

Sally Munk  
Department of Planning, Housing & Infrastructure

3 September 2024

## **Re: Submission to SSD-62855708 - Botany Waste Management Facility - 2-4 Hale Street, Botany NSW 2019**

Dear Sally,

We refer to State Significant Development SSD-62855708 which proposes a new Waste Management Facility including the following:

- Demolition of existing structures;
- Construction of a new purpose-built warehouse of 3,647m<sup>2</sup> for the receipt, basic sorting and recycling with aggregation of material;
- Construction of a site office of 260m<sup>2</sup> including amenities;
- Construction of a new at-grade hardstand area including;
  - Two (2) in-ground weighbridges.
  - Thirteen (13) parking spaces.
- Construction of two (2) separate vehicular access driveways off Hale Street facilitating separate light and heavy vehicle movements which will result in a net loss of five (5) on-street parking spaces.

We act on behalf of the owners of the following sites:

- CHEM SITE PTY LTD (ACN 128 730 941) - owner of 13-15 Hale St Botany
- CHEM SITE PTY LTD (ACN 128 730 941) - owner of 19-21 Hale St Botany
- LULAND INVESTMENTS PTY LTD (ACN 104 116 270) - owner of 15 & 23 Luland St Botany
- LULAND INVESTMENTS PTY LTD (ACN 104 116 270) - owner of 25 Hale St Botany
- HALE ST HOLDINGS PTY LTD (ACN 600 108 209) - owner of 23 Hale St Botany

We write to object to the proposed SSD. Our key concerns relate to the potential adverse traffic and parking impacts associated with the proposed waste management facility.

In particular we note that the proposed development will generate significant truck movements to and from the site on a 24 hour basis, all year round.

The truck movements will include articulated vehicles up to and including 26 metre B-doubles, truck and dog trailers up to 19.6 metres long and single rigid trucks up to and including 12.5m Heavy Rigid Vehicles (HRV).

The Traffic Impact Assessment (TIA) prepared by TRAFFIX (submitted with the SSD) states anticipated truck volumes for the development as follows:

- *Articulated Vehicles up to 26m B-doubles and Truck and Dogs up to 19.6m:*
  - *94 vehicle trips per day (47 in, 47 out).*
- *Rigid Vehicles up to 12.5m:*
  - *318 vehicle trips per day (159 in, 159 out).*
- *Combined:*
  - *412 vehicle trips per day (206 in, 206 out).*

The TIA states that:

*“Heavy vehicle movement are split between the day/nighttime periods with 80% of trucks arriving between 7am-6pm and 20% between 6pm-7am, with the following truck volumes expected during road network peak periods:*

- *Articulated Vehicles up to 26m B-doubles and Truck and Dogs up to 19.6m:*
  - *8 vehicle trips per hour (4 in, 4 out).*
- *Rigid Vehicles up to 12.5m:*
  - *24 vehicle trips per hour (12 in, 12 out).*
- *Combined:*
  - *32 vehicle trips per hour (16 in, 16 out).”*

The above truck movements do not include small vehicles trip generation at the site which will be additional and is stated in Part 6.11 of the TIA as:

- *“54 vehicle trips per day (27 in, 27 out); and*
- *54 vehicle trips per day (27 in, 27 out).”*

It is unclear if the second line of the above is a typographical error.

The TIA indicates that all trucks entering the site will be via a left turn into the site from Hale Street and that all trucks departing the site will be via a right turn from the site into Hale Street. That is, no trucks will depart the site in an eastward direction along Hale Street and that all trucks will enter and depart the site along Hale Street to or from Foreshore Road.

The conclusions of the TIA (under Section 10) based upon the above heavy vehicle distribution scenario is as follows:

*“Traffic generation arising from the proposal has been assessed having regard for the proposed site operations as discussed in Section 8.2. In terms of the overall network performance arising from the proposed development, all intersections operate satisfactorily at LoS A with spare capacity under both the Base Case (2023) and Base Case + Development scenarios. No external infrastructure improvements (intersection upgrades etc.) are required in this regard.”*

Our review of the TIA raises the following specific concerns:

- There does not appear to have been any detailed analysis undertaken as to the safety of heavy vehicles entering and exiting the site (i.e. 412 times a day) having regard to the complex existing circumstances of the immediate road network including the following aspects:

