

To whom it may concern,

I refer to the proposed waste facility to be built in Moorebank at Lot 6, DP 1065574 (MP 05\_0157). The developer is Concrete Recyclers Pty Ltd / Moorebank Recyclers Pty Ltd. I wish to register my **opposition** to this proposal. As a resident of Georges Fair at Moorebank, I am completely opposed to this application for many reasons. I respectfully request that you use your authority to reject this application. Mr Barry O'Farrell, Premier of NSW, has been quoted as stating his support for:

*"a return of local planning powers to local communities"*

(<http://news.smh.com.au/breaking-news-national/nsw-govt-scraps-3a-planning-provision-20110404-1cwq2.html>)

The Premier is also quoted as stating on 4 April 2011 that:

*"Cabinet today agreed to end a system where a minister can make extra-ordinarily wide-ranging decisions to impose developments on local communities"*

(<http://news.smh.com.au/breaking-news-national/nsw-govt-scraps-3a-planning-provision-20110404-1cwq2.html>).

I would ask you to ensure that the views of local residents are considered with regard to this proposed development.

Any development application for a recycling plant at Moorebank should be rejected for the following reasons:

**1. Lack of community consultation:** A large number of people attended a community consultation evening on Tuesday, 31 May 2011 at New Brighton Golf Course concerning this proposal. It was organised by Judith Stubbs and Associates. There is an expectation that developers should listen to the concerns raised by local residents through authentic consultation. However, almost all of the community members in attendance at this meeting were absolutely disgusted by the lack of genuine consultation with the local community. Those who attended were treated with disdain and many questions are still unanswered. The meeting did not involve genuine consultation for the following reasons:

- a. The organiser of this meeting, Judith Stubbs and Associates, claimed to have letterbox dropped all residents within 1.5 kilometres of the proposed development site. However, I have heard from some residents in the local area who did not receive any information about this meeting. In addition, almost all of the people who will be affected by this development in the future are yet to start building on their vacant blocks of land and were not contacted. As far as I am aware, Judith Stubbs and Associates made no effort to obtain the contact details of those people who have bought vacant land in the new Georges Fair development and as such has deliberately excluded a significant amount of people who will be affected by this proposed development. As such, Judith Stubbs and Associates have not made a genuine attempt to consult with a local community. In addition, I am under the

impression that Judith Stubbs and Associates letterbox dropped some residents to the west of the Georges River but did not contact any residents of Milperra, which will also be affected by the development. Again, there has been no attempt to consult with the community at large.

- b. When we arrived at this meeting, we were put into groups by Judith Stubbs and Associates. This was a deliberate attempt by the organisers to limit whole room discussion. In addition, the organisers had the audacity to ask half the residents to leave the meeting and come back in an hour. Neither of these demands were accepted by the residents. This demonstrates that the tactics used by the organisers were underhanded and designed not to engage in a proper community consultation.
- c. The community consultation only lasted two hours. For such an important step in the decision-making process, this was insufficient. At this meeting, residents indicated that they would be willing to stay for several hours afterwards to ensure that all aspects of the proposal were discussed, however, the meeting was shut down by the organisers. Again, this limited discussion and people did not have an adequate opportunity to raise their concerns.
- d. The organisers ran the meeting in a dictatorial manner and did not listen to the concerns of residents. At several points during the meeting, the organiser referred to members of the public as "rude" and deliberately did not give the microphone to people who wished to raise different points. The organiser ended up ignoring those who she knew were most passionately against the proposal.
- e. The organiser spent more time discussing the procedure for the meeting than the aspects of the project.
- f. The scribes who were writing down points that people were saying did not take down all points that were being discussed. As such, their information is not a true and accurate reflection of what was discussed at the meeting. Again, any report Judith Stubbs and Associates makes as a result of this meeting will be inaccurate and incomplete. I am yet to be provided with a copy of this report, despite repeated attempts to obtain this document.
- g. The representative of the developer/planner at the meeting refused to answer some questions put to him several times by concerned residents. In particular, the developer/planner refused to answer a question about whether there would be a risk from asbestos.
- h. Several people wished to address the audience towards the end of the meeting, including the main sales representative at Georges Fair, however, the organiser of the meeting rudely shut them down and refused to allow them to speak. If this was

supposed to be a genuine consultation process, the organiser of the meeting should have allowed people to speak more freely.

