



12 November 2020

TfNSW Reference: SYD19/01502/05

Council Reference: SSD 10395

Department of Planning Industry & Environment
GPO Box 39
Sydney, NSW 2001

Attention: Sally Munk

Dear Sir/Madam

NOTICE OF EXHIBITION OF EIS FOR WESTERN SYDNEY ENERGY & RESOURCE CENTRE – 339 WALLGROVE ROAD, EASTERN CREEK

Reference is made to the Department; correspondence dated 1 October 2020, requesting comments from Transport for NSW (TfNSW) on the Environmental Impact Statement on the abovementioned application.

The proposed development is located within the Western Sydney Parklands Plan of Management. It shares a common boundary with Westlink M7 and will connect to Wallgrove Road via the Austral Bricks Road. It is noted access from and to the site will be via a fourth leg at the proposed new signalised intersection at Wallgrove Road and Austral Bricks Road.

The documents provided in support of the application have been reviewed and TfNSW provides the following comments:

- TfNSW request that an additional lane along Austral Brick Road on approach to the intersection of Wallgrove Road.
- Further consideration is to be given to traffic demands for movements and estimated traffic of waste vehicle trips.
- Further consideration to modelling for the signalised intersection of Wallgrove Road and Mini Link Road.
- Further consideration is to be given to pedestrian and cycle access.
- Further information is required on travel routes for hazardous waste material.
- Need to prepare a Green Travel Plan in consultation with TfNSW.
- Further consideration is to be given to the operational and construction management plans.

Details on the above matters are provided at Attachments A.

- The subject property shares a common boundary with Westlink M7. Comments on matters concerning matters related to Westlink M7 are provided in Attachments B & C.

If you have any further questions, Sandra Grimes, Development Assessment Officer, would be pleased to take your call on (02) 9563 8651 or please email development.sydney@rms.nsw.gov.au. I hope this has been of assistance.

Yours sincerely



Pahee Rathan

Senior Land Use Assessment Coordinator

Attachment A

- There is concern with the lack of storage near the access point in the event queueing occurs. Any queueing is expected to have a significant impact on the nearby signals.
- Due to the large impact of heavy vehicles that will use the signalised intersection of Austral Bricks Road and Wallgrove Road, TfNSW require two lanes on Austral Bricks Road on approach to Wallgrove Road to be included in the design to ensure the intersection does not fail. This request was noted in pre- DA advice. Amended plans and appropriate modelling should be submitted to TfNSW for review.
- There appears to be an inconsistent traffic demand for movements. Heavy vehicle numbers were dropped in operational AM and PM scenarios which are lower than future based scenarios and do not match with estimated number of operational vehicles stated in p.22 of the traffic report.
- The optimum cycle time of 120 secs is recommended which will determine the optimum cycle time to satisfy the performance of critical movements.
- The development is estimated to generate 188 two-way waste vehicle trips per day (a mix of semis and B-Doubles), with a peak of 30pph. However, p.390 of the EIS states the site will have a potential to process 90pph which may increase the trips in both AM and PM peaks.
- It is noted material will come from the existing Cleanaway facility at Erskine Park. Heavy vehicles will use Erskine Park Road, Lenore Drive and Old Wallgrove Road. While the haul route said to be suitable for B-Doubles, the impact of up to 90vph of heavy vehicles using the signalised intersection at Wallgrove Road and Mini Link Road should also be modelled.
- Pedestrian and cycling access is not clearly shown in the TTAR including circulation diagrams. The TTAR provided as part of the EIS does not address TfNSW policies for integrating transport with land use regarding off-street bicycle parking and end of trip facilities. To encourage driver and staff mode shift to cycling TfNSW recommends additional bicycle parking spaces should be installed and end of trip facilities provided.
- The TTAR breaks down the materials and chemicals that will be used in construction and operation, but does not describe the origins and destinations of DGs or any route assessment (for barriers and detours) between the sites. It is noted that hazardous waste will be transported to St Mary's for treatment. It is requested the proponent provide a network diagram showing dangerous goods routes, identifying barriers to using the most direct route and the diversions that will be necessary during operations.
- Section 5 of the TTAR provided a framework for an operational plan and construction management plan. Cumulative impacts need to be assessed, as changes to activity in Austral Bricks and adjoining sites do not appear to be included. Additionally, vehicle routes, road safety and key intersections, and peak hour construction vehicle movements by time of day should be included. It is requested that the operational plan and construction management plan include an assessment of cumulative impacts of surrounding development, vehicle routes, road safety and key intersections, and peak hour construction

vehicle movements by time of day. The plans need to demonstrate that a safe, modern fleet will be utilised for the project during operations and construction.

