8 June 2023

Attention: Jacqueline Klincke
Development Assessment Planner

Penrith City Council
PO Box 60
Penrith, NSW, 2751

PO Box 1563
Warriewood
NSW 2102

ABN 45 162 835 083

Dear Jacqueline,

Response to request for information for proposed modification to tyre recycling facility at 1-21 Grady Crescent, Erskine Park (MOD 23/0058).

Thank you for providing letter correspondence on 23 May 2023 requesting additional information for Council's consideration of the above modification application.

The purpose of this letter is to sufficiently capture the response to the requested information for the Council's consideration and subsequent assessment of this application. **Bold** text is an exact reproduction of the request for information received, while normal text is Tyrecycle's response.

In relation to potential noise impacts on surrounding sensitive receivers caused by increased truck movements associated with the proposed increase in tyres being accepted on the subject site, it is stated within the Acoustic Assessment that additional truck movements would occur intermittently over the day and that there are no proposed changes to the approved morning and afternoon peak heavy vehicle movements. Furthermore, the Assessment states that there is likely to be minimal site activity external to the warehouse building during the night time period.

However, when reviewing the Statement of Environmental Effects submitted along with the application, it is proposed within Section 2.3, Table 2.2 of the document that the majority of the increased truck movements associated with the proposed modification will be entering and exiting the site between the hours of 8:00pm and 5:00am. In relation noise impacts from truck movements, the hours of which the increase in truck movements to and from the site do not correlate between the two documents.

It is therefore requested that further clarification be provided to ensure that the Noise Assessment captures the proposed modification accurately.

A review of Section 2.2, Table 2.3 of the Statement of Environmental Effects (Element, 2023) confirms:

- No change to inbound and outbound light and heavy vehicle movements during the morning and afternoon peak periods.
- Heavy vehicle movements will increase across the working day, with the majority of additional movements occurring between 8 pm and 4 am. This includes two additional B-double movements to and from the site that are required to collect the additional palletised product generated from the modification.
- The modification does not require adjustments to the site plan or swept path diagrams on site.

Table 5.4 of the SEE also confirms that collection and drop-off trucks will increase to 10 trucks per day and will enter and leave site between 8 pm and 4 am.

Todoroski Air Sciences have provided letter correspondence which clarifies Council's comments.

The correspondence is provided in Attachment A and reiterates that:

- In total, there will be approximately 14 trucks over the 8-hour period from 8 pm to 4 am. The truck movements will be spread over the 8-hour period and average approximately two trucks per hour, which is less than the maximum of seven trucks assessed in the maximum hour during the morning and afternoon peak hours. During the 8 pm to 4 am period, the traffic volumes on transportation routes are lower compared to the previously approved maximum hour volumes assessed. Consequently, the potential impact on the road network during the night period considered to be negligible.
- The noise impact assessment for the approved development evaluated potential road traffic noise generated by the existing operations. The assessment determined that the traffic movements during peak hours will not see any tangible change to the existing noise generation from road traffic and this is consistent for the proposed modification application. Moreover, the traffic generated by modified operations will not pass any residential land uses and as such potential road noise impacts on residential receivers associated with a minor increase in truck movements during the night period will not occur.

The pre-lodgement advice outlined: "The application shall be supported by turning swept paths in accordance with AS2890 clearly demonstrating satisfactory manoeuvring on-site (both internal and external) for light and heavy vehicles with forward entry and exit to and from the public road, noting the increased use of the loading docks on site."

This information has not been submitted and is therefore requested.

Letter correspondence was provided to Council on 14 November 2022 which clarified certain requirements noted in Council's pre-lodgement meeting minutes dated 15 September 2022. The letter noted that the proposed modification will not require new or additional truck configurations, nor will require an alteration to the approved site development plan or internal maneuverability pathways. As such, the existing and approved swept path diagrams for the development remain applicable and do not require amendment.

