

25 August 2016

Mazz Appleton, Planning Officer, Industry Assessments
Department of Planning and Environment

Dear Mazz,

**Re: State Significant Development
Premises: 20 Hearne Street Mortdale**

Please find comments in relation to the State Significant Development at 20 Hearne Street Mortdale.

In summary, the State Significant Development Application for the increase in intensity of the existing Resource Recovery Facility at 20 Hearne Street Mortdale comprises the following:

- * Increase waste processing limit from 30,000 tonnes per annum to 300,000 tonnes per annum up to 95% of which is to be construction/demolition waste and soil.
- * Alter the hours of operation of the use from the existing 6am - 6pm Monday to Saturday (with no vehicular access before 7am) and no operation on Sunday or Public Holidays; to 24 hour operation Monday to Saturday (with processing activities undertaken from 6am to 10pm) and no operation on Sunday or Public Holidays.
- * Demolition of the existing facility and construction of a purpose built facility comprising tipping area (14.5m in height walled to the northern, eastern and southern sides and open on the western elevation); outdoor bin storage areas on the western boundary; two weighbridges (one for incoming vehicles and one for outgoing vehicles); offices and staff amenities; and the provision of 12 parking spaces at the front of the site

An initial inspection of the plans and supporting EIS raises the following concerns:

(1) Traffic impact

The increase in the number of heavy vehicle movements is summarised in Section 6.8 of the EIS and indicates that all heavy vehicles (with vehicle lengths of up to 19m stated) can enter and exit the site in a forward direction. Swept path diagrams for the full range of required movements must be provided to demonstrate this claim.

The EIS identifies the heavy vehicle traffic generation for the existing site as 204 (two way) movements per day (p97) with an additional 226 movements estimated to result from the proposal resulting in 430 daily heavy vehicle movements. This equates to 14 additional heavy vehicle movements per hour based on the proposed processing hours of 6am to 10pm. No calculation of existing hourly heavy vehicle movements is provided in Section 6.8 of the EIS, however on the basis of the 204 existing daily movements provided and the processing operating times of 6am to 10pm it is assumed that the existing hourly traffic generation over the new proposed hours of operation would be 13 movements per hour. This would equate to a total of 27 heavy vehicle movements per hour (on average) across the 16 hour daily processing operation of the use. Heavy vehicle movements are identified as reaching the daily peak between 11.30am and 12.30pm.

In relation to these figures, Council notes that limited queueing is provided for on site. How then, does the proposal aim to prevent extensive heavy vehicle queueing on the street, especially during the midday peak identified?

On the raw numbers stated, 362 movements (two way) will be associated with inbound waste with 68 (out bound) movements transporting outbound waste. Council expresses strong concerns that the operation of the proposal with the heavy vehicle movements suggested will result in excessive queueing on Hearn Street and will therefore result in a negative impact on traffic flow in Hearne Street.

This issue should be resolved prior to the issue of any future development consent.

Any development consent should be accompanied by a Plan of Management detailing how the queuing impacts are going to be resolved.

(2) Noise impact

Should the application be approved, the movement of trucks between 7pm and 7am should be restricted to using Boundary Road as the only means of access to and from the site. This will reduce the noise impacts on the adjoining residential area.

Appropriate conditions should be imposed in relation to operational noise generated from the site, to ensure nearby residential areas are not affected. I believe that this can be achieved.

(3) Dust Impact

It is noted that the Air Quality Impact Assessment provided modelling using "relevant NPI or USEPA AP42 emissions factors/equations" on a worst case scenario for dust emissions. A dust management plan should be lodged prior to any approval to ensure that the worst possible case scenario sited in the Air Quality Impact Assessment is mitigated for the life of the development.

(4) Hours of Operation

The impact on residential neighbours in nearby streets (especially Barry Avenue and Boundary Road) between the hours of 7pm and 7am is an issue particularly in relation to noise and traffic related noise after standard hours of business operation.

(5) Stormwater

A Water Cycle Management Plan must be provided prior to any approval of the proposal. The specifications and limitations of the wastewater control measures must be assessed prior to any approval of the proposal.

The control measures proposed (eg Rocla First Defense Unit, Ecosol Litter Basket, proprietary litter baskets and Leachate Collection Sumps) must be conditioned to be maintained for the life of the use and to be certified as functioning in accordance with the manufacturers specifications and EPA requirements at 12 monthly intervals by a suitable qualified expert.

(6) Permissibility

The proposal exceeds the maximum permissible building height of 10m Permitted under the Hurstville LEP 2012. The 14.5m height proposed is well in excess of this requirement. Insufficient evidence has been provided that the additional height clearance is required for the proposed use. As the proposal is purpose built, it is not dependant on the existing 14.5m high building on site and there is no site constraint that would prevent the proposal from not complying with the 10m height limit.

A 45% variation to the Hurstville LEP would result in a undesirable precedent that would reduce the strength of this statutory control. The proposal should provide for a redesign demonstrating compliance with the 10m height requirement.

Conclusion



Generally the scale of the development is considered to be incompatible with the objectives of the light industrial zone under the Hurstville LEP 2012.

These comments are based on the EIS sections relating to previously raised Council Concerns relating to traffic, noise, dust hours of operation, stormwater and permissibility. An exhaustive assessment of the EIS has not been undertaken, comments have been limited to the issues identified above.

Yours sincerely,



Tina Christy
Manager Development Assessment