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Greenhills Beach NSW 2230
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Submission

Breen Resource Recovery Facility (SSD-10412)

I request that the Department and the Minister address the following matters when assessing and determining the development application.

1. Traffic

The traffic report forecasts an increase in heavy vehicle movements, particularly in the morning peak. However, the application is silent on the gradual and incremental impact of traffic from this and other re-developments on the Kurnell peninsula. The only access to the peninsula is via Captain Cook Drive, which is only a single lane beyond the Elouera Road roundabout. Consideration must be given to an upgrade of the road to improve traffic management, congestion and safety. This could be included as developer's works-in-kind in the proposed new VPA. Or an alternative arrangement made for this developer and all future developers on the peninsula to contribute to an upgrade of the road through monetary contributions or works-in-kind agreements in association with their developments.

The improvement of this public infrastructure will in-turn support the vitality and activation of this important employment precinct. It will also support the projected increase in traffic as a result of the two NSW government projects, Cape Solander whale watching (current) and Kamay ferry wharves (proposed).

2. Noise

The application seeks approval to operate 24 hours. Given the type of equipment used to crush, screen and compact items like concrete, it will be critical to ensure that:

- The buildings housing that equipment are adequately constructed and sound-proofed and
- The use of external vehicles, plant and equipment is appropriately controlled, to mitigate any noise pollution to the residential area, especially in the still of the night.

3. Dust

The application seeks to fill and contour the areas in the south and west of the site over several years to form a public reserve. These areas already sit exposed, well above the surrounding landscape. It will be important to ensure that proper, regular and well-maintained dust suppression is applied and monitored until all new vegetation is established, especially to protect the nearby residential area.

4. Height

It is unclear how high the finished ground level will be in the future public reserve. A section A-A in the Landscape Plan indicates 59.5m, yet the Field Survey indicates 36.5m. It is also unclear how either of these heights compares to both:

- the current height of the existing mounds of fill in that location and
- the 1997 Hassell Plan.

The current and proposed (future final) height at the highest point should be clearly stated so that a proper assessment can be made of any implications for dust, noise and visual amenity.

5. Cap

I support the imposition of an annual cap to the total amount of material imported, where that amount is currently un-capped. However, I can't find any justification for how the 650,000 tonnes figure was derived. Apart from a statement that *imports have been as high as 1.9 million tonnes at a peak time in the past*, there's no explanation of how the 650,000 tonnes compares to current or recent or average activity. Such a comparison and explanation must be obtained to justify the appropriateness of the proposed cap.

Regards,

Gregory Longmuir