



PLANNING

The Secretary,
Department of Planning and Environment
Att: Mazz Appleton
GPO Box 39
Sydney NSW 2001

16 August 2016

Re: Letter of Objection to State Significant Development 7421 for the Proposed Expansion of an Existing Waste Management Facility at 20 Hearne Street, Mortdale.

I refer to **SSD 7421** for State Significant Development (“SSD”) application to increase the capacity of the existing Waste Management Facility at No 20 Hearne Street Mortdale (“the subject site”).

I wish to lodge a submission by way of an objection to this SSD application on behalf of a client who operates a business in Hearne Street and therefore has first-hand knowledge of the subject site and the activities which have been carried out at the subject site over the past few years.

The reasons for this objection are outlined below.

1. Traffic Generation on Hearne Street

The proposal includes an increase in both the overall waste delivered and processed at the site as well as proposing that truck movements, including delivery and unloading of waste materials, are carried out on a 24 hour basis. The increase in the traffic to use Hearne Street resulting from such a large increase capacity and a 24 hours operation, which is a 9 fold increase in waste handled at the site, is of significant concern.

The Traffic Impact Assessment prepared by GTA Consultants dated 25 June 2016 (“the Traffic Report”), states the following in relation to traffic generation of the existing and proposed development (emphasis added):

*“The Mortdale Facility site currently generates approximately **204** (two-way) vehicle movements per day at its current processing capacity of 30,000 tonnes per annum. The Mortdale Facility’s proposed operation is to increase its vehicle movements to approximately **430 vehicles per day**. By way of comparison, the site’s proposed use is anticipated to generate in the order of approximately an additional 14 vehicles in any hour or **226 additional vehicles per day** in comparison to the sites current use”.*

In relation to operational traffic impact, the Traffic Report provides the following (emphasis added):

*Given the extension of operating hours and increased tonnage transported, the proposal will allow for a **greater distribution of traffic volumes over a longer period of time** with a proposed additional 4 hours toward the end of the facilities operating hours including a **proposed 24 hours for loading and unloading**. Effectively ‘flattening’ the peak activity and mitigating traffic volumes to further outside of the current road network peak periods. The additional traffic volumes generated by the proposal is 14 and 226 vehicles movements in any hour and daily traffic volumes of the site, respectively. Against existing traffic volumes in the vicinity of the site, the additional traffic generated by the proposal (i.e. approximately 1 vehicle every 4 minutes) **could not be expected to compromise the safety or function of the surrounding road network**. Overall,*

the existing operation of the surrounding road network, public transport services and pedestrian/ cycle linkages will largely remain unchanged as a result of the proposal.

In relation to mitigating measures, the Traffic Report states (emphasis added):

*Compared against the existing traffic volumes in the vicinity of the site, **the additional traffic generated by the proposed development is negligible and could not be expected to compromise the safety or function of the surrounding road network.** Given this, the proposed development in its own right would not warrant any upgrades to existing road infrastructure in the vicinity of the site.*

These comments in the Traffic report are not supported in that the proposal will generate 430 vehicle movements per day, an increase of 226 vehicle movements per day, which is not considered to be “negligible”. The assertion that the operational impact of such an increase in traffic generation will be negated via a *greater distribution of traffic volumes over a longer period of time* is also not supported. This statement simply suggests that since the facility is proposed to operate 24 hours a day, that the traffic generated will occur all day and all night instead of in peak times is not supported.

This amount of increased traffic along a local road within a light industrial zone and on the edge of a residential area, is not supported and is not good planning practice.

This level of additional traffic is of significant concern to existing businesses along Hearne Street due to the increased number of truck movements along this local road as well as the noise, vibration and dust which is often generated from these vehicles as they move along Hearne Street. This will have an unacceptable impact on these existing businesses and is therefore unacceptable.

The previous operators of this site treated the carriage of Hearne Street as a private car park and holding yard for heavy vehicles accessing the site. The 9 fold increase in capacity and

226 additional vehicle movements per day has significant potential to result in such an abuse of public land again.

The area is zoned for light industrial uses, which by definition are those that does not interfere with the amenity of the neighbourhood by reason of noise, vibration, dust, and the like. The traffic generated by this proposal alone results in this proposal being inconsistent with the objectives of the zone. The proposed 24 hour operation is also not supported, given the likely truck movements not only along Hearne Street but Boundary Road, particularly between Hearne Street and Forest Road to the north-west, which includes some residential development.

