



Our reference: ECM: 9194843  
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Susan Fox  
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Dear Susan,

**Response to Request for input into the Secretary's Environmental Assessment Requirements (SEARS) for St Marys Resource Recovery at 25 Dunheved Circuit, St Marys**

I refer to the above request for SEAR's received by Council on 25 June 2020. Thankyou for the opportunity to comment on the proposed development. The following comments are provided for consideration and inclusion in the SEAR's response:-

**Environmental Management Considerations**

The proposal seeks to increase the processing capacity of the current resource recovery facility to 250 000 tonnes per annum of wood waste, metals and cardboard, with minor construction works also included. The activities carried out on site will be subject to an Environment Protection Licence (EPL) issued by the NSW Environment Protection Authority (EPA), as the development is considered a scheduled activity. In turn, the EPA is the regulatory body for environmental impacts associated with the use of the site and it is assumed that they will also provide comment on the proposal.

Nevertheless, the EIS prepared to support the state significant development application should provide a detailed and comprehensive description of the proposal. All environmental impacts of the proposal will need to be identified in the EIS and supported by technical assessment reports prepared by appropriately qualified persons and in accordance with applicable legislation, guidelines and standards. For this proposal, detailed information regarding how waste will be received, stored and processed is to be provided, and assessments of noise impacts, and impacts to local air quality are particularly important.

In carrying out the above required assessments, the applicant will need to identify all sensitive receivers. Though not yet constructed, it needs to be noted that Council has received an application for a town centre-type development in Jordan Springs East. The future residents of this development should be considered in any assessment relating to environmental impacts, such as potential noise and air quality impacts. These residents will be located less than one kilometre from the development site.

Also, it is important to acknowledge that SEPP 55 does require that the consent authority consider whether the site is suitable for the proposed use. Given that the current proposal does include hardstand works (though the extent is not known), it is considered that it would be an opportune time to ensure that the site is not contaminated prior to any further development. Should remediation works be required, development consent is to be obtained , as all remediation works in the



Penrith Local Government Area are considered Category 1 works as a result of SREP 20 (Clause 11(4)). In turn, should remediation works be necessary, they should be incorporated into the development proposal.

The SEAR's request also suggests that a BDAR waiver is intended to be sought. The appropriateness of this suggestion is a matter for the Department to consider and may warrant consultation with OEH, given any request for a waiver which suggests the mapping may not be appropriate is considered to warrant a review and amendment of the mapping, if it was deemed that there are no communities evident on site that warrants an assessment under the Biodiversity Offset Scheme.

## **Engineering and Traffic Management Considerations**

### Stormwater Drainage

The following is requested to be addressed in any state significant development application lodged for this site:-

- Demonstration that the existing on-site stormwater system is of adequate capacity and there will be no increase in stormwater runoff from the site as a result of this proposal.
- The applicant should be requested to demonstrate that there will be no increase in runoff from the site as a result of the development for all the storms up to and including the 1% AEP event.

### Water Sensitive Urban Design

The application is required to address Council's Water Sensitive Urban Design Policy and Technical Guideline. Increase in impervious area may require the provision and implementation of a water sensitive urban design strategy that complies with Council's Technical Guideline.

### Road Design and Car Parking / Access

It is noted that the applicant's submission in their "traffic" comments indicate that they do not consider that there will be any significant impact of their traffic on the road network and that they will address this in the EIS. The development however is a proposed expansion of the existing waste recovery business (previously Bingo) using the existing access and buildings. The resulting intensification of usage including heavy vehicle volumes and possibly types is a key consideration that is considered to warrant works to the road reserve to cater for the resulting impact. The existing access driveway, Dunheved Circuit and the roads in this industrial precinct are very narrow and congested but. They have been deemed acceptable for existing operations and intensity but the proposed expansion will warrant works to cater for the increased traffic generation. It is understood that this was a specific matter raised within a preceding SSD application for this site, which was suitably addressed by the applicant through the provision of proposed road works and kerb re-alignments. The SSD application was approved but did not eventuate.

The proposed development must therefore address the impact of the proposed heavy vehicle traffic on the existing access driveway and road network as well as the internal parking, manoeuvring and operational issues.

It is considered necessary that a detailed traffic and parking study be prepared and submitted by the applicant as part of the SSD application that addresses traffic volumes, frequency of movements, road capacity and infrastructure impacts and required civil works. This includes an analysis against the Australian Standards and Penrith DCP 2014. The report should also address the following:-

- Heavy vehicle traffic generation, access, and manoeuvring in the local road network, the site access and internal arrangements.
- The narrowness of Dunheved Circuit for the proposed heavy vehicle access
- Ongoing issues with heavy vehicle parking in the reserve area opposite the site
- Impact on traffic safety and congestion in Dunheved Circuit, intersection with Links Road, Links Road other inspections and including the intersection with Forester Road
- Consider and address the impact on traffic safety and congestion in Links Road which will increase due to current additional future traffic generated by the Lend Lease Central Precinct sub-division which will access Links Road
- Confirm the largest heavy vehicle proposed to access the site and these B-double turn or other heavy vehicle paths for entering / exiting ( left in/ left out, right in/ right out) from their driveway into Dunheved Circuit loop and B-double turns (left in/left out, right in/right out) at Dunheved Circuit / Dunheved circuit loop (north leg and south leg) intersections. This will identify the road works required to accommodate this development and for which Council require the applicant to provide at their full cost.
- The applicant should then include suitable plans for works to accommodate these turns for assessment.
- Demonstration that all vehicles are to enter and leave the site in a forward direction;
- Demonstration that appropriate signage is to be installed to direct staff/delivery vehicle drivers/ visitors to on-site parking and delivery areas;
- Demonstration that signage which is clearly visible from the public road shall be directional signage and line marking shall be installed indicating directional movements and the location of loading areas and visitor/staff car parking to the satisfaction of the Principal Certifying Authority;
- Demonstration that all vehicle parking and manoeuvring must be in accordance with AS/NZS 2890.1:2004, AS/NZS 2890.1:2004/Amdt



1:2005, AS/NZS 2890.2:2002, AS 2890.3:1993, AS 2890.5:1993, AS 2890.6:2009 and Council's requirements. This includes vehicular access from Dunheved Circuit / Dunheved Circuit loop, access driveway and internal manoeuvring for a 4.6 metre high 26 metre long B-Double vehicle in accordance with Roads and Maritime Services guidelines, Austroads guidelines and AS2890.2:2002;

- Demonstration that all car spaces and loading areas are to be sealed/line marked and dedicated for the parking of vehicles only and not be used for storage of materials/products/waste materials etc;
- Demonstration that secure bicycle parking is to be provided at convenient locations at the facility in accordance with AS 2890.3:1993;
- Demonstration that accessible parking is to be provided at accessible paths of travel at the facility in accordance with AS 2890.6:2009;
- Demonstration that the required sight lines around the driveway entrances and exits are not to be compromised by street trees, landscaping or fencing;
- Demonstration that sight distance requirements at driveways are to be in accordance with AS 2890.1:2009.

Should you wish to discuss any matters further and allow for further dialogue as requested between officers, please do not hesitate to contact me on 4732 8125.

Yours sincerely,

**Gavin Cherry**  
**Development Assessment Coordinator**