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EIS application 201700053  
Submission Against Materials Recovery Facility – Fyshwick

I strongly object to the Materials Recovery Facility. I consider that the Environmental Planning and Sustainable Development Directorate has not fully examined the proposal.

The EPD has not considered the future of this development. Security of ACT waste management must be assured.

1. The Proposal

- a) This proposal is stage 1 of a development which plans to build an incinerator on the Fyshwick site.
- b) The people of the ACT have already expressed their opposition to incineration as a waste treatment solution.
- c) It is doubtful whether CRS, a newly formed entity, has the finances or expertise to build and manage a Waste Transfer station and operate a railway hub.
- d) The perception is that they will gain necessary approvals and licences and on-sell the land and business to a larger company in the municipal waste disposal industry.

2. Traffic movements.

The EIS has not demonstrated how the waste vehicles and metal recycling vehicles will both safely access the site and show how the movement of containers by fork lift or crane will interact with those vehicles. Also, this increases traffic flow through to Fyshwick.

230 waste trucks/460 movements per day on local traffic cannot be tolerated.

The Traffic study has averaged the truck movements along Ipswich street and Wiluna Street at 4 per minute. The average is calculated over a 16-hour operating day for the facility. But since the garbage trucks operated from 7 am to about 4pm then the averaged figures are more like 1 extra truck every 2 minutes.

The potential for increased road accidents was not addressed. The impacts on the busy Newcastle /Ipswich/Monaro highway intersection and the Canberra Ave/ Ipswich street/Monaro Highway in the south must also be assessed for congestion and potential accidents.

The EIS has seriously underestimated the risk of accident as a result of the increased truck movements in these streets. The EIS should have provided a Road Safety Assessment.

If the proponents state 230 waste trucks, then my thoughts would be that the proponents would submit a variation application to increase the movements once the station is up and running

### 3. Air Pollution and odour and noise

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

- a) 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.
- b) 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.
  - i. Likewise, the impact of additional diesel emissions was not addressed.
  - ii. Cumulative air impacts were ignored.

These two issues create serious health concerns which was also not 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.

### 4. Stormwater

IZ Development Code states that:

- a) all sites of size greater than 2,000m<sup>2</sup> and subject to redevelopment need to provide evidence of adequate stormwater storage capture;
- b) need to ensure that the capacity of the existing pipe (minor) stormwater connection to the site is not exceeded in the 1-in- 10-year storm event and need to ensure that the capacity of the existing overland (major) stormwater system to the site is not exceeded in the 1-in-100-year storm event.

There is no evidence offered in the EIS that the stormwater management meets these criteria. It is completely unacceptable that any leachate we allowed to be disposed of in the stormwater or sewerage systems.

Building contractors or the general public would not be allowed to do this. The efficiency of the bund to contain leachate and wash down water must be demonstrated.

The collection points and disposal methods must be described. EIS must provide details.

#### 4. Land Valuation

The development of a Waste Transfer station in the middle of Fyshwick will have an effect on land values and perhaps sterilise them for certain future uses. The large block of land at the end of Lithgow street is Government land will lose value.

The proposed East Lake Urban renewal development will also be devalued by this facility and more so when the incinerator goes there too.

The East Lake Urban Renewal is proposed for a further 9000 residents. The High-Rise section of these plans put 6 storey apartments - 290m from the site and level with the ventilation stack. The Odour Impact Report failed to assess the adverse impacts on those residents. The ACT EPA Separation Distance Guidelines suggest 300 m a safe distance for residential from Waste Transfer Stations. It should be a greater distance to provide assurances that their amenity will not be affected.

#### **Who wants to live next door to a dump?**

#### 5. Community

The community was not involved in the site selection and the impacts the facility will have on the surrounding community taking into account local, social, and cultural factors.

In conclusion I would urgently request that the EPD reassess this application, provide more information to the community, increase publicity and awareness to the community as I have found that only a few know about this Application and it could be considered a proposal being approved by sleight of hand.

Yours sincerely

