

From: [REDACTED]
To: [EPD, Customer Services](#)
Subject: Submission in relation to the proposed Fyshwick Waste Facility
Date: Tuesday, 26 June 2018 11:57:36 PM
Attachments: [REDACTED] [Objection.pdf](#)

Hi,

Attached is an objection to the approval of the proposed Fyshwick Waste Facility.

I would be grateful if I could be sent an acknowledgement of receipt in due course.

Regards

[REDACTED]

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OBJECTION TO THE PROPOSED WASTE SORTING (AND WASTE BURNING?) FACILITY IN IPSWICH ST FYSHWICK

I write to express my strong opposition to the proposed establishment of a Waste Sorting (and possibly Waste Burning) Facility (described by the proponent as a Materials Recovery Facility) to be developed next to the railway line between Ipswich and Geelong Streets in Fyshwick by Capital Recycling Solutions (CRS), as outlined in the recent released for comment Environmental Impact Statement EIS201700053.

A quick examination of the Objections (Submissions) received to date indicates that many people with greater expertise and qualifications than I have raised a number of damning points about the proposal. I will therefore be brief.

Odour

I understand that the EIS can give no assurances about the likely odour impacts, but except to concede that these will only be able to be determined after the facility has been completed and is in operation. To accept that the facility will be odour free on this basis appears to be a big ask. It would not take much, just a tiny whiff of putrescence every now and then to destroy the food shops at the Fyshwick markets. Shoppers at Harvey Noman and Nick Scali are unlikely to be very enthusiastic either. Given that Parliament House is only 3km away, it is possible that an unfortunate combination of winds might waft any odours that far. Federal MPs and Senators would be unimpressed and should such an unhappy event coincide with a State Visit or the like the Commonwealth might be moved to exercise its powers over the ACT to ensure that there was no repetition. This would not only be embarrassing for the ACT Government, but might also leave the ACT ratepayers responsible for paying any compensation due to CRS for the arbitrary closure of their business. It would be better to not risk such an outcome.

Fire

From the frequency of fires at other waste processing facilities it seems that this is a significant risk. Even if the chance of a fire can be demonstrated to be relatively low, the impact of any fire in a facility of this nature in this location would be very high. Again, if you didn't have to, why would you take this risk? Will the ACT require CRS to take out adequate insurance against the loss of income from forced closure of their businesses from fire or similar disaster, with the payouts to be insured based on previous years' tax returns and the premium payable determined by a commercial insurance provider unlikely to be susceptible to political pressures.

Even if the architects and engineers that design the plant assess the risk of fire as low to very low, this assessment has little value. In typical modern highly complex systems, if something goes wrong, it is because the responsible people have not realised what has happened could happen, and therefore failed to safeguard against it. No doubt the operators of the Coolaroo waste facility in Victoria swore on a stack of Bibles to the Victorian Government that a fire could not take place at their plant, yet as we know, it did.

Air Quality

There are no assurances that the proposed facility will not emit any fine particulates. Fine particles have an unduly negative impact on health. One of the advantages of life in Canberra is that exposure to fine particulates is on average much lower than in other capital cities. Why would the Government welcome a proposed development that threatens this advantage? Particularly when the proponent could give no figures for particulate emissions, meaning that no meaningful calculations as to the real health cost of the proposal can be made. The possibility remains that the health costs to the community will outweigh the financial gains made by the owners of the proposed development.

It appears that the EIS has also not taken into account the extra particulate and nitrate production generated by the additional truck traffic and any consequent car emission pollution from cars caught up in truck generated traffic jams. Neither does it have much to say about potential pollutants going up the smoke stack.

The inability or unwillingness of the proponent to adequately address these matters indicates that the proposal should be rejected.

Traffic and Noise

The proposed development would generate heavy traffic with predictions of an increase of 460 truck movements per day. This will have a very negative impact on traffic flows, and also on congestion, safety and amenity

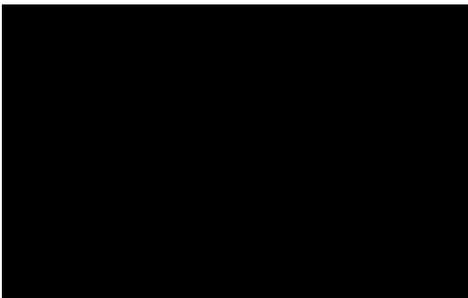
Zoning Issues

Finally, this is a totally unsuitable development for Fyshwick as it now is. While Fyshwick was zoned “Industrial” by the NCDC and subsequent planning regimes this misuses the word if compared with Industrial areas in other jurisdictions. Fyshwick has never been an industrial estate. It is, and has been for several decades at the least a commercial area catering to all those businesses that would not look appropriate in the Canberra centre. Mainly big box retail, but also furniture, motor vehicles, and specialty stores. Yes, there was (and is a little industry: timber furniture makers; panel beaters; printers. And in the area of Fyshwick across the Monaro Highway we have a food precinct around the Fyshwick markets. Just how a garbage processing centre is supposed to fit in with this existing mix is to say the least not at all clear. To permit the Waste Processing Facility to proceed would elevate the rights of the owners of CRS over the owners of existing businesses in the area, who have been there for years and invested in the area. To devalue the businesses of these existing owners by approving the proposal would be inequitable, and certainly inappropriate.

The easiest solution might be to rezone Fyshwick to a zoning which more closely reflects its current status. A new industrial category (say light industrial and commercial) might have to be inserted in the plan. Some might quail at the thought of such a significant change in the Territory Plan, but MLA's are paid their large salaries to ensure that the citizens of Canberra get the outcomes that they want, not what a developer wants.

This new zoning would have to make it clear that Fyshwick was not a suitable location for any industrial activity which was noisy, smelly, unsightly, likely to generate unreasonable amounts of heavy traffic, held an undue risk of fire, attracted scavenging birds and or/released fine particulates. Under this proposal the Government might have to reacquire CRS' two blocks (16 Ipswich St and 15 Lithgow St) for what it was paid for them, but this would be a minor cost and probably offset when these blocks were on-sold to other owners. If this route were followed the ACT Government should negotiate with NSW rail about relocating the rail terminus and Kingston Station to Queanbeyan and rezoning most of the rail corridor through Fyshwick and Kingston for commercial development. Under this option it might be wise however to reserve a light rail corridor along the railway easement to permit the extension of the light rail to Queanbeyan and its suburbs in due course.

Clearly the negatives associated with the proposed Fyshwick Waste Facility outweigh any conceivable benefits. The proposal should be rejected.



26 June 2018