On this basis, the proposal is considered to be a total overdevelopment of the site and should be refused on the additional traffic generated in a light industrial zone alone.

2. Narrow site access and On-site Manoeuvring

Vehicle access to the site is currently from Hearne Street as a two-way crossover driveway approximately 6 metres wide, illustrated in **Figure 1**. This is considered to be totally insufficient to accommodate the anticipated truck movements through the site on a 24 hour basis.

While the Traffic Report indicates that there is a proposed 16.5 metre wide single two-way driveway to be provided, it is unclear how such a wide driveway can be accommodated on this site given the narrow frontage the site has to Hearne Street. The proposed driveway is considered to be inadequately shown on the plans and it is doubtful that such a driveway can be provided to Hearne Street.

The sweep path diagrams, shown in **Figure 2**, also indicate that there is a proposed driveway capable of allowing two trucks to enter and leave the site simultaneously.



Figure 1: Existing driveway from Hearne Street (Source: SIX Maps)

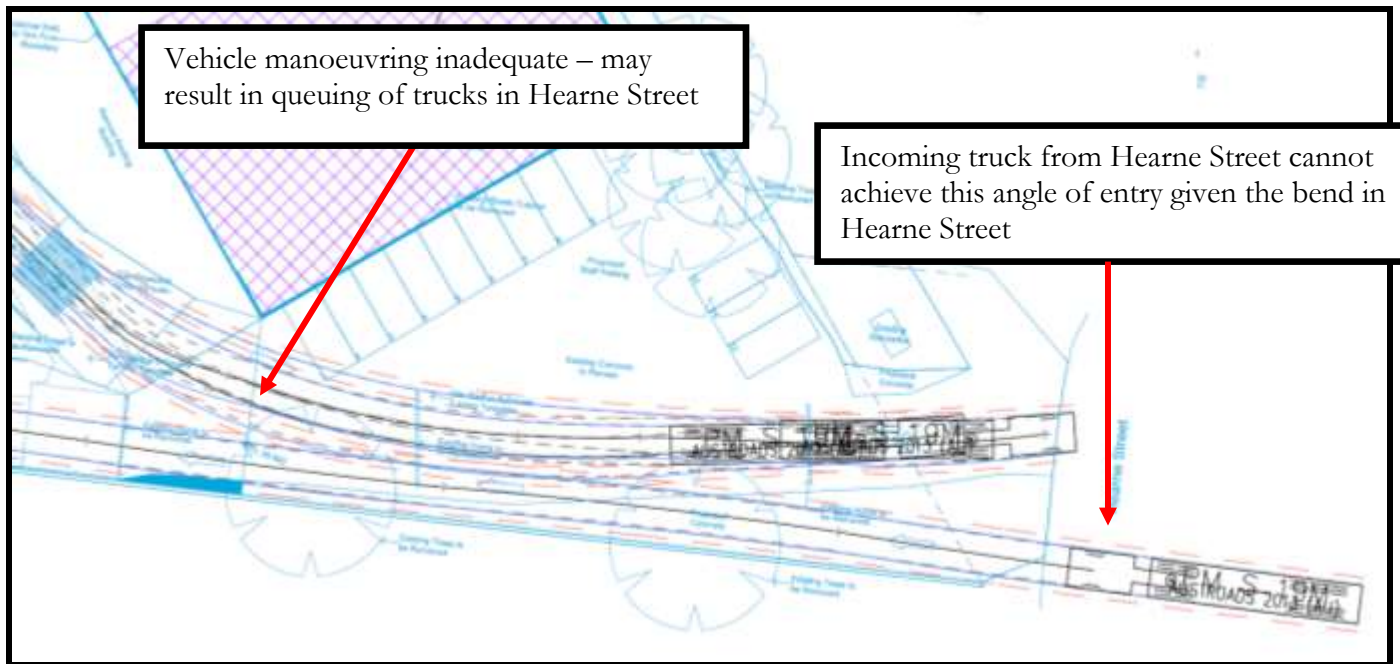


Figure 2: Sweep Paths on the site (Source: Traffic Report, GTA, June 2016)

It appears that the angle of the incoming truck in the sweep path diagram is not achievable given that the site has an angled frontage to Hearne Street and the driveway is located on a bend in Hearne Street. This incoming truck would be located within the property at No 25 Hearne Street to achieve an angle like that pictured. Any other angle of the truck would result in a partial blockage of the driveway such that the outbound truck would not be able to exit the site.