This is reiterated in Chapter 4 and Section 5.3.2 of the Statement of Environmental Effects submitted with the application.

The original swept path diagrams approved with the existing development consent are included as Attachment B for ease of reference.

A Fire Risk Assessment was carried out by ARUP, dated 9 September 2022, and refers to a previous "Performance Solution" relating to, but not limited to, exit travel distances. The assessment advises that an updated solution/comment should be provided particularly with the removal of an exit door on the northern wall.

It is therefore requested that an updated National Construction Code "Performance Solution" be formulated for the proposal addressing, but not limited to, the removal of the exit door on the northern wall.

Tyrecyle acknowledge the recommendation of the ARUP report and have been in liaison with the landowner to investigate the removal of the exit door on the northern wall and the formulation of an updated National Construction Code Performance Solution.

Tyrecycle will keep Council informed on the outcome of the investigation, however, have no opposition to this requirement being inserted as potential condition of consent, stating that removal of the door will be investigated and an updated National Construction Code 'Performance Solution will be formulated addressing, but not limited to the removal of the exit door on the northern wall.

The NSW Environment Protection Authority (EPA) has recommended the following matters to be addressed through the submission additional information:

1. An increase in the maintenance frequency of the onsite stormwater management system must be undertaken.

2. The applicant shall provide a contingency plan to manage the volume of material onsite in the event that dispatch of outgoing material is hindered due to issues with any third-party transport providers.

3. Additional bunding (drive-over fire retardant building) is to be provided at the roller doors to direct the flow of fire water to the recessed area beneath the loading area as advised in Section 8.3 Water Containment of the Fire Risk Assessment (ARUP, 2022).

Regarding item 1, Section 5.5.3 of the SEE states:

Following consultation with the EPA, Tyrecyle sought confirmation on the existing stormwater management system with the landowner. The site is currently equipped with an 'Ocean Protect' engineering solution which is a hydrodynamic separator which removes total suspended solids, oil and other gross pollutants from stormwater which drains from the site to the Estate's stormwater system. The Ocean Protect device captures gross pollutants such as rubber crumb which may be inadvertently tracked over hardstand surfaces. The device is regularly inspected, emptied and serviced in accordance with manufacturer specifications to maintain performance.

Tyrecycle inspect existing stormwater treatment devices regularly at the site as part of its existing operations. The devices are then cleaned out and otherwise maintained as required to maintain their capacity and effectiveness.

Tyrecycle are willing to commit to an increased frequency of weekly inspections and maintenance as required of on-site stormwater management system as requested by the EPA. If necessary, a condition of consent can be inserted to this effect.

Tyrecycle discussed this with the EPA during their site visit and reiterated that Tyrecycle will carry out weekly inspections of the stormwater management system (and following significant rainfall events) and record the details of inspections in a register. Tyrecycle will use the data to inform an ongoing investigation to identify an appropriate frequency of cleaning the drains and implementation of any further drain entry controls if required (i.e. mesh drain covers).

A contingency plan to manage volume of material received at the site in the event of equipment failure or other unforeseen events has been developed and is currently under review by Tyrecycle management. Tyrecycle would similarly be happy to insert a commitment to preparing the plan in consultation with the EPA as a condition of consent.

Likewise, Tyrecycle are willing to install additional bunding at the roller doors as recommended by the ARUP report and this can be inserted as a condition of consent if required.

I trust this information assists in the Council's assessment of this application. Should you have any questions on the development or above responses, please do not hesitate to get in touch with me.

Kind Regards

Luke Farrell
Principal Environmental Consultant

0455 666 006
luke@elementenvironment.com.au

ATTACHMENT A

TODOROSKI AIR SCIENCES
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Phone: 02 9874 2123
Fax: 02 9874 2125
Email: info@airsciences.com.au
Web: www.airsciences.com.au
ACN: 151 202 765 | ABN: 74 955 076 914

7 June 2023

Luke Farrell
Principal Environmental Scientist
Element Environment
Via email: luke@elementenvironment.com.au

RE: Tyrecycle Modification Noise Assessment – Request for Information

Dear Luke,

The following outlines additional information and clarification to address Penrith Council's request for information relating to the *Noise Assessment – Tyrecycle Modification* (Noise Assessment) (**Todoroski Air Sciences, 2022**). The request for information is shown in grey italics and is followed by our response to the comment.

