

STATE SIGNIFICANT DEVELOPMENT SSD-10446
PROPOSED RESOURCE RECOVERY CENTRE
275 Adams Rd
LUDDENHAM

We firmly OPPOSE:

- **the construction of a Resource Recovery Centre at 275 Adams Road, in or near the Luddenham Village and surrounds; and**
- **24 hour per day, 7 days per week operation of any such facility; and**
- **any approval for Adams Road to be used for heavy vehicles.**

1. Consultation

The Consultation Strategy within the proposal does not adequately address engaging with residents of the surrounding area.

There are only 8 residential premises identified as being directly affected by the proposal. However, the continued utilisation of the quarry (300,000 tonnes per annum¹) and the proposed resource centre (600,000 tonnes per annum²) will add hundreds to, potentially, thousands of heavy vehicles to the road network immediately surrounding the centre and the local Luddenham area.

Residents of the Luddenham village and Adams Road/Northern Road have not been contacted directly and consulted for any proposal and, as such, their concerns have not been taken on board.

2. General Impacts

Transporting 600,000 tonnes of waste per year 24 hours per day, 7 days per week³, would mean increased use of local roads and noise. This amount of usage by heavy vehicles is of concern to the local residents and those living along Adams Road.

Noise and exhaust fumes from hundreds to thousands of extra heavy vehicles at all hours, increased traffic on local roads all negatively affect residential quality of life and the safety of local residents.

This area is not a “terra nullius” and has a vibrant village and populated rural surroundings.

The proposal to seek to use Adams Road to access the site means using the old and new Northern Road/Adams Road intersections would directly and negatively affect local residents. Discussion within the report suggests that Adams Road will be upgraded. ***We oppose the use of Adams Road for heavy vehicle traffic from the two Northern Road intersections..***

Any vehicles seeking to access the site should be directed to use only Elizabeth Dr/Adams Road intersection for access.

3a. Current Northern Road intersection with Adams Road

Heavy vehicles should NOT use Adams Road from the intersection with the Northern Road (current alignment) as it has substantial suburban and other residences located along its alignment.

1 See the Proposal, 1.2.3 Page 2

2 Ibid, 2.3.1 Page 13

3 Ibid, 2.3.3 Page 13

There is considerable local traffic to the Luddenham Public School, Holy Family School and businesses along the Northern Road as well as residents and visitors gaining access to their houses. Adding heavy vehicles to that road will be unsafe and extremely problematic for residents and visitors.

3b. New Northern Road alignment and intersection with Adams Road

If the proposed resource recovery centre has heavy vehicles travelling along the new Northern Road alignment and intersection with Adams Road, this will affect dwellings along Eaton Road and Adams Road as well as the village of Luddenham and residents where the vehicles continue along Northern Road as it heads toward Elizabeth Drive.

Noise, dust and safety issues arise from a huge increase in heavy vehicle usage for all the local residents and users of the road. ***Adams Road, from the new and old alignment of The Northern Road should not be used for heavy vehicle traffic.***

A 24 hour, 7 day per week operation with heavy vehicles using the roads in the immediate vicinity of Luddenham will greatly and adversely affect residential life and daily activities.

The only section of Adams Road that we consider could be considered accessible by heavy vehicles is the section which is between Elizabeth Dr and the entrance off Adams Road of the proposed facility.

4. Noise

Apart from the noise of the increased heavy vehicle traffic for the proposed centre, undertaking recycling activities such as crushing building waste will cause noise, along with the use of machinery to transport it around the site. For example, the sound of vehicle reversing “beepers” carries for kilometres (as we can attest with the current construction of the new Northern Road alignment) and will affect many other residents.

Using commercial or industrial levels to assess noise⁴ is not appropriate to the current situation and the land use. Using future ANEF noise levels does not take into account the residential and other business impacts of the noise from the proposed resource recovery centre. As the Table 6.1 outlines, there will be an impact on residences etc up to 1500m from the centre. This also doesn't take into account the traffic noise, which “is to be assessed”.

5. Dust and Pollution

Heavy vehicles carrying loads of building and other material and increased heavy vehicle emissions will affect the residents in the Luddenham village and surrounding properties, including those not connected to town water and relying on roof run-off and dam water.

