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14 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 RECOVERY FACILITY (SSD 7462), 13 PEMBURY ROAD  
MINTO NSW 2566.

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 on 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.

Glyson Enterprises Pty Ltd trading as Tai Cheong Foods operate as a food wholesaler located at 21 Pembury Road, Minto.

Glyson Enterprises Pty Ltd object to this proposed development with the reasons outlined below.

## **2.0 TRAFFIC**

A Traffic Impact Assessment report was conducted by Transport Planning Partnerships for the proposed expansion of the waste transfer facility. In reality on a daily basis trucks waiting to enter Minto Industrial Estate will be parked alongside any available parking space and at some locations double parked to wait to drop off their load.

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 metre semi-trailers, 19.6 metre truck and dog combinations and 25 metre 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 movement equivalent to 188 vehicles (Table 10).

Table 11 indicated 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 5 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 on 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 1pm with only two spaces allocated for articulated trucks (19m 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 be managed and by whom? It is quite easy to state this in a report. However, in practice, it probably won't occur. However, this contingency plan should also 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? There are safety concerns for employees and visitors accessing Pembury Road in the scenario that trucks will be parked bumper to bumper on Airds Road and Pembury Road causing traffic breakdown.

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 already issues with parked and double-parked trucks along Pembury Road and in the event of a system failure at the waste 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**

Currently, there is already a large amount of dust and dirt which circulates the area around Pembury Road, this is evident on the cars and road. There is a constant need for a road sweeper truck which runs up and down Pembury Road to manage the amount of dirt which is left on the roads due to the Waste Facility. Despite this maintaining a cleaner road, it does also cause safety concerns as vehicles often need to drive on the opposite side of the road to pass the cleaning vehicle.

### **4.0 NOISE**

### **5.0 CONCLUSION**

Glyson Enterprises Pty Ltd does not support the proposal which involves increasing the operating capacity of the Minto Resource Recovery Facility due to the reasons stated above. There are currently already issues arising with traffic congestion, lack of parking spaces and air quality. We believe Pembury Road is at peak capacity and cannot support the increase proposed capacity at 13 Pembury Road, Minto.

Yours sincerely,

Glyson Enterprises Pty Ltd

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