- i. Judith Stubbs and Associates provided attendees with a feedback form which did not have enough space for people to write detailed comments. Again, this was designed to limit feedback.

In addition, I contacted Judith Stubbs and Associates on 5 July 2011, 16 July 2011, 31 July 2011 and on 14 October 2011, requesting a copy of the environmental assessment. Judith Stubbs and Associates have still not provided me with a copy of the environmental assessment. As a result, this organisation has not been particularly helpful in providing information to members of the local community.

**2. Other locations and facilities:** There is no need for a recycling plant in this area of metropolitan Sydney. There are pre-existing recycling plants operated by both Benedict Recycling and Smorgan Steel Recycling at Chipping Norton. Benedict Recycling is also planning to build a recycling plant at Heathcote. Both Chipping Norton and Heathcote are neighbouring suburbs of Moorebank and there is no need for so many recycling plants in such close proximity to each other.

**3. Increased traffic:** The residents of Moorebank will already have to cope with increased traffic flowing from the proposed Moorebank Intermodal Terminal Project. This is expected to result in an additional 1.5 million truck movements in the first year alone. Residents of Georges Fair are already concerned about the traffic movements that will flow around Moorebank due to this Commonwealth Government project. It is unreasonable to expect the residents of Moorebank and its surrounding suburbs to experience additional noise, pollution and congestion associated with the proposed recycling plant, given the likelihood of the Moorebank Intermodal Terminal Project proceeding. In addition, with the recent opening of Brickmaker's Drive, residents of Georges Fair regularly witness the traffic along this road banked up for several hundred metres already. Truck movements from the proposed recycling plant will make this situation much worse.

**4. Proximity to residential homes:** The proposed development is far too close to existing and proposed residential homes. Based on a Google Earth image, the proposed recycling plant will be just 589 metres from the front door of my home. This is completely unreasonable. For other residents, the recycling plant will be even closer. It is unacceptable for a noisy recycling plant that potentially produces toxins (and may process asbestos) to be so close to residential homes. I myself suffer from asthma and there will no doubt be other residents of this area who will be affected by the dust, chemicals and pollution that the recycling plant will produce.

**5. Asbestos:** At the community consultation meeting, the developer/planner was asked a question about asbestos being processed in the plant. The developer/planner answered some questions during this meeting but refused to answer this one. In addition, the question was put to him again and he still refused to comment. As a result, I can only

assume that the plant will be used to process asbestos. As such, I totally oppose this project on the grounds that it will endanger the health of surrounding residents, many of whom are children. The NSW State Government would not wish to be liable for future health concerns that arise as a result of this development.

6. **Toxins:** Similarly, a question was asked about toxins released into the atmosphere from this project. Whilst the air quality representative did make an attempt to answer the question, she indicated that she was not sure what types of toxins/chemicals would be released into the air and she could not guarantee what substances the discharge would have. Again, I must oppose this project on the basis that the developers themselves are unaware of what chemicals will be released and how this will impact on the local environment and residents.

7. **Flooding:** The proposed development is in an area that floods. The developer/planner could not indicate what would happen in the event of a flood. As such, it is likely that unsafe building materials will spread through the Georges Fair area in the event of a flood. This could consist of anything including asbestos and is clearly unsafe.

8. **Crushing material:** The information from the developers is contradictory. They claim that the building materials will be crushed indoors. However, their own documents reveal that they plan to install sweepers "where trucks and people will travel" and that there are even "unsealed areas" in the development. The developer's own documentation reveals that dust will be an issue. There are inconsistencies throughout the developer's information and they cannot be trusted to properly follow any development approval they receive.

9. **Georges Fair new housing estate:** On a related matter, the residents of Georges Fair have purchased property on the basis that "planned streetscapes and cycle paths meet native bushland and parks" (<http://www.georgesfair.com.au>). The residents of Georges Fair are expecting there to be cycle paths up to the bushland area, as promised. However, these will be impossible to use due to the health risks of the neighbouring proposed recycling plant.

