

15 April, 2020  
Ref.: 147/034-20 DC (Traff)

The General Manager  
Cumberland Council  
PO Box 116  
Merrylands, NSW 2160

Attention: Ms. Diep Hang (Senior Development Planner)

Dear Diep,

**RE: 84 Percival Road, Smithfield**  
**Alteration, additions for use of existing premises as a waste management facility**  
**DEVELOPMENT APPLICATION NO.: 2019 /0480**

I refer to Council's deferral comments letter dated 23 March 2020 of the above DA in regards to Items 1, 3 and 4.

**Item 1 – On-site parking spaces**

**Council Comments**

It is noted that there are no specific parking rates in Part A of Holroyd DCP 2013 for waste management facilities. The most appropriate parking rate for the proposed use is comparable to a warehouse.

A minimum of 12 on-site parking spaces is required to be provided based on the warehouse and office gross floor area of the building. The provision of 9 parking spaces is a short fall of 3 parking spaces.

The submitted SEE and Traffic and Parking Assessment outlines that there is a total of 8-9 employees at any one time during the daily operations of the business. It is also noted that the premises would also accept private vehicle loads, in which may require parking on-site upon visit. It is requested that further information be provided with regard to the management of private vehicles visiting the premises, to support the provision of 9 parking spaces on site for the proposed use. Alternatively, 3 additional parking spaces shall be provided on-site to accommodate a total of 12 parking spaces (inclusive of 1 accessible parking space).

**Response**

The revised proposal provides 12 parking spaces as follows:

- Area A – 6 spaces including a Disabled parking space
- Area B – 6 spaces

Please refer to Attachment A for detail.

### Item 3 – Weighbridge

#### Council Comments

The applicant shall provide further information regarding the operations of heavy vehicles and the weighbridge. If the heavy vehicle will access the weighbridge at entry and exit then queue areas shall be provided within the site – It is noted that there may be traffic conflict during this process. In this regard, this matter shall be addressed.

In addition, the applicant shall also demonstrate that there is sufficient queuing area between the entry point and weighbridge for heavy vehicles that will enter the site based on traffic generation and delivery times.

Plans show a nil setback proposed from the weighbridge to the northern boundary. Amended plans shall be submitted detailing any proposed works / treatment (i.e. retaining wall or fencing details) adjacent to the weighbridge to determine the impacts of its location upon the neighbouring property.

#### Response

The operation of weighbridge is as follows:

- It is proposed to change the use of the existing commercial and residential building supplies business into a metal recycling yard noting there will be separation of copper from cables as well as compaction. The owners of the business will be taking the metal scraps from consumers and then on-sell this to a metal recycling yard where the metal can be sorted. On arrival of the consumer to the site, they will be required to weigh the vehicle loaded and will have to weigh again once they have unloaded in order to work out the weight of the metals delivered to the site. On this weight worked out, the business owner can then purchase the material and the correct price. The specifications for the weighbridge have been prepared and submitted to council for determination. The metal storage area will be located within the warehouse and to the rear of the property, as shown on the proposed site plan. When the metal substance has accumulated, a truck will be used to transport the metals to a specific metal recycling yard. The proposed development comprises a scrap metal waste transfer station where material is accepted from scrap metal customers which are brought to the site in trucks and in skip bins which are then taken into the warehouse building or to the rear yard for sorting.

The scrap metal material is then sorted into the following main categories metal, copper, steel and aluminium. The site will be operated by 8 employees who will control the operations and the hours of operation at 7am to 4pm Monday to Friday with Saturday operation from 7am to 1pm. Sydney Smithfield Metal Recyclers do not own any trucks, and as such all material coming to the site is via customers own vehicles.

Approximately 20,000 tonnes per year would be accepted at the site and there will be storage of up to 100 tonnes at any one time. There is no processing of the scrap metal to occur on the site rather only sorting and compacting to on-sell to other businesses. There will be no crushing or screening to take place on the site.

