



Tarago and District Progress Association Incorporated

ABN: 20 532 382 103

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Phone: 0456 497 575

“Promoting the Social and Economic Development of Tarago Village and District”

13th August 2018

Ms Kate Masters
Senior Planning Officer
Industry Assessments
Department of Planning & Environment
Level 22, 320 Pitt Street
SYDNEY NSW 2000

Dear Ms Masters

RE: VEOLIA MODIFICATION REQUESTS TO MP 06_0239 AND MP 10_0012

Thank you for the opportunity to provide feedback on Veolia’s modification requests to Woodlawn Mechanical Biological Treatment (MBT) Facility (MP 06_0239) and Crisps Creek Intermodal (Crisps Creek IMF) (MP 10_0012).

The modification request involves the construction and operation of a Resource Recovery Facility to process up to 50,000 tonnes per annum (tpa) of residual general solid waste (non-putrescible) from the Mechanical Biological Treatment (MBT) facility (MP_0239) to produce solid recovered fuel (SRF). The SRF produced at the facility would not be used on-site, it would be transported to the Crisps Creek IMF where it would be railed to Port Botany and utilised either locally or internationally. In order to facilitate the transfer of waste from the Crisps Creek IMF to Sydney, a modification to MP 10_0012 is also required.

TADPAI does not oppose in principle the building of a Resource Recovery Facility to produce SRF; however, its construction and operation should be dependent on Veolia's ability to:

- safely and conveniently merge its use of public infrastructure (road and rail) with the need and use of all other users;
- resolve the odour issues with the Tarago Community, which has now been ongoing for 12 years; and
- proactively consult with the Tarago Community moving forward.

Slow Vehicle Lane

TADPAI does not believe that Veolia has fully addressed traffic management between Crisps Creek IMF and Woodlawn Eco Precinct, as the analysis provided is only a SIDRA road intersection analysis, which does not address other road users frustrations of having to follow slow moving trucks up the hill from Veolia’s Crisps Creek IMF.



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In the Minister for Planning and Infrastructure Final Approvals for Woodlawn dated 16 March 2012, the following is stated with respect to road upgrade and maintenance between Crisps Creek and Collector Road:

Goulburn Mulwaree LGA

8. Prior to the commencement of expanded operations, the proponent shall assess the need for road upgrades, on the section of Main Road 268 (Bungendore/Tarago Road) between the Crisps Creek IMF site access and the intersection of Collector Road and Bungendore/Tarago Road. This assessment shall:
 - a) be prepared to the satisfaction of the Director-General;
 - b) be prepared by a suitably independent and qualified expert whose appointment has been endorsed by the Director-General in consultation with RMS;
 - c) evaluate the suitability of the provision of a climbing lane or other suitable road upgrade alternative/s on this section of road in terms of road traffic safety and the safety of the Proponent's truck drivers negotiating the right-hand turn into Collector Road;
 - d) based on the above, identify the most suitable road upgrade option for this section of road; and, if identified as the most suitable road upgrade option by this condition 8(d)
 - e) assess the need for a climbing lane against *Austroads Guide to Road Design Part 3: Geometric Design* based on heavy vehicle usage associated with the Bioreactor on this section of road.

Note: Within 2 weeks of its completion, a report on this assessment shall be submitted to the Department for review. See Appendix 4 for reference to the intersection of Collector Road and Main Road 268.

9. Depending on which road upgrade option is identified as most suitable under condition 8(d) above, prior to the commencement of expanded operations, or a time otherwise agreed to by the Director-General, the Proponent shall provide that road upgrade on the above section of Main Road 268 (Bungendore/Tarago Road), to the satisfaction of Goulburn Mulwaree Council.

Of particular interest here is clause 8(c) addressing the need for a climbing lane up the Tarago-Bungendore Road between Crisps Creek and Collector Road. Verbal guidance from Veolia is that a study was undertaken in 2013/14 but TADPAI has no record of this report. If the Department of Planning and Environment (DPE) has a copy this report than TADPAI would appreciate it, if DPE could provide a copy of the report for TADPAI records.