- The western edge of the proposed truck entry and exit driveway is approximately 40m away from a significant rise in the road level of Hale Street to the west – vehicles will be accelerating down the slope towards the site;
  - The eastern edge of the proposed truck entry and exit point appears to be approximately only 15m from the roundabout intersection of Luland Street and Hale Street;
  - The proposed truck driveway is opposite an existing driveway at 12 Luland Street and is diagonally opposite two more driveways at 270-29 Hale Street and 31 Hale Street;
  - The swept path analysis appears to indicate truck movements over the on-street parking spaces on the southern side of Hale Street, opposite the subject site.
- It is not clear how the expected 412 truck movements per day have been calculated – the analysis in the TIA is based on this assumption and therefore it should be explained in detail. Assessment does not appear to have been undertaken for a scenario whereby more truck movements could occur.
  - The basis of the assumed heavy vehicle movement split between the day/nighttime periods (with 80% of trucks arriving between 7am-6pm and 20% between 6pm-7am) is not clear.
  - The proposed queuing arrangements appear to be reliant upon management by on-site staff – if so how will this be undertaken and what happens if more than 5 heavy vehicles arrive at the site at any given time (given the site has a queuing capacity for 5 heavy vehicles only)?

In the event that more trucks arrive at the site and there is insufficient queue space on site, what will be the path that heavy vehicles take within the local road network to enable them to circle and return to access the site?

- Of particular concern is the impact to the local road network in the situation that independent truck operators/contractors (driving 26m to 19m long heavy vehicles) enter Hale Street from the west (as set out in the TIA) and are then unable to enter the site in peak periods.

In such a situation it is unclear where trucks will go or where they wait. Presumably they will be forced to head east along Hale Street past the site. In this regard it is noted that there is restricted vehicle access to Botany Road from Hale Street – therefore large heavy vehicles will presumably need to use the round-about intersection at Hale Street and Luland Street and or attempt U turns somewhere in Hale Street and or Luland Street.

It is unclear if that is physically possible, and no detailed analysis has been undertaken of this scenario. It is considered that such a situation is likely to have an unsafe and significant adverse impact on the functioning of surrounding road network.

- In considering the above matters, it is unclear from the information provided in the application what the proposed method of coordination and enforcement of the proposed traffic and parking procedures will be for the day-to-day operations of the facility.

It is unclear how the arrival and departure arrangements for heavy vehicles will be managed – such that, what will prevent heavy vehicles from arriving at the site from the east or departing in an eastward direction?

While heavy vehicle trip numbers and distribution routes are outlined in the TIA, it is unclear how these arrangements and movements will be enforced and managed on an hourly and daily basis.

It is unclear what will happen if the stated number of heavy vehicle trips (412 vehicle trips per day) are exceeded, that is, how will the operator maintain the proposed truck movements to the level that has been stated and assessed in the TIA, and how will the operator reduce truck movements in the event that additional trucks seek to use the facility.

In summary there does not appear to be a detailed explanation of the required management processes to coordinate the 412 truck movements and the 54 smaller vehicle movements each day and to ensure that they use the proposed distribution routes. Nor does there appear to be identified mitigation measures proposed if additional heavy vehicle truck movements occur and or the circumstances eventuate that there is insufficient queuing space at the facility.

- Council DCP requirements indicate that a parking (and not just a traffic) survey should be undertaken. A detailed parking study does not appear to have been undertaken and therefore the impact of the loss of at least 5 on-street car spaces to accommodate the proposed development have not been assessed thoroughly.

We are informed that on-street car parking is often fully utilised - it is unclear therefore what provisions will be made, if any, for the net loss of valuable on-street car parking which benefits the wider industrial zone.

In addition there appears to be the circumstance that additional on-street car parking spaces will be affected by the heavy vehicle truck swept paths entering and departing the site and this should be clarified.

The TIA's assessment and conclusions are based upon a specific number of truck movements per day and a singular, specific vehicle distribution route for all heavy vehicles. The TIA and the EIS do not examine or assess alternative scenarios or the impact upon the local road network if those arrangements are not adhered to.

Further, there is a lack of detail as to how the specific trucks movements numbers and identified distribution route will be enforced or managed to ensure that the identified numbers and route is adhered to.

It is considered that further information and clarification with regard to the above matters is required in order to be able to confidently and thoroughly assess and determine the true impacts of the proposed heavy vehicle truck movements that would be generated by the proposed development.

From the information provided it is not clear that the proposal will not have significant adverse impacts upon the safe operation of the local road network. It is also noted that the proposal will result in a significant reduction in on-street car parking (i.e. at least 5 car spaces) within the area and there has been no detailed assessment of the impact of the loss of on-street car parking.

We trust that the Department will consider our objection with the proposed development and seek clarification as to the matters raised and revert to us.

Should you require any further information, please do not hesitate to contact myself on (02) 9380 9911 or by email at [sgordon@sjb.com.au](mailto:sgordon@sjb.com.au).

Yours sincerely

A handwritten signature in black ink that reads "Stuart Gordon". The signature is written in a cursive, flowing style.

Stuart Gordon  
Associate