

I am **OPPOSING** this proposed Nulon Motor Oils Facility Development Application for the following reasons:

### **Communication to the local community**

I oppose this Development because of the lack of community consultation by NULON. I found out about this application approximately 7 Feb, up until this date 26/2/2020, the only mail I have received regarding this Development was a letter from MP Anne Stanley dated 14/2/2020, I have joined a Facebook group to be kept informed.

Sufficient information has not been provided to the community by Nulon or CIP Constructions (NSW) Pty Ltd in regards to the development and any potential impacts. They have not undertaken a genuine community consultation and engagement process during the preparation of the EIS.

All information gathered about the proposed development has been gathered online through websites, by the community. A letter was posted on Greg Simons personal Facebook page which didn't state much that was helpful in alleviating the communities concerns. The letter just stated that the development would be beneficial to his existing employees and it would not affect the community due to the factories safeguard's, but nothing about what the proposed safeguard are.

Being a resident and land owner in Greenway Park Estate/West Hoxton community, for over 20 years, I feel that the community should have a voice in what is developed in this area. I also feel that a factory development of this magnitude and type in the Bringelly Business Hub location will affect the communities and the resident's quality of life, due to the possibility of environmental contamination and fear that this type of factory will enhance existing health issues and create new health problems to members of the community.

### **Health risk**

Community members with pre-existing medical conditions in the area such as autism, asthma, hay-fever and other medical conditions may be greatly affected if this development, and the factories proposed future developments, were to be approved. This type of Development would be more suited for an industrial area.

If Nulon builds a factory in the proposed position I feel that they will be taking away potential jobs opportunities from our communities, because Nulon is relocating from Moorebank and bringing existing employees with them. More employment opportunities would be accessible if there were to be new warehouses, factories retail stores, restaurants, and other more desirable developments built in the area. Nulon would only be creating 45 employment positions as to double the job opportunities that could be available. 45 job opportunities are not very high.

I do understand that there will be warehouse and factory developments, in the Bringelly Business Hub which I am not against. I also am not against Nulon Products Australia as a business, but I am opposed to any new developments that bring a potential health and environmental risk to the community and local communities.

The quality of life, safety and health of the community and environment are worth more than a facility, and its employees, that can operate and function anywhere.

### **Environmental risk to Local Flora, Fauna and Parklands**

I also feel that Nulon is the type of development that poses a high risk of pollution to the community and contamination to the surrounding parkland.

There is risk of Aquatic Hazard less than 100m away in the pond at Bidwell Park, where I have seen people fishing in the pond occasionally. Chemwatch.com has categorised most of Nulon's Products as Acute Aquatic Hazard Category 3, Chronic Aquatic Hazard Category 3 and any incident no matter the magnitude would affect the local parklands flora and fauna as well as the neighbouring properties cattle and land.

### **Zoned Light Industrial**

Light industry means a building or place used to carry out an industrial activity that does not interfere with the amenity of the neighbourhood by reason of **noise**, vibration, **smell**, fumes, smoke, vapour, steam, soot, **dust**, **waste water**, **waste products**, **grit and oil**.

The Bringelly Business hub is supposed to be allocated for light industrial businesses and I feel that because Nulon will be producing vast numbers of motor oil products, storing combustible products, storing vast numbers of aerosol products and a future 24/7 operational business with and movement of large tankers and trucks into and out of the communities and loading dock operations at all hours of the day and night that it should NOT be considered light industrial.

Nulon's application is based on the existing facility at Moorebank in regards to amount of production and storage of products, yet Greg Simons (CEO of Nulon Products Australia) states in a newspaper article (The Liverpool Leader) that his production will be double of the existing Facility at Moorebank, therefore I feel the application should be reviewed because all the figures in the proposed development application are outside the lines of being correct.

Nulon has not given a full list of:

- All the hazardous materials to be used in the proposed development and the quantity of each present
- All equipment proposed for use at the proposed factory site
- The mode of storage used (bulk or packages/ containers) and the maximum quantity stored or held on proposed factory site
- The average number of annual and weekly road movements of hazardous material to and from the proposed facility, and the typical quantity in each load.

Nulon has only given an estimate of/from the existing facility which is half the size in storage and production area. Also I feel that in the removal of waste products by other companies that the traffic volume will be higher than stated in the development application and the risk of contamination from the product they are removing also a potential risk.

Just because a business is considered light industrial, and I am not agreeing that Nulon is light industry, doesn't mean it is safe or good for the environment and the communities healthy, it just means that it have less environmental impact than those associated with heavy industry.

Light industries require only a small amount of raw materials, area and power. While light industry typically can cause little pollution, particularly when compared to heavy industries, some light industry can cause significant pollution or risk of contamination. Any business that produces or blends oils with harmful/toxic additives, stores large quantities of harmful chemicals and aerosols should not be considered as light industry.

## **Operating hours**

In Nulon's Development Application the proposed operation hours are:

1. Goods handling 24 hours on all days of the week.

Nulon's loading docks traffic and noise level prediction for trucks and tanker deliveries, with air brakes and reversing alarms, will be 24/7 of incoming and outgoing traffic, which local residents will definitely hear during the night, especially the resident that lives on the adjoining land that is less than 100 meters from the proposed development.

## **Safety Guarantee**

Nulon consistently guarantees that the facility is absolutely safe, that it poses no health risk to neighbours and the community. Nulon's past history of numerous incidents with the Moorebank community shows that this guarantee is not reliable. No one or company can also guarantee that there will not be Chemical & Oil spills and leaks or Contamination in or around a facility. Nulon cannot guarantee that human error, machine malfunction, weather or local fires will not cause a disaster at his facility, and any of these could be catastrophic to the community.

