



8 September 2020

Mr Chris Ritchie  
Director, Industry Assessments  
Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Attention: Susan Fox

Dear Mr. Ritchie,

**EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT  
CHULLORA MATERIALS RECOVERY FACILITY  
21 MUIR ROAD, CHULLORA**

Reference is made to the Department of Planning, Industry, and Environment (DPIE) correspondence via the Major Projects Planning Portal dated 17 August 2020, regarding the abovementioned application which was referred to Transport for NSW (TfNSW) for comment.

TfNSW has reviewed the Environmental Impact Statement (EIS) and the associated Transport Impact Assessment (TIA) and provides advisory comments in **TAB A**.

If you have any further inquiries in relation to this development application please contact Narelle Gonzales, Development Assessment Officer, on 0409 541 879 or by email at: [development.sydney@rms.nsw.gov.au](mailto:development.sydney@rms.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink that reads 'BEPeg'.

**Brendan Pegg**  
Senior Land Use Planner  
Planning and Programs, Greater Sydney Division

## TAB A

### 1. Comment

The Environmental Impact Statement (EIS) makes various mentions of a 'triple axle rigid vehicles' (p.72 and 77) and 'triple axle vehicles' (p.73), including that a triple axle rigid vehicle can carry a 40 foot container. A rigid vehicle cannot carry a 40 foot container.

#### Recommendation

It is requested that the proponent clarify what is meant by a 'triple axle vehicle'.

### 2. Comment

The EIS states that the average load per truck for a B-double is 55 tonnes (p.72). B-doubles cannot carry this much payload. The approximate payload for a 25/26m B-double at GML is 42.5 tonnes, and at HML is 48 tonnes.

#### Recommendation

It is requested that the proponent clarify the payload for a B-double.

### 3. Comment

The EIS states that the average load per truck for a Heavy Rigid Vehicle (HRV) is 22.5 tonnes (p.72). A rigid truck cannot carry this much payload.

#### Recommendation

It is requested that the proponent clarify the payload for a HRV.

### 4. Comment

The EIS states that the average load per truck for a truck and dog is 42 tonnes (p.72). Only PBS truck and dog combinations such as Quad Dog and Quin Dog will get close to 42 tonnes payload and it also requires access to at least the PBS.

#### Recommendation

It is requested that the proponent clarify the specific truck and dog combination and payload.

### 5. Comment

The EIS states that product collection vehicles (outbound) would comprise triple-axle rigid vehicles, truck-and-dogs and B-doubles (p.73). However elsewhere in the EIS, it states that to provide a conservative estimate of traffic numbers it has been assumed that product would be collected by semi-trailers and truck-and-dogs only (p.136)

#### Recommendation

Request the proponent clarify whether B-doubles have been used to estimate traffic numbers.

### 6. Comment

The proposed vehicle movements show in table 4-12 of the EIS (p. 73).

#### Recommendation

It is requested that the proponent clarify how these movement numbers were calculated, and whether the inflated payloads for the various heavy vehicle types were used as part of this calculation.

It is also requested that the proponent clarify whether there are any service vehicle trips generated by the development as Table 4-12 only shows inbound waste and outbound product movements in the proposed vehicle movements' figures.

## Transport for NSW

27-31 Argyle Street, Parramatta NSW 2150 | PO Box 973, Parramatta NSW 2150

P (02) 8265 6962 | W [transport.nsw.gov.au](http://transport.nsw.gov.au) | ABN 18 804 239 602

7. Comment

A Green Travel Plan is not considered necessary at this time however, TfNSW recommends that the proponent consider providing end of trip facilities to encourage and support active transport.

In addition, TfNSW recommends that the site should reassess the necessity of a Green Travel Plan should the site operations expand requiring an significant increase in employee numbers.