Therefore, it is doubtful that two trucks can pass at the driveway entry to the site, which would lead to queuing into Hearne Street while the outbound truck departs the site. This is totally unacceptable as Hearne Street needs to be kept clear at all times for other traffic to pass and other businesses in the street to operate effectively. This is of major concern to businesses in Hearne Street and renders the proposal unacceptable.

While the Traffic Report indicates with the use of the sweep path diagrams that there is adequate on-site manoeuvring, this assertion is not supported. There is inadequate manoeuvring on the site to allow the types of trucks to service the site to pass in the southern area of the site adjoining the new building. This area of the site appears too narrow to allow the inbound and outbound trucks to pass. The sweep paths for the outbound truck appear to require the use of the car parking spaces to exit the site, while it also appears that the two sweep paths overlap such that two-way vehicle movement in this area of the site is not achievable.

This again is likely to result in trucks queuing in Hearne Street waiting to access the site while outbound trucks depart the site. This is totally unacceptable and warrants refusal of the application.

3. Environmental Impacts of the Proposal

The Environmental Impact Statement prepared by APP dated 29 June 2016 (“the EIS”) states the following in relation to the operation of the proposal:-

All waste will enter the site via the 16.5 metre wide driveway crossing with Hearne Street, where it will be weighed on arrival via the 'southern' weighbridge. The contents of trucks are visually inspected at this point by the weighbridge operator. Trucks will then enter into the covered shed / awning and unload by either tipping or through bins being tipped to remove contents wholly within the covered shed / awning area. The load is to again be inspected on the tipping floor during and after unloading to determine waste acceptability.

Covered bins containing wastes may also be stored in the designated bin storage area and moved to the processing area when operations permit processing. An example of this would involve construction waste being received outside of permitted processing hours. Under such circumstances, the bin would be covered and held in the designated bin storage area until such time as it can be accepted for processing.

The operation of the premises as outlined above is concerning in that there will be bins full of waste being stored outside and while it is proposed to cover these bins, in practice this is unlikely to be undertaken. Such a condition would require significant compliance action which is unlikely to be undertaken.

The placement of bins full of waste to be stored outside until “accepted for processing” results in full bins sitting outside for an unlimited time period which has significant potential to result in dust and other air pollution affecting adjoining and nearby properties. This is illustrated in **Figure 3**.

