

From: [REDACTED]
To: [EPD, Customer Services](#)
Subject: SUBMISSION -DRAFT EIS BY CAPITAL RECYCLING SOLUTIONS NI2018-27 FOR THE PROPOSED WASTE TRANSFER FACILITY IN FYSHWICK
Date: Tuesday, 26 June 2018 10:34:39 PM
Attachments: [VTsubmission against EIS No.201700053-CRS MRF.pdf](#)

[REDACTED]

**SUBMISSION ON DRAFT EIS
BY CAPITAL RECYCLING SOLUTIONS
NI2018-27
FOR THE PROPOSED WASTE TRANSFER FACILITY IN FYSHWICK
TO THE MINISTER FOR PLANNING**

I object to the above development.

Additional traffic to be introduced to Fyshwick particularly Ipswich Street is unacceptable.

1. The number of trucks is not adequately accounted for in the Draft EIS.
2. The number of trucks will have a greater impact than acknowledged.
3. There was no accompanying assessment of the increased risk of traffic accidents because of the additional truck movements in this street

It is not clear in the EIS whether the 230 trucks is a complete figure. The number of trucks bringing waste metals to the Lithgow Street facility for rail transport seems to be omitted and the number of trucks bringing additional freight to the terminal is also unknown as is the number of empty trucks entering to pick up the recyclables for market other than by rail. Trucks removing leachate and contaminated soil and water is not included. Most importantly the estimation of truck numbers or movements does not factor in any growth at the site. As Canberra grows in population the amount of waste will increase and so too we hope, will the amount of material to be recycled and hence moving off site to market. The number of trucks over time will exceed the 230 cited.

There seems to be some confusion about the number of trucks or truck movements.

...the proposed MRF development when combined with general freight movement will produce an average addition of 230 truck traffic movements per day (waste collection vehicles and general freight trucks) (p.x).

Elsewhere in the EIS it is 230 trucks not truck movements. Also the delivery time of the waste trucks will coincide with the general pick up times at households and is not likely to be over the full 16 hours a day operation. That means that if, for example, it confines itself generally to a 7am-4pm time slot the trucks will be arriving not every 4 minutes but more like every two. I would add also that CRS is not in control of these trucks and cannot stipulate as to their movement. At the site visit consultation of 31 January 2018, the representative of CRS said the number of trucks is 230. Consequently where trucks come and go on Ipswich St there will be 460 truck movements per day additional to present traffic. On Wiluna and Lithgow Streets the truck movements are one way so the movements are 230 trucks.

The Draft EIS makes the additional comments which I wish to refute;

The additional trucks represent an approximate 5% increase in the existing truck movements and would see an overall increase, during the peak, of approximately 0.3% in total vehicles. As such, traffic increases and the impact to road users is considered to be negligible (p.xi).

The EIS dismisses the impact of these truck movements (460!) as “negligible” based on a 5% increase. I argue that a 5% increase is statistically highly significant and should be a cause of concern to the approval authorities and TCSS. A 0.3% increase during peak periods seems low but I would argue that for the purposes of assessing this development the Traffic Study has underestimated the peak periods. Certainly between 7 and 8 am and 5 and 6 pm there is a peak period of commuter vehicles on the road but considering the garbage trucks are either in the suburbs picking up in the morning or finished their runs in the evening peaks then obviously there would be such a small increment. However the whole of the day should have been investigated for peak truck periods in Fyshwick and the additional garbage trucks assessed against those times when they would be increasing the traffic load. The middle of the day is the busiest time in Fyshwick for truck movements.

Additionally the impact on traffic of garbage trucks or scrap metal trucks or other delivery trucks is likely to have more of an impact on traffic flow than small vehicles.

The greater traffic impact of this development however is on the congestion in and around Ipswich Street. Ipswich Street is the main thoroughfare north and southbound to the Monaro Highway to join Canberra Ave. The exit ramp from the north makes a left hand turn and then a sharp right into Ipswich Street. There is little distance between the ramp and the lights at this intersection. Any delays in traffic which cause garbage trucks to arrive in succession is going to cause congestion at this intersection and a bank of traffic on the ramp. This could be dangerous as well as cause driver irritation and valuable loss of time to commercial couriers. The EIS needed to include a comprehensive intersection analysis for those interactions pertinent to this development for safety and convenience of drivers-and it did not.

New lights at the site entrance are proposed. There are possible problems with this. The Traffic Study did not adequately assess the traffic impacts on Wiluna Street taking into account the number of heavy vehicles already using it from neighbouring industries. Large trucks exit and enter those premises and already have to negotiate parked vehicles and moving cars on the road. The potential exists for an accident with incoming garbage trucks especially if they have to queue to enter the site. Empty trucks will be exiting the Metals Recycling yard across the path of the incoming garbage trucks and any reversing trucks from the neighbouring businesses across the street. The EIS admits that Wiluna Street will be the most adversely affected.

The risk of accidents between trucks and smaller vehicles was ignored in the EIS. They are common and do not necessarily occur on highways. Most are rear end collisions or a result of merging traffic, poor visibility and poor road conditions. These are the factors which will apply in Fyshwick. The alignment of Ipswich Street; its width and capacity for re-widening and the impact of additional traffic lights there have been insufficiently addressed. Until these issues have been resolved to community satisfaction and to the satisfaction of the Minister then the Proposal should be rejected.

Air Pollution, odour and noise is unacceptable

The EPD has not fully studied noise impact and traffic movements to the satisfaction of the residents.

1. The level of noxious air quality caused by this development, on this site, has not been convincingly demonstrated in this EIS as having been adequately minimised. No formal Air Quality Report was undertaken in spite of it having been legally required by the Scoping Document. The risk of odour adversely affecting nearby residents and the new Eastlake area has not been adequately addressed.
2. The site is a contaminated site with high concentrations in places of hydrocarbons. The Air Quality study, if written, should have assessed the adverse impact of wind-blown dust from the site, during construction and demolition periods, adding toxic fine particulate emission into the ambient air we all breathe.
3. Likewise, the impact of additional diesel emissions was not addressed creating serious health concerns which have also not been addressed in the EIS.

All waste facilities have odour problems, pests and cause litter on site and windblown to adjacent streets.

Noise impacts will have a cumulative impact from the MRF, the metals recycling and other businesses Lithgow street, the truck movements and the rail operation loading and unloading and a compounding impact with odour, air and traffic impacts.

This has not been adequately addressed in the EIS.

Yours faithfully

A black rectangular redaction box covering the signature of the sender.

26 June 2018