements to Byrnes Road. Whilst it is acknowledged that the development proposal will generate addition traffic to the subject site the Traffic Impact Assessment claims that this can be catered to by the existing road network and intersection infrastructure. Notwithstanding this as the modification will result in increased heavy vehicle traffic volumes on Byrnes Road there is justification for the relevant road authority to consider and potentially require the upgrade of the current standard of the intersection geometry and pavement treatment at the intersection of the access driveway with Byrnes Road. In this regard TfNSW emphasises the need to minimise the impacts of any development on the existing public road network and maintain the level of safety, efficiency and maintenance along the road network.

The submitted documentation refers to the need for the preparation and submission of a Construction Traffic Management Plan prior to the commencement of construction activities, to ensure the safe and efficient movement of traffic and workers.

The development site is not located in close proximity to the classified road network. Access to the Sturt Highway and the Olympic Highway is available via several routes through the local road network. The current intersections that provide for access to the Bomen Industrial area, including the newly constructed Merino Street, from the Olympic Highway and Sturt Highway have capacity to accommodate the additional traffic resultant from the proposed development.

Based on the above Transport for NSW (former Roads and Maritime Services) advises that no objection is raised in respect to the proposed expansion of the current facility as it does not represent changes that would be cause for any additional concerns in respect to the Classified Road network.

Any enquiries regarding this correspondence may be referred to the Manager, Land Use - Transport for NSW (South West Region), Maurice Morgan, phone (02) 6923 6611.

Yours faithfully



Per:  
Lindsay Tanner  
Director South West NSW