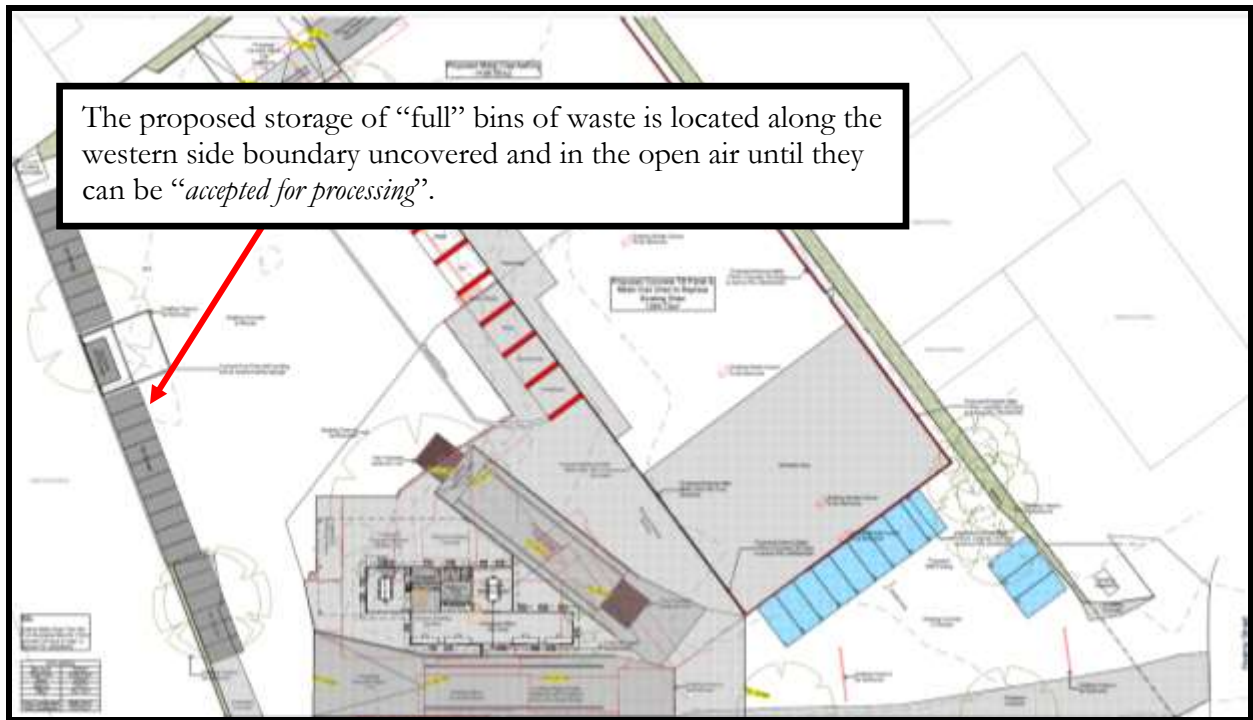


Figure 3: Proposed Site Layout

(Source: Insight Architecture, 21 March 2016)

Furthermore, the proposed “shed” is not fully enclosed and the bins full of sorted waste along the western edge of the shed are being housed under an awning and not within the building. The sorting of the waste is to occur within the shed however, with the sides of the building being open, there is likely to be significant dust and other air borne particles emanating from the building.

The most effective way to minimise dust and another air pollution from adversely affecting the surrounding area is for the undertaking of the sorting, separating and storage activities to be undertaken inside a building with roller doors and the like closed. Notwithstanding the dust suppression measures proposed, the proposed open-form shed, the method of sorting and the storage of sorted waste bins outside in an open form shed is unacceptable and is likely to result in dust and air pollution to surrounding properties. This is illustrated in **Figure 4.**

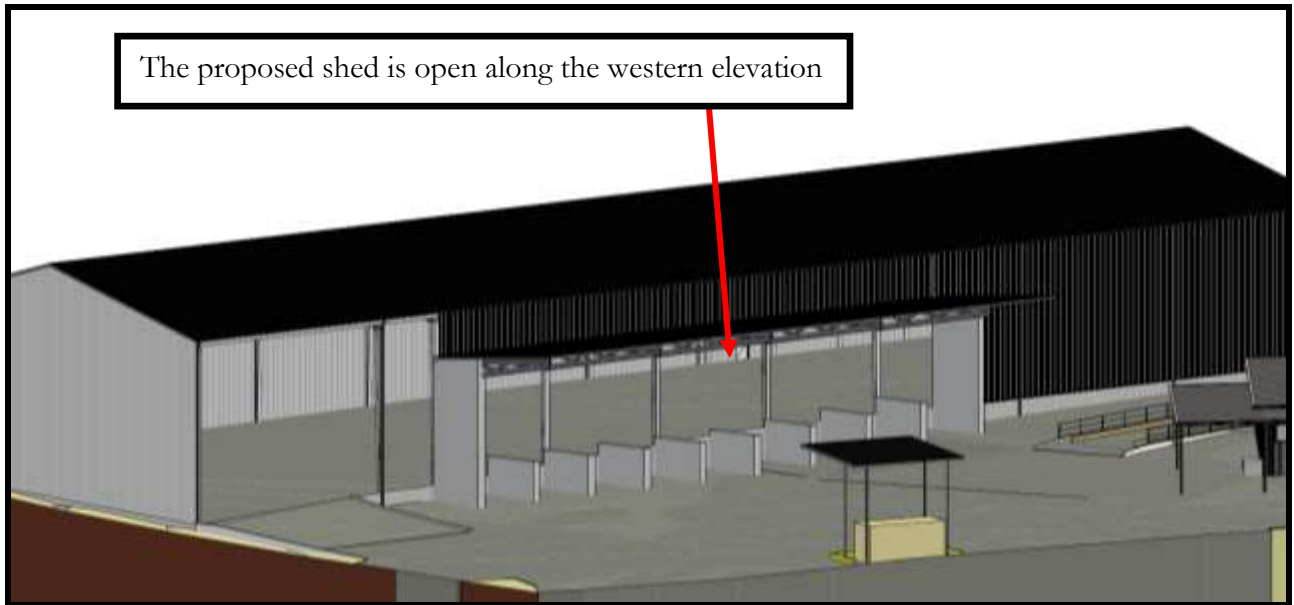


Figure 4: Proposed new shed (perspective)

