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From: [REDACTED]
Sent: Wednesday, 27 June 2018 6:41 PM
To: EPD, Customer Services
Subject: Submission: Materials Recovery Facility, Fyshwick
Attachments: attachment 1.pdf

Categories: Green Category

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>> Attached for your consideration my submission relating to the proposed materials recovery facility in Fyshwick.

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>> Sent from my iPad
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Submission AGAINST the Proposed Establishment of a Waste Management Facility in Fyshwick:

Reference - Draft Environmental Impact Statement by Capital Recycling Solutions:

Materials Recovery Facility Fyshwick, Section 8, Blocks 9 & 11

Application Number 201700053

There is no argument regarding our responsibility to the environment and the need for recycling of the ever-increasing amount of waste generated by our 'disposable society'. The argument lies with the selected location of the proposed facility in the centre of a thriving commercial centre and its very close proximity to current and proposed residential areas, childcare centres, schools, food markets, the Parliamentary Triangle and Parliament House itself.

As a long-term resident of Narrabundah (over 30 years) I have some serious concerns about the proposed establishment of a Waste Management Facility (WMF) in Fyshwick, and believe that the long term interests of both the local residents and business communities, not to mention the environment, have not been seriously taken into consideration; that once again the developers and their bank accounts speak louder than community concerns. The politicians have already shown their lack of interest in the lives of their constituents by failing to attend public meetings where community concerns regarding the proposal have been loudly vocalised.

Selection of Fyshwick Site:

The Environment Impact Statement (EIS) submitted by Capital Recycling Solutions (CRS) does not anywhere in its 600+ pages give a valid or convincing argument as to why Fyshwick is the only possible viable location for the facility, apart from the accessible railway facilities and the monetary savings these provide to the CRS proposal. Facilities which, I understand, will be upgraded with the provision of funding of over one million dollars from the NSW government/tax payer, thereby saving CRS the expense of having to fund the improvements themselves and benefiting not only their proposed WMF but also their already established metal recycling facility which very conveniently backs on to the proposed Fyshwick site. The site selection appears to be a very smart business decision which will no doubt give CRS a monopoly in waste management in the ACT, as any other interested waste management companies would need to budget for the cost of a railway facility. Obviously for CRS these 'savings' and the palpable benefit to its existing metal recycling facility, have played a huge part in their selection of the Fyshwick site, community concerns notwithstanding.

It is a worry that the ACT Government approved of the sale of the land to CRS no doubt knowing there would be community concerns. Nevertheless they proceeded with the sale before even advising the community of the proposed use of the land. What were our town planners thinking? As per a Planning Institute document: "Planning is the act of researching, analysing, anticipating and influencing change in our society, about guiding and managing suburban development; *planners balance the needs of communities and the environment.*" This doesn't appear to be the case with the approval of the sale of the Fyshwick site to CRS, and confirms the view of many ACT residents that the Government continues to sell out its voters by ignoring community concerns in its grab for money.

It appears that journalist Paul Costigan was right when he commented in his recent article in the "City News": *We are subject to planning by regulations and zoning with the developers defining the outcomes with very little aesthetics and minimal biodiversity.*"

The question begs to be asked: why has no other location been considered by either CRS or the government?

Environmental Concerns and Impact on Local Businesses and Residents:

There are several issues that are of concern under this heading, some of which have been addressed (although neither sufficiently nor convincingly) in CRS's EIS submission, while others have not. In addition, there are several instances in the EIS where CRS admit that the factors used for determining the possible effect on the environment (for example odour and traffic congestion) would require confirmation by testing once the WMF is operational, ie once it's too late to stop this facility from going ahead. Surely this is their own admission that the information in the EIS is insufficiently substantiated thereby making their claims unreliable. CRS have also failed to provide a strong argument that the proposed incinerator, which they have now removed from their proposal, will not be put forward again once the WMF is established and they have their foot in the door; or that any future owner of the facility will not push ahead for the installation of an incinerator.

- **Odour** (appendix I) – as stated above, CRS have admitted that the factors used in their analysis of the effect of odour from the refuse being processed at the facility cannot be confirmed until the facility is operational. Too little too late for the local residents and business community who will be forced to live with the smell and the effect it will have on property valuations and loss of clientele, possibly forcing closure of businesses and a decrease in planned retirement benefits anticipated from the sale of a family home once considered to be located in a sought after area, but thanks to the WMF now considered to be an area to be avoided.

In addition, the EIS appears to have based its calculations on typical climatic conditions, and while it is acknowledged that no one can control the weather, untypical conditions of very high temperatures and/or strong winds which may carry any odours as far as Parliament House (and visiting dignitaries who would understandably not be impressed by the smell and Australia's inability to properly plan the location of a refuse facility) have not been taken into consideration.