1. *Acoustic Impacts*

A review of the submitted Acoustic Assessment, prepared by Todoroski Air Sciences (dated 12 November 2022), has been undertaken and following comments are for your consideration.

In relation to potential noise impacts on surrounding sensitive receivers caused by increased truck movements associated with the proposed increase in tyres being accepted on the subject site. It is stated within the Assessment the additional truck movements would occur intermittently over the day and that there are no proposed changes to the approved morning and afternoon peak heavy vehicle movements. Furthermore, the Assessment states that there is likely to be minimal site activity external to the warehouse building during the night time period.

However, when reviewing the Statement of Environmental effects submitted along with the application, it is proposed within Section2.3, Table 2.2 of the document that the majority of the increase truck movements associated with the proposed modification will be entering and exiting the site between the hours of 8:00pm and 5:00am. In relation noise impacts from truck movements, the hours of which the increase truck movements to and from the site do not correlate between the two documents.

It is therefore requested that further clarification can be provided to ensure that the Noise Assessment captures the proposed modification accurately.

The *Tyrecycle Erskine Park Section 4.55(2) Modification Statement of Environmental Effects* (Statement of Environment Effects) (**Element Environment, 2023**) states that Modification will result in additional truck movements to and from the site. These extra movements occur between 8pm and 4am, outside of peak traffic hours. The Noise Assessment acknowledges the presence of additional truck movements resulting

from the Modification. However, it affirms that the number of additional trucks in a maximum hour associated with the Modification will be less than the currently approved maximum of seven trucks during the AM and PM peak hours.

As summarised in Table 2.3 of the Statement of Environmental Effects (**Element Environment, 2023**), as part of approved operations, the site receives an average of six trucks for tyre delivery/drop off, along with two b-doubles for rubber crumb pallet collection between 8pm to 4am. With the Modification, this will increase to ten delivery/drop off trucks (an increase of four trucks) and four b-double trucks for rubber crumb pallet collection (an increase of two trucks). In total, there will be approximately 14 trucks over the 8-hour period from 8pm to 4am. The truck movements will be spread over the 8-hour period and averages to approximately two trucks per hour, which is less than the maximum of seven trucks during the AM and PM peak hours. During the 8pm to 4am period, the traffic volumes on transportation routes are lower compared to the previously approved maximum hour volumes assessed. Consequently, the potential impact on the road network during the night period considered to be negligible.

The Noise Assessment refers to the modelling scenario in the *Noise Impact Assessment Tyrecycle Erskine Park* (NIA) (**Todoroski Air Sciences, 2020**). The scenario assumes daytime levels of plant activity with a maximum number of truck movements, along with an F-class temperature inversion and light winds towards receivers. This scenario represents a potential maximum operating situation occurring during night-time weather conditions and would encapsulate the features of the Modification. The modelling predictions in the NIA indicates the Project would comply with the applicable noise trigger levels and thus the Modification would not generate any additional noise above this.

The NIA also evaluated potential road traffic noise generated by the Project. The assessment determined that the traffic movements during peak hours would not see any tangible change to the existing noise generation from road traffic and would also apply to the Modification. Moreover, the traffic generated would not pass any residential land uses near the site and as such potential road noise impacts on residential receivers associated with a minor increase in truck movements during the night period will not occur.

Thus, the predicted noise levels in the NIA are conservative and would adequately account for the increased production and truck movements associated with the Modification.

Please feel free to contact us if you would like to clarify any aspect of this report.