The extract below (next page) from Golder Associates 'Independent Environmental Audit: Woodlawn Waste Management Facility' dated 4 April 2012, strongly suggests that all matters relating to public roads are within the domain, influence and responsibility of the Goulburn Mulwaree Council (GMC), and that the levy paid by Veolia to Council covers off and addresses all matters relating to the public roads within the Goulburn Mulwaree Council area, noting that similar provisions exist within the Minister for Planning and Infrastructure Final Approvals relating to the Queanbeyan Palerang Regional Council (QPRC) area.

This said, TADPAI believes that the roads between Goulburn and the Woodlawn Eco Precinct and between Queanbeyan and the Woodlawn Eco Precinct are State Roads given that the NSW Independent Planning Commission (and Minister) have imposed or granted conditions of use on these roads. Case in points, constraints in hours of general operation, specified routes, and the use of B-double vehicles and other heavy vehicles by Heron Resources, Veolia, and Hi Quality on Braidwood and Tarago-Bungendore Roads.



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INDEPENDENT ENVIRONMENTAL AUDIT

Condition	Compliance	Comments
ROADWORKS		
141	Yes	No road construction works have been undertaken in the last three years. Some sealing of haul roads and road maintenance works have been undertaken. Council undertakes all road maintenance works outside of the site in accordance with Section 94 contributions.
142	Yes	Refer above.
143	Yes	Refer above.
144	Yes	Refer above.
145	Yes	Refer above.
		(a) rehabilitation of the pavement at the intersection of Bungendore and Collector Roads;
		(b) provision of a right turn bay at the intersection of Bungendore and Collector Roads for south-bound traffic turning into Collector Road;
		(c) construction of a right turn bay on Bungendore Road for right-turning traffic into the Intermodal Facility. (MSC GTA); and
		(d) paving of the following areas with an asphalt concrete overlay:
		(i) intersection of the Intermodal access road and Main Road 268
		(ii) intersection of Main Road 268 and the Collector Road
		(iii) intersection of the Collector Road and the access road to the landfill site.

4 April 2012
Report No. 127623109

41



INDEPENDENT ENVIRONMENTAL AUDIT

Condition	Compliance	Comments
146	Yes	Golder understands that this has been undertaken.
147	Yes	Golder understands that this has been undertaken.
148	Yes	Golder understands that this has been undertaken.

TADPAI's position is that no one is monitoring the need for an overtaking lane, and that any analysis undertaken is now dated and is not reflective of current use or concerns. If this is not the case than TADPAI would appreciate it, if DPE could provide a copy of any recent relevant report that addresses the need or not for a climbing lane for TADPAI records.



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In preparing TADPAI's initial response to Veolia's Appendix A 'Traffic Report for Proposed Solid Recovered Fuel Facility at Woodlawn, Tarago', we have consulted the NSW Treasury website with regard to capital planning for public infrastructure. TADPAI has found that NSW Treasury's website provides considerable guidance on this, inclusive of strategic whole of life maintenance and upgrade planning, costing and budgeting. See below:

The screenshot shows the NSW Treasury website. The header includes the NSW Treasury logo and navigation links: About Treasury, The NSW economy, Budget & financial management, Information for public entities, Projects & initiatives, Documents & resources, and Treasurer & media releases. A search icon is also present. The main content area is titled 'Capital planning' and includes a sidebar with links to 'More about capital planning', 'Capital planning submissions', 'Nominated Agencies and Public Non-Financial Corporations', and 'Key contacts'. The main text explains that capital planning includes the provision of Capital Investment Plans (CIPs) at the agency, cluster, and whole of government level. It also mentions the capital planning policy as part of the overall NSW capital expenditure submission framework. Below the text are sections for 'Useful links' and 'Other useful links', both containing a list of relevant documents and frameworks.

← → ↻ Secure | <https://www.treasury.nsw.gov.au/information-public-entities/capital-planning>

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Key contacts »

Capital planning also includes the provision of Capital Investment Plans (CIPs) at the agency, cluster and whole of government level. CIPs provide us with a summary of the total capital investment commitments and intentions over a 10-year time frame.

