2nd October, 2026

Maroubra NSW To: NSW Department of Planning and Environment
Re: SSD-81129958 – West Gosford Resource Recovery Facility Expansion
30 and 38 Nells Road, West Gosford

FORMAL OBJECTION

I am writing to object to the proposed expansion of the resource recovery facility at 30 and 38 Nells Road, West Gosford.

I work in the building and construction industry, and therefore have a professional interest in projects of this nature. I have trucked waste material off our jobs to, and picked up aggregates from resource recovery facilities many times over the past decades in my time working in the industry. I have seen some good facilities and some sub-par facilities. I understand the importance of having facilities that can properly handle construction and demolition waste, and which are held to the correct standards and regulations. Recycling and recovering building materials is necessary. However, I do NOT believe the information provided in this SSD justifies increasing this facility to the scale proposed. The assessment leans heavily on modelling and desktop figures, and does not properly deal with how a site this size actually runs day to day. I believe the EIS needs to be reworked, based on how the site will actually operate and not just how it performs in a model, before the SSD can be properly assessed.

As a builder, I understand the high importance of prioritising all design and construction decisions before the construction process starts, especially when it comes to environmental controls and traffic. Left until later, they fall short of standards and they don't work. Everything needs to be in place and proven before the facility opens, so it runs properly from day one. These issues can't be an afterthought.

Key points to support the objection

- **Dust, noise and amenity:** Crushing, tipping and truck movements all scale up with throughput. The EPL already has specific dust and material-tracking requirements.
- **Stormwater, fire and stockpiles:** Much larger stockpiles need proven stormwater and fire controls. The Department should look at heavy rain, fire, power loss and over-stockpiling, not just normal conditions.
- **Environment and Aboriginal heritage:** The site needs a proper survey for threatened species and habitat (for example pygmy possums) and for Aboriginal archaeological potential, not an assumption based on past industrial use.
- **24-hour dispatch:** Loadout and transport could run 24 hours a day, 7 days a week. That means night-time heavy vehicle movements, reversing noise, headlights and site lighting near neighbours.
- **Weighbridge queuing:** The 20 m weighbridge sits at the single gate to 38 Nells Road, with no room on site for trucks to wait. Queues would spill onto Nells Road, a dead end, and back up towards Manns Road. The traffic report doesn't appear to assess queue length. The suggested fix is a setback of at least 28 m.
- **Scale of the increase:** Throughput goes from about 30,000 to up to 200,000 tonnes per year, almost seven times the current approval. The operating area grows from about 7,890 m² to 24,570 m². This is a major change, not a minor upgrade.

- **No clear need shown:** The Central Coast Resource Management Strategy 2020–2030 describes the region as well supplied with waste and recycling infrastructure. Large facilities are already approved, including 200,000 tpa at 90 Gindurra Road and about 99,000 tpa at 33 Pile Road, Somersby. The application doesn't show what shortfall this site would fill.
- **Unclear project scale:** The Planning Portal says 200,000 tpa, but earlier consultant material said the EIS was assessing up to 300,000 tpa, including acid sulfate soils for transfer. That 100,000 tpa gap leaves it unclear what the public is being asked to comment on.
- **EPA compliance history:** Under EPL 20648, the site has had Official Cautions in 2017, stockpiles over the 4 m limit in December 2019, and a $15,000 penalty notice in February 2020. The question is why controls that struggled at 30,000 tpa should be trusted at 200,000 tpa.
- **Modelling is not enough:** The EIS relies on modelling and desktop figures and doesn't deal with how a site this size runs day to day. It should be reworked before the SSD is assessed.

My concerns in more detail:

1. DUST, NOISE AND AMENITY

Crushing, tipping, loading and truck movements all scale up with throughput. The EPA licence already sets specific requirements for dust and for tracking material off the site, and noise gets worse when it is combined with loading through the night. The Department should look at how the site will actually run day to day, not just whether each piece of equipment meets an assessment criterion.

2. STORMWATER, FIRE AND STOCKPILES

A much larger operation means much larger quantities of material handled and stored. The proposal needs to show that stormwater, stockpile, fire protection and emergency arrangements can cope at that scale, especially given the site’s previous stockpile and stormwater issues.

The Department should look at what happens in heavy rain, equipment failure, fire, power loss or over-stockpiling. A facility this size needs practical contingency arrangements, not just plans that work under normal conditions.

3. ENVIRONMENT AND ABORIGINAL HERITAGE

The expansion increases the area used and the intensity of the operation, so site-specific assessment matters. It should properly consider threatened species and habitat, including species such as pygmy possums, rather than assuming an industrial site has no environmental value.

The same goes for Aboriginal heritage. Archaeological work around West Gosford–Narara shows that less-disturbed areas can retain archaeological potential, including possible sandstone-related features. That doesn’t prove artefacts are on the Nells Road site, but it does mean the site should be properly surveyed, not assessed on assumptions about its past industrial use.