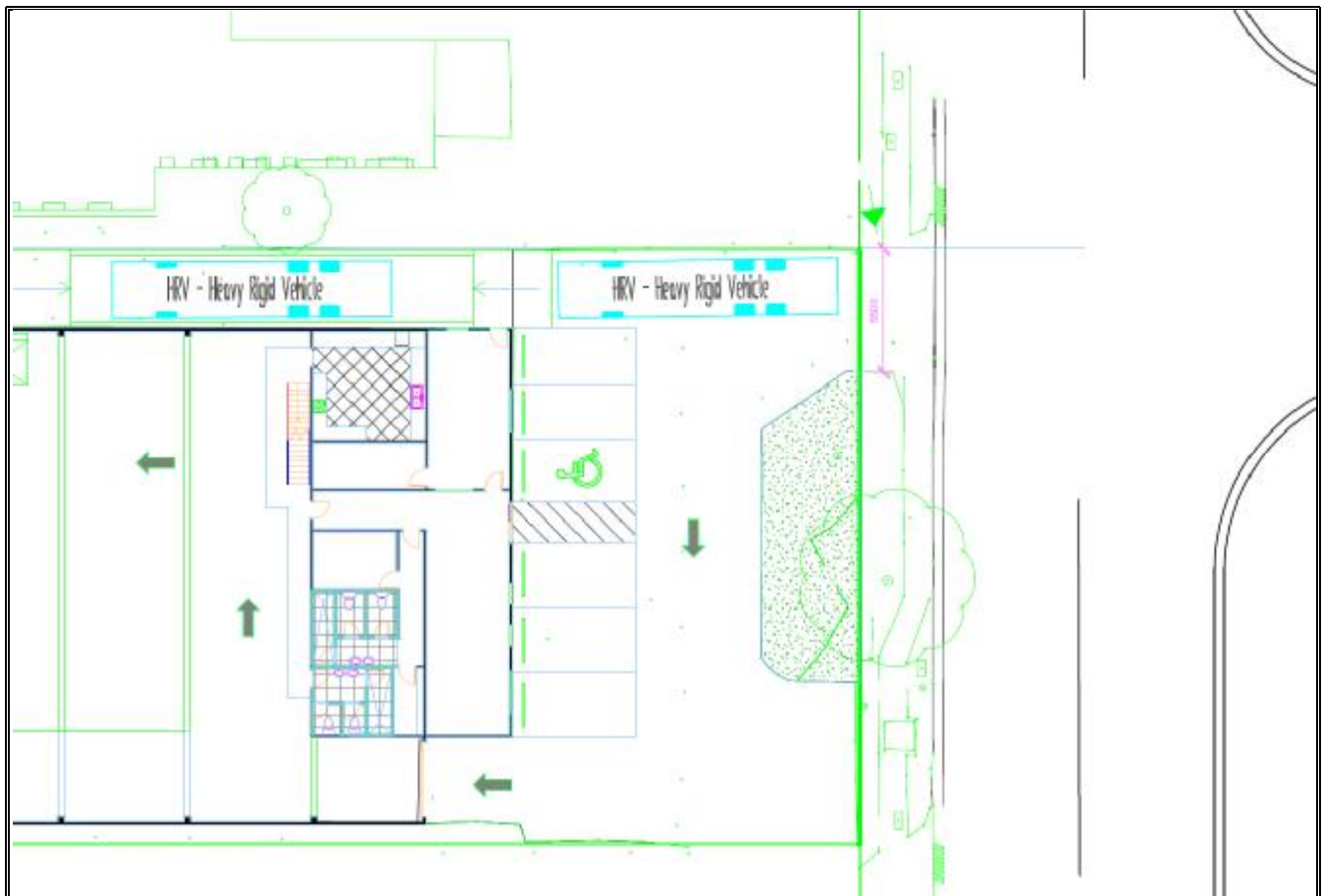
- Booking of entry would only be via phone reservation

- A staff will wait at the gate for entry of any vehicle into the weighbridge
- The expected number of vehicles is 4 per hour (2 arrival and 2 departure per hour – that is one vehicle every 25 minutes) which will eliminate any conflict or queuing of HRV.