The capital planning policy is part of the overall NSW capital expenditure submission framework. This framework includes the procurement policy framework – with business cases and Gateway Reviews – and the commercial policy framework – including Statement of Business Intent, Statement of Corporate Intent, and projects of State Significance.

Useful links

Treasury circulars, policy papers and useful links

- [Guidelines for Capital Business Cases \(TPP08-5\)](#)
- [Submission of Business Cases \(TC12-19\)](#)
- [NSW Gateway Policy \(TC17-03\)](#)
- [NSW Gateway Policy \(TPP17-01\)](#)
- [Parameter and Technical Adjustments and Measures](#)
- [Infrastructure Investor Assurance Framework \(TC16-09\)](#)
- [Public Private Partnerships](#)
- [Recurrent Investor Assurance Framework \(TPP17-02\)](#)
- [How to Prepare an Asset Strategy](#)
- [Asset Management Strategic Planning \(TAM06-3\)](#)

Other useful links

- [State Infrastructure Strategy – Rebuilding NSW](#)
- [NSW Procurement website](#)
- [Government Property Principles \(Premier's Memorandum M2012-20\)](#)
- [NSW Government ICT Investment Policy and Guidelines](#)
- [Infrastructure Investor Assurance Framework - Infrastructure NSW](#)
- [ICT Assurance Framework - Department of Finance, Services and Innovation](#)
- [Better Practice Guide on the Strategic and Operational Management of Assets by Public Sector Entities - Australian National Audit Office](#)
- [ISO 55000 Standards for Asset Managers, Asset Management](#)

Veolia's or DPE need to re-write Veolia's Submission Appendix A 'Traffic Report for Proposed Solid Recovered Fuel Facility at Woodlawn, Tarago' to address at minimum:

- the diversity of traffic using the the public roads between Crisps Creek and Woodlawn Eco Precinct;
- current usage and future usage of the roads, by existing vehicle types and usage, noting that at this time Veolia and Heron Resources have been approved to use B-Double trucks on the roads between Goulburn and Woodlawn Eco Facility (see below);
- truck speeds climbing the hill from Crisps Creek to Collector Road, and impact on other users;
- maintenance and upgrades to the bridge crossing Crisps Creek, which currently has some infrastructure issues;
- a costed strategic upgrade and maintenance strategy, that upon Planning Approval becomes a Government funded strategy for implementation;
- rail operations, if not covered of elsewhere (yet to sight);



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- community consultation that has occurred;
- Goulburn Mulwaree Council input;
- Risk assessments, noting that TADPAI's assessment regarding the road between Crisps Creek and Collector Road, using the Goulburn Mulwaree Council's risk assessment matrix, is that *"the risk changes from Severe Consequence / Rare Likelihood (Medium unmitigated Risk Score) to Severe Consequence / Likely Likelihood (Extreme unmitigated Risk Score) due to increased truck movements over the coming 12 months, and frustrated drivers being stuck behind slow moving trucks, and thus drivers attempting overtakes"*;
- the requirements and expectations of NSW Treasury; and
- anything else pertinent to specifically managing the public roads and traffic between Crisps Creek and Woodlawn Eco Precinct, noting that TADPAI has approached Goulburn Mulwaree Council for a general road and traffic analysis within and around the Townships of Tarago and Lake Bathurst, and along Braidwood Road from Goulburn to Tarago.

Evidence of Veolia B-Double use

	unexpected Aboriginal site(s) are found during construction.
Traffic	<p>Construction traffic will be managed through the provisions of the draft CEMP (Appendix E).</p> <p>Traffic generation during operation is limited to approximately 10 deliveries per month, being:</p> <ul style="list-style-type: none">• 1 B-double truck delivering methanol every 10-20 days• 1 B-double truck delivering sodium hydroxide every 10 days• 1 truck for the 1000L immobilized cell bioreactor every month• 1 truck per week to remove dewatered sludge <p>These truck movements will be managed through the approved Traffic Code of Conduct for the project.</p>
Visual	The impact of the leachate treatment plant on visual amenity is minimal due to the

Source: 'Modification of DA 31-02-99 and MP10-0012 for the construction of a leachate treatment plant and associated infrastructure and changes to regional waste limits and operating hours', dated May 2017.

