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**Attachments:** 180627 KBRG EIS.pdf

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Please see attached submission.

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To whom it may concern

**KBRG submission on Draft Environmental Impact Statement (EIS) Presented by Capital Recycling Solutions P/L**

**Draft EIS application No. 201700053**

The Kingston and Barton Residents Group (KBRG) wishes to register its strong objection to the draft EIS Application No. 201700053 that is the proposal to establish a Waste Transfer Facility at Ipswich Street Fyshwick.

We are of the view that this proposal is poorly conceived and would generate considerable negative issues and a range of significant problems for the residents, existing business community, their employees and clients, for the economic future of the larger precinct, and for the environment. If pursued, the proposal would be counter to well-considered, existing ACT Government policy and investments and would deliver little or no economic, social and environmental benefits to the Canberra community and Government and a broad range of damaging impediments. The KBRG believes the Government must refuse this proposal in the interests of all Canberrans.

The KBRG along with the Inner South Canberra Community Council (ISCCC) supports the ACT Government's goal of reducing, reusing and recycling waste and in driving towards zero net emissions by 2045. The CRS proposal to locate a major waste facility at Fyshwick in Central Canberra, where land is at a premium under Government policy of urban renewal, conflicts with the *Market Sounding to Industry* and the *ACT Waste Management Strategy (2011-2025)*. Minister Fitzharris in February 2017 called for innovative ideas from industry to manage ACT's waste into the future. The accompanying Market Sounding echoes page 32 of the *ACT Waste Strategy (2011-2025)*, where it advises that; "*Major new waste infrastructure will primarily be located in the Hume Resource Recovery Estate beside the Mugga Lane Resource Management Centre. The Hume Resource Recovery Estate is being developed in conjunction with the Mugga Lane Resource Management Centre as a recycling estate housing a range of facilities.*"

The Government's *Market Sounding to Industry 38532-01* in Attachment 2 (p.16) reaffirms Hume Waste Precinct;

*A2.1 The Hume Waste Precinct is immediately southeast of the ACT landfill and, aside from its proximity to the transfer station, recycling collection and green waste processing that occurs, is adjacent to a major arterial road that connects to the interstate highway. Rail and air links are nearby, as is the NSW boundary. The area is zoned industrial and it is an excellent site for a waste precinct and is one that will eventually grow into a nationally recognised waste centre of excellence.*

In comparison to the Government's existing undertakings, we consider that the proposed facility in Fyshwick, is clearly the **wrong solution in the wrong location**. It would involve transferring all of Canberra's red bin waste from a broad acre site over a kilometre from the nearest homes, to a very busy, gentrifying, quality retail, commercial, services and light industrial business centre in the heart of inner south Canberra, within a hundred metres from the nearest homes and next door to many

quality Fyshwick businesses. Future planning may well seek to introduce areas of CZ5 with residents and the ACT Government is considering Fyshwick as an option for a night time economy.

The proposed facility is very much at odds with the current and future directions for Fyshwick, which includes the upcoming sustainable development of the suburb of East Lake with plans for a residential population of 9,000 people and the newly emerging Dairy Road Foreshore Molonglo Group development only a few hundred metres away.

This proposal was considered at three community meetings over the last nine months where the proponents were given the opportunity to brief Canberrans. Attendance at these meetings was high with 85, 240 and 120 people at these meetings and the universal decision of resolutions was “**Not at this site**”.