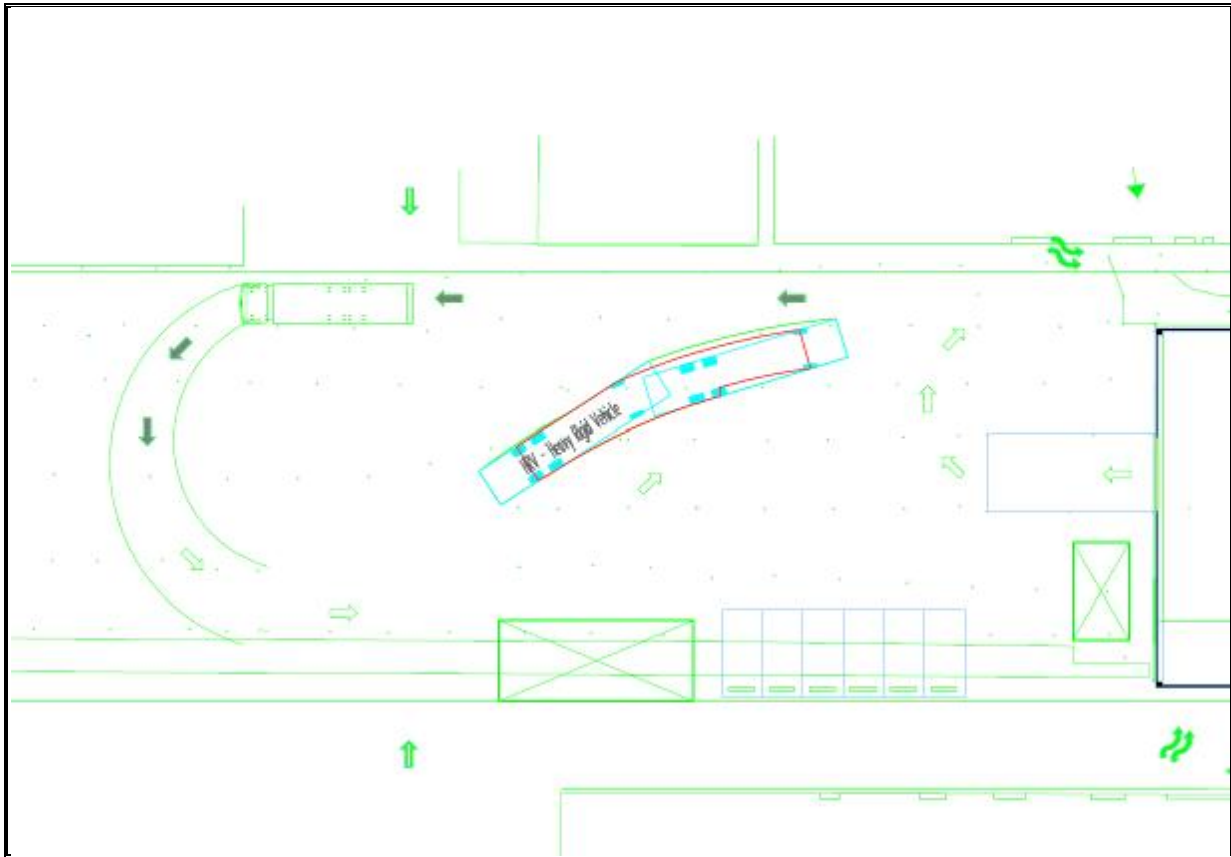
*Peak Truck Trips hourly on a weekday:*

- Ø One small rigid trucks up to 7 metres in length (one arrivals and one departure)
- Ø One medium (8.8 metre) or large rigid truck (one arrival and one departure)
- A docket would be issued on entry, once the waste is unloaded the vehicle will head back to the weighbridge for weighing and payment.

We have demonstrated the worst case scenario of a HRV. The queuing at the entry point is as follows:



The internal queuing area is as follows:

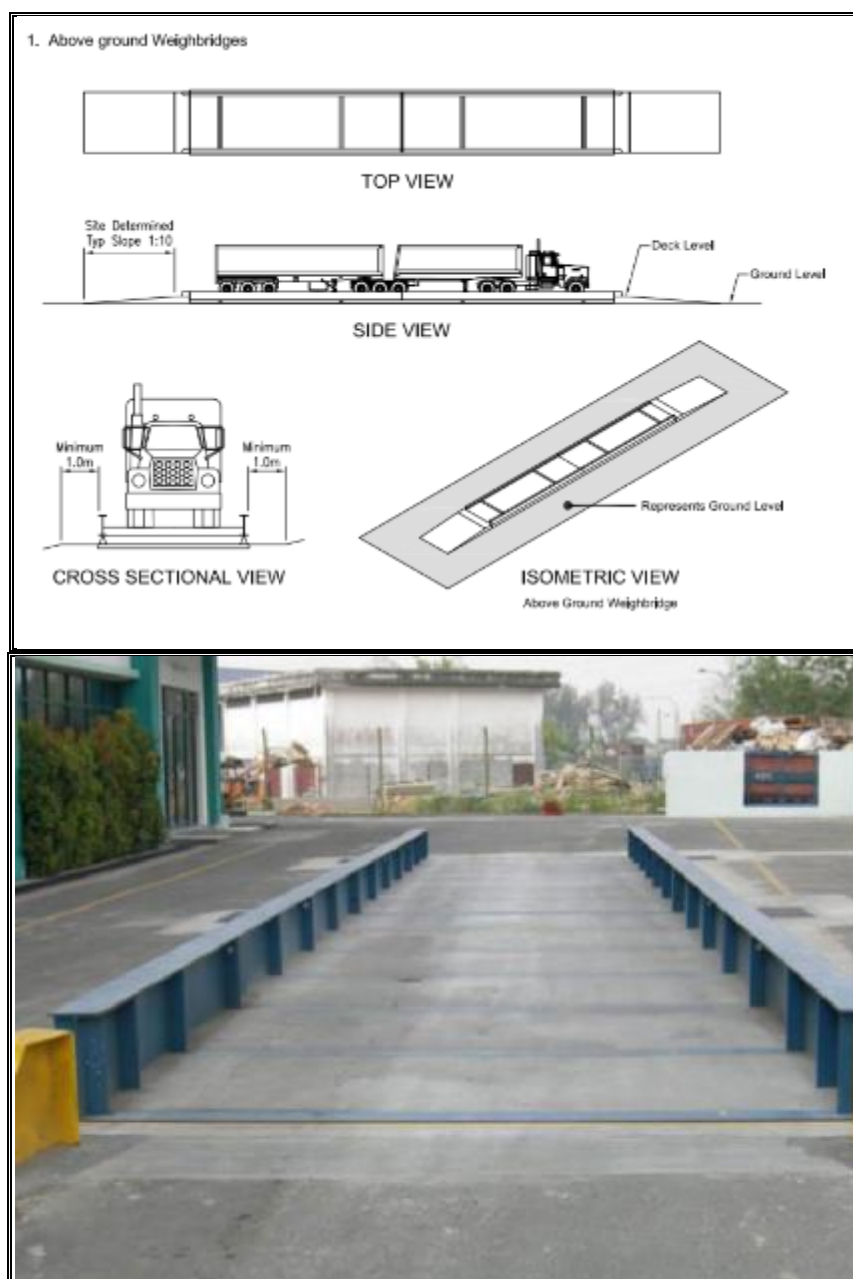


There is sufficient queuing areas both at entry and internal. There is one space at the entry to the weighbridge, however vehicles can also wait on the street for entry which would be rare.