To summarize, feedback from the Tarago Community and other transport businesses operating in the area, is that they are frustrated by constantly being trapped behind slow moving Veolia waste trucks climbing the hill from Crisps Creek to Collector Road. Technically the main issue is that the Veolia trucks leaving Crisps Creek cannot get the momentum and speed to climb the hill quickly. Those trucks coming from Tarago, have the opportunity to build up momentum and speed as they approach Crisps Creek downhill and therefore have some chance of climbing the hill on the other side of Crisps Creek with some speed. TADPAI believe that despite Veolia, by its own admission



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(see Veolia's Submission Appendix A), being the major user of the public roads between Crisps Creek and Woodlawn; that the road and traffic management, upgrade and maintenance of these roads, is a NSW Government (and possibly Goulburn Mulwaree Council) obligation, responsibility and liability.

TADPAI strongly believes that NSW Independent Planning Commission (and Minister) cannot give approval to Veolia's expansions without also acknowledging the NSW Government's own commitments and financial obligations required to successfully support Veolia's operations at Woodlawn, such as providing a safe and convenient road environment for all users. Thus in moving forward, TADPAI believes that the NSW Independent Planning Commission (and Minister) need to now approve the building of a slow vehicle lane on the Tarago-Bungendore Road between Crisps Creek and Collector Road if approving Veolia's submitted Modification Requests in full or in part.

It should not be forgotten that:

- the NSW Independent Planning Commission (and Minister) gave approval to Veolia to increase its waste receipting at Woodlawn via road from the surrounding local government areas and the ACT from 50,000 tpa to 90,000 tpa in April 2018 (this year); and
- that since then, there has already been one fatality on the Tarago-Bungendore Road (3rd June 2018), and that we want to avoid more deaths by having a well planned and maintained road system for everyone to use.

Potential Funding Source

It has been brought to TADPAI's attention that Transport for NSW has acquired funding to extend the Tarago Rail Siding. The Tarago Times has reported "*The \$8.6 million project was announced by the NSW Roads and Freight Minister Melinda Pavey*". [July 2018 Edition, page 4] TADPAI further understand from Veolia that Transport for NSW is considering or has decided to park the first returning empty train from Crisps Creek, in the Tarago Siding while the second train has a uninterrupted run directly into Veolia's Crisp Creek Intermodal Facility. Regrettably Transport for NSW has acted without consultation with the Tarago Community.

TADPAI also understand that Veolia had to lodge the application for funding for the extension of the Tarago Rail Siding on behalf of Transport NSW through Infrastructure NSW. [Veolia Community Consultative Committee Meeting of 23 May 2018] TADPAI does not know why Transport for NSW had to solicit funding from Infrastructure NSW via Veolia for its own initiative. I am sure that there is a good reason for this, but in terms of first impressions, does not seem kosher.

Had Transport for NSW consulted with the Tarago Community via TADPAI, its staff would have been informed that the road movement in and around Tarago and District is of more significant concern for the following reasons, and that the \$8.6m would be better spent on building a slow vehicle lane along the Tarago-Bungendore Road, between Veolia's Crisp Creek Intermodal Facility and Collector Road at the top of the hill.



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- around 6000 new truck movements per annum between Goulburn and Woodlawn Mine via Tarago when Heron Resources commences production towards the end of 2018;
- the near doubling of Veolia semi-trailer truck movements as a result of approval in April 2018 to increase the waste volumes to be moved by road from 50,000 tpa to 90,000 tpa;
- proposal to divert up to 300,000 tpa of Canberra waste to Veolia’s Woodlawn Bioreactor, via rail to the Crisp Creek Intermodal terminal, and thence by road to Woodlawn Mine;
- general increase in heavy vehicle movements afforded by improved road conditions between Canberra and Nowra, and between Goulburn and Batemans Bay respectively;
- general increase in cars and caravans, cars and boats, etc. numbers because of the improved roads cited above, and Council’s and others tourism campaigns; and
- general increase in population in Tarago and surrounding districts in response to housing affordability in the area compared to elsewhere, including Goulburn, and corresponding work commutes between Tarago, and Canberra and Goulburn respectively.

