Project No. 1661858-L-007-RevA

10 August 2017

Attention: Director - Industry Assessments
NSW Government
Planning Services
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

RE: BINGO INDUSTRIES – MINTO RESOURCE RECOVERTY FACILITY, 13 PEMBURY ROAD

Attention: Director – Industry Assessments

1.0 INTRODUCTION

It is understood that Bingo Industries has submitted a development application on behalf of Minto Resource Recovery Facility (waste transfer facility), located at 13 Pembury Road, Minto Industrial Estate, Minto for the proposed operating capacity increase from 30,000 tonnes per annum (tpa) to 220,000 tpa of non-putrescible waste. This represents an increase of more than 7 times the existing processing capacity.

The waste to be processed includes metal, timber, paper, cardboard, glass, plastics, ceramics, asphalt, soils, bricks and concrete. The proposal will also include an extension of current operating hours. An Environmental Impact Statement accompanied this application.

Foamco Industries Pty Ltd (Foamco) operate a foam manufacturing plant in Minto and currently occupies 16, 18, 20, 23, 25, 26 and 27 Pembury Road, Minto. The Bingo Industries site is located approximately 100 metres south-west of Foamco plant at 16 Pembury Road.

Foamco object to this proposed development and outline the reasons in the sections below.

2.0 TRAFFIC

A Traffic Impact Assessment report was conducted by Transport Planning Partnerships for the proposed expansion of the waste transfer facility. Figure 2 of this report shows Pembury road (looking east) does not reflect the reality that is occurring on a daily basis within the Minto Industrial Estate where trucks, (double Bs) are parked along every available parking space and at some locations double parked as shown in the photos below.

Photo 1: Typical 4 axle truck and dog combination and double-B photos

Pembury Road is a two lane carriageway, 12 metres in width with unrestricted on-street parking permitted on both sides. Currently there are no restrictions around the vicinity of the site for the existing fleet of heavy vehicles accessing and leaving the site, the largest vehicle being a 25 metre B-double. The following vehicles (aside from cars) will access the site; 19 m semi-trailers, 19.6 m truck-and-dog combinations and 25 m B-double trucks.

Regarding existing traffic volumes presented in the TIA report, Pembury Road '*currently operates with traffic volumes well within its operational capacity thresholds set with Roads and Maritime's Guidelines'*.

Table 2 of the TIA shows the existing waste transfer facility generates an average of 88 two-way vehicle movements per day, of which 22 are comprised of trucks greater than 15 tonnes in capacity. The proposed development would generate an additional 376 daily two-way movements equivalent to 188 vehicles (Table 10).

Table 11 indicates that approximately 14% of the waste will arrive and almost all waste (100%) will leave the site in trucks greater than 15 tonnes. This amounts to 57% and approximately 107 trucks per day transporting waste to or from the site in 15 tonnes (or greater) trucks. This is almost five times the current number of trucks entering or leaving the site.

Section 6.7 of the TIA presents proposed traffic management measures for the proposed development. Section 6.7.1 outlines the schedule of waste deliveries to the site. The report states that '*although public deliveries (i.e. non-site operator trucks) are not required to book-in ahead of time, they would be encouraged to do so*' and '*trucks can be diverted to other nearby facilities by the site operator, if required.*'

In practice, this will rarely occur as the trucks will arrive on-site without prior warning. A site traffic management system must be put in place whereby all trucks are required to schedule a time with the

operator for arrival to ensure a maximum number of trucks are on-site at any given time. The maximum number of trucks to be allowed on-site should be agreed with Council and enforced through permit conditions.

Section 6.7.3 states that the '*trucks would be able to stack (or queue) within the designated spaces on-site*' and managed by staff. The TIA report states '*there are 61 two-way vehicle movements in/out of the site during peak operation at the facility*'. This amounts to 31 trucks arriving at the site between 12 noon and 1 pm with only two spaces allocated for articulated trucks (19 m semi-trailer). As the TIA report states, it will take approximately 20 minutes for each truck to enter the site, deposit waste and exit. However, during this time period, if more than 2 trucks arrive within the space of several minutes, which in a realistic possibility, queuing on Pembury Road is likely to occur causing traffic congestion and safety issues.

The report also states that '*as a contingency, vehicles carrying loads which are not ready to be received at the facility may stall temporarily in the kerbside lane on Airds Road*'. No further detail on this 'contingency plan' is provided i.e. how would it by managed and by whom? It's quite easy to state this in a report. However, in practice, it probably won't occur. However, this contingency plan should be conditioned in permit conditions for the site

The report does not provide any detail in the event there are on-site operational issues and waste cannot be accepted. Where do the trucks go? This scenario occurred earlier this year where trucks with dog trailers were parked bumper to bumper on Aird Road and Pembury Road causing congestion and traffic chaos. A collision between one of the waste trucks and a car also occurred on Aird Road during this period. This raises significant safety concerns. The reason for the congestion was due to a system breakdown at Bingo Industries. It is extremely concerning that this scenario occurred with 88 two-way vehicles per day. At 464 two-way traffic movements per day, this type of scenario is likely to cause complete traffic breakdown creating a significant safety risk for employees and visitors accessing Pembury Road.