10. **Truck movements:** Information provided by the developer indicates that there will be an additional 324 truck movements per day but "hourly truck volumes generated by the recycling facility are very low and will have no impact on the arterial road network". This is complete nonsense. It is a blatant falsehood to suggest that there will be "no" impact on arterial roads such as Nuwarra Road, Newbridge Road and Governor Macquarie Drive. I challenge Lyle Marshall & Associates (the traffic consultants) to witness the traffic in this area during morning and afternoon peak hours and still maintain that there will be "no" impact by having an additional 324 truck movements per day. Even more significantly, the traffic consultant at the meeting himself stated that there are currently 1100 (from memory) movements a day at the moment. This represents a 30% increase in traffic, but the consultant describes this as having "no impact". Again, this is factually incorrect.

11. **Trucks:** According to the plan, trucks will not be allowed to turn left into Brickmakers

Drive upon exiting the recycling plant. However, no information was given on how this would be achieved. If there is merely to be a "no left turn" sign, this will be ignored by truck drivers and is unable to be enforced regularly by the NSW Police.

**12. Weekend operations:** The proposed development is expected to be open on Saturdays. This is unacceptable as the residents of Georges Fair are entitled to have a weekend without the noise of the crushers in the recycling plant. The proposal only states that noise is expected to "within relevant criteria" but does not explain in practical terms to residents what this actually means and whether there will be noise heard by the residents of Georges Fair. Again, this is misleading. The fact that the developers wish to create a 4m acoustic shield, which is quite high, suggests that there will be severe noise pollution coming from the facility.

**13. Visual concerns:** Visually, there are some concerns here. At the meeting, the developer/planner indicated that the site could not be seen from Georges Fair. However, their own documentation reveals that building materials will be stockpiled up to 10 metres high, which would be seen from various parts of Georges Fair, especially the most western parts, which are the highest. Also, the developer's documentation states that the buildings, stockpiles and machinery are not "likely" to be seen but cannot give a guarantee. This is something which the developer should be able to guarantee, as they should know how high their building will be. The fact that the developers are unaware of this demonstrates that their proposal has not been properly designed and there are too many assumptions in their modelling.

**14. Dust:** There is a concern over dust from the recycling plant. The developer's own documentation reveals there will be "likely dust from the recycling facility" (pg 3). The developer has outlined controls to "reduce" dust but there will definitely be dust produced from this project. I am asthmatic and this will affect me. Given the fact that the Georges Fair area will have young new families, this development is unsuitable in this area due to the health concerns. At the meeting on Tuesday, 31 May 2011, a local councillor made the comment that Liverpool City Council had already failed to monitor dust issues at other recycling plants in the LGA. As a result, there are major concerns with this development.

**15. Planning issues:** There are planning inconsistencies here. The area is zoned E2 Environmental Conservation. It is ludicrous to suggest that a recycling plant that the developers admit will produce dust actually 'conserves' the 'environment'. As a result, the development does not meet the zoning requirements. In addition, this is not a development of state significance and it should not be dealt with Under Part 3A of the Act.

**16. Land values:** The developer's information overlooks the impact on land values. This is one of the most significant concerns for the residents of Georges Fair. We have also saved extensively in order to purchase land in a new housing estate. The land is already very expensive as it is. Residents of Georges Fair have also then purchased expensive new homes

as well. This development will have severe impact on land values and we will not be offered any compensation by the developers. We are talking about losses in the hundreds of thousands of dollars.

**17. Delays:** This application has been on foot since at least 2006 ([http://www.planning.nsw.gov.au/asp/pdf/05\\_0157\\_preliminary\\_environmental\\_assessment.pdf](http://www.planning.nsw.gov.au/asp/pdf/05_0157_preliminary_environmental_assessment.pdf)) and it did not proceed then due to a range of issues. It is now 2013. The residents of Moorebank have a right to certainty in terms of the future use of this property. With the passing of time, more and more residential homes are being built in Georges Fair and it becomes less and less suitable for a recycling plant to exist in this area.

