(Address is not for publication)

7th March 2013

Major Projects Assessment, Department of Planning & Infrastructure, GPO Box 39, SYDNEY NSW 2001

Emailed to: plan_comment@planning.nsw.gov.au

Dear Emma,

Objection to Proposed Building & Construction Waste Recycling Facility, Moorebank MP 05_0157

We strongly **object** to the proposal to establish a waste recycling facility in Moorebank and we have significant concerns that this facility will have a negative impact on the residents of Moorebank, its' surrounding areas and the Georges River.

The reasons for our objection are as follows:

Access to the site

Although Concrete Recyclers (Group) Pty Ltd (Concrete Recyclers) has indicated in their Environmental Assessment (EA) that access to their site Lot 6, DP106 5574 (the site) is not an issue, our understanding is that access is still outstanding. We are of the understanding that Concrete Recyclers is still in dispute with council in respect of approval of access and also with the adjoining property owners, Benedicts.

Unless the outcome of these disputes is known, and the method of access to the site is made available for public exhibition, it is not possible for residents to know how this will impact on noise, pollution, traffic etc. Therefore we can only provide our feedback based on the proposed plan to access the site and we will need to review the EA again once the issue of access has been resolved.

If the method of access goes ahead as documented in the EA then there are a few problems:

- 1. The information contained in the EA is out of date and does not include or plan for upcoming changes to roads and traffic in the area which will see more cars and trucks using the key access roads. This includes:
 - a. Additional trucks on Newbridge and Nuwarra Roads and Brickmakers Drive as a result of the **Moorebank Interchange facility**. There will be additional trucks on all roads leading into and out of the site as a result of the Moorebank Interchange facility.
 - b. Additional traffic coming from outlet roads not yet built in Georges Fair.
- There is already considerable traffic congestion at the intersection of Brickmakers Drive and Newbridge Road during peak periods. The addition of large trucks turning right (or trying to turn right) into Brickmakers Drive will just not work. It's already a "car park" during peak morning times and this would just exacerbate this problem.
- 3. The EA states that trucks leaving the site will be restricted from turning left into Brickmakers Drive by use of a **barrier** and **signage**. Even though the EA states "it is an offence to disregard a regulatory

sign", residents of George Fair have already seen how truck drivers navigate *over* the existing chicanes, use excessive speed along Brickmakers and tail gate drivers who follow the speed limit of 50kms. We are therefore extremely sceptical that this approach will be successful.

4. Although the EA includes details about restricting left hand turns out of the site, there does not appear to be any such restrictions on traffic that exit the M5 (from both east & west directions), travel onto Nuwarra Road, turn **right** into Brickmakers and then turn **right** into the site. This will probably be a very popular option so it is sure to be heavily utilized by trucks causing additional pollution, noise, road damage, danger to other drivers and pedestrians and traffic congestion. Any additional volume of trucks onto Brickmakers Drive will be disastrous.

Visibility of the site

The information in the EA about visibility is out of date and misleading.

- The data and supporting photographs were only taken from ground level and not taken from the second story of any home in Georges Fair. Photos were taken in the very early stages of development. Visibility of the site **must** be measured from the highest viewing points in Georges Fair (at least 2nd story balconies along Bradbury Street), surrounding suburbs, as well as any future residential developments (proposed residential development and marina by Benedicts and approved residential development by New Brighton Golf Club) and Milperra.
- 2. The EA does not mention high density zoning along Nuwarra Road which overlooks the site. Visibility has not been assessed for <u>the 6 story residential building</u> currently under construction.
- 3. As stated in the EA, visibility of the site is dependent upon the trees and shrubs surrounding the site. As also detailed in the EA, the site is located in a **bushfire zone**. If a bush fire destroys this vegetation, the site will be visible from the whole of Georges Fair and beyond and it will take years and years for trees to grow to their current height. Although there may not have been a bushfire in recent years, there is evidence of burnt trees in the vegetation so this scenario is possible. With the extremes of weather we have been experiencing, it is not unlikely that there will be a bushfire. We may then be left with a **perfect view of the site similar to the eye saw currently created by Benedicts**. We are currently subjected to this absolute disaster on a daily basis which is **TOTALLY unacceptable**.
- 4. When we purchased land in Georges Fair, Benedicts was <u>not visible</u> and trees and vegetation screened the site. Unfortunately, almost all of the entire screening vegetation has been removed and we are left with "Lawrence of Arabia" style hills of sand. This demonstrates that Concrete Recyclers **cannot** rely on vegetation and trees to screen their site as this may not offer a permanent solution.