Yours faithfully,
Todoroski Air Sciences

Philip Henschke

TODOROSKI AIR SCIENCES | info@airsciences.com.au | 02 9874 2123

References

Element Environment (2023)

"Tyrecycle Erskine Park Section 4.55(2) Modification Statement of Environmental Effects", prepared for Tyrecycle by Element Environment, March 2023

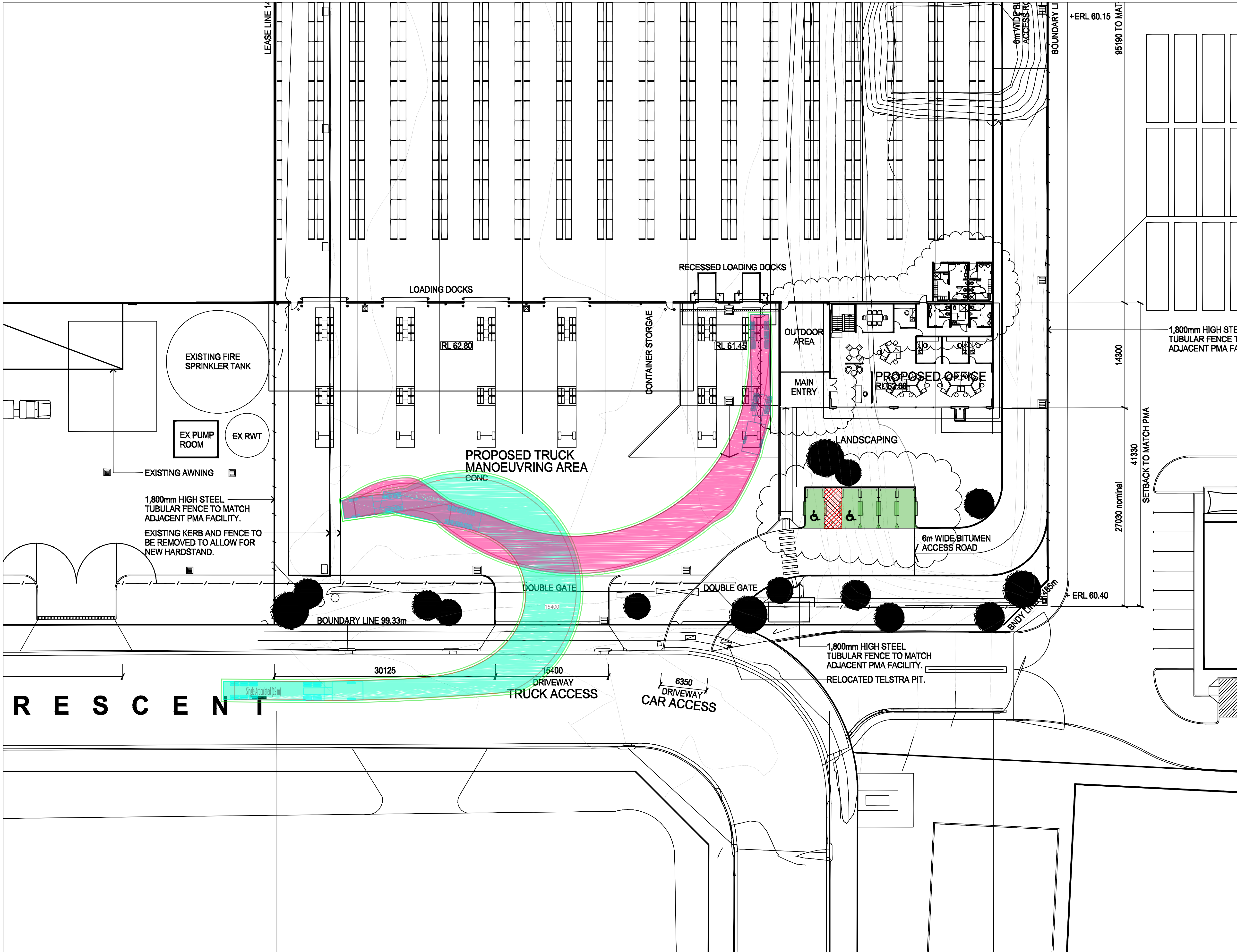
Todoroski Air Sciences (2020)

"Noise Impact Assessment Tyrecycle Erskine Park", prepared for Tyrecycle Pty Ltd by Todoroski Air Sciences, September 2020.

