

# CORRECT PLANNING AND CONSULTATION FOR MAYFIELD GROUP ( CPCFM )

**Kate Masters**

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Department of Planning & Environment

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Dear Ms Masters

Mayfield West Recycling Facility Extension (SSD 7698)

Comment on the Environmental Impact Statement

Correct Planning and Consultation for Mayfield Group ( CPCFM ) was established in 2010 and has about 500 members and supporters.

CPCFM objects to the Development Proposal number SSD 7698 from Benedict Recyclers for expansion of their plant in Mayfield Newcastle.

We have no vested or political influence in the project other than as a community group.

This submission has taken about 120 hours of volunteer time and effort to prepare, for which we have received no external funding in cash or kind.

CPCFM is very concerned at the low level of public consultation and notes there has been no public meetings. CPCFM has had, at our request, a limited site inspection and has viewed the EIS.

CPCFM did strongly object to the original proposal by Benedict to establish their business in Mayfield West, and we believe our fears, then expressed, are now becoming evident.

Our objections on the expansion proposal are based on three core areas.

1 Failure of the existing approval to operate in accordance with its conditions of consent.

- The plant is not currently operating to the capacity provided by the previous application. Therefore there is
  - No need for an expansion
  - The current throughput does not reflect the successful operation on which much of the new application is based

- The consent conditions as outlined in the notice of determination of development application DA 2015/0291 from Newcastle City Council would appear to have been poorly complied with.
- There is no wheel wash in operation for vehicles leaving the premises and the shed is not enclosed.



Photograph 1.3 and 1.4 in the EIS shows the open nature of the shed.

- 2 The existing approval has not lived up to the needs assessment, and the proposed assessment would also seem to fall far short of a reasonable and plausible needs assessment
- 3 The proposal documentation would seem to be inadequate, and the figures contained in it do not seem capable of substantiation.

CPCFM is very concerned that this project is being considered as a State Significant development. Because:

This is a very small project and the area of impact very vague;

It is a travesty to consider facilities such as Benedict's as a waste facility, when they are in reality simply a recycling facility and transfer station. It is a 100% in and 100% out facility that has no on site burial of material or remanufacturing of material handled.

CPCFM notes the approval for the original establishment of the Mayfield West business was not an SSD.

**For these reasons, we call for the State Significant Development status of the currant application to be withdrawn**

The project by Boral at Kooragang Island, currently under consideration by Planning, is nearby - being only 3200 metres to the NE.

CPCFM engaged in considerable consultation with Boral who were, in our opinion, very open and transparent with us and hosted two site inspections.

Whilst CPCFM did have some concerns about the Boral traffic movements, we chose not to object to their expansion proposal. The Boral proposal was to expand the existing facility from 100,000 tonnes per year to 350,000 tonnes per year and operate 24 hours a day, 7 days per week with 530,000 tonnes total storage max.

Referring now to the Benedict proposal, CPCFM believes there is no direct market link between waste supply and recycling material other than from a general relationship that high economic activity generates more building, which commonly generates more demolition. The use of regenerated material also seems to be dependent on factors other than availability.

The size of the stockpiles would seem to be dictated by the lack of balance between the product collected and the product sold. The waste levy guidelines would seem to penalise Benedict if it held product until there was a quality end use demand for product.

Incoming and outgoing material sales can be predicted to an extent, but like any prediction,

would be based on a list of multiplied assumptions that in all likelihood would not be entirely

accurate. There is no quantified predictions in the documents. CPCFM believes a business case is essential for planning approval to be accepted.

CPCFM could not locate the stats for the total on site holding of product. CPCFM estimates this could be 500,000 tonnes or more.

There seems to be no maximum daily truck movements that would cause the daily truck movements to be greatly exceeded during periods of stockpile drawdown.

The issue of dust and noise would seem to not take into account the maximum holding.

**CPCFM believes that details on the market demand for the wastes proposed to be stockpiled and processed on the premises should be included and considered in the expansion application.**

CPCFM notes that the EPL for the site included a requirement for Financial Assurance in order to provide security that if the company abandons the site it will not be encumbered with waste.

