Emma Barnet - Submission Details for

From:To:<emma.barnet@planning.nsw.gov.au>Date:3/12/2013 11:09 AMSubject:Submission Details forCC:<assessments@planning.nsw.gov.au>Attachments:Comments on proposed waste reclying facility in Moorebank.pdf

X Department of Planning

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

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Moorebank, NSW 2170

Content:

I, as a resident of the Georges Fair Estate and on behalf of my family, strongly OPPOSE the proposal for the development of the waste facility in Moorebank.

IP Address: cpe-121-217-162-10.Inse2.cht.bigpond.net.au - 121.217.162.10 Submission: Online Submission from https://majorprojects.affinitylive.com?action=view_diary&id=56319

Submission for Job: #100 MP 05_0157, Moorebank Waste Facility https://majorprojects.affinitylive.com?action=view_job&id=100

Site: #91 Moorebank Waste Facility; , Moorebank https://majorprojects.affinitylive.com?action=view_site&id=91

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MP 05_0157, Moorebank Waste Facility

Construction and operation of a recycling facility that would handle approximately 500,000 tonnes of construction waste per year

Comments based on the documents available on the website

- General: The proposed material recycling facility will be located in close proximity of a residential area (Georges Fair Residential Estate). Distance between the north-west corner of the proposed site and the nearest residences in the Georges Fair area is 250 meter. It is even narrower at the intersection of the link road and the Brickmakers Drive. Therefore, despite all mitigation measures, it is inevitable that the proposed recycling plant, during construction and operation, will cause significant impact on the residents in the Georges Fair areas the natural bushland and the Georges river. Any emission or discharge (accidental or regulated) from the proposed site will have significant impact on the ecosystem. Construction of the facility on an existing (non-operational) landfill has the potential for accidental release of pollutants currently confined (as reported) in the landfill.
- **Cumulative Impact:** Existing Benedict Sand and Gravel facility is already putting pressure on the nearby environment and residents (existing and future who are already purchased plots in the Georges Fair Estate) in terms on air pollution, excessive noise, strong odour, traffic congestion and visual impacts. The proposed facility will add extra loads to the environment and the community. Cumulative impact will have severe and irreversible impacts on the environment and community. The EIA did not include cumulative impact assessment.
- Underestimation of Affected Area: Page 1-2 of the EIA report indicates that a "small" section of the Georges Fair estate is located to the west of the site. This is incorrect. The length of this "small" section is approximately 600 meter or more than half the estate's length. Therefore, impacts arising from the proposed project will have significant impact on this "large" section of the residential estate.
- *Site Access:* Site access through Brickmakers Drive (through 18m wide strip of land) would cause significant traffic congestion on Brickmakers Drive. Once the Georges Fair Estate is fully developed, this road will play a major role to take pressure off already over-stressed Nuwarra Road. Trucks coming in and out of the proposed site would cause heavy congestions not only on the Brickmakes Drive but also on the Newbridge Road. Travel time will be increased and it will impact aversely on local community and businesses. Note: Alternative access routes have not been considered in the EIA
- **Study Limitations:** Noise and traffic studies have <u>underestimated</u> number of vehicle movements along Brickmakers drive. This is a newly constructed road connecting the Heathcote road (via Nuwarra road) and the Newbridge road. People travelling between western suburbs (i.e. west of M5) and Bankstwon areas are increasingly using this road and it is adding more vehicles to the road every day. This number will increase significantly when all residential area (Georges Fair) is fully developed. Additional truck movements (to and from the proposed facility) along this road will cause significant traffic congestion and it will increase travel time and decrease quality of life of the residents living in these areas.

This is to note that the traffic survey was conducted (refer to Appendix 4 of the EIA) in October 2012 at Brickmakers Drive only a few weeks after it was constructed. At that time, as people were unaware of the existence of this road, number of vehicle using this road was significantly low particularly during peak hours. Therefore, the collected data was not representative of the current situation. **Brickmakers Drive should not be used** during construction and operation of the proposed material recycling facility.

- Erroneous Air Quality Assessment: Air Quality Assessment report was done between 2007 and 2010. Meteorological data collected in 2005 was used for air quality modelling. No recent data has been used. Also the air quality data used in the study was collected from a monitoring station (Rose Street, Liverpool) that does not represent the ambient air quality in and around the proposed site. Particularly the emission generated by the existing waste recycling plant (Benedict) has not been taken into consideration at all. It is likely that the cumulative emission from the Benedict site and the proposed plant will exceed the air quality criteria applicable to residential areas particularly the areas close to both sites (note: these areas in Georges Fair are yet to be developed).
- Asbestos Related Health Risk: There is potential that materials containing asbestos will be recycled in the proposed facility. GIVEN CLOSE PROXIMITY TO THE RESIDENTIAL AREAS AND MATERIALS CONTAINING ASBESTOS ARE LIKELY TO BE USED IN THE PROPOSED FACILITY, THE PROPOSED WASTE RECLYCLING FACILITY MUST NOT BE BUILT IN MOOREBANK.
- **Change to Local Hydrology:** The proposed site will be on the floodplain of the Georges river and certainly it is going to affect the hydrological regime of the whole area. Natural run-off/drainage will be interrupted.
- **Proposed Layout:** A 4m mound along the site boundary has been proposed. This seems grossly inadequate as most of the proposed structures e.g crushers, workshop etc are double of this height. This mound will not be able to screen neither noise nor emissions arising from the proposed facility.
- **Bushfire:** Bushfire impact assessment did not assess whether the proposed facility would exacerbate bushfire (in case there is one) in the area between the proposed site and the Georges Fair residential area. It is not clear whether a fire would travel faster westward due to the presence of the recycling plant in the east than it would naturally do under "no-development" scenario. There is also potential that the construction or operation of the plant could trigger any bushfire event.
- Inadequate Community Consultation: Community information session was organised on 31 May 2011 and the EIA has been issued almost 2 years after the consultation was done. A significant number of residents were moved in the area (particularly in the Georges Fair) since the consultation was organised. Therefore, concerns of the existing and future (owner of the building under construction) project-affected people were not considered in the EIA. General perception of the current resident towards the proposal for the development of recycling facility is negative.
- **Visual Impact**: The assessment did not consider visual impact arising from the stockpiles. The stockpiles in the existing Benedict site can be seen from a long distance. The impact

from the new recycling facility would be the same. The report is therefore inadequate and cannot be considered in any decision making process.

• **Odour Control**: The EIA report does not provide details of the odour control measures. Strong odour from the existing Benedict waste plant has recently being experienced by the residents. Repetition of such incident should not happen.

Based on the above, I, as a resident of the Georges Fair Estate and on behalf of my family, strongly OPPOSE the proposal for the development of the waste facility in Moorebank.