TO SSD-81129958 30th September, 2026
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OBJECTION TO SSD-81129958 — WEST GOSFORD RESOURCE RECOVERY FACILITY EXPANSION: 30 & 38 Nells Road, West Gosford

To the Department of Planning, Housing and Infrastructure,

I am writing as a property owner in the local Central Coast area, to object to the proposed expansion of the West Gosford Resource Recovery Facility at 30 and 38 Nells Road.

This is not simply an extension of an existing business. The proposal would increase the facility from approximately **30,000 tonnes per year to 200,000 tonnes per year — almost seven times the existing approved throughput** — while expanding the operating area from approximately **7,890 m² to 24,570 m²** across the two properties, adding a new integrated entry, weighbridge, wheel wash, buildings, hardstand and stormwater infrastructure.

My concerns are:

- **The enormous increase in waste throughput**, from approximately 30,000 to 200,000 tonnes per year — a nearly seven-fold increase, on an operating area more than three times its current size.
- **The proposed 24-hour, 7-day dispatch and transport of material**, which is highly unreasonable and unnecessary for a facility in this location, with noise, truck movements, reversing alarms, loading, unloading and lighting extending into the night.
- **Site suitability.** Nells Road is zoned industrial, but it neighbours working businesses and other sensitive receivers identified in the project's own Noise and Vibration Impact Assessment (Appendix F). Industrial zoning is not a blank cheque for unrestricted activity.
- **The operator's documented EPA non-compliance history** — including official cautions, a stockpile-height breach and a $15,000 penalty notice — at a site now seeking to operate at more than six times its approved throughput.
- **Whether this much additional capacity is needed at all**, given the Central Coast already has substantial waste and recycling infrastructure, with many other recycling centres in the area.
- **The lack of transparency** around the apparent 200,000-tonne versus 300,000-tonne capacity referred to in different project material.

- **Environmental risk** — dust and air quality, noise, stormwater, groundwater, stockpiles, traffic, fire, waste contamination, vegetation clearing, threatened species and Aboriginal cultural heritage.
- **The need for actual, ongoing, independently verified monitoring**, rather than reliance on the proponent's predictions and modelling.
- **The adequacy of the environmental information** provided to the public and to the Department.

1. 24-Hour, 7-Day Dispatch Is Highly Unreasonable

My strongest concern is the proposed ability to dispatch and transport material **24 hours a day, seven days a week**. The project's own material states that waste receival hours would increase, while loadout and transport of sorted materials or residual waste could occur 24 hours a day, seven days a week at off-peak times.

I find it extremely difficult to understand why a construction and demolition waste facility needs to send trucks in and out throughout the night. Why should residents and nearby businesses have to accept heavy vehicle movements at midnight, 1 am, 2 am or 3 am — headlights, truck engines, reversing alarms, loading and unloading — and what is the demonstrated need for it?

The fact that this is an industrial area does **not** mean that anything goes, 24 hours a day. Nells Road contains established businesses — including printing and engineering operations such as Kwik Kopy Gosford and Power Clipper — with employees, customers and deliveries during normal hours. Why should they have to accept an effectively round-the-clock waste-dispatch operation next door simply because the land is zoned industrial?

More importantly, the project's own Noise and Vibration Impact Assessment (Appendix F) identifies the sensitive receivers that must be properly considered and protected. The Department should not accept a general argument that "it is an industrial area" and therefore overnight impacts do not matter. **Industrial zoning is not a licence for unrestricted night-time noise.**

A truck movement may be described as "off-peak" from a traffic perspective, but at 2 am it is certainly not off-peak for someone trying to sleep, or for a business trying to operate normally the next morning. Restricting waste receival hours achieves little if dispatch — trucks arriving and leaving, loading, reversing, vehicle alarms, lighting and processing noise — continues through the night. The EIS must clearly separate the hours of receival, processing and dispatch.

Dispatch should be restricted to reasonable daytime and evening hours unless the proponent demonstrates a compelling need, it must state the actual number, timing and routes of overnight truck movements so they can be properly tested.