The Architectural drawings have been revised to eliminate nil set back.

Note that no retaining wall or changes to fencing is required.

The concept of the weighbridge is as follows:



#### Item 4 – Car Park and Driveway Layout

##### Council Comments

- a) The submitted drawings have not clearly demonstrated compliance of the designed driveway, internal roadways & ramps, car parking spaces, sight distance and loading areas with Holroyd DCP 2013 and Australian Standards (i.e. AS2890.1 – 2004 for light vehicles, AS2890.6-2009 for disabled spaces and 2890.2-2002 for heavy vehicles). Dimensions (parking spaces length and width, aisles width, head height clearance, etc.) shall be shown on the plan in accordance with Australian Standards.



### Response

The following compliance table provide further details (as per Attachment A):

#### Parking Layout Requirements & Compliance

Components	Proposed	AS Requirement	Comply
Parking Space Dimensions	2.4m x 5.4m	2.5m x 5.5m	ü
Disabled Parking space	2.4m x 5.4m with shared zone	2.8m x 5.5m with shared zone in Compliance with AS2890.6-2006	ü
Aisle Width (One Way)	3.0m min	5.5m	ü
Driveway Width	Min.3.0m	Min. 3.0m (Existing)	ü
Internal Roadways /Ramp (one way flow)	Min.3.0m	5.6m	ü
Sight Distance (50km/h)	At 5s gap, min. 45m	Minimum 80m	ü
Access Driveway	Min.3.0m	5.5m (Existing)	
Ramp Grade	1:5 (20%)Max Grade	1:5 (20%)Max Grade	ü
Head Height Clearance	2.2m minimum	2.8m	ü

### Council Comments

- b) The provision of off-street parking spaces for the proposed development in accordance with Holroyd DCP 2013 – refer to above Item 1 of this letter.

### Response

This has been addressed under Item 1.

### Council Comments

- c) The location of loading and unloading area for the largest vehicle that will entre/exit the site in a forward direction.

### Response

Please refer to Attachment B. Swept paths demonstrate manoeuvrability of largest vehicle (HRV) loading / unloading and entering /exiting the site in a forward direction.

### *Council Comments*

- d) Swept path analysis shall be provided demonstrating the following:
- The largest heavy vehicle (e.g., heavy ridge vehicle as mentioned in the report) can enter, manoeuvre within the site and exit in a forward direction.
  - A vehicle can pass another B99 vehicle and a largest heavy vehicle at intersection points and at curved section of the driveway.
  - The largest vehicle entering / exiting the site is not encroaching onto road centre line and / or parked vehicles on the frontage roads etc.

### *Response*

Part i) demonstrating the largest heavy vehicle (HRV) entering and manoeuvring within the site and exiting in a forward direction is shown in Attachment B.

Part ii) demonstrating the largest heavy vehicle (HRV) passing another B99 vehicle within the site and exiting in a forward direction is shown in Attachment C. The traffic movement as per the Traffic Report is minimum.

The expected vehicle trips are as follows:

#### *Staff Car Trips (weekday and a Saturday): Morning*

- Ø five car arrivals between 5:30am to 6am for staff working in the metal loading bays
- Ø Four office staff arrivals between 7am to 8am

#### *Afternoon*

- Ø Five car departures between 6pm to 6:30pm for staff working in the metal loading bays
- Ø Four office staff departures between 4pm to 5pm

#### *Peak Truck Trips hourly on a weekday:*

- Ø One small rigid trucks up to 7 metres in length (one arrivals and one departure)
- Ø One medium (8.8 metre) or large rigid truck (one arrival and one departure)

Part iii) demonstrating the largest heavy vehicle (HRV) entering/exiting the site without encroaching onto the centre line is when HRV enter from north and exit to the south. This will be the agreed travel to this site with the clients. However, if this is breached, HRV can still travel as shown in Attachment B on the other side of the road in accordance with Australian Road Rules and safely enter the weighbridge station.

### *Council Comments*

- e) The submitted documents have not demonstrated if entry points are to be provided with security gates, the gate shall be setback from the front property boundary to provide a queuing area. The queuing area shall fully accommodate the largest heavy vehicles that will enter the site in accordance with Australian Standard 2890.2-2002.

### *Response*

The front gate will be a security sliding gate as per existing. See photos below.

The gate will be left open so that queuing is within site.

The queuing areas have been addressed under Item 3.