(Source: Insight Architecture, 21 March 2016)

The operation of the proposed facility is also likely to result in significant noise being generated by the proposal. This potential for noise is exacerbated by the proposed sorting and separating of waste within an open form building whereby noise is allowed to escape to adjoining properties. The placing of bins within the bin storage area along the western side boundary is also likely to increase the potential for noise to adversely affect the amenity of adjoining and nearby properties.

The proposal is unsatisfactory in relation to its potential for adverse impacts arising from dust, noise and other air borne pollution likely to adversely impact on adjoining and nearby properties. This is totally unacceptable and warrants refusal of the application.

4. Inappropriate Location

The significant increase in capacity of the existing facility at the subject site is considered to be inappropriate for the site given it is located within the IN2 Light Industry zone under the *Hurstville Local Environmental Plan 2012* (“HLEP 2012”).

The objectives of the IN2 zone, pursuant to Clause 2.3 of the HELP 2012 include (emphasis in bold added):-

- *To provide a wide range of light industrial, warehouse and related land uses.*
- *To encourage employment opportunities and to support the viability of centres.*
- ***To minimise any adverse effect of industry on other land uses.***
- *To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.*
- *To support and protect industrial land for industrial uses.*
- ***To enable industrial development which does not pollute or adversely affect adjoining land, air or water.***
- *To ensure industrial development creates areas that are pleasant to work in, safe and efficient in terms of transportation, land utilisation and service distribution.*

The proposed increase to the existing operation at the site is likely to adversely impact on the amenity of the area. The significant increase in traffic movements coupled with the storing of bins outside and the open air nature of the proposed shed on the site increase the likelihood that the proposal will lead to adverse impacts on the quality of the environment in this location in terms of traffic, noise and air pollution.

The addition of 226 vehicles per day along Hearne Street will disrupt the efficient and effective operation of existing businesses in Hearne Street, which have already endured trucks queuing and parking in Hearne Street in the past. The significant increase in the capacity of the premises proposed in this application is considered to be excessive for the site's location along a local road within a light industrial zone. The site is considered to be too small and constrained by a limited access point to Hearne Street to sustain a proposal of this magnitude.

In these ways, it is considered that the proposal is contrary to the zone objectives (dot points 3 and 6) and the proposed increased capacity of the existing operation in this application will also be inconsistent with the zone objectives

An alternative location is needed which is more appropriate for a 24 hour operation involving significant heavy vehicle movements. A location within a general industrial zone (IN1) or heavy industrial zone (IN3) along an arterial road or other similar high traffic road, is a more appropriate location for this proposal.

5. Past Concerns with the Existing Facility

The existing facility at the subject site has been operated with significant environmental and amenity impacts on the surrounding area. Some of the concerns with the past operation of the premises include:-

- Rocks and bricks on Hearne Street which have fallen off trucks servicing the subject site.
- Dust emanating from the site such that the environmental impact on air quality is significant.
- Trucks servicing the subject site are not being washed down which results in significant amounts of dust emanating from the wheels and bins of the trucks.
- The street gutters are full of dust and dirt that require them to be cleaned approximately every 4 weeks.
- Cars parked on the street are covered in dust on a daily basis.
- The trucks, including B Doubles, are often being double parked (trailer only) on Hearne Street and near miss collisions with other vehicles are occurring frequently.

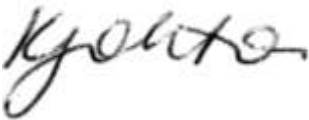
These environmental impacts arising from the current operation are only likely to be exacerbated by the proposed increased in the capacity of the existing facility.

It would be appreciated if this objection could be considered in the Department's assessment of this State Significant Development Application.

If you have any questions regarding this application, please contact me on 0410 448 247 or email on kim@kjplanning.com.au.

Thank you for considering this submission.

Yours Faithfully,



Kim Johnston

Town Planner

Principal Consultant