Todoroski Air Sciences (2022)

"Noise Assessment – Tyrecycle Modification", prepared for Element Environment by Todoroski Air Sciences, November 2022.

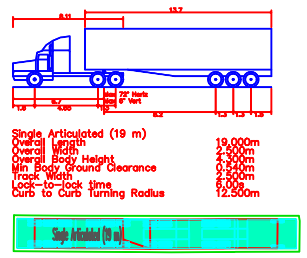
ATTACHMENT B


LEASE LINE 14
LOADING DOCKS
RECESSED LOADING DOCKS
EXISTING FIRE SPRINKLER TANK
EX PUMP ROOM
EX RWT
EXISTING AWNING
RL 62.80
RL 61.45
CONTAINER STORGAE
OUTDOOR AREA
MAIN ENTRY
PROPOSED OFFICE
LANDSCAPING
PROPOSED TRUCK MANOEUVRING AREA
CONC
1,800mm HIGH STEEL TUBULAR FENCE TO MATCH ADJACENT PMA FACILITY.
EXISTING KERB AND FENCE TO BE REMOVED TO ALLOW FOR NEW HARDSTAND.
6m WIDE BITUMEN ACCESS ROAD
DOUBLE GATE
DOUBLE GATE
BOUNDARY LINE 99.33m
30125
15400
DRIVEWAY
TRUCK ACCESS
6350
DRIVEWAY
CAR ACCESS
1,800mm HIGH STEEL TUBULAR FENCE TO MATCH ADJACENT PMA FACILITY.
RELOCATED TELSTRA PIT.
R E S C E N T
+ERL 60.15
+ERL 60.40
95190 TO MAT
BOUNDARY LI
14300
41330
27030 nominal
SETBACK TO MATCH PMA
1,800mm HIGH STE TUBULAR FENCE T ADJACENT PMA FA
BNDY LINE

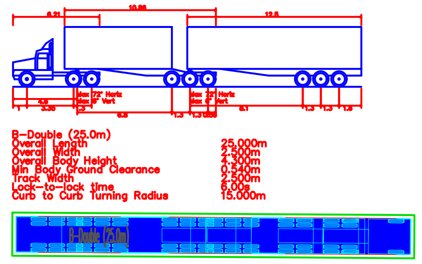
comments

A3

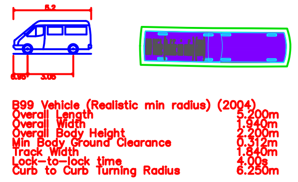
19m Articulated Vehicle



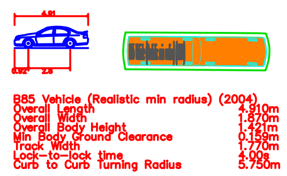
25m B-Double



B99 Vehicle



B85 Vehicle



2.5m x 5.4m Parking Envelope

2.4m x 5.4m Shared Bay

ptc.

Suite 502, 1 James Place
North Sydney NSW 2060

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ptcconsultants.co

rev	date	comment / description	drawn	reviewed
1	18.08.20	For Review	PS	AP

project

1-21 Grady Crescent, Erskine Park

drawing title

Swept Path Analysis - 19m Articulated Vehicle

client	Element Environment Pty Ltd
drawing #	ptc-001
project #	2869
scale	1 : 500

rev 1

LEASE LINE 148.1m

BOUNDARY LINE 141.094m

6m WIDE BITUMEN ACCESS ROAD

+ERL 60.15

95100 TO MATCH EXISTING

STING LOADING DOCKS

LOADING DOCKS

RECESSED LOADING DOCKS

RL 62.80

RL 61.45

CONTAINER STORGAE

OUTDOOR AREA

MAIN ENTRY

PROPOSED OFFICE

LANDSCAPING

14800

ISTING TRUCK
NOEUVRING AREA

EXISTING FIRE SPRINKLER TANK

EX PUMP ROOM

EX RWT

EXISTING AWNING

1,800mm HIGH STEEL TUBULAR FENCE TO MATCH ADJACENT PMA FACILITY.