- Table 12, attached outlines the conservative assumptions used in the generation of truck trips (20 tonnes and 7 tonnes per vehicle for feedstock for example). The function of the new/proposed intersection on Wallgrove road to the Gazcorp Industrial Estate may be impacted by these unrealistic assumptions.

Attachment B

- TfNSW note that the proposal will require new water, sewer, telecommunication and electrical connections. The EIS notes that the exact route of the new connections is to be confirmed at the detailed design stage however, the preferred route crosses underneath the M7. TfNSW does not support any new underbores below the M7 Motorway, overhead utilities above the M7 Motorway or services using TfNSW owned conduits. However if they are required:
 - New underbore: Any new work to underbore the M7 will require TfNSW & WSO Co prior approval and must meet TfNSW/WSO Co requirements (ie. maintenance free, minimum 100 year design life etc). Any new assets/maintenance access points must be outside the Motorway Land. This also includes launch and receive pits. An instrumentation and monitoring plan will be required.
 - New overheads: Any new overhead utilities (i.e. powerlines) must not encroach on the Motorway operational corridor under all environmental conditions nor restrict access to operate and maintain M7 assets (clear zones). No new structures are to be built within the Motorway corridor (i.e. should free span the Motorway corridor). No supports/towers/foundations within the Motorway corridor.
 - Existing spare conduits: The proponent must not use any TfNSW owned conduits/underbores.
- The proponent must enter into an agreement with TfNSW/WSO Co prior to any works over, on or under the Motorway corridor, or immediately adjacent to the Motorway corridor, such as excavations adjacent to the Motorway embankment/retaining wall.
- All costs incurred by TfNSW & WSO Co in relation, but not limited to negotiation of agreements, technical review etc. are to be reimbursed by the Proponent.
- TfNSW note that blades will be used to interrupt the large facades, so they are more visually interesting and less bulky, as well as breaking up the mass from main viewing corridors on the M7 in the north and south directions. Large green walls are proposed to the north and south of the site to further soften the building's appearance when viewed by traffic travelling on the M7. TfNSW discourages the use of any moving parts or bright lights which may distract drivers. Please confirm the proposed facade layout and finish will not distract drivers travelling along the M7.
- There is a concern that flue gas from the ventilation stack could impact the motorway such as when an inversion takes place leading to poor visibility. Please confirm the design and operations ensure this doesn't occur under all environmental conditions.
- Proponent to ensure the design and site layout does not result in Electro Magnetic Interference to the M7 Motorway systems.
- As referenced in Appendix A of the EIS Submission, please confirm the Proponent will develop a bonding and earthing strategy to ensure the WSERRC does not impact the M7 Motorway assets through earth leakage.

Attachment C

PROPOSED DEVELOPMENT:

SSD-10395 - Western Sydney Energy and Resource Recovery Centre 339 Wallgrove Road

Comments from WSO Co Pty Ltd (Westlink M7)

- **Boundary fence**

1. The developer must not interfere with or remove the boundary fence with the Westlink M7 without prior written consent of WSO Co Pty Ltd.
2. The developer must must reinstate the boundary fence between the Westlink M7 Motorway corridor and the subject development site prior to the issue of any construction certificate authorising works. The fence must be constructed to a minimum height of 1.8m above existing and finished ground levels.
3. The boundary fence location must be set-out by a licensed surveyor registered under the Surveying and Spatial Information Act 2002 and upon completion a survey report from the surveyor must be provided to the RMS and Westlink M7 confirming that the fence has been constructed on the boundary or within the development site. There must be no encroachment by any structure upon the Westlink M7 corridor without the consent of the Transport for NSW and Westlink M7.
4. The boundary fence must have no gaps or holes at any point.
5. Alternative treatments can be agreed with written agreement from WSO Co. at the developers cost.
6. The developer must submit a bank guarantee from a financial institution agreed by Westlink M7 for \$80 000 prior to construction commencing.

