



9 March 2018

Ms Chloe Dunlop  
Senior Planner, Industry Assessments  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Madam,

**RE: SSD 7462 – Minto Recycling Pty Ltd (Bingo Industries)  
No. 13 Pembury Road, Minto**

I refer to the Department's correspondence regarding the proposal to increase the permitted tonnage of waste per annum permitted to be handled at the subject site from its current 30,000 tonnes.

This response has been prepared following receipt of amended information from the proponent, which was prepared in response to submissions raised during the application's public exhibition.

I would like to apologise for the time it has taken for Council to formally respond to the revised information.

Council wishes to make the following comments on the following matters in turn:

1. Traffic impacts
2. Development control plan compliance
3. Air quality
4. Staging of the site's construction activities
5. Developer contributions

Each matter is raised as follows:

**1. Traffic impacts**

Council has reviewed the addendum traffic report supplied with the revised application.

There are a number of issues that are yet to be addressed to Council's satisfaction within the report. These are outlined overleaf:

- The report appears to assume a significantly higher volume of waste is currently being accepted and processed at the site when compared to the existing EPA-issued licence. It is recommended that this matter be investigated further.
- The practicalities of the truck turning within the proposed buildings are questioned.

Reversing manoeuvres are not generally supported in safe working environments, particularly where drivers may not be familiar with site operations as they are not employees of that particular worksite. It is recommended that the proposal to reverse heavy vehicles within an enclosed building as part of normal operations be further ground-truthed with a specialist consultant and or SafeWork NSW. Of particular interest are the reversing manoeuvres that take place away from the tipping area.

As the proposed unloading/loading regime relies on these reversing manoeuvres, it is recommended that this be checked prior to the Department considering approval of the proposal.

- The turning manoeuvres shown on submitted plans do not appear to be practical in some instances – with wheels crossing over weighbridge edges and the like, which is likely to damage the weighbridge and not be a permitted practice on site. The weighbridges are not generally flush with the surrounding pavement surface. Rather, they are likely to have a raised kerb or other raised element to ensure the vehicle is located appropriately.
- The stacking proposed within the building is not considered to be appropriate in terms of manoeuvring for articulated vehicles – there is no turning path shown that illustrates how an articulated vehicle would access the stack nearest the wall should the vehicle use entry weighbridge number 2. Manoeuvring within the building as proposed is reliant on articulated vehicles being in that particular stack.
- Any articulated vehicle accessing the site without queuing into Pembury Road is reliant upon there being no queuing at the weighbridges. The practicalities of this situation are queried, particularly during peak times.
- According to submitted turning paths, not all wheels of some articulated vehicles are located on the weighbridge after entering the site. Again, this is important as the weighbridges are not flush with the pavement surface. If vehicles cannot access the weighbridge in either a timely manner and importantly, an accurate manner, this raises issues with the monitoring of the site's performance in terms of its EPA licence restrictions and also the timeliness of the queuing/unloading criteria relied upon in the traffic assessment.
- No reverse to tip manoeuvre turning path is provided for b-double vehicles within the building. Are b-doubles broken down on site in order to perform their tipping manoeuvre? If not, how is the a-trailer emptied? Breaking down of the combinations would add time and influence queuing.
- The turning paths and queuing system proposed does not appear to consider the influence that vehicles waiting to be loaded with processed waste would have on the smooth operation of the unloading process for certain articulated vehicles ie. if a b-double or articulated vehicle is parked outside Shed A for loading, a truck and dog articulated vehicle and b-double cannot leave the site. The influence this would have on queuing is potentially quite detrimental.

All of the points raised above point to the site's 'fragility' in terms of continued smooth operation. Small problems have the potential to create significant queuing in Pembury Road, which has become evident in the past.

## **2. Development control plan compliance**

The proposal possesses some significant departures from Council's development control plan requirements. These are particularly evident in matters concerning the provision of car parking and building setbacks.

Pursuant to Council's Campbelltown 'Sustainable City' Development Control Plan, the proposal would be (conservatively) required to provide in the order of 37 off-street car parking spaces. This is based on the floor area of the building.

While it is acknowledged that the proponent has stated that a smaller workforce would be present at the site at any one time under the current proposal, Council must consider possible future use of the site should consent be granted. Accordingly, a revision of the proposal is requested to ensure that it is closer to the required number of off-street parking spaces.

Further, stacked car parking is not permitted under the DCP and the practicalities of that stacking, when coupled with the low number of spaces and shift change over times have not been adequately considered in the proposal. The movement of staff to their vehicles has the potential to interfere with the smooth running of unloading practices within the main building.

The setback of the site office does not comply with Council's development control plan.

Council requests that the Department consider the site's relatively low order landscaping and requests that consideration be given to requiring that it be embellished should approval for this application be granted. There is no accounting made for the loss of existing vegetation should proposed car parking spaces 4 to 7 be constructed.

### **3. Air Quality**

The benefits of the proposal to enclose site operations within a water sprinklered building are acknowledged.

The air quality assessment does not readily appear to consider the impacts of that enclosure on workers in the building in terms of their exposure to internal combustion engine fumes and the treatment of such within the enclosed environment.

As the proposal is reliant on the site operating in the manner now proposed, it is recommended that further investigation be undertaken regarding the suitability of operating fossil fuel powered vehicles (predominantly diesel-fuelled) within an enclosed space. Long-term exposure to those fumes in the enclosed environment and the impacts this may have on worker health should be considered.

Should ventilation be required, a discussion on the impacts this might have on dust suppression and fugitive emissions of particulate matter must be provided.

### **4. Staging of the site's activities**

Council requests, should the Department favourably consider the application, that strong consideration be given to a gradual approach be implemented in the increase to the accepted tonnage per annum at the site.

This would enable monitoring of the success (or otherwise) of the site's management as proposed by the proponent in the amended application.

### **5. Developer Contributions**

Council's Section 94A Plan (Section 7.12 Plan) applies to the site and development type. Pursuant to the Plan, the contribution payable would be 1% of the development's capital investment value.

Should the Department grant consent for the proposal, Council would request that a condition be imposed requiring the payment of the contribution in accordance with the plan.

Thank you for providing the opportunity to provide feedback on the proposal in its revised form.

**Conclusion:**

The application highlights a number of significant logistical challenges. By comparison with other similar operations (measured as a function of site size to incoming tonnes per annum), it is questionable whether this site is capable of sustaining the proposed operation of 220,000 tonnes per year.

The fragility of the transport system provided for within the building proposed is questionable – with a small issue in the site's operation considered likely to compound well beyond the site boundaries, as has occurred presently from time-to time.

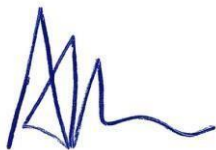
Council acknowledges the work done by the applicant to respond to concerns raised in the initial stages of the development's assessment and agrees that the impacts of the development are likely to be less (particularly in terms of air quality) when compared to the original proposal.

Should the Department consider the development is worthy of consent, Council would enjoy the opportunity to provide comment on proposed conditions.

I trust that this assists your assessment of the proposal.

Thank you again for the opportunity to comment on the subject state significant development proposal and I apologise for the delay in sending this response to you.

If you require any further information please contact Andrew MacGee on (02) 4645 4616.

A handwritten signature in blue ink, appearing to be 'James Baldwin', with a stylized, flowing script.

James Baldwin, per  
**Director City Development**