It is concluded that Items 1, 3 and 4 has be adequately addressed in this report and we seek approval of this development application.

Yours Sincerely,



Mr. Zulfi Khan

**MEngSc, BSc [CE-Honors], BSc [Horticulture], MIEAust CPEng, NER**

Civil / Structural Engineer

*Director*

*Attachment:*

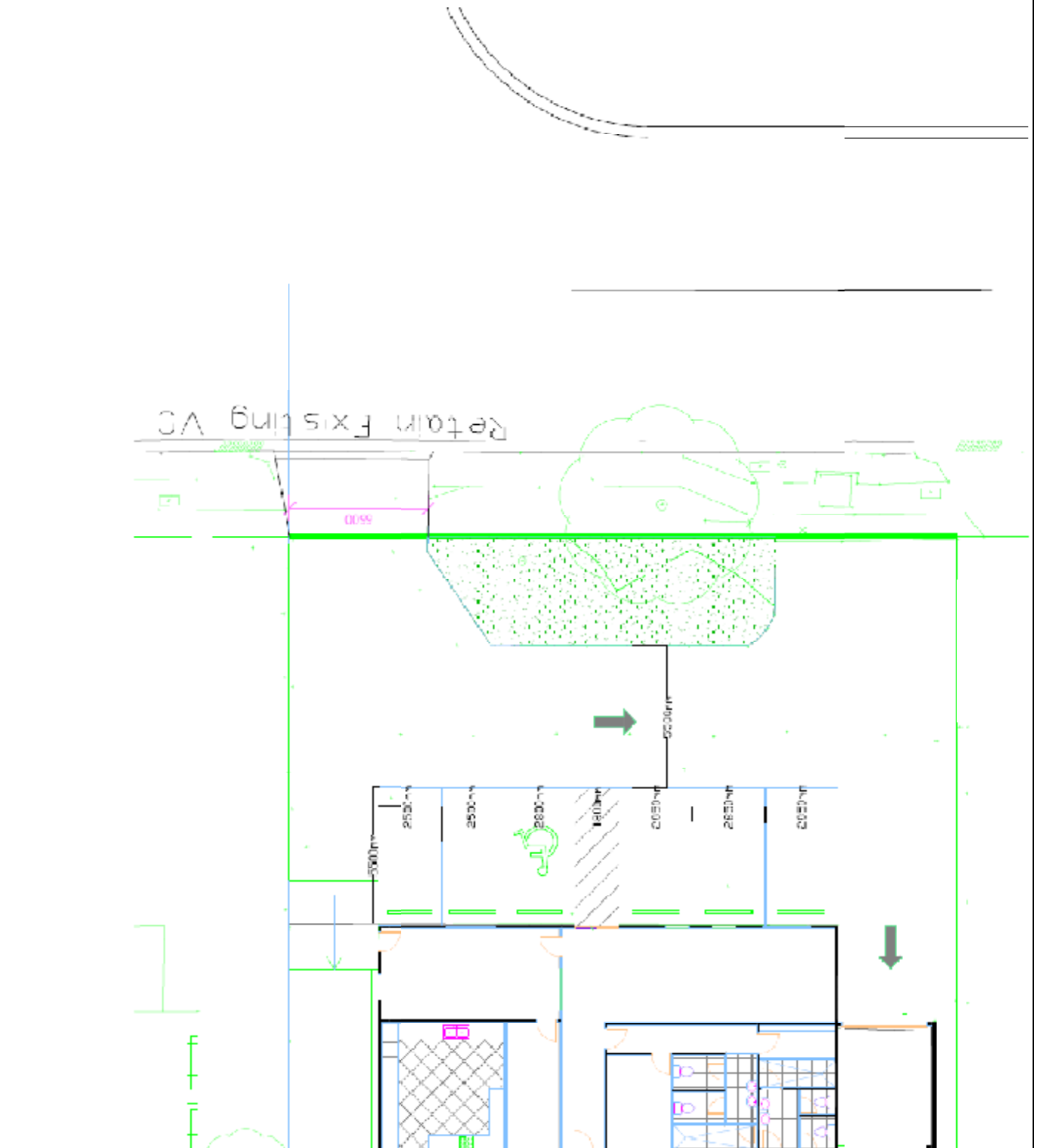
*A – Car Park Layout*