It is considered that the proposed development should not proceed. Contrary to the TIA report's statement that Pembury Road has the capacity to accommodate the increased traffic volumes, we dispute this. At present there are issues with parked trucks along Pembury Road and in the event of a system failure at the waste traffic facility, there is no contingency plan to manage trucks arriving at the site.

We therefore believe that the proposed development should not be approved.

3.0 AIR QUALITY

An Air Quality Impact Assessment was undertaken for the proposed expansion of the waste transfer station. Predictions of ground level concentrations of particulate matter (PM_{10}, $PM_{2.5}$ and dust deposition) was presented in the report and indicated that particulate concentrations are predicted to be below relevant ambient air quality criteria. The report also included the prediction of particulate concentrations at neighbouring industrial locations which were also below criteria.

As required by legislation, the air quality impact assessment has focussed on emissions within the site boundary. There is little or no mention of particulate matter generated by the trucks entering or leaving the site. Section 10.1 of the report states '*paved roadways, hard stand areas and driveways will be kept clean by use of the onsite sweeper and dampened using hoses as required to prevent dust from the vehicle movements*' and '*all vehicles will be checked for mud and soil on tyres prior to leaving site and where mud or soil is detected on the entrance road (i.e. "track out"), staff will be deployed to sweep the road*'. These management measures may look fine on paper but in reality, it doesn't work.

At present, there is a high level of dust generated in the area for a 30,000 tpa capacity waste transfer station and deposited on our cars. Foamco manufacture high quality foam which can be sensitive to high levels of dust and impact on our product. This soil and mud from the Bingo Industries trucks are deposited on the roadway. In an attempt to clean this deposited soil/mud, two street sweepers are currently used on a daily basis to clean the roads including Pembury Road. These sweepers are not effective in removing the soil and mud as the roadway is wetted, the resulting mud being thrown onto cars, kerbs and pathways. Furthermore, when the roadway dries, high levels of dust are generated. The photo below clearly shows this on-going problem.

Photo 2: Street sweeper in operation with soil/mud on Pembury Road

Increasing the capacity of the waste transfer station from 30,000 tpa to 220,000 tpa will only serve to make this situation worse with approximately 107 additional entering and leaving the site. Higher levels of dust will not only deteriorate the amenity of the area, it will create visibility and safety issues and potentially affect the high quality foam products produced at Foamco.

It is therefore contended that an increase in waste acceptance to 220,000 tpa will have a deleterious effect on air quality on those premises (i.e. Foamco) on Pembury Road and the local road network.

We therefore do not support this proposed development and believe it should not be granted approval.

4.0 NOISE

A Noise and Vibration Impact Assessment was conducted for the proposed expansion of the existing waste transfer station. The report concludes that the expanded site will be able to comply with noise criteria.

An off-road traffic noise assessment was also undertaken on Campbelltown Road only stating that '*no project related traffic noise impact are anticipated at residential receivers adjacent to the surrounding road network*'.

The noise assessment has not considered the significant predicted increase in traffic along Pembury Road and the likely noise impact this will have on the receiving industrial environment. While it is acknowledged that noise levels in the Minto Industrial Estate is higher than in a residential area, a significant increase in traffic due to the project on Pembury Road and in particular trucks, will increase noise levels significantly. Trucks travelling on Pembury Road and the local road network result, mainly due to the existing waste transfer station create a high noise environment already. Further increases in traffic, and particularly trucks, along Pembury Street due to this proposed development, will serve to make the noise levels significantly worse.

We therefore strongly object to this proposed development and strongly recommended that planning should not be approved.

5.0 CONCLUSION

Foamco strongly object to this proposed development on the ground of increased traffic and unacceptable deterioration in air quality and noise. At present, for a 30,000 tpa waste capacity, there are significant issues with traffic congestion and air and noise pollution due to this waste transfer station. Bingo Industries has shown a blatant disregard and respect for all other industries along Pembury Road and within the Minto Industrial Estate due to the traffic congestion and pollution caused and has shown no indication that it intends to minimise its impact on the other industries on Pembury Road and within the Minto Industrial Estate. The proposed waste capacity of 220,000 tpa will make traffic, air and noise pollution significantly worse and Foamco firmly believe the development should not proceed.

We trust the NSW Department of Planning and Environment will take our comments into consideration and prevent further pollution on Pembury Road and the Minto Industrial Estate by rejecting this proposed development.

Yours Sincerely

For Foamco Industries Pty Ltd,

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Director

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