

Attention: Director – Industry Assessments

10 August 2017

Project No. 1661858-L-007-RevA

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, 13 PEMBURY ROAD
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.

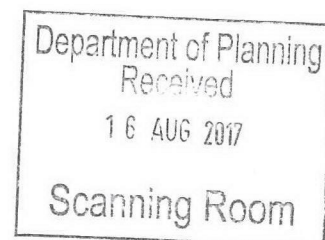
The waste to be processed includes metal, timber, paper, cardboard, glass, plastics, ceramics, asphalt, soils, bricks and concrete. The proposal will also include an extension of current operating hours. An Environmental Impact Statement accompanied this application.

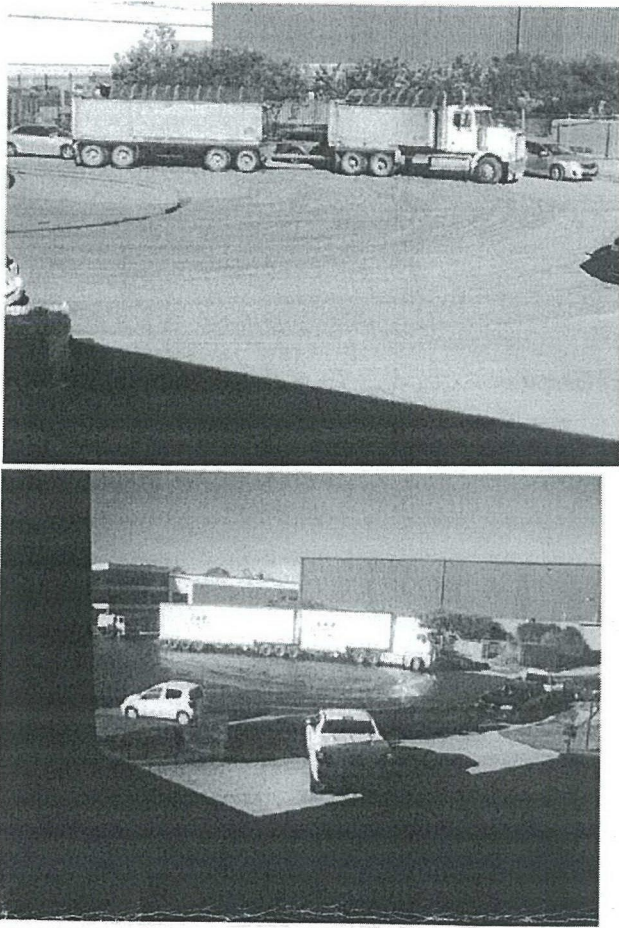
I, Walter Casanova owns, 16 Pembury Road, Minto. The Bingo Industries site is located approximately 100 metres south-west of 16 Pembury Road.

I 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.





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 be 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

I am also worried on the Air quality in the area where the staff inside the facility is wearing masks and the other office staff around the area are not advised of any dangers.

4.0 NOISE

The amount of trucks moving around the area and even the facility noise is increasing the risk of lives in the area.

5.0 CONCLUSION

I am of the opinion that the facility of this type should not be allowed in a prime industrial area of Minto but need to be far from prime industrial estate.

Further, the proposed facility is very close to the canal that moves the rain water and is to be taken into consideration of possible contamination in the water.

Yours sincerely


WALTER CASANOVA