

16 September 2020

Director – Industry Assessments, Planning and Assessment  
Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

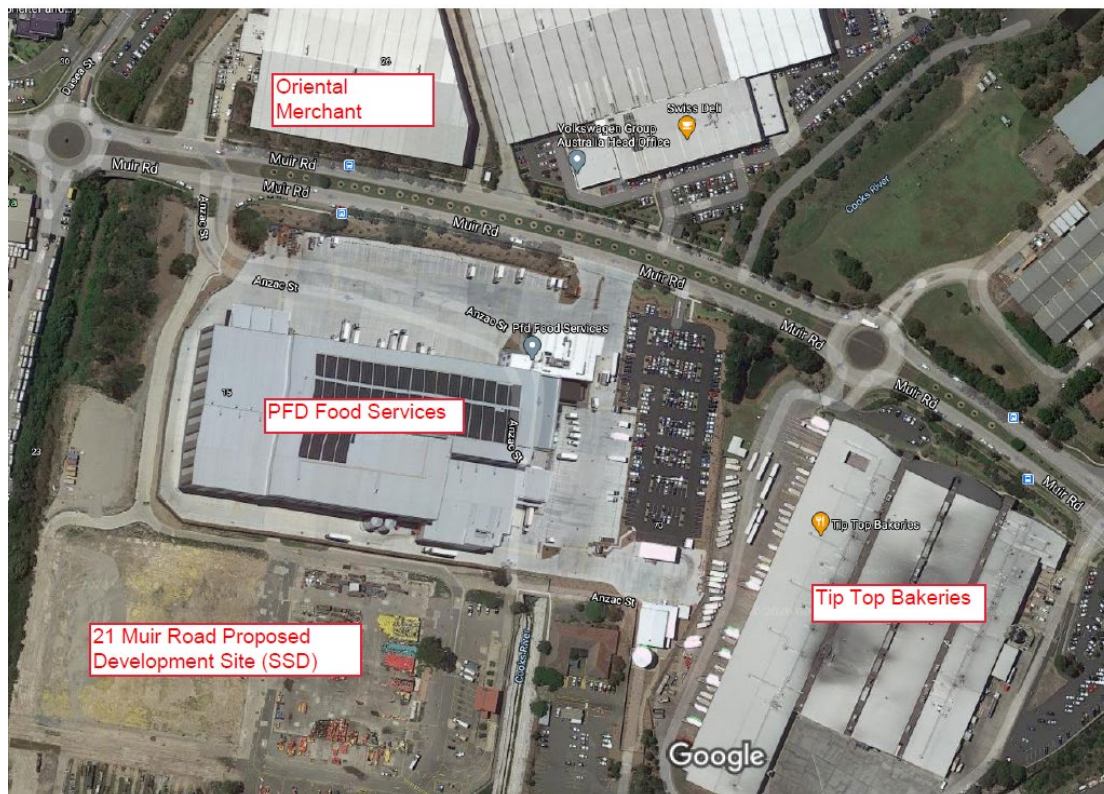
Attention: William Hodgkinson, Team Leader – Industry Assessments

Dear William,

**RE: Chullora Materials Recovery Facility (SSD-10401)**

I refer to the notice of exhibition for the State Significant Development (SSD-10401) at 21 Muir Road, Chullora for the construction and operation of a materials recovery facility (MRF) with a maximum throughput up to 172,000 tonnes per annum of waste. I understood the MRF would process co-mingled and source separated dry waste from municipal, commercial and industrial sources, including paper, cardboard, glass, plastic and aluminium.

Mecone NSW Pty Ltd act on behalf of Oriental Merchant Pty Ltd, an adjoining landowner at 26 Muir Road, Chullora. We have reviewed the supporting documentation, including the Environmental Impact Statement, prepared by Arcadis, and note several omissions in the documentation. As such, we raise the following concerns, which we ask to be addressed.



