

**PROPOSED RESOURCE RECOVERY CENTRE – SSD-10446  
275 Adams Road, LUDDENHAM.**

**We are opposed to the construction of a Resource Recovery Centre in Luddenham adjacent to the central Village area. We also oppose the use of Adams Road for heavy vehicle traffic.**

**Consultation**

The Consultation Strategy has not engaged with the residents of Luddenham. In fact only 8 residential premises have been identified as directly affected by this proposal.

We strongly disagree with this assumption given the close proximity to the village centre and the proposed haulage of 300,000 tonnes per annum out of the quarry and 600,000 tonnes per annum into the waste facility. This is 900,000 tonnes per annum total with an estimated 20-25,000 loaded truck movements and up to the same number unloaded (Assuming 40 tonne/truck). This will impact the local road network and therefore the residents of the greater Luddenham area who should be included in this consultation process.

**General Impacts**

The transportation of the 600,000 tonnes of waste per year 24 hours per day, 7 days per week is untenable and contrary to the residential and rural zoning of the area. Noise, heavy vehicle movements, dust generation, odour and general increase in air , visual, noise and water pollution is of concern to the residents of the Luddenham village and greater area. These all negatively affect residential quality of life, the health and the safety of local residents and as such is not compatible with the existing land use and zoning in the area.

The proposal to use Adams Road to access the site ensures the maximum negative impact on Luddenham as the old and new Northern Road/Adams Road intersections would be utilized. No attempt has been made to minimize the negative effects of the proposal on Luddenham Village by restricting the use of Adams Road for movements to and from the site from Elizabeth Drive only. The use of Adams Road from the two Northern Road intersections should not be allowed in this proposal.

**1. Current Northern Road intersection with Adams Road**

This area should not be open to heavy vehicles and the weight restrictions on Adams Road should remain especially in within the Luddenham Village area and close surrounds. This is a residential area with 2 schools, 3 places of worship and a number of small businesses. Heavy haulage 24/7 is incompatible with the existing residential and rural land uses and zonings.

**2. New Northern Road alignment and intersection with Adams Road**

This area should not be open to heavy vehicles and the weight restrictions on Adams Road should remain especially in within the Luddenham Village area and close surrounds. This is a residential area with 2 schools, 3 places of worship and a number of small businesses. Heavy haulage 24/7 is incompatible with the existing residential and rural land uses and zonings.

The only feasible section of Adams Road that could be used by heavy vehicles is the very short section between Elizabeth Dr and the proposed entrance of the facility off Adams Road.

**Noise**

We are currently only too aware of the impact of noise in the Luddenham area at the moment with the ongoing road works and the excavation, tree felling, tree chipping and associated heavy haulage and machinery movements associated with the Badgerys Creek airport. Neither of these projects are

24/7 so some respite for residents does occur. However this proposal is for 24/7 operation with the use of heavy haulage, dumping, crushing, excavation and transportation around the site..

The use of commercial or industrial noise levels to assess the proposal is not appropriate given the current residential and rural land use and zoning. The use of future ANEF noise levels is not valid nor does it include the heavy haulage noise pollution which “is to be assessed” and as such is unacceptable.

### **Dust and Pollution**

Many residents of Luddenham rely on the harvesting of rainwater from their roof tops as they are not connected to the mains water supply from Warragamba Dam.. The dust and air pollution generated by the proposed enterprise and the associated heavy haulage will pollute the water supplies of these residents.

This proposal will have a severe and negative impact on the environmental water flows of the local creeks, dams and land drainage into Oakey and Cosgrove Creeks ultimately flow into South Creek and the Nepean River. Any areas north of Penrith who receive their water supply from the North Richmond water plant will be negatively impacted.

It is proposed that this facility would accept “asbestos”. The haulage, dumping and disposal of “asbestos” is incompatible with the residential nature of the area.

### **Water Catchment**

Failure to undertake a comprehensive groundwater assessment should render this application incomplete and as such the proposal should be immediately rejected. This is an extreme oversight given the site sits between two creek and on a site listed in the Liverpool City Council draft Wianamatta South Creek Flood Study. (<https://www.liverpool.nsw.gov.au/council/have-your-say/public-exhibitions-and-notice>)

The requirement of a leachate pond or series of ponds speaks to the toxic potential of this proposal. Any estimates made regarding the capacity of a leachate pond will have been carried out during a protracted drought period and not be valid for average annual rainfall let alone flood events.

### **The Site and Surrounds**

The proposed site of this waste facility falls within Primary Production and/or future Agribusiness zoned land and is not compatible with either zoning. The facility will be a 24/7 source of high levels of air, light, noise, and water pollution whilst being a visual scar upon the landscape and the local environs. This proposed facility is not compatible with the current or future land uses in the Luddenham Village and the greater area.

### **Conclusion**

We oppose the proposed Resource Recovery Centre at 275 Adams Road Luddenham. We refer you to the items listed in Table 4.1 in the Issue Identification.

Each of the listed items in Table 4.1 will negatively impact the residents of Luddenham Village and the greater area and we consider this waste facility is incompatible with current residential and primary production land uses as well as the future zonings of Residential, Agribusiness and Environment and Recreation. It is apparent that such a facility would negatively impact the health, well-being and prospects of the residents of the area and the environment itself.

#### **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