2. A Massive Increase in Scale, Footprint and Industrial Activity

The proposal would lift throughput from approximately 30,000 tonnes per year to 200,000 tonnes per year — approximately **6.67 times the existing approved annual throughput**. It would expand the operating area from approximately **7,890 m² at 30 Nells Road to approximately 24,570 m² across 30 and 38 Nells Road**, with a new integrated entry, weighbridge, wheel wash, buildings, storage areas, hardstand and stormwater infrastructure.

That means substantially more trucks, more material handling, more stockpiles, more machinery, more processing and more opportunities for dust, noise and stormwater impacts. This is not “more of the same.” It is a substantially larger waste operation. The Department must ask a simple question: can this site and its surrounds actually accommodate an operation of this scale without unacceptable environmental and community impacts? I am not convinced that question has been adequately answered.

The Department must assess the proposal at its **maximum scale and maximum potential impacts** — traffic, dust, noise, stormwater, waste storage, fire, processing, vehicle movements and cumulative impacts — not on the assumption that the facility will operate on average days or that controls will work simply because they have been modelled. The public should not have to infer the true footprint from separate plans: every area of earthworks, hardstand, building, storage area, drainage structure, vegetation-clearing area and temporary construction area, and the final operational footprint, must be clearly shown.

A more-than-six-fold increase demands a corresponding level of evidence: genuine regional need, current regulatory compliance, environmental and infrastructure capacity, biodiversity and cultural heritage protection, traffic, stormwater and fire safety, air-quality and noise protection, and reliable operational controls. The question is not whether a 200,000-tonne facility can be designed on paper. The question is whether it has been demonstrated that **200,000 tonnes per year is actually required and that its impacts can reliably be managed in practice**.

3. The Operator's Non-Compliance History Matters

The Department must have regard to the documented environmental non-compliance history of the existing facility at 30 Nells Road, currently operated under EPL 20648:

- **2017 Official Cautions:** The NSW EPA reported that the operator, Economy Waste Group Pty Ltd, received Official Cautions concerning breaches of environmental legislation, including storing waste outside the licensed area and poor stormwater management.
- **December 2019 EPA Inspection:** Following an inspection, the EPA reported that waste stockpiles exceeded the 4-metre licence height limit and that required stockpile-height markers were missing.
- **February 2020 Penalty Notice:** The EPA issued a $15,000 penalty notice concerning these licence breaches.
- **Legacy of Delayed Due Diligence on Adjoining Land:** Historical planning context across the adjoining landholding at 38 Nells Road (such as historical iterations under DA/57682/2018) reveals a clear, recurring pattern of delayed environmental due diligence, protracted planning hurdles driven by complex biodiversity and threatened species constraints, and a reliance on deferred environmental investigations.
- **Unmanaged Reactive Risks:** This historical precedent indicates that environmental risks—particularly concerning sensitive local ecosystems, threatened flora and fauna habitats, and riparian zones near Freshwater Creek—have historically been managed reactively or pushed to later stages, a flaw the applicant is attempting to repeat in the current SSD-81129958 expansion proposal.
- **Failure on Fundamentals:** This track record highlights a recurring failure to manage the fundamentals of a waste facility: keeping waste within licensed boundaries, maintaining stockpile limits, and controlling stormwater.
- **Unproven Scale Capability:** It raises a serious question about the operator's ability to follow licence conditions when this proposal seeks to increase approved throughput to almost seven times its existing capacity.
- **Absence of Compliance Proof:** If the existing, much smaller facility has a documented history of breaches, the community should not simply be expected to trust that an operation almost seven times larger will be managed successfully without compelling, verified evidence of new systems, resources, and compliance controls.
- **Current Performance Unverified:** Current compliance under EPL 20648 must be proven, not assumed. The Department must establish whether existing operations are regularly inspected, monitored, or audited to confirm lawful operations before considering an expansion of this magnitude.

4. The Central Coast Is Already Well Supplied — Where Is the Need?

There is a legitimate planning question as to whether the Central Coast is already **well supplied, approaching saturation, or potentially over-supplied for particular waste streams**. Central Coast Council's own Resource Management Strategy states that "the Central Coast is well supplied with household waste and recycling infrastructure," and identifies substantial existing and approved capacity, including:

- **Buttonderry** — 250,000 tpa licensed total capacity, including 110,000 tpa directed to recovery;
- **Woy Woy** — 100,000 tpa licensed capacity, with a further identified opportunity for an alternative waste treatment facility of up to 115,000 tpa;
- **90 Gindurra Road, Somersby** — an approved 200,000 tpa C&D resource-recovery facility;
- **33 Pile Road, Somersby** — approved for approximately 99,000 tpa, principally non-putrescible resource recovery;
- **1 Vere Place, Somersby** — approximately 12,000 tpa of building and demolition waste;
- **21 Tathra Street, West Gosford** — an approved metal-transfer/recycling facility; and
- **the Somersby Materials Recovery Facility**, processing Central Coast household and commercial recyclables.

