

Paul Phillips
65 Bradbury St
Moorebank, NSW 2170

RE: Objection to Proposal 05_0157 Moorebank Recyclers

I wish to submit my objection to the above proposal, based on the below.

Director General's Requirements

The DGRs were issued in July 2006, almost 7 years ago, surely they must be re-issued taking into account up to date information, such as the 1000+ homes planned (and existing) for the neighbouring properties (Benedict and Georges Fair/old Boral).

With the preliminary EA also dated in 2006, it does not sufficiently take into account the residential growth in the area, with the close proximity to the proposed site.

Part 3A of the planning code has been scrapped, why is this ridiculous development being allowed to be submitted and assessed under an out of date, scrapped government legislation?

Figure 2 of prelim EA does not adequately show residential growth from when aerial photo was taken 7 years ago – hundreds of additional families are living within 200m of the proposed site, they have not sufficiently looked at this

PEA refers to existing Boral site, and future residential, residential has been in place for over 5 years, this goes to show how out of date the information is (7 years)

PEA refers to LEP dated 1997, forgetting that this was updated in 2008, 5 years ago, and 2 years after the out dated EA was initially prepared

Site Access

In the Director General's requirements, it is said that the proponent must have site access approval before submitting this request. The site access documentation and land owners consent attached with the submission are out of date, as council rescinded land owners consent in a memo to Moorebank Recyclers, dated June 2011. The Proponent's other 'option' for site access is also not agreed, as the proponent is in court proceedings with the council regarding the establishment of an easement across two separate lots under council control. The date of these proceedings is for the end of May 2013, with a decision expected by late 2013, early 2014. I do not see how this submission could have gone ahead without the DGR's being fulfilled. There is also a proposal with

RMS currently (submitted Nov 2012) to make the entire length of Brickmaker's Dr (from Newbridge to Nuwarra) a 5t load limit.

With their designs for site access, they are forgetting that Benedicts will be building a bridge between their own site and Brickmakers drive through/over lot 309, and the courts have denied MR access to use to that road/bridge as their site access.

By building the proposed access road earthworks, they will remove 3500m³ of flood water storage from within a flood plain, when residential homes are right next door, that's clever.

Traffic/Trucks

The data in the EA traffic report is severely flawed, they have not sufficiently taken into account the growth of the Georges Fair residential estate, nor the proposed Georges Cove Marina development, and associated residential development. The no left turn signage, and associated concrete barriers designed to stop trucks turning left onto brickmakers dr from the access road will not be in place, as this access road/bridge is being built as part of the Georges Cove development (development of the current Benedict's site), and these traffic adjusters are not part of this. Regardless if they were in place, trucks already drive over existing concrete barriers etc on Brickmakers Dr, so why wouldn't the proponents trucks do this also as a shortcut to the M5

The EA continually says they will be accepting trucks from 6am, with crushing to start at 7, but all there traffic data refers to trucks timings starting at 7am and finishing at 6? What time would these trucks be queuing up from, idling noisily alongside existing housing to get access to the site?

The estimated number of truck movements per day is also flawed, as it is based on 10 year old data regarding the estimated amount of recycling that will be done on site, and the estimate of how this will be handled., what happens when they decide it is more efficient to run double the trucks with smaller loads, that would drastically change the use of an already busy road & intersection, especially during peak hours.

Their traffic data must be flawed, any local person can tell you that the local main roads and intersections are not performing satisfactorily during the peak times, with Brickmakers drive backing up for approx 1.2km when trying to get onto Nuwarra Rd in the afternoon peak (from 400pm onwards), and between 8-9 am, when trying to turn onto Newbridge Rd from Brickmakers Drive, there is substantial traffic bank up, taking upwards of 10-15 min to travel 200m to the intersection.

An additional *estimated* 324 trucks per day will not help this situation in the slightest, but make it much worse, in the EA, they also say that they will increase heavy vehicle movements on the local roads on weekdays from 1 every 2 minutes, to 1 every minute, effectively doubling the trucks on the local roads, driving past people's homes, using their noisy air brakes to slow down for intersections.

The table showing estimated truck movements for each hour of the day is at odds with earlier in the report. In the earlier sections, they say there will be around 19 in and out during 8-9 am, here they say 7.52 and 21 in and out between 4-5, here they say 4.18– more flawed data. They also still neglect the trucks entering before 7am to drop off loads.

This table does not add up to 324 truck movements per day, so can we assume the other app 250 truck movements will be between 6-7 am and 5-6 pm???

They also claim here that their trucks would be distributed to Nuwarra Rd (directly along Brickmakers Dr perhaps?

They have estimated the number of daily truck movements based on 2003 data, which is hopelessly out of date

They are proposing only 16 vehicle spaces, how will this work when they have two water trucks, a number of service vehicles and a fuel truck? Surely they can't expect their staff (20 of which could be assumed to be onsite at any one time), to park kilometres away and walk to work?

Dust Generation

The use of 'misting sprinklers' to control dust released is ludicrous., dust will be flying off the trucks entering site, driving around site, off loads that are dumped onto stockpiles, off the stockpiles themselves, and when the material is processed. When house-sized chunks of concrete are broken up, outside of the sheds, toxic silica dust will freely enter the airstream from the prevalent E/NE winds, and be carried the short distance of 200m to existing homes, ready to be breathed in by parents, children & pets. When the sprinklers fail, or are turned off outside of operating hours (they will not be running 24/7 that is guaranteed), this toxic silica dust, along with who knows what else will be free to blow around the site, blow over existing homes, and also be carried off to land in the Georges River itself, already an ecological disaster, but one that is being worked on.