Nulon has also stated that they will be taking away the human element as if Machine and technology run by themselves and are more reliable. It's not a matter of *if* an incident will happen but *when* an incident will happen, which will impact the surrounding community, future communities and parklands as well as residents living on fear of that day.

## **Production**

A review of Nulon's application should be considered because of Greg Simons (Nulon CEO) statement in a newspaper article that the new facility would double its production, whereas the application states different and the statistic for the motor oil production, based on Nulon's Moorebank facility should not be considered in the Development Application, it may or may not be fabricated but it is not the correct percentage of production and storage for the proposed facility. A new Development application should be admitted with evidence of the correct proposed production and storage figures.

The data of the maximum quantities of products and DGs that are to be stored at the warehouse are taken from and based on the existing site operations, at Moorebank facility, with allowance for a level of inventory growth into the future.

Aerosols 35,000 L, Combustible liquids 1,066,025 L, LPG Cylinders 8,750, this cannot be correct for the magnitude in size of the proposed facilities storage area is much greater.

## **Visual Sensors Receptors**

Also a statement in the newspaper, The Liverpool Leader on 22 Feb 2018, by Greg Simons is that the community won't even know they (The factory) are there, how is this so when the proposed development along with the future development are 1/3 to half the area size of Greenway Park Estate. This will be a visual impact on residents, especially those with houses that have a view (Panoramic or not) in Greenway Park Estate of the surrounding area.

The Visual Sensors Receptors for all and many properties has not been taken into account when submitting the application. Greenway Park estate is not flat; it is situated on a hill with views as far

Parramatta, Royal National Park and Sydney CBD. From my house I can see The Sydney Harbour Bridge. Resident's, one road higher than my property, have panoramic views of the greater Sydney and they can defiantly see the proposed development site at 10 Bringelly road Leppington, this been a view they do not want ruined by a view over a factory site.

### **Bush fire prone area**

This part of the Sydney Western Parkland is also a bush fire prone area, which has been acknowledged by The NSW Rural Fire Service, and also was shown on 22 February 2017 by there being a large fire in the West Hoxton area which threatened nearby residents. A house fire on Cowpasture Road on 21 July 2017 and another grass fire at the back of Carnes Hill Market Place January 2018. A grass fire also burnt about 200 hectares in West Hoxton on 15 November 2009.

In the last 12 months the community has had several grass fires, randomly located with suspicion of a pyromaniac, which is another factor that should be considered.

Also, point of interest, the pond in Bidwell Park (the adjoining parkland property) has in the past been used by NSW RFS to fill water bombing aircrafts to help contain fires in the surrounding areas, that won't be a possibility in future if there is any likelihood that the pond may be contaminated from the proposed development.

### **Western Sydney Parklands**

Western Sydney Parklands have stated that the Bringelly Business Hub will be beneficial to the surrounding community. "The parklands have been described as the 'lungs of Western Sydney' and are essential as recreational and environmental spaces.

- Mr Roberts (Minister for Planning) referred to the park as "a gift from this generation to future generations"
- Mr Ayres (Minister for Western Sydney) has called the parklands "the breathing lung of western Sydney".
- NSW Premier Gladys Berejiklian has also said the 5280ha Western Sydney Parklands was the largest urban park in Australia and "an important resource for all of Sydney". "Western Sydney isn't just a great place to live and work, it's also a great place for families to enjoy themselves and to play," she said.

If these quotes are true and to be taken seriously than why would anyone want a factory right at the end of such a busy section of the Parklands, with vastly growing communities near precinct 16 of the parklands. Why should this parcel of land be treated any different than the rest of the parklands and how can it be considered as low recreational and ecological value, when the parkland supports native life forms of fauna and flora. Develop there to make it a high recreational area for the community and you would have more people visiting and using this land, far more than a factory would. We need more parks in the community to support the growth of population in this area.

The Western Sydney Parklands Visions and Principles, stated in their Design Manual and Plan of Management 2020, now looks like a fiction novel. This can be resolved by developing something that the whole community and surrounding community can use, should not this area represent how beautiful our parklands are, a place where people can meet and appreciate the environment and there community.

**In closing this submission I would like to add my conclusion**

The potential hazards of this Development and having this type of factory in the Bringelly, Horningsea Park, Carnes Hill, surrounding communities and future surround communities outweighs the benefits (as little as the benefits are). This type of facility is not suitable to be developed in the Bringelly Business Hub, as it will be a potential hazard to the future local and adjacent businesses, the environment and the local community and surrounding communities. A review into the Nulon Application is advised as it is based upon the existing factory at Moorebank and not solely on the proposed development in Bringelly Business Hub. The term "allowance for a level of inventory growth into the future" does not weigh with what the proposed future development will be, how much allowance will that be?

I would also like to know which government department authorised the change of status of public land to an industrial zone. No information was sent directly to the residents of West Hoxton which I am located. I would like to see all relevant documents for the rezoning of this site and the government official that signed the changes of land status for this location. The Zoning of this area as industrial is just not logical considering the surround parklands and communities.

With the fine line of whether Nulon's facility is light industrial or high industrial, which no one can agree on, the community has come together with their concerns about its potential risk to the environment and the health of the residents living in the communities. These concerns should be enough to NOT have the development approved.

With this submission please find attachments of PDF files petitions with signatures opposing the Development Application for the Proposed Nulon Motor Oil Facility.