- **Retaining wall at the boundary of the Westlink M7**

The developer is to consult with TfNSW and WSO Co. and provide evidence to satisfy TfNSW and WSO Co that the proposal does not impact the integrity of the retaining wall at the boundary of the development site and the motorway and how the retaining wall is to be protected during construction.

- **Drainage**

1. Preference is that storm water from neighbouring properties is not discharged into the Motorway's drainage system but directed into the Local Council's storm water system.
2. Construction or installation of storm water drainage systems within the Motorway lease area by or on the behalf of the property own is absolutely forbidden unless approval is obtained from Transport for NSW (Motorway and Property

Departments) and WSO Co. The main objection to the installation of private drainage structures within the Motorway lease area are:

- i. These items provide additional hindrance or present further hazards and risks to WSO and Transport for NSW maintenance crews in undertaking maintenance works along the motorway boundaries.
 - ii. May impact or encroach on other underground services that may be located within the motorway lease area including water, sewerage, gas, electricity and communications services.
 - iii. Become a maintenance liability for TfNSW and WSO Co. as these items are located within a restricted access area preventing the owner from undertaking maintenance works on the structures. As a result, TfNSW or WSO Co. may become responsible by default for the ongoing maintenance of these items.
 - iv. Potential legal liability issues may arise as a result of the drainage system being coming blocked or dysfunctional resulting possible flooding of the property and associated buildings due to backing up of storm water.
3. Where it is not possible or feasible for the stormwater to be directed into the Local Council's storm water system then the property owner or Developer must obtain and comply with Transport for NSW, WSO Co Pty Ltd and Local Council or other Authority (where the Motorway's drainage system connects into another Authorities storm water system or discharges in to a natural waterway) approvals as outlined:
- a. To ensure that storm water or erosion does not adversely affect the Westlink M7 Motorway corridor the developer must ensure, prior to TfNSW issuing approval for the application that the development's drainage is not to increase Flows and or Afflux levels over or through the M7 Motorway corridor and any of its drainage assets during any:
 - i. One in five year ARI
 - ii. One in ten year ARI
 - iii. One in twenty year ARI
 - iv. One in fifty year ARI
 - v. One in one hundred year ARI
 - b. The developer must supply a drainage study demonstrating compliance with this condition. The study must be produced by a professional hydrologist acceptable to WSO and the Transport for NSW. The model will be reviewed by WSO's consultant at the proponent's expense.
 - c. As a general guideline where storm water is to be discharged from a neighbouring property on to the Motorway lease area the following requirements should be meet:
 - i. For storm water being drained from hard stand area including driveways, parking bay, etc. must pass through an oil separator prior

to being discharged on to the Motorway Lease area.

- a) All discharged storm water from the oil separator, building roofs, footpaths, yards and gardens must be discharged from a slit trench located at least 1m back from the Motorway Lease boundary within the private property.

- **Access & Interface arrangements**

- **Inductions**

1. To ensure that Work Health and Safety laws are fully implemented within and near the Westlink M7 Motorway corridor, the developer staff must be inducted into M7 and fill out a Motorway Access Permit for site activities on M7 land, if work has to be undertaken from M7 Motorway side.
2. Works within the Motorway land will only be permitted subject to completion of the Motorway Access Permit and any associated commercial agreement or bank undertaking that sufficiently mitigates WSO Co Pty Ltd's risk (so similar words)

- **Light impact assessment**

1. The developer is to provide evidence from a suitably qualified expert that there will be no adverse visual impact from light spill from the development to motorists using the motorway.

- **Restricted vehicle height**

1. The developer must ensure restricted over height vehicles under M7 overpass is implemented during construction and O&M.

- **Under bore of Westlink M7**

1. Any proposed under boring of the motorway requires consent of the TfNSW and WSO Co
2. Prior to any under bore the developer must meet with TfNSW and WSO Co and agree suitable survey monitoring arrangements at the developer's expense
3. A commercial agreement must be entered into between the developer and WSO Co. to address any commercial risks to WSO Co.