The proponent's existing recycling facility at Camellia is a great generator of dust, with similar dust reduction systems in use as proposed in Moorebank facility – nearby residents (350m) are having to wash/scrub their houses daily. They claim their neighbours have no issues, they are talking about the industrial neighbours, not the residential a short wind gust across the river.

Misty sprays will be used to ensure stockpiles form a crust to stop any dust being generated, what about when the particles are too fine to be stopped by misting sprays, or when the dust that is present clogs up the sprayers, I am quite sure that they will not be misting the outside of their stockpiles, where the wind will carry silicosis-causing cement dust particles, ready to infect my family's lungs

Spraying water on piles of dust will just cause the dust to fly off anyway, and if the wind is strong enough (and it is in this area), the wind will blow the misting water away from the stockpiles, taking the dust with it, carrying it for kilometres and depositing it across homes, environmentally sensitive land, shopping centres & schools.

Noise

Noise of excavators with rock breakers breaking apart concrete chunks is louder than Benedict's current noise (which EA models their noise off)

Proponent frequently makes note of existing Benedict's noise, yet easily forgets that Benedict's are relocating, and building residential & a marina (how easy is it to forget a proposed development when you are the only one who objected to it). They make use of existing Benedict's noise, claiming it will help to mask their own noise generated

Assessment of noise levels is incorrect, as they state homes are over 500m from the site, when homes will be within 200m of the site

Measurement of existing noise levels is taken between existing Benedict's site (east of proposed site) and Eloura Cres (west of GF residential), and they think the noise found here would be higher than GF residential from their own site, ridiculous

I highly doubt that a noisy, dusty concrete and building waste recycling facility will not have a detrimental effect to local endangered wildlife

Noise recordings taken in Feb & March 2007 are apparently considered still relevant, especially when there is an additional few hundred homes between the MR site and where noise recordings were taken

Predicted traffic volumes for brickmakers drive are used to play down MR site's noise generating, claiming that this traffic noise will basically drown out the MR site's noise, claiming that all cars will be travelling at 60km/h on a 50km/h speed limited road – more flawed data in the out of date EA.

Visual Impact

The EA states that the crushers are 12m (primary) and 10m (secondary) high, how does the proponent intend to house these crushers inside up to 10m high and 8m high colorbond sheds? Surely he doesn't intend to bend the rules of the universe to allow something taller than the shed be housed inside it?

What happens to the 'negligible' visual impact when a bushfire roars through and burns out all of the greenbelt hiding the facility?

Under Visual Impact, proponent claims there is zero exposure of the land to existing residential, this is incorrect, as homes at the top of Bradbury Street can see the open area where the site is to be located, and the 6-storey unit blocks in construction on Nuwarra road would also have a great view of the surface of the site

Flooding Potential

The proponent says they will have a 10m wide wall of stockpiled material, of varying height, obviously this wall will not be in place for very long.

Flood waters can still enter site where the trucks enter

The EA says land is not suitable for building due to prior landfilling, how can it be suitable for buildings now (sheds, offices etc), and for heavy crushers etc?

The water runoff data throughout the EA is entirely contradictory, at some places saying all runoff will be captured in storage tanks, in other places saying that surface runoff will exit the site through openings in the 'wall' surrounding the site, running into the Georges River, and allowing an easy entry point for possible 'inland tsunami' floodwaters to enter the site, allowing all the toxic cement dust to flow freely through the waterways, causing unknown environmental havoc.

Parts of the EA say that they are going to be draining all surface runoff directly into the Georges river, that's a great idea for pollution, let's just allow concrete and asphalt dust directly into the environmentally challenged river.

Apparently, approved earthworks will protect the operational facilities from floodwaters, not the potentially toxic material stockpiles, which could wash away down river causing who knows what damage to the environment.

Water usage of 130kL daily, based on maximum used at existing facility – what they don't say is the huge amount of dust still generated at that existing facility and how the water misting sprays do nothing to stop it (Camellia facility, as seen on A Current Affair story March 2013)

Where they speak of 'only fractionally more overflow events' (from water storage tanks) – they mean to say 25% more, which is not the small fraction they claim.

Air Quality

They specify that there are few winds from N/NE, with the most predominant being from the NW. This is incorrect, the majority of winds are from the E/NE, with Southerlies and other general directions also occurring less frequently. Dust generated on site WILL be easily blown the short 200m to residential homes with young children, causing untold numbers of health issues

In conclusion, I have nothing against recycling, and nothing against industry. My issue is with the placement of said industry, there is a place for everything, and smack bang between two residential communities of over 1000 homes is not the place for a concrete recycling facility. Perhaps the proponent would do better to acquire land far from residential, in an industrial precinct for his industrial facility.

The proponent paid \$10,000 for this land 10-15 years ago, and is simply trying to put an out of place facility there, simply because he feels he can. I doubt if he would enjoy living 200m from one of his facilities.

Sincerely

Paul Phillips