



PLANNING

Presentation to the Planning Assessment Commission

SSD 7421 – Resource Recovery Facility (Bingo Proposal)

12 December 2017 (Mortdale Community Centre)

Thank you for the opportunity to outline my concerns with this proposal.

I would like to state that I support recycling, promoting business and providing employment closer to where people live, which are all sound planning principles.

However, I am concerned with the scale of the proposal in this light industrial zone and its likely impacts on nearby businesses and the local road network, particularly Hearne Street.

My main areas of concern include:

- The suitability of the site;
- Potential impacts along Hearne Street; and
- The potential future increases to capacity.

I will now briefly discuss these concerns.

Suitability of the site

The suitability of the site for the development is a relevant consideration under s79C of the EP&A Act. There are several aspects of the site which I believe are considered to make it unsuitable for this development, particularly in relation to its proposed capacity.

These include:-

- The narrowness of the driveway and access point to Hearne Street which makes it almost impossible for trucks to pass each other at the site entry. Ideally, the site should have a two-way vehicle entry, which is unobstructed and allows for separated truck movements;
- The awkward shape of the site in that the location of the proposed new building results in a narrow gap for trucks to pass each other along the southern boundary; and
- The location of the site within a light industrial zone which aims to cater for light industry which, by definition, includes industrial activity that does not interfere with the amenity of the area through things such as noise, vibration, or dust. The proposal is considered to be contrary to the objectives of the Light Industrial zone, which include, among other things:-
 - *To minimise any adverse effect of industry on other land uses (dot point 3).*
 - *To enable industrial development which does not pollute or adversely affect adjoining land, air or water (dot point 6).*

The existing operation does not satisfy these objectives in that it is having an adverse effect on other land uses in the area through the dust and truck movements generated, primarily as the trucks move along Hearne Street. I acknowledge that for some of this time the site was operated by different owners, however, the type and size of the proposed facility has significant potential to continue these adverse impacts.

The transportation of the waste to the site has the potential to contribute to this continual pollution of the environment currently experienced in the local area which cannot be resolved through conditions.

In these ways, it is considered that the increased capacity proposed at the site will also be inconsistent with the zone objectives.

The second issue of concern is the potential traffic impacts and vehicle movements both within the site and to site which are likely to have a significant impact on the operation of Hearne Street.

These concerns include:-

- The proposal indicates that there will be a total of 336 truck movements a day, an increase of 132 truck movements per day from the current use. This figure appears to be an under-estimation given the proposed increase in operations at the site is in the order of 700% yet the traffic increase is only around 65% (page 18 of assessment report).
- The reasons given by the applicant for this low increase in truck movements is that the site currently caters for smaller, lighter loads of waste while the proposed operation will comprise larger, heavier trucks, reducing their overall number. It is evident that the site already caters for these larger trucks as truck and dog combinations have been actively using the site for some time.
- A further reason was that the larger trucks would be encouraged to remove waste from the site in the same trip thereby reducing the overall truck movements to and from the site. This reason is contrary to the queueing management principles which seek to encourage the dispatching of the sorted waste from the site only in non-peak periods (6pm & 10pm) meaning that for a large portion of the day the trucks would leave empty requiring more trucks to come back to the site to remove the sorted waste.
- A further concern is that since there will be no access permitted to Barry Avenue, that all of the 336 trucks will be along Hearne Street, which is a huge increase in traffic.
- There is also a heavy reliance on truck management on the site including the need for driver inductions, driver code of conduct, use of stacked/waiting spaces, turning away trucks if there are unexpected circumstances and the use of traffic controllers. While these measures are supported, the site will be utilised by various people, including customers who would be unfamiliar with these procedures which could lead to vehicle collisions or queueing into Hearne Street (page 5 of assessment report).

- It is considered that the overall layout of the site and the anticipated vehicle movements throughout the day is problematic. Since the site is an awkward shape, trucks need various areas for manoeuvring and reversing as well as unloading unsorted waste and loading sorted waste with some such movements appearing to restrict the use of the stacked waiting spaces.
- It is also unclear as to how the fuel point would operate in light of the stacked spaces being located adjoining this point or how trucks with non-conforming waste would leave the site in the midst of the other 30 odd trucks which are in various positions of manoeuvring or waiting in stacked spaces.
- The five (5) stacked spaces shown along the southern site boundary have the potential to result in queuing in Hearne Street if all of these spaces are full.
- A skip bin business requires room for the storage of bins, which are either empty or needing maintenance. Therefore the bin storage area which was removed to make more room for stacking and manoeuvring is likely to be reinstalled ite, which may impact on the operation of the site.

The third issue is the potential expansion in the future in light of the reductions made to the capacity of the proposal. The applicant may seek to increase the capacity through a future modification which would result in more trucks servicing the site using Hearne Street. This is a major concern as the anticipated truck movements are already considered to be excessive.

In summary, it is considered that the proposal involves a capacity which is too large for the site and that the past problems encountered with the use of this site are likely to be exacerbated as a result of this proposed extensive increase in intended capacity.

Thank you for providing the opportunity to comment on this proposal.