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From: ISCCC Chairperson <Chair@isccc.org.au>
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To: EPD, Customer Services
Cc: ISCCC; ISCCC Chairperson; RATTENBURY; LEE; CANDICE; BARR; STEPHEN-SMITH; GENTLEMAN; FITZHARRIS
Subject: ISCCC Submission in response to EIS for proposed Fyshwick waste facility - EIS Application 201700053
Attachments: FINAL-ISCCC-Response-Fyshwick-EIS.pdf
Categories: Green Category

Attached is a submission from the Inner South Canberra Community Council in response to the EIS for the proposed Fyshwick waste facility.

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Inner South Canberra Community Council

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INNER SOUTH CANBERRA COMMUNITY COUNCIL (ISCCC) SUBMISSION: OBJECTIONS TO PROPOSED WASTE FACILITY FYSHWICK – EIS APPLICATION 201700053

OVERVIEW

The ISCCC is a voluntary, not for profit, community-based association operating in the inner south area of Canberra. The ISCCC's objective is to preserve and improve the social, cultural, economic and environmental well-being of Inner South Canberra and the Inner South Canberra community. We are the peak community body representing the interests of inner south residents and communities with representation from inner south residents groups, including those in closest proximity to the proposed facility: Old Narrabundah Community Council, Griffith Narrabundah Community Association, and Kingston and Barton Residents Group.

The ISCCC supports the ACT Government's goals of reducing, reusing and recycling waste and driving towards zero net emissions by 2045. The ISCCC supports the Waste Feasibility Study Roadmap and Recommendations with respect to source separation of food and garden organics through kerbside collection in green bins. Yet we understand the proposed Fyshwick facility will recycle only about 20 percent of the material transported there. About 80 percent of waste received, including organic material, would end up in landfill in Woodlawn near Tarago in NSW. This would seem to undermine the intent of the Waste Feasibility Study roadmap and recommendations.

We consider that the proposed facility is the wrong solution in the wrong location. Both the *ACT Waste Management Strategy (2011-2025)*, and the *Market Sounding to Industry* to which the proponents responded, highlight the primacy of the Hume Waste Precinct as the location for major new waste infrastructure. It would be inconsistent with this strategy to redirect Canberra's red lid bin waste from a rural broad acre site in Hume over a kilometre from the nearest homes, to an urban bulk retail and light industrial business centre in the heart of inner south Canberra. Our understanding is that the proposed facility will be:

- Less than 100 metres from residents in Fyshwick
- Less than 100 metres from commercial and retail premises on Ipswich, Wiluna and Lithgow Streets
- 364 metres from the evolving Dairy Road precinct receiving 10,000 visitors weekly
- 570 metres from the Southside Village on Canberra Avenue
- 730 metres from residents in parts of Narrabundah near Canberra Avenue
- 804 metres from the Symonston Childcare Centre
- 905 metres from the Fyshwick open air markets

The proposed facility is also at odds with future directions for Fyshwick and surrounding areas. Over the next 10-15 years, the 14.5 hectare Dairy Road precinct will host over 50 buildings combining artist studios, retail, light industrial, commercial, creative and cultural spaces¹. In just over six months, visitation to the site has increased from 200 people per week to more than 10,000 per week. The draft EIS does not consider the impact of the proposed waste facility on the Dairy Road precinct, including the significant increase in heavy vehicle traffic on Ipswich Street and on the intersection of the Monaro Highway, Newcastle Street and Dairy Road.

The proponent acknowledges the East Lake residential development, which would be approximately 300 metres from the proposed facility, but concludes that “Whilst this proposal is possible, there are no firm plans for development of this site from the ACT Government.”² In fact, substantial planning and community consultation has occurred in regard to the East Lake development, as indicated on the EPSDD website³, and may lead eventually to up to 9000 people living in the area between Kingston Foreshore and the Monaro Highway. The impacts of the proposed facility on people living and/or working in such close proximity certainly should be assessed.