EXISTING KERB AND FENCE TO BE REMOVED TO ALLOW FOR NEW HARDSTAND.

PROPOSED TRUCK MANOEUVRING AREA
CONC

6m WIDE BITUMEN ACCESS ROAD

27030 nominal

DOUBLE GATE

15400

DOUBLE GATE

BOUNDARY LINE 99.33m

+ ERL 60.40

BNDY LINE 145m

1,800mm HIGH STEEL TUBULAR FENCE TO MATCH ADJACENT PMA FACILITY.

RELOCATED TELSTRA PIT.

54000

30125

15400
DRIVEWAY
TRUCK ACCESS

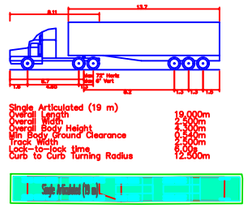
6350
DRIVEWAY
CAR ACCESS

C R E S C E N T

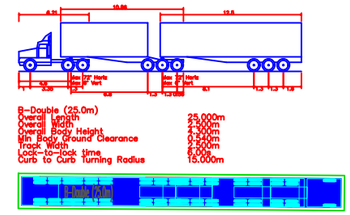
comments

A3

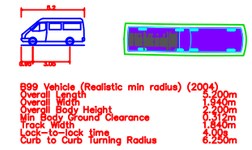
19m Articulated Vehicle



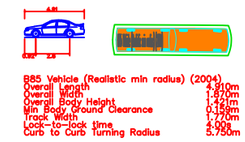
25m B-Double



B99 Vehicle



B85 Vehicle



2.5m x 5.4m Parking Envelope

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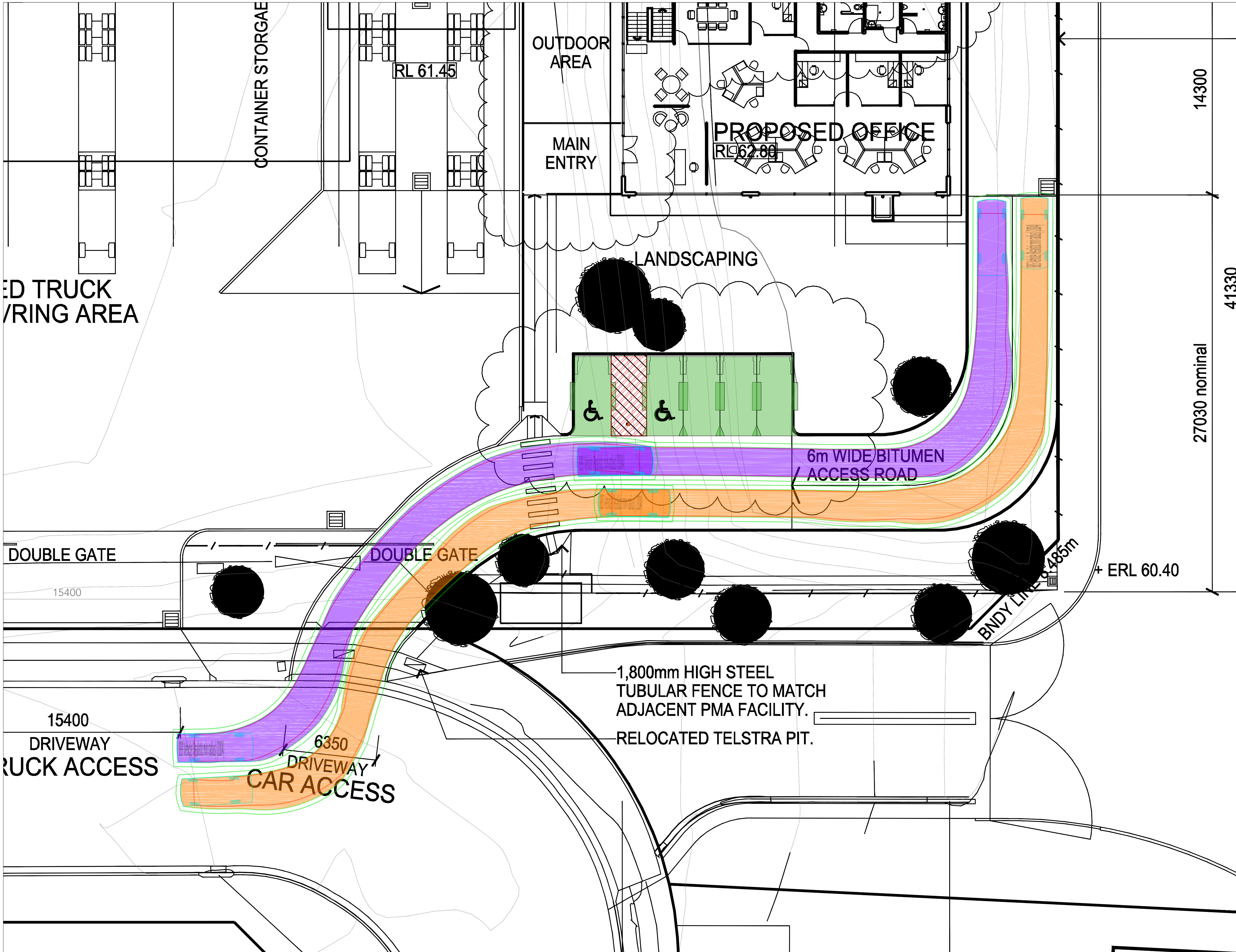
rev	date	comment / description	drawn	reviewed