**Figure 1.** Subject site to the south and Oriental Merchant site to the north (Source: Google Maps).

## Air Quality Impact

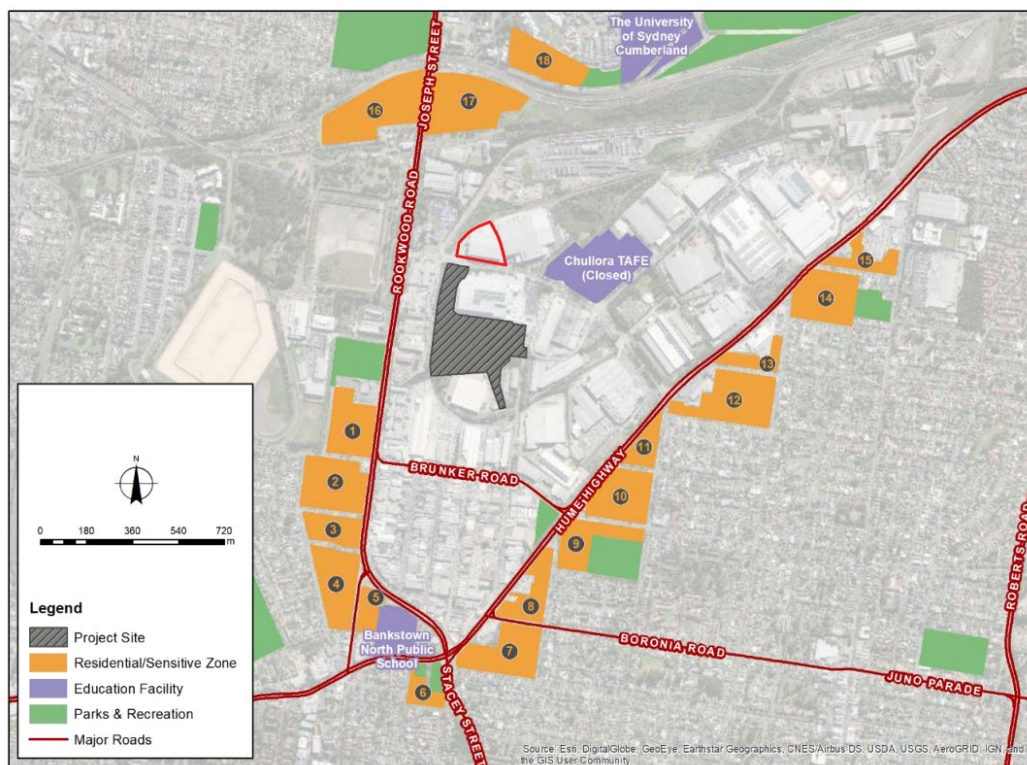
The Air Quality Assessment, prepared by Katestone Environmental Pty Ltd ('Katestone'), assesses the extent of impact upon air quality on nearby sensitive receivers, including residential, educational and recreational areas, such as parks, in accordance with *Protection of the Environment (Operations) Act 1997*. Further, we note that the assessment by Katestone has been undertaken in accordance with the Approved Methods for Modelling, pursuant to Part 4 of the Clean Air Regulation, which outlines statutory methods for modelling and assessing emissions of air pollutants from stationary sources.

Part 3.4 of the Air Quality Assessment states the following with respect to how 'sensitive receptors' are defined under the Approved Methods for Modelling:

*"...a location where people are likely to work or reside; this may include a dwelling, school, hospital, office or public recreational area. An air quality impact assessment should also consider the location of known or likely future sensitive receptors."*

We note the above list is non-exhaustive regarding land uses. The air quality assessment by Katestone provides a thorough assessment of the impacts upon residential, educational and recreational receptors, but omits nearby, specifically adjoining land uses, including our client's site. Not only does the assessment not consider our client's site, outlined in red on Figure 1 below, but does not include an assessment of all adjoining land uses, which include many sensitive receptors, including commercial premises, such as food and drinks premises. We believe this to be a significant omission in the reporting and overall assessment that needs to be properly considered.

Further to the above, while the air quality assessment acknowledges the location of known sensitive receptors, it fails to provide for an assessment of likely future receptors. The air quality assessment must have regard to the future development potential of adjoining sites and wider area. The proposed MRF will likely have adverse impacts on the future development of surrounding land, which the air quality assessment fails to consider.



**Figure 2.** Location of sensitive receptors, recreational areas and educational facilities in the vicinity of the Proposal site and Oriental Merchant Pty Ltd site (no. 26) outlined in red (Source: Katestone Environmental, modified by Mecone).

### **Traffic Impact**

Upon review of the Traffic Impact Assessment (TIA), prepared by The Transport Planning Partnership, we understand that it is intended to provide heavy vehicle access to the site via Muir Road. The TIA confirms that this access point has historically been used by heavy vehicles serving the site. Notwithstanding, the driveway is located directly opposite our client's site at 26 Muir Road, which is expected to result in potential impacts relating to queuing, congestion and emissions affecting our site. We do not believe the TIA has properly considered the likely impacts of heavy vehicles along Muir Road at all times of the day, noting the 24-hour, 7 day a week operation. We therefore request further modelling be undertaken in order to understand the extent of impacts on Muir Road associated with heavy vehicles and how these vehicles may affect the daily operation and movement of vehicles from our client's site.

### **Acoustic Impact**

The application is supported by a Noise and Vibration Impact Assessment, prepared by Wilkinson Murrumbidgee. Mecone have reviewed the assessment and note that it provides a road noise assessment (RNA) has been provided. The RNA has been based on the *NSW Road Noise Policy* (NSW RNP) which outlines the following with regard to the permissible increase in road traffic noise from a land use development:

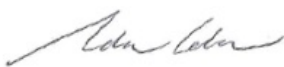
*"For existing residences and other sensitive land uses affected by additional traffic on existing roads generated by land use developments, any increase in the total traffic noise level should be limited to 2 dB above that of the corresponding 'no build option'."*

Although our client's site is not used for the purposes of residential land, we believe the land use to be sensitive against the acoustics impacts generated by the proposed development. Our client's site is not included in this assessment and noting its close proximity to the entry/exit point for heavy vehicles, this is considered a significant shortfall in the assessment. Moreover, we understand that up to 264 heavy vehicle movements a day are proposed to be generated by the development, including 170 movements during the daytime period. This is a substantial number of heavy vehicles to be using Muir Road, which has not been properly assessed in relation to our client's site, which is located opposite the entry/exit point to be used by those heavy vehicles.

In conclusion, we respectfully request a thorough re-assessment of the proposal and its amenity impacts on adjoining properties, specifically our client's property at 26 Muir Road. We believe there to be many shortcomings in the supporting assessments, in relation to impacts on adjoining properties and we ask that these be properly considered.

Please do not hesitate to contact me should you wish to discuss the contents of this submission.

Yours sincerely,



Adam Coburn  
**Director**