Further issues of concern relating to the proposed Fyshwick facility are provided below.

TRAFFIC IMPACTS

- Additional traffic of 230 waste trucks/460 truck movements per day on Ipswich St will have significant adverse impacts on access, safety and amenity.
- A significant increase in truck movements on Ipswich St will be dangerous. Trucks from the north come over a hill and then have to move across to the left lane and merge with traffic coming into Ipswich Street from Barrier Street (near Harvey Norman) before entering the Facility site at the bottom of the hill. The short timeframe and distance for merging lanes and then slowing to enter the waste transfer site at the bottom of the hill will increase the risk of accidents.
- There will be a significant impact on congestion, resulting in increased travel time for users of that transport corridor. The adverse impact of that congestion and increased travel time do not appear to have been addressed.
- The proponents’ documents appear to assume signalisation of the exit from the facility into Ipswich Street, but there is no analysis of impacts arising from signalisation or who would pay for it. Any interruption to the regular flow of traffic is likely to create bunching, especially between this new set of traffic lights and the lights a short distance south on Ipswich Street, increasing travel time for road users.
- A traffic risk assessment considering the potential for increased road accidents, and associated costs, has not been presented.
- The draft EIS fails to take account of Ipswich St as the only direct route between Canberra Ave and the Monaro Highway, a congested transport corridor at peak times.
- In particular, traffic analysis is needed for the very congested intersection where the on/off ramps of the Monaro Highway meet Newcastle Street and Dairy Road.
- Rigorous analysis of traffic impacts requires an estimate of future traffic growth in the area, but this has not been addressed, including to account for traffic arising in the new Dairy Road and East Lake precincts.

¹ <http://molonglogroup.com/dairy-road-foreshore/>

² EIS, page 51.

³ https://www.planning.act.gov.au/topics/current_projects/studies/eastlake_urban_renewal

- Adverse traffic impacts will occur also on Wiluna and Lithgow Streets. The brick supply yard is obliged to close off the road at times more than once per day to allow for delivery of bricks and pavers. The additional truck movements would present a queueing problem and road blockages.
- Traffic counts were conducted for the standard morning (0800-0900) and afternoon (1615 to 1515) peaks, but an additional lunchtime peak (1200 to 1300) exceeded both the morning and afternoon peaks. Subsequent analysis does not appear to have considered the lunchtime peak, so that the picture presented of traffic growth is incomplete.

MATERIALS AND WASTE

- The redirection of Canberra's red lid bin waste from Mugga Lane to the proposed Fyshwick facility risks the significant stockpiling of waste, including putrescent waste, which would have adverse impacts for odour and for attracting birds and vermin.
- On the existing Access Recycling metal recycling premises next to the proposed site, the materials brought onto the site do not appear to have been processed and transported off-site quickly. For example, a large stockpile of crushed glass has been on-site since at least 2017. This does not give confidence that the proposed facility, a joint venture between Access Recycling and Benedict Industries, would be managed in a way to minimise stockpiling.

LANDSCAPE AND VISUAL IMPACTS

- As noted above, there is already significant stockpiling of materials on the adjacent site of CRS joint venture partner Access Recycling. This has negative landscape and visual impacts, and creates concern about the possible landscape and visual impacts of the new facility.

SOILS AND GEOLOGY

- Considerable chemical contamination was left by its previous use as a bulk fuel depot. Benzene and other hydrocarbons have been identified in the soil and ground water in excessive concentrations. We understand from the Remedial Action Plan that future site users could be exposed to contamination through direct contact with contaminated soil, inhalation of dust from contaminated soil, and inhalation of vapours from contaminated soil that penetrate inside the buildings. From the EIS documentation, it seems that the risk of inhalation of vapours was a reason why a building had not been envisaged before for the site.
- To prevent indoor inhalation of such vapours, a vapour barrier in the building is proposed, for example in the form of a sealed geomembrane or spray-applied barrier system beneath building slabs. However, this requires a plan for long-term protection of the vapour barrier, and hence a long-term commitment and resources directed to a monitoring system.

