

25 July 2019

Our Ref: 25489
Your Ref: SSD 7187

Planning Services
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Chris Ritchie – Industry Assessments

Dear Mr. Ritchie,

APS acts on behalf of Jemalong Mundamia Pty Limited who are in the process of developing a 300+ residential subdivision at Mundamia only 2km away from the proposed West Nowra Resource Recovery Facility (RRF). This submission is made in response to the exhibition of the EIS for the upgrade and extension of the West Nowra RRF.

The primary concerns for the proposal are on the Mundamia URA and the potential negative impacts that will be experienced by future residents of the Mundamia URA and the adjoining Cabbage Tree Lane URA.

The main issues that will be addressed in this submission are:

- Traffic impacts;
- Noise impacts;
- Dust impacts;
- Odour impacts;
- Bushfire impacts.

The following information is based off of the information outlined in the Environmental Impact Statements (EIS) and the appendices.

We kindly ask for your careful consideration of these issues.

Traffic

From the EPI, appendix F - Traffic and Transport Assessment, the following points are made:

Consistently throughout this report Yalwal was mis-spelt 'Yalwah'. This should be corrected.

Background Growth:

2017- Kalandar Street and the Princes Highway intersection recorded a score of a 'F' at 89 seconds.

2027- Kalandar Street and the Princes Highway intersection has increased the 'F' to 337 seconds

2017- Albatross Road and Kalandar Street intersection scaled as 'E' at 59 seconds.

2027- Albatross Road and Kalandar Street intersection scaled as 'F' at 414 seconds.

2017- Yalwal Road and Albatross Road intersection scaled a 'B' at 18 seconds.

2027- Yalwal Road and Albatross Road intersection scaled a 'F' at 959 seconds.

It is noted that the impacts of the increased traffic on the intersection of Yalwal Rd and George Evans Rd has not been considered. This is a critical intersection for the Mundamia URA and has not been taken into account.

Overall, the upgrade of these intersections **MUST** be reconsidered, as these wait times are completely unacceptable and ludicrous. Due to this, an upgrade of these intersections is required, and due to the nature of the development, a contribution should be considered and followed through.

It is noted that Shoalhaven City Council has a number of Contributions Projects to cater for the upgrade of some of the lead in roads and intersections into this area and these projects should be adjusted to cater for the increased traffic from this significant project.

The assumption that was made throughout the report stated that 100% of vehicles that will be using the RRF will all be following the same route. This assumption should be tested as it is highly unlikely that this will be the case. Traffic may head south along Albatross Rd and also come through the Nowra township, which also has not been accounted for.

Noise

From the EPI, appendix E - Noise Assessment, the following points are made:

No assessment of the noise was undertaken at the site of the Mundamia URA or Cabbage Tree Lane URA. This is a significant, as any noise generated from the proposed site may affect the amenity of future residents of both URA's.

Dust

From the EPI, appendix C – Air Quality Assessment, the following points are made:

No assessment of the dust was undertaken at the site of the Mundamia URA or Cabbage Tree Lane URA's. Due to the nature of the proposed development there is a high chance of dust throughout the air. This is a significant, as any dust generated from the proposed site may affect the amenity of future residents of both URA's.

Odour

From the EPI, appendix C – Air Quality Assessment, the following points are made:

No assessment of the odour was undertaken at the site of the Mundamia URA or Cabbage Tree Lane URA. Due to the nature of the proposed development there is a high potential for odour spreading to adjoining residential areas which will have a significant impact on the amenity and health throughout the air. This is a significant, as any dust generated from the proposed site may affect the amenity of future residents of both URA's.

Bushfire

From the EPI, Appendix I – Bushfire Assessment, the following points are made:

Due to the proposed site being significantly prone to bushfire, and due to the nature of the materials that are to be recycled in the new facility, the emergency plan is inadequate for the scale of the

development. It would be best if this plan was re-written to ensure the safety of not only the workers, but the general public. However, a more significant concern is that there is only one access road in and out of the proposed site which may lead to entrapment in the event of a bushfire. Due to the nature of fires, they can be unpredictable and sudden, the creation of an alternative evacuation route would be the best solution for both the workers and general public.

I am aware that there have been precautions put in place, such as the use of the Biofilter and an increase in the Dams that are on the site, however, when dealing with materials such as mulch, and particularly in the fire season (September to March) the intense heat and sudden winds result in embers spreading quickly and leading to uncontrollable fire.

Thank you for considering new outcomes for this proposal,

Regards,

A handwritten signature in black ink, reading "C. Mahony". The signature is written in a cursive, flowing style.

Caitlin Mahony

Allen Price & Scarratts.