Danger of exposure to hazardous material

It is of great concern to us that there is little to no concern about the potential dangers posed by materials like asbestos and lead paint entering into the site for processing. The EA does not provide any details about the source of the materials or what specific materials will be processed. The materials are only referred to as building and construction waste. We understand that materials may come from any source including old demolished buildings. How could anyone make a visual assessment for <u>asbestos and/or lead paint</u>?

Surely material from building sites CANNOT be accepted at this site as the risks relating to asbestos and lead paint distribution through dust particles is too high.

When Concrete Recyclers held a Community Information Session with Georges Fair residents on 31st May 2011 the question of asbestos was raised but could not or would not be answered.

Air quality impact

Similar to the above, Concrete Recyclers appears to have no concern for the health and wellbeing of residents impacted by cement dust. In fact, there is no mention in the EA of the cumulative and long term impact of inhalation of air borne dust particles on the health and wellbeing of residents.

Any kind of support for residents is an obvious omission in the project objectives set out by Concrete Recyclers.

The dust mitigation measures set out in the EA are very general eg use water sprays to minimise dust and wet truck wheels as they leave the site. If dust is not spread, then why the need for sweeper trucks?

This strategy is not specific enough to reassure residents that the dust will be proactively managed and will not impact on homes in such close proximity to the site.

The recent extreme weather saw strong winds which are outside of the "standard winds" used in the analysis of particle distribution. It is reported that extreme weather is here to stay and therefore these variations should be included in the air quality analysis to ensure that all safety measures can be sustained during extreme heat, extreme winds and extreme rain.

Air quality is very important to the residents of Georges Fair as there is a vast amount of information available on the internet detailing the health dangers of concrete dust.

Last March, a safety alert was issued by WorkCover warning about the dangers of Concrete Batching. So why wouldn't this apply to the residents of Georges Fair?

Of most concern to residents is the danger of air borne exposure to silica which can lead to lung injuries including silicosis and lung cancer.

If only one child who is exposed to concrete dusk contracts a lung disease or worse, **cancer**, it is one child to many!

Risk to fish in Georges River

Concrete dust kills fish. If there is any risk of concrete dust getting into the Georges River as a result of flooding or excessive concrete dust air particles then there could be an environmental disaster. Maintenance and the wellbeing of our water systems are the highest priority.

Community Consultation

It should be noted that the community consultation was held almost 2 years ago when there were very few homes established in Georges Fair. Since then the number of homes built in Georges Fair has doubled and land sales have soared. These new or soon to be new residents have not had the opportunity to be involved in any consultation. In fact, there are people who have purchased land in Georges Fair, closest to the facility, who have not been told about this proposal.

All residents who have purchased land should be advised of this proposal.

Negative impact on the development and growth of Moorebank

Liverpool is perfectly placed for growth in residential development. It has brilliant amenities, transport, schools and is a big draw card for young families. It is only around 40 minutes from Sydney. Georges Fair along with Wattle Grove and Chipping Norton are boom areas.

New businesses like Costco are being attracted to Liverpool. And Liverpool Council has plans to improve the waterfront along the Georges River for the benefit of all of Sydney.

If this building and waste recycling facility is established in such close proximity to homes, schools and the Georges River, the Georges Fair and Moorebank area will be or will be perceived to be an unsafe place for residents and families to live, and the facility will drive down property values – without any compensation to home owners.

Planning for recycling is important

The need for recycling to reduce land fill is important.

The location of sites to facilitate recycling deserve careful planning so that they:

- are sustainable,
- meet the needs of the community,
- meet government recycling objectives,
- are commercially viable and
- are SAFE for residents.

Recycling facilities should not be placed near heavily populated areas.

The need for recycling is only going to grow. This means that a **long term solution** needs to be found so that sites are located further away from residential areas. Recycling operators and transport companies could be given some benefit or possibly tax concessions to offset the additional costs involved in transporting materials over longer distances.

The health and wellbeing of our community and particularly of our children is of upmost importance so we therefore ask that the proposed Building & Waste Recycling Facility – Moorebank <u>is rejected</u>.

Yours sincerely,

SUSAN DWYER WENDY MALCOLM