ODOUR AND AIR QUALITY

- The Odours document says odours are mitigated against by air changes in the building five times an hour and that residential areas are too far away to be impacted according to the odour scale, but they say there could be some odour affecting nearby commercial and industrial businesses.
- Table 3.3 (p. 23, Appendix I) refers to an unidentified waste transfer station in Sydney that processes only municipal waste, with mean stack gas temperature of 21.4 degrees Celsius. However, Appendix B (Model source, emission and BPIP configurations) to Appendix I appears to indicate that the exit temperature of odour fumes from the stack

was set at 0 degrees Celsius in the modelling process. This setting would tend to underestimate the extent of dispersion of the odour plume when emission temperatures are higher due to higher ambient temperatures inside the facility, as would be the case in summer in the ACT.

- Given the right atmospheric conditions, offensive odours can travel significant distances, even if only intermittently and in low concentrations.
- CRS have not provided an Air Quality Impact Assessment Report that considers additional fine particulate burdens in the air shed, the increase in diesel emissions and the chemical composition of the plume from the large ventilator stack.

NOISE

- In addition to the noise of the additional 230 waste trucks/460 truck movements each day, and operation of plant and equipment on site, the facility would operate from 6am to 10pm – that is 16 hours per day, 6 days a week.

GENERATION AND DISPOSAL OF HAZARDOUS WASTE

- The plans to deal with hazardous materials in the waste brought onto the site are very vague (estimated at 0.5% each for municipal solid waste and commercial & industrial waste assessed in Odours report) – the proposed approach is to tip it on the floor and take out these items and put them in special containers, but it's not clear what happens after that.

GREENHOUSE GAS EMISSIONS

- We question whether there will be sufficient recycling of materials processed at the site, about 20 percent, to justify the redirection of all Canberra's red lid bin waste from Mugga Lane to Fyshwick. About 80 percent of this will be sent by rail over the border to the Woodlawn landfill in New South Wales.
- The proponents indicate that food waste could be separated at the Fyshwick facility if there is a composting requirement, otherwise it will go to the Woodlawn landfill. Most methane is from such putrescible waste. While, it is claimed that the Woodlawn Bioreactor Landfill has a more efficient methane capture than Mugga Landfill, it does not change the fact that a massive proportion of the waste stream will go to landfill. Source separation of organic materials would be a preferable approach to reduce greenhouse gas emissions.
- We understand that the shed built at the waste facility will have a gross floor area of over 7000 square metres, double the size of a similar facility in Banksmeadow in Sydney that can take in up to 500,000 tonnes per year. It suggests that the Fyshwick facility will need to import waste from other states to keep it operating at high capacity.
- When all these factors are taken into account, will the proposed facility contribute to a total net reduction in greenhouse gas emissions, or lead to increased emissions in the ACT?

FIRE RISK

- The EIS pays scant attention to the risk of an internally-generated fire. There are regular fires in various waste facilities, including in garbage trucks. Lithium ion batteries can be a source of risk.
- In a 3 year period from June 2014 to June 2017, the adjacent scrap metal yard integral to this project, required the attendance of the ACT Fire Brigade on 7 occasions.
- Waste fires are costly and Canberra has already experienced waste fires at Mitchell, Pialligo, Mugga, and in scrap metal yards in Fyshwick, and Beard.

HAZARD TO AIRCRAFT OPERATIONS

- The proposed facility is about 2.5km from the mid-line of the main runway at Canberra
- airport. Air safety guidelines and aviation legislation identify bird strike as a danger to aircraft and public safety. Waste transfer stations and incinerators are assessed high risk, including because they attract birds, and other animals due to the presence of food.



Chair
27 June 2018