This will also affect the run off and flow into water catchment areas such as Cosgrove's and Oakey Creeks.

6. Water Catchment

Non-recyclable and asbestos waste should NOT be disposed of in the used quarry site. Run-off from the proposed resource recovery centre is of concern and a leachate pond would be expected to have some contaminants. In heavy rain events, the possibility of run off of contaminated material is increased and even where not contaminated, will affect the normal flow of the two nearby creeks which end up in South Creek.

4 Table 6.1 Preliminary Environmental Review and Approach to Assessment, page 25

The lack of a groundwater assessment⁵ due to the “design of the resource recovery centre” does not fully take into account possible groundwater issues and such an assessment should be undertaken.

We note that the Advisian Report on the South Creek Catchment Flood Risk Assessment⁶ currently on display on the Liverpool City Council website, shows the quarry and proposed resource recovery site to be at the boundary of the upstream inflow for both Oakey and Cosgroves Creeks and flood affected. The report states that “...shorter storm durations such as the 2 and 9 hour storms generate the largest flows along many of the smaller tributaries.”⁷ As such we are concerned that the potential for issues from the proposed Resource Recovery Centre and the leachate ponds directly adjacent to Oakey and Cosgrove Creeks are largely dismissed within the application and could cause problems for the catchment area.

7. The Site and Surrounds

This site sits within Primary Production and/or future Agribusiness zoned land. A Resource Recovery centre detracts from the agricultural and residential nature of the surrounds. To infill the quarry in the future with unrecyclable materials including asbestos is not appropriate in this area or for future agricultural use.

The NSW Government, Western Sydney Planning Partnership, local Councils and other organisations should be working to protect the Luddenham village and environs from adverse impacts to the area, rather than seeing it as one big greenfields site awaiting any and every opportunity to degrade it through industrial and other development.

Conclusion

We strongly oppose the proposed Resource Recovery Centre at 275 Adams Road Luddenham, concur with the list of issues contained in the Issue Identification of the consultation attachment (table 4.1⁸) and state the following effects have not been considered:

- Residents of Luddenham have not been consulted and as such their concerns have not been considered in this application.
- Adams Road from the intersection with new and old Northern Road should not be used to access the site. Maintaining the three tonne vehicle limit on Adams Road is essential to protect the residents of Luddenham village and immediate surrounds.
- Transport noise, huge numbers of heavy vehicles and pollution will directly and negatively impact the safety and daily life of residents in Luddenham village and along the route through noise, sleep disturbance, vibration and road/air pollution.
- Walled product bays will be open to the elements.
- Water course issues are not adequately considered and largely dismissed from the application.
- 24 hour operation will directly affect residents in the Luddenham and extended area: the amount of heavy vehicle traffic generated and that noise travels such that traffic as far afield as Elizabeth Drive can be heard in the village at night.

5 Ibid, page 26

6 Wianamatta (South) Creek Catchment Existing Flood Risk Assessment, Extract for Liverpool City Council, July 2020, Diagrams B1, B2 and D2 refer pages 47,48 & 55 of 60

7 Ibid, page 15.

8 Table 4.1, Community Engagement Strategy, page 8

We agree with the list of issues identified in Table 4.1 (see below) and consider these have not been adequately addressed for Luddenham residents.

ATTACHMENT

Table 4.1 Issue identification

Environmental aspect Potential impact on community

Noise and vibration

- daytime noise
- night-time noise
- sleep disturbance
- vibration

Air quality/dust emission

- dust emissions
- impacts to airport operations

Traffic and transport

- additional light and heavy vehicle movements
- road safety
- road network capacity
- traffic congestion (particularly to emergency services)
- road surface damage

Hazards and risks

- dangerous goods transportation
- attraction of wildlife/vermin
- fire hazard
- risks to safe airspace

Visual

- change in visual landscape character
- lighting impacts
- design of RRC
- potential for litter

Surface water

- erosion and sediment control
- surface water contamination
- attraction of wildlife

Biodiversity

- impacts to native vegetation
- impacts on the Oakey Creek riparian corridor