**CPCFM strongly supports this.**

CPCFM considers the site is totally unsuitable for the proposed expansion of the existing waste recycling facility for the following reasons: -

- It is within a prestige light industrial area dominated by small clean business. We provided a very detailed breakdown of the types of such businesses to the Joint Regional Planning Panel, when we objected to Benedict's first application.
- The site is inappropriate for bulk materials handling and stockpiling activity

- It is located remotely to main roads in minor low traffic streets with only one connection to Industrial Drive
- It is remotely located to a considerable source of construction waste materials and to consumers of recycled construction products
- It is close to sensitive residential and light industry land uses
- The need to store 40,000 litres of fuel above ground is not a characteristic of the area and presents a major hazard. Given the availability of mobile onsite fuel providers this seems to be a totally unnecessary risk.
- The existing facility has never operated at capacity
- The existing facility has only been in operation for a few months.
- It is CPCFM's understanding that Waste Facilities are not permitted in the Steel River area under the LEP.
- The claim that the occupation of the site by Benedict has cleaned up the anti-social behaviour of the area is not supported by evidence. Please see photos below taken a few weeks ago, following our site inspection of Benedict's



CPCFM is also concerned that the site is inadequately served (or not served at all 2.2.10) by road access, power, phone, water and sewage. This may seriously hamper fire, rescue and emergency services. CPCFM asks how will a fire be extinguished. Surely as a minimum the shed should have a sprinkler system.

CPCFM also questions the source and adequacy of water used for dust suppression.

CPCFM notes that the JRPP determination required the site to be connected to the sewer within 12 months of occupation. This would seem to have not yet been done and the EIS shows no proposed date for the work.

CPCFM notes that an electrical substation is nearby and is concerned that power may be disrupted.

CPCFM is concerned that the handling of product on the Benedict site is best described as primitive with a damaged open sided shed being the main building and the crushing screening and stockpiles appearing to be makeshift.

CPCFM cannot comprehend how this infrastructure could control dust, odour, noise and air quality to meet its existing approval let alone comply with the proposed expansion requirements and associated standards.

The processing of materials outside in the open in "campaigns" is of real concern especially for noise and dust.

It would appear that neither is assessed in the modelling except as a yearly figure. This is unreasonable and does not reflect the operational activity.

The expansion proposal does not indicate the onsite materials, improvements to infrastructure to cope with the extra throughput, or the necessary management plan to cope with the operation. The EFT staff number would seem grossly inadequate for the operation of the facility, especially considering the lack of infrastructure and increase in stockpiles.

The operation of the auxiliary area is very vague and does not provide enough detail to enable CPCFM to make informed comments.

CPCFM, and the community of Mayfield, are very concerned with the increase in dust potential from the very open site, the increased stockpile surface area and open shed. The dust assessment from the site would appear to be inadequate and not of a sound scientific basis. We believe results are understated.

CPCFM notes that in Table 2.8 there is no water truck for dust suppression or stockpile sprays listed as plant.

CPCFM notes that the site surface in the main is not sealed; and due to the nature of the soil, that waste, toxins and other substances are likely to drain into the subsoil, and probably migrate the less than 30 - 300 metres to the river. **We consider the site should be totally capped or sealed.**

CPCFM notes the following table made up from the EIS and the original proposal does not compute, and is not consistent within the document.

It also demonstrates that the existing table does not comply with its consent conditions for the existing operation.

There are also no figures provided to show the actual vehicle movement numbers now or the current product numbers.

Truck Movements	258	360	64+
Ute/ trailer movements	22	28	6+
Recycled and rejects		70	70+
Staff & visitor movements	34	42	8+
Ancillary movements	160	70	70-
Total daily vehicle movements	474	544 (Adds up to 570)	70 (96)

From this table it can be seen that the truck movement numbers are up by 102, and not the 64 as stated.

That is, that the 225,000 tonne input plus 225,000 tonne output is carried by 51 trucks averaging about 42 tonnes per load assuming each truck is loaded both in and out. With the average truck load being stated by Benedict at 17 tonnes per load CPCFM believes the truck numbers are understated by about 200%. Thus producing 125 truck input movements on a daily average basis plus the 64 identified in the table.

Added to that is the corresponding output truck movements. That is an increase in total vehicle movements of about 250 truck movements per day.

That figure is very much less than the 360 heavy vehicles per day in the Boral application of a similar tonnage.

Table 3.1.1 and 7.1 seem to contradict each other.