Transport for NSW staff would also have been informed that its approach to parking waste trains in the extended rail siding would result in the noisy engines and smelly waste containers being parked up immediately behind the Tarago Public School. This is totally unacceptable to the Tarago Community and the School, for the obvious disruptions and that will occur from noise, vibrations and odour, and concerns regarding student and staff health.

When the waste bioreactor was first proposed assurances were provided to the Tarago Community that waste trains would not be parked up inside the town of Tarago, and certainly not directly behind the School.

TADPAI wrote to the GMC on 26 June 2018 outlining what it believes the NSW Government and Council need to do to improve road safety and provide business continuity for Veolia, Heron Resources, and the other trucking companies operating in, around and through Tarago. The construction of a slow vehicle lane on Tarago-Bungendore Road from Crisp Creek to Collector Road, was one of the primary recommendations.

TADPAI has written to the Secretary for Transport for NSW on this matter (10th July 2018) but as of submitting this Submission has not had a response from Transport for NSW.

TADPAI requests that NSW Independent Planning Commission (and Minister) direct Transport for NSW to use the secured \$8.6m to build the slow vehicle lane on Tarago-Bungendore Road from Crisp Creek to Collector Road commencing this financial year.

TADPAI also requests that that NSW Independent Planning Commission (and Minister) facilitate Transport for NSW consulting with the Tarago Community to examine other options to extending the Tarago Rail Siding. The Tarago Community’s preference is for the waste trains to be parked up outside of the town of Tarago.



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Odour

Odours continue to be emitted from the Woodlawn Eco Precinct, and despite best efforts by Veolia to eliminate the odours, the odour emissions continue. While some Community members continue to lodge complaints to the Environmental Protection Agency (EPA) and directly with Veolia; many people have given up on the reporting of odours because nothing seems to be done to resolve this matter.

There is considerable discontent within the Tarago Community with regard to the odours coming from the Woodlawn Eco Precinct, and some residents now believe it is time for some form of legal Class action. TADPAI is now trying to negotiate with Veolia for a once-off compensation package for affected residents, this is proving challenging and progress is slow.

It flies in the face of community concerns to read that Veolia contracted The Odour Unit to conduct a qualitative desktop assessment, based on some conceptual modelling using the technical drawings and specifications provided by Veolia. And that in conclusion, an actual assessment of odour emissions could not be determined, and that the proposed method to abate emissions has to be validated after commission.

This approach is not an appropriate response to Community concerns. At this time, there should be no Modification Requests being considered that involve the additional production of odours, no matter how small or minor.

It is requested that the NSW Independent Planning Commission place on hold these Modification Requests, and any and all other new licence or Modification Request with respect to the waste operations at Woodlawn, pending Veolia and the Tarago Community reaching an appropriate compensation package for the ongoing odour emissions.

Community Consultation

Under Veolia's licence to operate the Woodlawn Eco Precinct, Veolia is obligated to meet and consult with TADPAI on a quarterly basis - this simply does not happen. The NSW Independent Planning Commission and DPE are requested to make this happen moving forward.

It is noticed that within Veolia's Modification Requests Submission that guidance from GMC was *“to keep the local community informed about the project”* (page 35). This has not occurred up until now - see the minutes of the Veolia Community Liaison committee (VCLC) meetings over the past year - nothing is recorded regarding this project.

TADPAI believes that Veolia intentionally avoids proactively communicating and consulting with the Tarago Community as it should be doing and as it has been requested to do so. TADPAI strongly believes that the VCLC has been proactive in trying to elicit information from Veolia, but little is being voluntarily offered. It is requested that the NSW Independent Planning Commission direct



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that the VCLC be replaced by a Community Consultative Committee (VCCC) per current legislation and policies; and that DPE should appoint an experienced Chairperson who can oversee Veolia's consultation processes with the Tarago Community.

Your Sincerely

A handwritten signature in blue ink, appearing to read "Wayne Baynham".

Wayne Baynham
TADPAI President
0415 174 935