Gindurra Road alone is an approved 200,000 tpa C&D facility — the same scale and the same type of waste as this proposal. Differences between waste streams make detailed analysis more important, not less. The applicant must not simply assert rising demand; it must demonstrate exactly what regional capacity shortfall exists and why another 200,000 tonnes per annum is required. The Department should insist on a transparent regional capacity assessment showing existing and approved capacity, actual throughput, unused capacity, relevant waste streams, forecast waste generation and recovery rates, approved facilities not yet operating, and the specific additional capacity claimed. In particular:

- What waste streams cannot currently be accommodated?
- What capacity shortfall actually exists, and why does it justify a facility of this size?

These questions deserve real answers before the community is asked to accept a major increase in waste activity next door.

5. The 200,000 vs 300,000 Tonne Discrepancy

There is an unresolved and, in my view, deeply concerning discrepancy between the public description of this proposal — 200,000 tonnes per annum — and consultant material that refers to an assessment basis of up to **300,000 tonnes per annum**, reportedly including potential acid sulfate soils for transfer. That is a difference of 100,000 tonnes per year — not a trivial rounding issue.

A project of this scale must have an **unambiguous maximum capacity**. The Department and the public must know whether the application seeks 200,000 or 300,000 tpa; whether 300,000 tpa is assessed anywhere in the EIS; whether acid sulfate soils form part of the proposed waste stream; whether traffic, air quality, noise, stormwater, fire and waste-storage modelling was based on 200,000 or 300,000 tpa; and whether an approval based on the lower figure could later be used to justify operating at the higher one. The public is entitled to understand precisely what scale of development they are being asked to comment on.

6. Ecology, Bushland and Threatened Species (Pygmy Possums, Melaleuca Vegetation, Scrub Turpentine)

If native vegetation, bushland or mature trees are proposed to be removed, the applicant must identify **exactly what is being cleared, how much is being cleared and why it is necessary**. The first question is: **why cannot the project be designed to avoid the clearing?** Offsetting or future planting is not an automatic substitute for avoiding the loss in the first place.

The assessment must identify vegetation communities, threatened ecological communities, mature and hollow-bearing trees, fauna habitat, threatened-species habitat and impacts on ecological connectivity, and must specifically address threatened species that may occur in the locality, including **Eastern Pygmy-possum and other threatened mammals, bats, birds, reptiles, frogs and flora**.

Habitat matters as much as sightings: hollow-bearing trees, mature vegetation, understorey, fallen timber, feeding habitat, nesting and roosting habitat and fauna movement corridors. Appropriately timed and sufficiently extensive field surveys are essential. The absence of a threatened species during a limited survey is not proof that suitable habitat is absent.

Melaleuca vegetation also warrants specific investigation. This is not a hypothetical regional issue: NSW Government records identify Melaleuca biconvexa (Biconvex Paperbark) as occurring predominantly in the Gosford/Wyong area, with extensive mapped habitat across the former Gosford and Wyong LGAs. The species is vulnerable and can occur on private land and around waterways. Given the scale of clearing, earthworks, drainage changes and increased industrial activity proposed, the

Department should require a proper site-specific assessment of all Melaleuca vegetation and any potential threatened flora habitat before determining this application. The fact that the site is zoned industrial does not remove the need to identify and protect environmental values that may actually be present.

A further threatened species requires specific attention: **Rhodamnia rubescens** (Scrub Turpentine), which is listed as critically endangered. Project ecological material reportedly records this species on or immediately adjacent to the subject land. This is not a new or isolated issue for this location: a development application on the adjoining lot was refused by Central Coast Council in 2020 specifically because the applicant had not sufficiently avoided a Serious and Irreversible Impact to this same species. Given that history, the Department should require independent verification of how this application proposes to avoid or mitigate impacts to Rhodamnia rubescens on this site, rather than accepting a general assurance that impacts will be minimised. The question is the same one that led to refusal next door: has avoidance actually been demonstrated, or only asserted?