Table 7.1 grossly misrepresents the traffic from the Benedict operation and proposal. The 2016 survey does not include Benedict's operation and needs to be raised by about 300, and the operation following the proposals instigation by about 600, giving about double the increase in the table.

The Benedict truck numbers must be considered along with the other expansion and development projects in the area. The cumulative number is critical to the liveability of the area.

Of major interest to CPCFM is the origin and destination of the trucks as this has a major impact on the congestion and safety of the regions roadways.

During our site inspection Benedict informed us that they had no information available, and that the weighbridge documents did not collate that information. The sample documents in the EIS support this lack of record keeping.

CPCFM wonders how traffic can be managed from the site, if no core management data is collected.

The lack of core data, plus the grossly understated vehicle numbers, must ruin the credibility of information in the EIS related to vehicle movement from Steel River Boulevard to and from Industrial Drive. How many and which vehicles turned left and right? The Proponent should be required to provide this core data. The suggestion that 42 turn left and 28 turn right has no substance and would appear to be a wild guess.

It was noted during our site inspection that material was being taken to Sydney for waste disposal by B Double truck; and not Summer Hill, as shown in the EIS.

From CPCFM's observations the Benedict site requires material to travel extra distances and this is certainly not environmentally responsible.

It is noted that in section 9.2(d)(i) it states: "polluter pays, that is those who generate pollution and waste should bear the cost of containment, avoidance or abatement." **CPCFM requests that statement from the proponent be written into the consent conditions if the project is approved.**

There is no traffic flow management plan to regulate entry times and departure times. It seems it is just a turn up system.

The noise, odour and air quality assessment does not consider vehicle movement to and from the site. This is a must, as the operation can seriously impact on the amenity many kilometres away.

Below is a table of other key data derived from the EIS.

item	Current Approval	proposed	change	Reference	Comment
Throughput (input)	90,000	315,000 tonnes	225,000+	3.1 & 3.1.1	
Average truck load tonnes			17		
Staff EFT	10	14	4+	EFT	
Stockpile Area	13,230	26,340 m2	13,110+	3.1.2	
Stockpile height	7	7m	0		
Truck Movements	258	360	64+	3.1.1 Daily	Conflicts with T7.10 ?
Ute/ trailer movements	22	28	6+	3.1.1	?
Recycled and rejects		70			
Staff & visitor movements	34	42	0		But staff up by 4 ?
Ancillary movements	160	70	0	3.1.1	?
Total daily vehicle movements	474	544	70	3.1.1	Conflicts with T7.10 ?
Hours of operation			unchanged	3.1	
Waste Classification			Unchanged	3.1	
Methods & equip			Unchanged	3.1	
Plant			1 extra Front End Loader	3.1.1	
Non Recyclable tonnes leaving the facility	18,000	63,000	45,000+	20% of input 2.5	
Truck loads daily of non recyclable @ 20t leaving the facility	4	15	11+		
Site employee and visitor vehicles	17	21	4+	T 7.10	

Site employee and visitor vehicle movements	34	42	8+	T 7.10	
Waste receivals	129	180	51+	T 7.10	
Waste receipt daily movements	258	360	102+	T7.10	
Recycled Products & Rejects	11	36	25+	T7.10	
Recycled & Reject daily movements	22	72	50+	T7.10	
Ancillary operations daily vehicles	80	35	45-	T7.10	
Ancillary daily movements	160	70	90-	T7.10	
All site daily traffic	237	272	35+	T7.10	
All site daily movements	474	544	70+	T7.10	
Steel river intersection	292	362	70+	T7.11	? What was daily movement from Benedict at survey date? Based on 2026 projection with 2% linear growth.?
Industrial Drive east	176	158	42+	T7.11	?
Industrial Drive west	116	144	28+	T7.11	?

### **Conclusion**

**CPCFM is convinced that this project is not viable financially or environmentally.**

**The traffic, dust, noise and odours are not reasonably assessed by the EIS.**

**Benedict, on this site, certainly does not have track record on which to base an application for a huge expansion proposal.**

**CPCFM considers that this application should be rejected.**



John L Hayes          Dated 22<sup>nd</sup> Dec 2016.

Convenor

Correct Planning and Consultation for Mayfield Group (CPCFM )\*\*