- **Traffic Congestion** (appendix E) – this concern has not been properly addressed by the EIS as their argument regarding traffic congestion is again based on factors which will need to be confirmed once the facility is operational. The implication (first para of Section 2.5) that a reduction in traffic redirected from Mugga Lane will balance any effect on the environment is unbelievable as the influx of heavy vehicles (some 460 vehicle movements in and out of Fyshwick per day) will surely play havoc with the traffic flow on both Ipswich and Wiluna Streets possibly causing traffic to back up as far as Canberra Avenue and the Majura Parkway as traffic attempts to enter/leave that part of Fyshwick as large and heavy vehicles attempt to enter/exit the WMF. This is currently not an issue with traffic movement on Mugga Lane. CRS's contention that the addition of one extra vehicle every 4 minutes is not considered to be a significant impact on Willuna Street, does not take into account the difference between the impact of a large turning heavy vehicle and a small light vehicle. In addition, emissions from an extra 460 heavy vehicle movements on Ipswich Street will no doubt make shopping in that area

uncomfortable due to air contamination and noise, resulting in a decrease in patronage of those businesses in the immediate area. The next step being either downsizing or closure of the business. Those businesses in Fyshwick who contend that the WMF should not be detrimental to the area clearly are not located near the proposed site.

- **Fire Risk** (appendix K) – the recent fire outbreak at the Fyshwick metal recycling facility (adding to the already significant number of fires experienced there over past years) only stands to demonstrate the possibility of fire danger at a recycling facility, even one which accumulates only metal. A facility which stores combustionable materials such as paper and plastics must have a higher risk of fire outbreak due to various situations, including something as simple as the sun shining on a piece of glass, leaving local businesses susceptible to economic loss and health risk to the nearby residential communities in Narrabundah and the proposed East Lake development, from the resulting air pollution and contamination (especially from plastics).
- **Floating Debris** – one only has to drive past the Hume waste management facility to see the ugly sight of floating debris (eg paper and plastic bags) which has been picked up by the wind and deposited in the surrounding rural area. Is this what we want for inner Canberra, in a thriving business area and (currently) sought after residential locations? Despite CRS claiming that all refuse will be unloaded within an enclosed area, the obvious need to have open entry/exit points for the refuse vehicles to enter and deposit their loads and then exit the building, will allow the escape of floating debris either with the assistance of the wind or simple human and vehicle movement around the dumped refuse. It is highly unlikely that the escape of floating debris can be prevented. Such debris is unsightly and possibly a health risk and will no doubt have a negative effect on business and residential valuations.
- **Property Valuations** - the stigma (perceived or otherwise) of having a waste management facility backing onto premises or within one kilometre of ones home will bring down land and property values not only for residential but also business properties. Business valuations will decrease and may even result in closure. Families who have worked all their lives to improve their business and/or living conditions, who are counting on the sale of their business/property to pay for a reasonable standard of living in their retirement without having to make a claim for the public pension, will find that their lifelong plans have been negatively impacted by the approval of this proposal.
- **Influx of Scavenger Birds and Vermin** (appendix M) – CASA has provided advice that it has no concerns regarding the influx of birds (scavenging for food) and the possible safety risk to air traffic of bird strikes due to the opening of this facility in Fyshwick. It is anomalous, however, that the airport has expressed concern about the increased birdlife as a result of the recent development of nearby wetlands but is not concerned about a similar influx of birdlife as a result of this WMF. This inconsistency should be further investigated.


No mention has been made of the possible influx of other vermin also attracted by food refuse. The health risks to the community by the possible invasion of the area by mice and rats, cockroaches, parasites, fleas, lice and other bugs should surely be of concern to the ACT Government when considering CRS's application. The possible health effects not only on the

local community but the ACT population in general, should surely be of concern as the vermin 'hitchhike' on visiting vehicles returning to their respective suburbs.

- **Travel Effect on Southside Residents** – also of concern is the disruption, as a result of traffic congestion, to easy access to the airport, the Majura Parkway, Gungahlin and the Hume Highway. More time consuming alternative access routes may be necessary not only for Narrabundah residents but also Woden and Tuggeranong residents who may normally access the airport, the Majura Parkway and the Hume Highway via Fyshwick. Easy access to the airport especially is one of the benefits of living in the Griffith, Kingston, Manuka and Narrabundah area and is part of the attraction of living in the area for both current and prospective residents.
- **Possible Job Loss** – obviously the opening of a WMF in Fyshwick will provide jobs, but those jobs would still be available regardless of whether the facility is located in Fyshwick or another location. But if the opening of a facility in Fyshwick leads to the closure or downsizing of local businesses due to the public avoiding a smelly and congested shopping area, there will be a resultant loss of jobs for those currently employed.

Canberra alone presently does not produce enough refuse to make this WMF viable, hence the need to import refuse from outside the Territory. I understand that ACT refuse management laws are not as strict as those of NSW, resulting in interstate interest in opening facilities in the ACT. Does this mean that our beautiful city and territory are to become the refuse management capital of Australia? Are we to be expected to stand back and let our livelihoods and family homes be lost and/or devalued? Community concerns are not being given the attention they are entitled to as the voters who have placed the politicians in their seats. It looks like the town planners are letting the developers define the outcomes rather than taking community and environmental concerns into account.

Before any tick of approval is given to this proposal a great deal more consideration needs to be given to community and environmental concerns, and CRS should be asked to explain why, other than for monetary reasons, the Fyshwick site is the only viable location for their WMF.



27 June 2018