1	18.08.20	For Review	PS	AP

project
1-21 Grady Crescent, Erskine Park

drawing title
Swept Path Analysis - 25m B-Double

client	Element Environment Pty Ltd
drawing #	ptc-002
project #	2869
scale	1 : 500

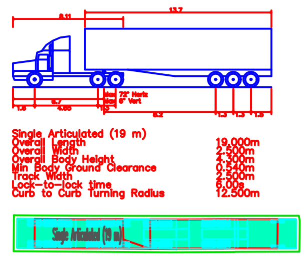
rev 1



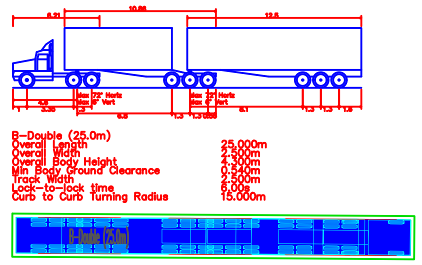
comments

A3

19m Articulated Vehicle



25m B-Double



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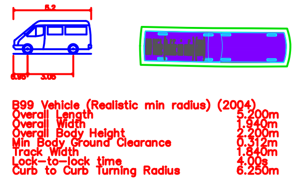
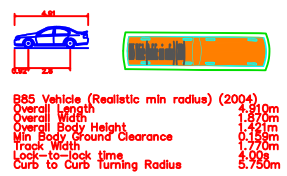


B85 Vehicle



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rev	date	comment / description	drawn	reviewed
1	18.08.20	For Review	PS	AP

project: 1-21 Grady Crescent, Erskine Park

drawing title: Design Review and Swept Path Analaysis - Ground Level Car Park

client	Element Environment Pty Ltd
drawing #	ptc-003
project #	2869
scale	1 : 200

rev 1