7. Aboriginal Cultural Heritage

The EIS must provide sufficient site-specific Aboriginal cultural heritage assessment **before** substantial ground disturbance is approved. A NSW Government archaeological assessment for the broader **West Gosford–Narara area** identified multiple vegetation and landscape communities and noted that less-disturbed portions can retain Aboriginal archaeological potential, including potential for Aboriginal artefacts and archaeological deposits.

That does **not** establish that artefacts are present at 30 or 38 Nells Road. It does demonstrate why the applicant cannot simply assume that an industrially developed site has no remaining archaeological potential. The Department must ensure that excavation, hardstand, drainage, access works and vegetation clearing have been properly assessed for Aboriginal objects and artefacts, modified trees, archaeological deposits, archaeological potential and other cultural heritage values. The principle is simple: **investigate first, disturb second.**

8. Stormwater, Groundwater and Leachate

Stormwater deserves particular scrutiny given the site’s documented compliance history. The EIS must demonstrate that the proposed system can manage the maximum operation, including significant rainfall events and system failures, by clearly identifying clean and dirty water separation, areas exposed to waste, drainage catchments, detention and treatment capacity, discharge points, pollutant pathways, overflow arrangements and the consequences if treatment systems fail or are overwhelmed. The existence of stormwater infrastructure does not establish that it is adequate at 200,000 tpa.

The proposal relies on hardstand and stormwater measures to manage contamination risk; project material describes Stage 1 road-base hardstand with geotextile and Stage 2 concrete hardstand as measures intended to protect groundwater. The EIS must explain why Stage 1 protection is sufficient for the first stage, how groundwater vulnerability was assessed, what contaminants could be generated, how leachate is prevented from entering soil or groundwater, what monitoring is proposed, and what happens if the hardstand or drainage system fails. It must **demonstrate** protection of groundwater — not simply assert that hardstand will provide it.

9. Dust and Air Quality

The project includes sorting, screening, size reduction, concrete crushing, timber shredding and material storage. Fine particulate matter and dust from concrete, masonry and other C&D materials demand rigorous air-quality assessment — at the **maximum operating scenario**, with unloading, crushing, screening, shredding, stockpiles and truck movements operating simultaneously, in dry conditions and high winds, and with failure or reduced effectiveness of suppression systems. The Department must be satisfied that dust controls remain effective at maximum throughput, not merely on average days.

10. Traffic

The EIS must give a transparent assessment of the additional heavy vehicles generated by 200,000 tpa: daily and peak truck movements, routes, vehicle types, operating hours (including overnight), intersection impacts, road capacity, cumulative heavy-vehicle movements and impacts during incidents or road closures. A more-than-six-fold throughput increase must not be assessed using assumptions based simply on the existing operation.

Mass balance and truck numbers. The EIS traffic material does not appear to be internally consistent with the throughput being sought. The applicant’s own vehicle schedule (TIA Appendix B) lists about 315 inbound loads a week, using payload assumptions that are at or above typical loads for mixed C&D and C&I waste in 4.5 t and 8 t skip and hook-lift trucks. On those figures, the scheduled inbound fleet can carry roughly 138,500 tonnes per year — well short of 200,000 tpa, let alone the 300,000 tpa referred to elsewhere in project material. Outbound product and residual-waste vehicles (reportedly around 163 vehicles, 326 movements a week) also appear to sit outside the daily and peak-hour totals used for the intersection modelling. If every tonne received must eventually leave the site as product or residual waste, the number of truck movements actually required at the proposed scale is substantially higher than what has been modelled — by a factor of roughly two to three on the figures available.

Intersection capacity. The TIA reportedly applies its own criterion that a degree of saturation above 0.8 indicates unsatisfactory give-way operation, yet also reports the Nells Road/Manns Road intersection approaching or exceeding that threshold in the 2036 design year with the development included, while still concluding a satisfactory level of service with no upgrade required. If the corrected truck numbers above are closer to the actual requirement, that intersection would be expected to exceed its own stated capacity threshold, and the Department should require the modelling to be re-run on validated vehicle numbers before any reliance is placed on it.