**18. Alternative uses:** The use of Lot 6, DP 1065574 for a recycling plant is inconsistent with the overall planning vision for the area. In close proximity to the proposed development site are primary schools, high schools, pre-schools and childcare centres, parklands, nature reserves, the Georges River itself, a proposed waterside marina (<http://www.liverpool.nsw.gov.au/LCC/INTERNET/trimDownloadDocument.aspx?number=044762.2011>), the local library and a golf club. To repeat, the use of Lot 6, DP 1065574 for a recycling plant is inconsistent with the pre-existing uses of surrounding land. The proposed development site would be more appropriate for a parkland, recreation facility or nature reserve.

I understand the need to have recycling facilities in Sydney. However, it is completely unconscionable to build a recycling plant at Lot 6, DP 1065574 for the above reasons.

The Premier of NSW has stated that he wants to:

*“re-empower the community”* (<http://www.smh.com.au/opinion/politics/pistolpacking-pachyderms-have-other-plans-for-ofarrell-20110330-1cg6s.html>)

in terms of planning decisions. At an extraordinary meeting of the Liverpool City Council on 15 June 2011, local councillors unanimously passed the following motion and recommendations:

*“That Council*

- 1. Writes to the State Government immediately to recommend refusal for this development as the proposed use of this site is incompatible with the current and planned residential and recreational uses of the area.*
- 2. Writes to Moorebank Recyclers clearly stating that approval will not be granted for access over Part Lot 310 and Lot 309 in DP 1118048 for waste management/recycling purposes.*
- 3. Makes submissions to the Director General which summarises and comments on the community concerns and such submissions should note that Council does not support the application.”*

As a result, the local community and its representatives are all of the view that this proposed development must not proceed. The views of the local residents need to be considered.

With reference to the “Preliminary Environmental Assessment” document lodged on the NSW Planning and Infrastructure website, there are number of issues with this document:

- The document was released in 2006 and undoubtedly contains information that is now inaccurate, incomplete or superseded.
- Pg 1: The document contains in inaccurate map of the site location, as the adjoining site is now the Georges Fair housing development, where approximately 50% of the land has been released and/or had houses built.
- Pg 4: Reference is made to the fact that land operated by Benedict Sands and Gravel and the proposed new development is suitable for waste recycling. However, this ignores the fact that Benedict Sands and Gravel are planning to shut down their operations and convert the area into residential housing and a marina.
- Pg 5: Reference is made to the fact that the area “has recently been rezoned to permit residential development”. This reflects the fact that this document is completely out of date as residents have been living in the Georges Fair housing estate for many years now, in houses close to the proposed development site.
- Pg 5: Reference is made to the New Brighton Golf Course. It should also be noted that the New Brighton Golf Course is undergoing a massive redevelopment to include residential housing on its land. Again, this environmental assessment ignores the fact that the area is mainly a residential housing area and is inconsistent with the proposed building waste processing plant.
- Pg 6: Reference is made to the proposed plant processing 500,000 tonnes of building and construction waste per year. This is totally inconsistent with the residential nature of the area.
- Pg 9: This document states that there are “some limited view opportunities” from the New Brighton Golf Course. When this report was written, there was no prospect of houses in this area, however, the new houses on the New Brighton Golf Course may be adversely affected by this proposal in terms of visual exposure, in addition to the residents of Georges Fair.
- Pg 11: Reference is made to Benedict Sands and Gravel running a recycling facility, however, this ignores the fact that Benedict Sands and Gravel are planning to shut down their operations and convert the area into residential housing and a marina.
- Pg 13: All of the data on noise and acoustics is now totally out of date, as the area has changed significantly since the commissioning of this report.
- Pg 14: The proponent admits that an issue is the generation of dust from “trucks travelling across the site”, however, makes no reference to how this risk to health will be mitigated or controlled.
- Pg 16: Traffic data is based on modelling completed in 2002 and 2003 and attempts to make a prediction as to 2006 traffic data. We are now in 2013 and it is irresponsible for

the proponent to rely on such data. In addition, this fails to take into account the more recently approved Moorebank Intermodal and its impact on traffic.

