

5 September 2014

Minister for Planning
Department of Planning and Environment
Online submission:
www.majorprojects.planning.nsw.gov.au/page/on-exhibition

cc: Director-General Environmental Protection Authority
General Manager, City of Ryde Council

Dear Minister,

RE: North Ryde Station Urban Activation Precinct, SSD 5093

Thank you for the opportunity to provide comment on application number SSD5093 for the Stage 1 works for the North Ryde Station Urban Activation Precinct (UAP).

We are writing this letter to provide background about our existing Resource Recovery Facility at 145 Wicks Road, North Ryde and to outline our objections over the incompatibility of high rise, high density development in close proximity to this essential facility. The Environmental Impact Statement (EIS) has not addressed the proximity of the future development to the existing resource recovery facility, and we believe issues such as traffic, noise and air quality impacts may arise from this oversight. These issues are further discussed below.

Background

SITA Australia currently owns and operates a Resource Recovery Facility at 145 Wicks Road, North Ryde. This Facility is an established and growing business. The Facility operates under an Environmental Protection Licence (Licence No: 4527) and is approved to accept the following types of waste:

- Asbestos
- General Solid Waste (Putrescible)
- General Solid Waste (non-Putrescible)
- Garden Waste
- Waste tyres
- General of specific exempt waste
- Other waste types below licencing thresholds.

In accordance with the Facility's Environmental Protection Licence, SITA also participates in the EPA's Household Chemicals Collection Program and provide recycling facilities for glass, paper/cardboard, batteries, sump engine oil, aluminium and steel cans, and reusable timber, firewood and garden waste.

The North Ryde Facility accepts up to 20,000 tonnes/annum of general solid waste (putrescible and non-putrescible) under this contract.

The picture in **Figure 1** shows the proximity of the SITA Facility to the proposed UAP. It is estimated that the high density residential area would be approximately 400m from the Facility.

SITA Australia, in particular the Ryde Resource Recovery Facility has established a good relationship with the Ryde Community Reference Group. Recently, improvements have been made to the Facility, which have strengthened this relationship, in particular with the Killara residents.

SITA operates the Facility in accordance with SITA Policy and industrial best practice to ensure that impacts to surrounding sensitive receptors in terms of noise, dust, odour and traffic impacts are as minimal as possible. SITA is required to operate the Facility in accordance with an existing development approval and Environmental Protection Licence. Of note, is the noise restriction criterion for nearby residential properties and other noise sensitive receptors such as schools and hospitals. SITA is required to ensure noise emissions are kept to a minimum. Specifically, noise at the Facility is expected to not exceed a noise criterion of 50 dB(A) LA10 (15 minute) at any point within 1m of any residential boundary or other noise sensitive area.

In addition, SITA is required to adhere to licence conditions in relation to odour. The North Ryde Resource Recovery Facility is required to not cause or permit the emission of any offensive odour from the premises.

Relevance of the Development to the North Ryde Resource Recovery Facility

It is noted the completion of the UAP is also likely to trigger further growth in the Facility as waste sources from the increase of residential properties and the mixed use commercial would provide new waste markets.

Close proximity of the UAP to the existing Facility may also strain existing noise attenuation and odour control measures at the Facility. The Resource Recovery Facility currently operates from 6am – 4pm Monday to Friday, and 7am – 5pm Saturday and Sunday. Whilst SITA operate the Facility in a way to continuously minimise environmental impacts to nearby receptors, new residential and commercial premises in close proximity to the Facility may generate new complaints relating to noise and air quality including odour.

Figure 1: SITA Australia Resource Recovery Facility and Proposed UAP



Expected Impacts

During construction of the UAP it is anticipated that the following impacts may occur:

- Water quality,
- Air quality, including fugitive emissions from vehicles and machinery,
- Increase in heavy vehicle movements,
- Temporary noise impacts associated with excavation and vehicle movements.

Due to the close proximity of the SITA Resource Recovery Facility, cumulative impacts associated with the operation of the SITA Facility, and the construction of the UAP needs to be addressed within the EIS. The SITA Facility has strict requirements for noise attenuation and noise impacts to nearby sensitive receivers and odour emissions, and with the addition of construction works, cumulative impacts associated with other developments, need to be discussed and mitigated.