Weighbridge queuing and on-site stacking. Project material places the new weighbridge at the integrated entry to the site, with the wheel wash immediately beyond it. Every inbound truck must stop and be weighed before proceeding, so a weighbridge positioned at the gate leaves no on-site space for trucks to queue ahead of it. In a peak period this would push queuing trucks back onto Nells Road itself, blocking access to neighbouring businesses and extending towards the Manns Road intersection — a road network the Department's own traffic material already treats as operating near capacity. I have not seen any assessment of queue length or on-site stacking capacity in the exhibited material. The Department should require the weighbridge to be set back a sufficient distance from the site entry to hold queued vehicles on site, demonstrated against corrected peak-hour arrival numbers, including the proposed 5am start to receival.

11. Fire and Emergency Risk

The proposal includes storage of recovered products and residual materials, including timber and other potentially combustible materials. Project material states that storage bays are proposed to be constructed in accordance with Fire and Rescue NSW's waste-facility guidelines. That is a starting point, not an answer. The EIS must clearly demonstrate maximum combustible storage quantities, separation distances, fire detection, suppression capacity, emergency access, water supply, emergency containment and impacts on surrounding vegetation and properties — and must consider credible control failures rather than assuming every protection system operates perfectly.

12. Waste Acceptance and Contamination Risk

A resource-recovery facility depends on effectively identifying and rejecting inappropriate waste. The EIS must clearly explain what wastes will be accepted and rejected, how incoming loads are inspected, how contaminated loads are isolated, how asbestos-containing material is identified, and how rejected waste is stored and removed — and how these systems will cope with a much larger number of incoming loads. The greater the throughput, the greater the importance of robust inspection and contamination controls. The Department must be satisfied that increased throughput will not undermine the ability to inspect incoming loads properly.

13. Cumulative Impacts and Operational Failure

This proposal must not be assessed in isolation. The Central Coast already contains numerous waste, recycling, resource-recovery and industrial operations, so the EIS must consider cumulative traffic, dust, noise, stormwater, industrial activity, vegetation loss, habitat fragmentation and environmental risk. The relevant question is: **what is the cumulative consequence of substantially increasing waste-processing activity in an area that already contains significant waste and industrial infrastructure?**

The EIS also appears to place substantial reliance on engineered controls. The Department must require assessment of what happens when those controls do not work as intended: stormwater systems overwhelmed, dust suppression failure, wheel-wash failure, excessive stockpiling, fire, power failure, equipment failure, contamination of incoming waste, accidental release, extreme rainfall and unusually high waste inflows. The Department must understand the consequences of failure, not merely the intended operation of the facility.

14. Predictions Are Not Proof — Actual Monitoring Must Be Required

A facility processing up to 200,000 tonnes of construction and demolition material raises real risks around dust and airborne particulate matter, noise and vibration, truck emissions, stockpile management, stormwater contamination and runoff from larger hardstand areas. At this scale, environmental management must be judged on actual performance, not predictions.

How will the Department verify that dust controls actually work during dry, windy conditions? That stockpiles remain properly managed? That stormwater controls keep working as material volumes increase? That noise stays within predicted limits — and what happens if night-time truck movements cause impacts that were underestimated? Given the facility's own compliance history, the community should not be expected to discover these problems only after the facility is operating at full scale. **A management plan is not proof that a control will work. Actual performance is.** The Department must require ongoing, independently verifiable monitoring of noise, dust, stormwater and stockpiles, with a clear mechanism for enforcement if performance falls short of what was predicted.

Once a facility like this is approved, it is very difficult for surrounding residents and businesses to reverse the consequences of an approval that was too permissive. The community should not have to spend years complaining before meaningful action is taken. If the operator is confident the facility will perform exactly as predicted, it should have no difficulty demonstrating that through real, ongoing monitoring.

15. The EIS Does Not Currently Provide Enough Information for a Sound Decision

One major concern is the **adequacy and sufficiency of the environmental information** supporting this proposal. An EIS for a project of this scale must provide clear, site-specific, quantitative and independently verifiable evidence showing what the impacts will be, where they will occur, their likely magnitude, what environmental values will be lost or affected, how impacts will be avoided or minimised, whether mitigation will actually work at maximum throughput, and what happens if it fails.