**The range of issues raised in objections to this proposal can be summarised as:**

- **Health Risks** – The Health Report in the EIS is inadequate and fails to assess the air inversion issue for this inner south area, the hazardous working conditions inside a supposedly sealed shed and the increased diesel fumes concentrated by slow moving heavy vehicles on the single through lanes of Ipswich St. The NSW EPA has assessed the Queanbeyan/Canberra area as having the highest reading of 2.5 particulates outside of Sydney. Those with asthma and hay fever are aware of the breathing difficulties. Not taken into account is the cumulative effect on human health from activities in the adjacent scrap metal yard which is the rail freight to Port Botany, integral to the project.
- **Odour:** Given the stated capacity of the facility at 300,000 tpa of waste, offensive and persistent odours can travel significant distances and Canberra’s regular temperature inversions are likely to cause major problems for all of the inner south. Note that the proposal is to simply vent the atmosphere in the shed into the air above unfiltered.
- **Traffic:** The additional traffic of 138,000 waste truck movements per year on Ipswich St will have significant adverse impacts on congestion, maintenance, safety and amenity in the already traffic challenged roads and connectors to the Monaro expressway.
- **Noise:** In addition to the noise of existing scrap metal and concrete crushing activities on adjoining sites, the 460/day additional truck movements operating from 6:00 am to 10:00 pm – that’s 16 hours a day, 6 days a week would seriously compound the noise issue for nearby residents and businesses. Trucks arriving before and after this time may also impact residents as they ‘park up’ and wait for operating times to transfer waste.
- **Contamination:** The plans to deal with hazardous materials in the waste brought onto the site are very vague – the site is an unremediated, long term petroleum fuel depot which in its present state is totally unsuited for such an activity. A substantial ground quality report and remediation audit and plan are essential and must be provided.
- **Air quality:** CRS has 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. Such report was itemised in the Scoping Document. A substantial air quality report should be a mandatory document before such an end use could be considered. The proponent must address the EPA Separation Distance Guidelines for Air Emissions in particular for residents currently within 100m and the East Lake development which contrary to CRS beliefs is proceeding.
- **Fire risk:** The EIS pays scant attention to the risk of an internally-generated fire despite there being regular fires in similar waste facilities. In a three 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 seven occasions. A waste fire in this location could lead to catastrophic consequences. Waste of unknown content may well contain unstable lithium

ion batteries. Asbestos has also been illegally disposed of in suburban bins (note the recent shut down of the recycling plant because of this issue).

- **Assessment of alternatives:** Ignoring the requirements of the Scoping Document, CRS has provided no attachment with comprehensive consideration/comparison of alternative sites, proposals, technologies, remediation of contamination, other types of waste treatment etc against its own waste transfer facility and landfill solution. CRS must do so.

Despite the protestations of the proponent, in response to vocal opposition by the community that the incinerator (WtE) is “off the table” it remains available in the government instrument, NI2017-389 as advised by ACTPLA until expiry in January 2019. The incinerator proposal is clearly still extant as the proponent had noted. *We consider the WtE ancillary to the overall solution in that it is dealing with residues from the MRF and does not impact on its effectiveness or viability. As such we are proposing to proceed with an EIS process to be undertaken for the WtE component at a later date.* The term “ancillary” means providing necessary support to the primary activities or operation, thus the incinerator is suggested as a necessary consequence of the operations of the waste transfer station. Indeed a proper business case including the WtE should have been provided. Alternatively, the stage 2 WtE must come out of the process which includes the initial November application for the Scoping Document. It is disingenuous for the proponent to publicly state apart from this process that there is no Waste to Energy proposal. WtE is currently opposed by the ACT responsible Minister for Climate Change and Sustainability.

The EIS must demonstrate that the need for the proposal outweighs all the adverse impacts.

- As far as location is concerned the proposed site is clearly inappropriate because of the proximity of existing and future residents, high quality retail, business and commercial activities which will be severely impacted.
- This proposal has no social licence to operate in this location. There are a long list of problems for the community including traffic, noise, dust, air pollution and aesthetic problems for owners, workers and customers.
- Significant negative economic considerations - the project would inevitably fundamentally change the trajectory of growth and the value and quality of economic development in Fyshwick. The ACT government as a significant land-owner along Canberra Avenue would have to accommodate a substantial reduction in sales value of all that land close to the site.
- The environmental risks and adverse impacts – this massive waste transfer facility will be the source of significant noise, dust, high health risks for employees and customers, traffic congestion, high risks of very large and significant fires, odour, aircraft bird strike and air pollution.

It is KBRG’s view that this proposal sited in Fyshwick would have significant negative adverse impacts and that it is difficult to identify any benefit which would accrue to the community of Canberra from such a proposal. The only benefit would accrue to the proponent and not the Government or the community. As such we ask that this EIS be denied.



President

KBRG

27/06/18

