12 May 2025

Our Ref: 25/148359
Our Contact: Robert McKinlay (02) 9366 3724

Sally Munk
Industry Assessments
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Ms Munk,

RE: Request for Advice – Response to Submissions Report – 2 Hale Street, Botany NSW – Waste Management Facility

Thank you for the opportunity to provide comment on the Response to Submissions (RTS) Report for the proposed Waste Management Facility at 2 Hale Street, Botany.

Bayside Council provided a submission on the Environmental Impact Statement (EIS) on 9 September 2024, which raised concerns in relation to the exhibited proposal, around:

- Traffic Parking and Access;
- Stormwater Management;
- Floodplain Management;
- Land Contamination; and
- Landscaping and Trees.

The following refinements were made in response to matters raised in Council's submission on the EIS and in further discussions between the Applicant and Council:

- Additional or amended information provided in relation to traffic management including parking requirements, queueing, operations and need for a slip lane.

- Additional or amended information provided in relation to stormwater and flooding including improved mapping, blockage scenarios, climate change scenarios, MUSIC modelling and the emergency management strategy.

- The Detailed Site Investigation Report has been amended to include a Safework NSW Dangerous Goods Search.

- A final landscape plan prepared by a qualified Landscape Architect which includes a planted buffer along the western and northern landscaped areas, species information for all proposed trees, improvements to the public domain, an outdoor space for staff and improved canopy coverage for the car park.

Advice on Response to Submissions

Council has reviewed the RTS and supporting documentation. The following comments relate to matters that have not been adequately addressed:

Traffic Impacts:

a) The queueing experienced on Hale Street on the approach to the intersection of Hale Street and Foreshore Road is unacceptable. Council notes there is no realistic ability to upgrade the intersection as that would require upgrading the bridge. However, it is possible to improve the traffic signal cycle times to improve the level of service of the Hale Street approach to the intersection by implementing minimum cycle limits in SCATS. The applicant needs to investigate the feasibility of this with TfNSW.

b) The queueing analysis is incorrectly calculated as an M/M/7 scenario. Realistically, there are two separate queues which follow in series:

    i. The initial entry and spotter inspection, which is an M/M/7 scenario, and;

    ii. The subsequent procedure, which includes pre-operational weighing on the weighbridge, manoeuvring into site, offloading waste material, manoeuvring out and post-operational weighing, which is an M/M/1 scenario since only one weighbridge is present and the site cannot offload material from multiple trucks at once.

    Therefore, the service time (T) in Appendix D is incorrect. Additionally, the queue is likely to grow since the subsequent procedure (after entry and spotter inspection) would take 9m30s, and trucks arrive at a rate of one truck every 4m36s (assuming best case- uniformly distributed arrival time). Hence, the flow of vehicles through the development is likely to take far longer to process and will likely result in queues of vehicles extending onto the road network. This site is very constrained as truck arrival and departure is serviced by a single lane road with a relatively short length that does not offer any other circulation options (given large trucks such as B-Doubles cannot use the roundabout to turn around or drive anywhere else to circulate). So, if the site becomes full of trucks and additional trucks arrive, there is nowhere else for trucks to go other than wait on the road resulting in intolerable congestion.

c) A plan showing seven (7) 25.0m – 26.0m B-Doubles as part of Appendix E. as identified in Section 9.8, Drawing 23.464 TX.02 is titled “Site Circulation and Queueing”, but does not show where vehicles can queue. Additionally, a bottleneck effect is likely to occur since a truck might park another truck in while waiting.

d) Council requests for the Traffic Engineer to confirm that the SIDRA modelling has been undertaken as a network model including all modelled intersections, as opposed to separated intersection models, to confirm that queueing is not expected to occur over key intersection/ site accesses.

e) The basis for the “truck on site dwell times” listed on Table 17 (page 16 of the TIA) shall be confirmed. It is not appropriate to provide this data without providing evidence such as a case study of footage of a similar site. The truck dwell times need to be firmly substantiated by supporting evidence as these truck dwell times in the TIA appear to be very short.

f) The dimensions of the Large Truck as identified in SIDRA must be confirmed, either in the form of PCUs, or length (m), to ensure that the dimension of the Large Truck is representative of the average vehicle servicing the site

Floodplain Management:

g) The flood modelling shows non-compliant flood afflux for the 1% AEP, 1% AEP including climate change/sea level rise and PMF flood events. The development does not comply with the criteria outlined in Section 9.5.4 of the Bayside DCP 2022. A flood mitigation measure such as additional flood storage volume must be investigated to offset the increases in post development flood levels that result in non-compliant afflux.

h) It is noted the development is not willing to revise the floor level of the warehouse to be 500mm above the 1% AEP flood level with climate change/sea level rise. Therefore, high risk materials in the warehouse need to be stored on a raised platform within the building set at a level that is at least 500mm above the 1% AEP flood level (including climate change additional rainfall and 0.9m sea level rise) to ensure this hazardous material is contained within the warehouse and does not pollute the waterways.

Stormwater Management:

i) The stormwater plans submitted are too conceptual to enable an assessment of the stormwater design and are insufficient in addressing Section 6.3 of the Bayside LEP 2021. To understand the level of detail expected for a stormwater concept design, the applicants engineer must review the detail provided in the stormwater plans in other industrial SSDs (e.g., SSD-49734709 & SSD-59024711) to understand the level of detail required for this development.

j) The following issues have been identified in the plan submitted:

   i. No sections or design details of the raingarden have been provided for review. This is particularly important as the raingarden appears to be overperforming in its impact on water quality treatment.
   ii. Design levels and pipe/culvert sizes for the drainage systems were not sufficiently submitted.
   iii. Proposed pipe sizes are not confirmed.
   iv. Trapped low points are created in the northern corner of the site with no drainage provided
   v. Insufficient details have been provided for the drainage works in the road reserve that the development is relying on for discharge. The previous submission matter requiring additional survey data has not been addressed.
   vi. No manufacturer specifications for the Stormwater Quality Improvement Devices are provided in the drawings. Hence the MUSIC modelling cannot be confirmed.
   vii. No specifications of drainage elements such as pits including standard details are shown on the plans.

   Overall, the submitted drainage documentation is inadequate and not supported by Council. The stormwater plans should not be provided as solely appendix in the report and instead provided as a stand-alone package of plans.

Landscape and Tree Retention:

k) While the Landscape Concept Report has largely addressed Council's original concerns, the following matters are noted:

   i. Where the Landscape Plan identifies that it is extending existing adjacent planting, it should note that native species will be planted.
   ii. *Phoenix canariensis* (Canary Island Date palms) if present on the subject site, may be removed to reduce nesting habitat for White Ibis in the vicinity of the airport. Where removed, these trees should be replaced with a native tree.
   iii. For removal of trees 3, 4, 5, 7, 8, 9, 10, 11 offset planting will be required as per Bayside DCP 2022 Section 3.8.2.
   iv. The Landscape Concept Design on page 8 does not address tree retention or removal of trees & vegetation present at the western and south-western site boundaries. Vegetation in this area should be considered in the same way as vegetation on other boundaries of the site.

We trust that the Department will carefully consider Council's advice when assessing this proposal. Given Council's outstanding concerns in relation to traffic, stormwater and flooding, we are unable to support this development in its present form.

If you require any further information, please do not hesitate to contact Robert McKinlay, Senior Urban Planner on (02) 9366 3724 or via email: Robert.McKinlay@bayside.nsw.gov.au.

Yours sincerely,

David Smith
Manager Strategic Planning