The Planning Portal identifies **39 EIS attachments** for this SSD. The question is whether that material collectively provides a clear and reliable basis for determination. In my view, significant questions remain, and the public should not be expected to reconstruct the environmental consequences from assumptions, incomplete information or scattered technical material.

The burden of providing the evidence needed to show the proposal is acceptable sits with the applicant — not the Department, and not the community. Where important information is uncertain, that uncertainty must be identified. Where further ecological, heritage, traffic, environmental or engineering investigation is required, it must be undertaken **before** determination. Where an impact can be avoided through a different layout, that alternative must be properly considered.

The Department has already assessed and approved a major resource-recovery facility in the region using extensive technical scrutiny, staged environmental performance requirements and post-commissioning verification.

The Department must require this proposal for a **major resource-recovery facility at Nells road to require more than predictive modelling and broad assurances**. They require measurable standards, monitoring, verification and consequences when environmental performance does not match the approved assumptions.

That is the standard the Department should apply here.

16. Overall Planning Concern

This proposal must not be treated as an existing recycling facility simply seeking permission to process more material. It is a **fundamental change in the scale, intensity and environmental footprint of the operation**: nearly seven times the throughput, more than three times the operating area, an additional property, and the ability to dispatch material 24 hours a day, seven days a week. Taken together, the issues in this letter show that the proponent has not yet made the case for an approval of this magnitude:

- **Need is unproven.** Council describes the Central Coast as well supplied, and substantial capacity already exists or is approved across the region.
- **The scale itself is unclear.** A 100,000-tonne discrepancy between 200,000 and 300,000 tpa is not a technical detail.
- **Night-time operation is unjustified.** Industrial zoning is not an entitlement to generate heavy-vehicle noise throughout the night beside working businesses and other receivers.
- **Compliance capability is unproven.** The 2017 Official Cautions, the December 2019 stockpile-height matter and the February 2020 penalty notice go directly to whether this operator can manage a facility almost seven times larger.
- **Risk multiplies with scale.** Noise, vibration, dust, air quality, stormwater, stockpiles, traffic, fire and contamination risks must be assessed at maximum throughput, not under favourable or average conditions.
- **Environmental and cultural values are unprotected until properly assessed.** Vegetation clearing, threatened species and potential habitat, and Aboriginal cultural heritage all require site-specific answers before any ground is disturbed.

17. What the Department Must Establish Before Approval

The public is entitled to clear, evidence-based answers to the following before any determination is made:

1. **What regional capacity shortfall actually requires this expansion**, and why does another 200,000 tpa need to be added to a region Council describes as well supplied?
2. **What is the true maximum capacity being assessed — 200,000 or 300,000 tonnes per annum** — and why does project material refer to both?
3. **What evidence demonstrates that the operator can reliably comply** with the substantially greater environmental obligations created by this expansion, and is the existing facility currently compliant with EPL 20648?
4. **Why is 24-hour, seven-day dispatch necessary**, and what will the actual number, timing and routes of overnight truck movements be?

5. **Which nearby businesses, residential properties and other sensitive receivers will be affected**, and what specific protections will apply to them?
6. **How will actual noise and vibration be monitored after commissioning**, and what happens if impacts exceed predictions or approved limits?
7. **How will dust and air-quality performance be verified** under maximum throughput and adverse weather conditions?
8. **How will stockpiles, stormwater and groundwater be protected** as material volumes and hardstand areas increase, including during extreme rainfall?
9. **Can the surrounding road network safely accommodate** the increase in heavy-vehicle movements, including overnight movements?
10. **What vegetation will be cleared, what habitat will be lost, and which threatened species could be affected?**
11. **What Aboriginal cultural heritage potential exists**, and how will it be assessed before ground is disturbed?
12. **How much waste, and how much combustible material, will actually be stored on site**, and how will fire risk be controlled?
13. **What happens if a critical environmental control fails**, or the facility operates at maximum capacity under adverse conditions?

The Department must establish the answers before granting approval.

CONCLUSION

The proponent must be required to prove the need, prove the capacity, prove the controls, and prove that the facility can operate safely and compliantly at its maximum proposed scale — before approval.

In my opinion, SSD-81129958 should be refused.