*B – Swept Paths*

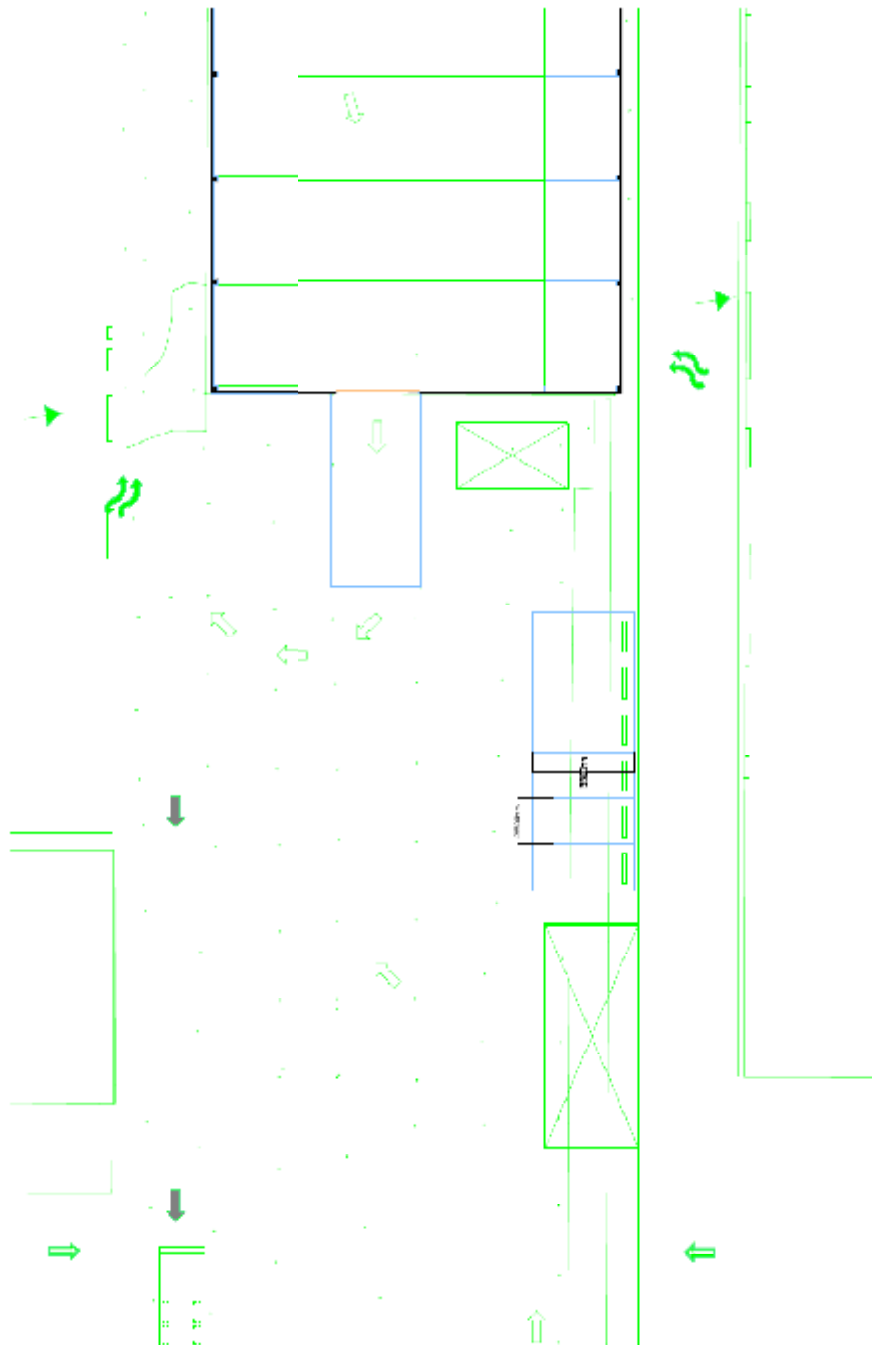
*C – Swept Paths of B99 & HRV Passing*

## Attachment A: Car Park Layout

Area A

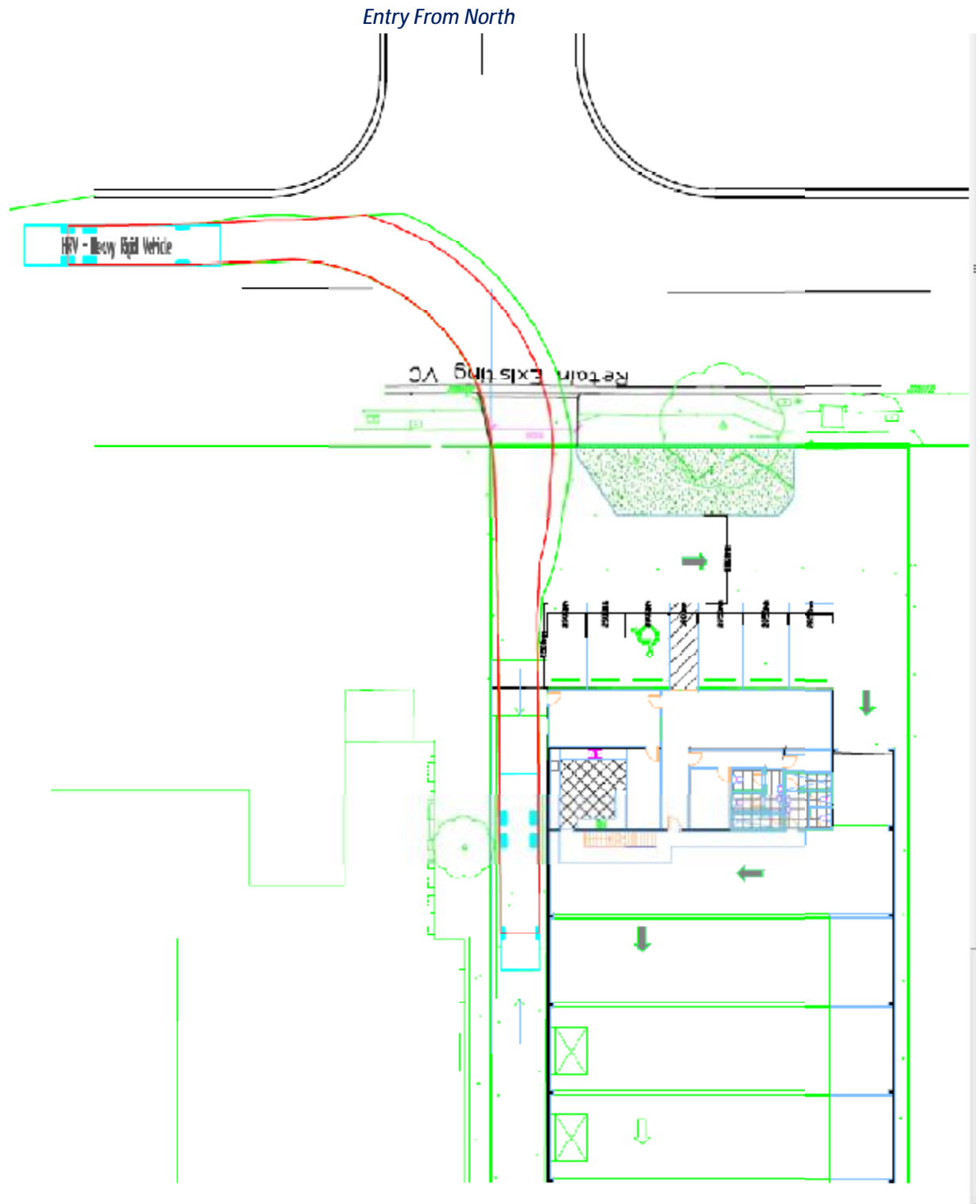