With reference to the updated “Environmental Assessment” document lodged on the NSW Planning and Infrastructure website, there are number of issues with this document:

- Pg 1-2: The photograph on this page demonstrates just how close the proposed recycling plant and road containing trucks are to residential housing.
- Pg 2-9: The mitigation strategies in relation to dust issues are insufficient. Sweeping sealed roads will simply move the dust around further and it will affect the health of local residents.
- Pg 2-12: Traffic data from 2003 is no longer relevant and fails to take into account the new housing in the area and the new Moorebank Intermodal.
- Pg 2-23: The report claims “approximately 0.5% of the material delivered to the Site is material which cannot be recycled”. This is a spurious claim as there is no way to know this. I would predict that a higher proportion than 0.5% would not be capable of being recycled, which could result in users of the site simply dumping non-recyclable material in the local area.
- Pg 4-3: This refers to the community consultation held on 31 May 2011, which I addressed above (see point #1). I did not receive any information in relation to this proposal at the time, as the information package was not sent to landowners (only those who had already built). As a result, much of the community of Georges Fair, which owns land but is yet to build, was excluded from this process. In addition, the community consultation was two years ago and excludes those who have moved into the area more recently.
- Pg 4-4: It is misleading to say that a recycling facility is consistent with the long term planning objectives for the area, considering the new Georges Fair housing estate, the new housing development proposed at the Benedict Sands and Gravel site and the new houses being built on the New Brighton Golf Course. In essence, if the proposed recycling plant were to be approved, it would strangely be surrounding by new houses.
- Pg 5-1: Acoustic monitoring data from 2007 is now outdated and unreliable. In addition, of the two residences in the Georges Fair housing estate where tests were completed, both are located somewhat further away from the proposed site than other homes that exist at Georges Fair. In order to gain an accurate understanding of the acoustic issues, there should have been an assessment of the acoustic impacts in relation to homes near Brickmaker’s Drive, which is closer to the proposed site and already has significant traffic and noise issues.
- Pg 8-3: The report concedes that when there is burning and clearing, this can reduce the effectiveness of the natural height and density of the canopy which would affect the visual exposure of the proposed development.
- Pg 10-3: This refers to Georges Fair having 19 vacant lots as at November, 2012. I would estimate this to be more like 300 or more vacant lots.



- Pg 10-9: This states “there is insufficient data to estimate the current and future traffic loading on the most heavily trafficked lane of this busy 6 lane arterial main road”, in relation to Nuwurra Road. I would argue that it is incumbent on the developer to gather this data and address the concerns of residents.
- Pg 12-2: This states that “the site processes waste materials which could contain contaminants”. This presents an unnecessary health risk for residents who may come into contact with these contaminants from trucks travelling in and out of the facility along normal roads and through other means. Most alarmingly, the proposal states:  
*“In addition, contaminants such as bottles, cans, drums, cylinders of dangerous goods could enter the Site mixed with waste materials. These materials could be released during processing (i.e. crushing and screening), resulting in contaminated materials release, flammable liquid ignition and fire and flammable gas ignition and explosion.”*  
 which again poses an unnecessary health risk.
- Pg 13-1: The proponent states that they will “operate the Materials Recycling Facility in a manner which is sympathetic to the amenity of the area in which it is located”. I would assert that it would be impossible for the proponent to meet this commitment, as the recycling facility is simply too close to residential homes and the risks cannot be adequately controlled due to the proximity to homes.

In conclusion, approximately 250 residents of Georges Fair, Moorebank, Hammondville and the surrounding areas attended the community meeting, exceeding the expectations of the developers. No residents were in favour of this development. We know that not all local residents were even advised about the meeting. As a result, there are hundreds more who are opposed to this development. For the above reasons, I would ask that you do everything within your power to stop this development. Please do not hesitate to contact me if you require me to clarify any of the above information.

Yours sincerely,  
 Brenden & Kristal Doonan