In addition, operational impacts associated with the subdivision and residential/commercial uses also need to be addressed in terms of their cumulative impacts with nearby developments and land uses. As mentioned previously, the SITA Facility is approximately 400m north east of the UAP. Also, an established organic waste processing Facility is located on the corner of Wicks and Waterloo Roads, opposite the proposed UAP.

Guidelines for the siting of composting and organics processing facilities are provided in Environmental Protection Authority's (EPA) 2004 Guideline: *Composting and Related Organics Processing Facilities*. Appendix A of the guideline states that these facilities should be located away from residences and other sensitive receptors due to dust and odour nuisance. The SITA Facility is licenced to collect and process Category 1 Organics (Garden and landscaping organics) and Category 3 Organics (Mixed residual waste containing putrescible organics), with Category 3 being the greatest potential for odour impact. Whilst a numerical distance for buffer distances are not provided, the guidelines provides that the category of organics being processed, the nature of the processes and the location of the facility with respect to population and sensitive areas, should be considered.

Established planning guidelines (eg *EPA Guidelines for Environmental Management of Landfill Facilities Municipal Solid Waste and Commercial and Industrial General Waste, (2007)*) recommend a minimum buffer zone of 400-500 metres to sensitive land uses due to the risk of occasional but unavoidable fugitive odour emissions during adverse weather conditions. The Facility is currently well sited with respect to sensitive receivers. Additional development in the location proposed by UAP is not considered optimal when viewed against the established guidelines.

The EIS has not considered the proximity of the Resource Recovery Facility or the established organic waste processing facility on the corner of Wicks and Waterloo Roads to the UAP. Potential air quality impacts, including odour, associated with these existing land

uses has therefore not been assessed by the EIS. Due to the close proximity of the Resource Recovery Facility and the organic waste processing facility to the UAP, SITA is concerned that in the future new air quality complaints, in particular relating to odour, may arise. An increase in complaints may lead to a non-compliance with licence conditions.

To minimise potential future impacts on the resource recovery facility, it is requested that Urban Growth (UG) NSW are transparent in disclosing the proximity of the proposed UAP to the existing Facility and its operations. Specifically we would like to request that this information is displayed in sale documents and retail brochures for sites.

Should an upgrade to the Facility be required as a result of an increase in environmental complaints due to the location of the development, it is also requested that UG NSW impose a developer contribution or similar to help SITA fund an odour upgrade of the Facility. This would assist in minimising the potential for odour complaints from new residential and commercial premises.

By increasing residential properties and commercial premises, it is anticipated that traffic on Wicks Road, Waterloo Road and Epping Road would be further stressed. The EIS states that preliminary traffic modelling indicates that the existing road network (particularly Lane Cove Road, Epping Road and Delhi Road) is operating close to capacity (Urbis, 2013 pg 70). Without road upgrades, traffic could have difficulty entering and leaving the individual sites within the precinct due to congestion on surrounding roads (Urbis, 2013 pg 70).

In addition, modelling of the Epping Road and Wicks Road, Lane Cove Road and Waterloo Road, and Lane Cove Road and Epping Road intersections were operating at unsatisfactory Levels of Service including long wait times and queuing at intersections (Urbis, 2013 pg 70). The Waterloo Road/Wicks Road intersection was found to have extended delays (Urbis, 2013 pg 71). The heavy traffic could have a 'flow on' effect into the commercial/business precincts within Macquarie Park and restrict further commercial development within these areas. Whilst it is acknowledged that the proposal includes the upgrade of some intersections, without adequate upgrade of the road infrastructure (i.e. road widening) further stress on the road network may be experienced. SITA operate a fleet of waste vehicles from the North Ryde Resource Recovery Facility, and an increase in wait time may lead to customer complaints.

If you have any questions or would require further clarification on the points above, please do not hesitate to contact me on my e-mail address; steve.marcon@sita.com.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Steve Marcon', with a large loop at the start.

Steve Marcon
Sydney Transfer Station Manager
SITA Australia Pty Ltd

cc

Nicolas Rampelbergs, Snr Project Manager, SITA Australia
David Muir, Snr Project Manager, SITA Australia