*Area B*



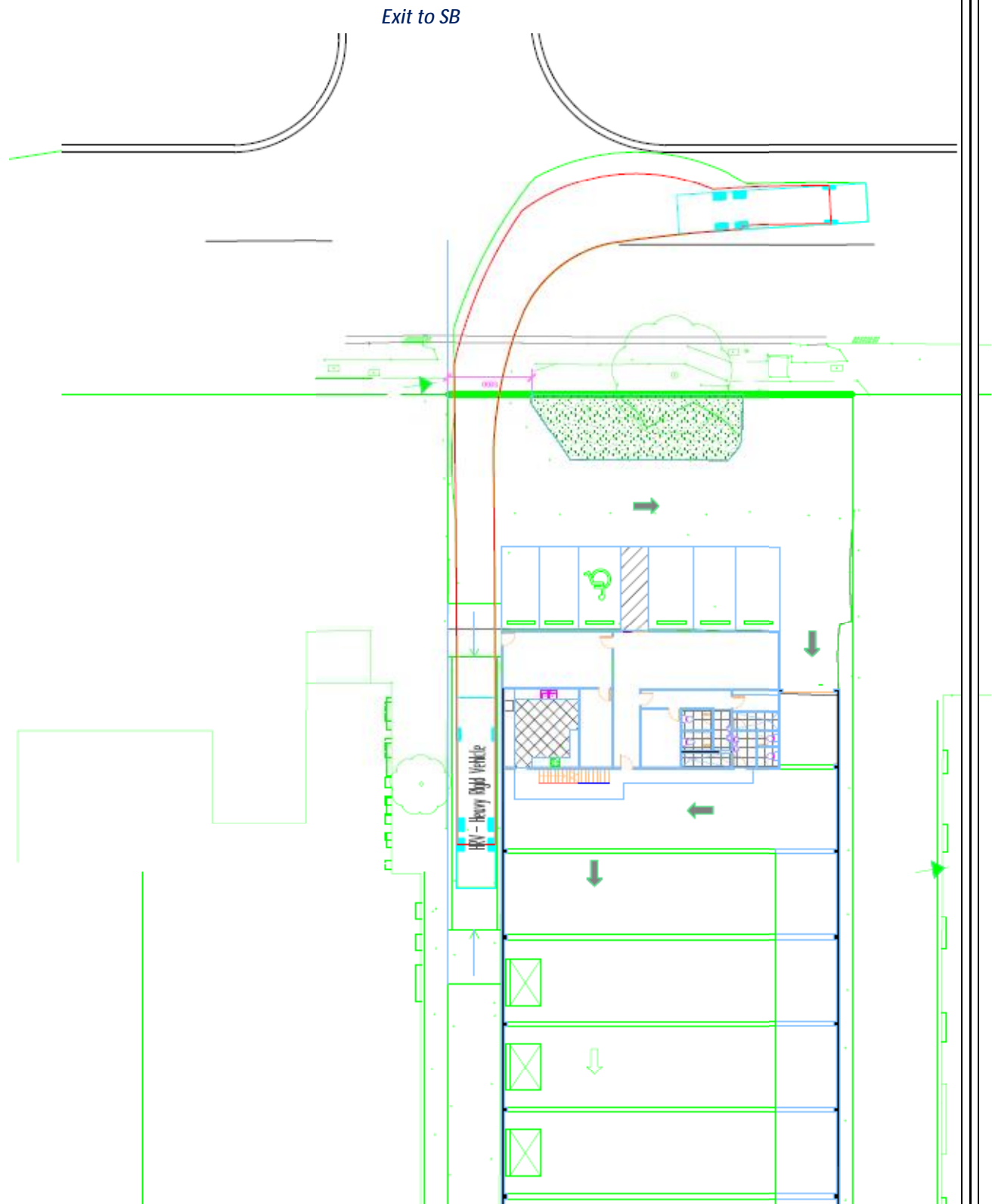
## Attachment B: Swept Paths

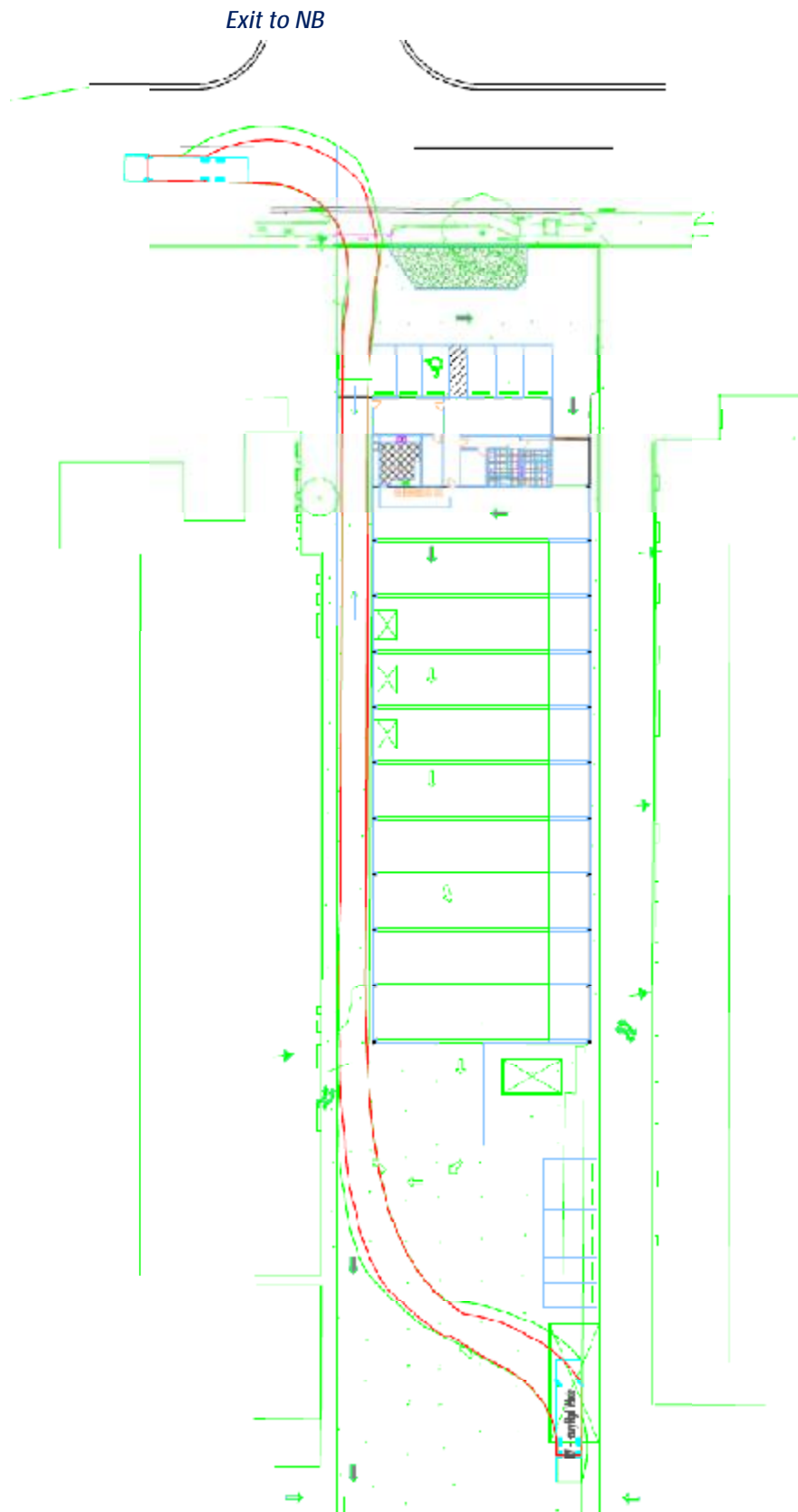
### HRV – Entry and Exit











*B99 Accessing Carpark*