4. 24-HOUR DISPATCH

While waste receival has set operating hours, project material states that loadout and transport of sorted materials or residual waste could occur 24 hours a day, 7 days a week. There is a big difference between a facility that works normal daytime hours and one dispatching trucks through the night.

For neighbours, that means heavy vehicle movements, reversing noise, headlights, site lighting and the loss of quiet periods.

5. WEIGHBRIDGE QUEUING

Anyone who has worked around trucks and tips knows every inbound truck has to stop and get weighed. The scoping report puts the new 20 metre weighbridge and office right at the entry to 38 Nells Road, with the wheel wash at the end of it. That's a single gate for trucks coming in and going out, and nowhere on site for a truck to wait its turn.

On a busy morning, trucks lined up for the weighbridge will be sitting out on Nells Road, blocking neighbouring businesses and backing up towards Manns Road, in a road network the traffic report already models as at capacity. Nells Road is a dead end, so there's nowhere else for them to go. As far as I can tell, the traffic report doesn't look at queue length at all, or at how many trucks can be held on site. That matters even more with receival opening at 5am.

It's not a hard fix. Set the weighbridge back at least 28 metres from the entry so the queue sits inside the site, and show that it works against the real peak-hour numbers.

6. SCALE OF THE INCREASE

The existing approved throughput is about 30,000 tonnes a year. The proposal is for up to 200,000, almost seven times the current approval. The operating area also grows from about 7,890 to 24,570 square metres, with additional hardstand, processing, storage, sorting and crushing areas and weighbridge infrastructure.

From an industry point of view, that is a much more intensive operation. It is a major change, not a small upgrade, and the Department needs to consider what it means for the surrounding area in real terms.

7. NO CLEAR NEED SHOWN

Central Coast Council's Central Coast Resource Management Strategy 2020–2030 states: "The Central Coast is well supplied with household waste and recycling infrastructure." Large facilities are already approved, including 200,000 tonnes a year at 90 Gindurra Road and about 99,000 tonnes a year at 33 Pile Road, Somersby, along with other facilities across the region.

Different facilities take different materials, so these capacities can't simply be added together. But the application needs to show what actual shortfall exists and why another 200,000

tonnes a year is needed at this location. A general need to recycle construction waste is not enough to justify a project this size.

8. UNCLEAR PROJECT SCALE

The Planning Portal describes a facility receiving up to 200,000 tonnes per annum of construction and demolition waste. Earlier consultant material stated the EIS was being prepared to assess a maximum of 300,000 tonnes per annum, including potential receipt of acid sulfate soils for transfer only.

This is not a minor wording issue. It is 100,000 tonnes every year, and it leaves the public unsure what they are being asked to comment on. What exactly is the Department assessing?

9. EPA COMPLIANCE HISTORY

The site's EPA licence, EPL 20648, has controls on stockpile heights, operating hours, dust, stormwater and the amount of waste permitted. EPA records identify:

- Official Cautions in 2017 concerning matters including waste being stored outside the licensed area and poor stormwater management;
- a December 2019 inspection where stockpiles were found above the permitted 4 metre height and height markers were not in place; and
- a February 2020 $15,000 penalty notice concerning alleged licence breaches.

If the existing facility already has a documented history of stockpile-height and stormwater problems, why should the Department approve an operation almost seven times larger without an exceptionally rigorous assessment of whether the proposed controls will work at 200,000 tonnes per year?

I also consider it reasonable to ask whether the existing operations are being regularly inspected, monitored or audited to confirm they are operating lawfully and consistently with EPL 20648.

10. MODELLING IS NOT ENOUGH

The EIS leans heavily on modelling and desktop figures and doesn't properly deal with how a site this size actually runs. A model shows what should happen on a good day. It doesn't show what happens on a wet Monday with trucks lined up at the gate. The EIS should be reworked, based on how the site will actually operate, before the SSD is assessed.

CONCLUSION

I support sensible recycling and recovery of construction materials. And I support the approval of resource recovery facilities that have been assessed, designed, constructed and operated in the right way, that is up to standard and regulation.

This proposal takes a site from about 30,000 tonnes a year to 200,000, almost seven times its current approval, on an operating area that more than triples. The application hasn't shown the Central Coast needs it. It doesn't make clear whether 200,000 or 300,000 tonnes a year is being assessed. It allows 24-hour loadout, with a weighbridge at the gate that will push

queues onto Nells Road. And it comes from a site with a documented EPA non-compliance history on stockpile heights and stormwater, asking the public to trust that the same controls will hold at that scale.

These are not small gaps in the paperwork. They go to whether this site can handle what is being proposed, and an EIS that relies on modelling is not enough to approve an expansion of this size.

I object to SSD-81129958 and ask the Department to reject the proposal. At the very least, it should not be assessed any further until the EIS is reworked to deal with these issues properly.

Kind regards,

Matthew