



9<sup>th</sup> April 2012

Ms Christine Chapman  
Department of Planning and Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Chapman,

**REMONDIS ALTERNATIVE WASTE TREATMENT FACILITY, CAMELLIA (MP 10\_0028)**

I am writing to **object** to the above proposal by Remondis Pty Ltd and Billbergia Pty Ltd at 1 Grand Avenue, Camellia. The reasons for my objection are outlined below:

We operate an Early Childhood Learning Environment next door at Level 4, 1c Grand Avenue Camellia/Rosehill. We look directly onto the property where this facility is being considered for.

Back in October 2006, the land behind 1c Grand Avenue was being presented to us as a possible public parkland area due to the Government placing a cap on the area. As such, the location of our service appeared to be suitable and appropriate. We currently service 145 families and 130 children attend our childcare centre throughout the week, I have great concerns for all our children, families and staff.

**1. Site Contamination**

As the site was previously occupied and used by the former James Hardie for the manufacture of asbestos products, the site is highly contaminated with a range of materials, including asbestos materials and friable pulp asbestos waste (ie raw materials). Due to the sites risks, the EPA declared that the site represented A SIGNIFICANT RISK OF HARM. To manage potential impacts the EPA required various management plans be implemented, including a Site Management Plan, which required the site to be capped with concrete to contain the materials and manage any exposure through the creation of barrier to human contact. A Public Positive Covenant was then imposed under s29 of the *Conveyancing Act 1919* to protect the site and maintain the concrete cap in order to manage any exposure of materials.

The proposal includes the breaching of this cap which could potentially result in the release of asbestos fibres. This not only poses an unacceptable risk to nearby receivers, particularly a Child Care Facility within **30m** of the site, but is **CONTRARY** to the Government's measures imposed on the

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site to manage any impacts. No Guarantee can be provided that this would not result in an impact to any nearby receivers. The cap **should not** be broken under any circumstances. The use of Asbestos materials was banned in Australia, so why would a primary source of the production of this material be allowed to be breached, and to particularly allow friable fibres to be released.

## **2. Traffic and Safety**

**Access to the site is proposed to be off Grand Ave and into Grand Ave North. Traffic for the project is expected to be around 288 movements per day, including some 184 trucks. It wasn't designed for this type of traffic.**

Historically Grand Ave North would have been the access off Grand Ave for the James Hardie site. However, with the closure of the James Hardie site and the development of a number of operators in the B3 Zone along Grand Ave, Grand Ave North is akin to a driveway and parking area for the occupiers of 1 Grand Ave. Grand Ave North was not designed or is operated as a separate road.

Traffic is already a significant issue in terms of traffic generation and safety along Grand Ave. The proposal to share access to the site with other users would significantly increase the safety risks particularly with parents picking up dropping off their children at our childcare centre. Anyone who has visited the site would see that it is extremely unsafe and is a conflict with light vehicles which would also use the driveway access and the people who park along and around Grand Ave North, including some parents and their children leaving and returning to their cars.

## **3. Odour Impacts**

The proposal seeks approval to process around 100,000t of Commercial and Industrial Waste and around 50,000t of food and green waste. The proposal seeks to process this waste from the 'greater metropolitan area' and not specifically from Parramatta.

All AWT's have odour issues, with a number already generating significant odour issues, such as the UR3R facility at Eastern Creek and Jacks Gully at Camden. The proximity of the facility to sensitive receivers including businesses and a child care facility would cause odour issues. These facilities are more suited to being located within a broader waste facility, given the separation from other sensitive receivers and the fact they need to dispose of a residual component at a landfill eg SITA AWT is located at Kemps Creek Landfill, the Kimbriki AWT is at a landfill and the Woy Woy AWT is at a landfill.

The AWT will stink and should not be located near sensitive receivers, and these facilities are more appropriately located at larger waste sites.

**Under the children services Education and Care Services National Regulations I as the Approved Provider is required to comply with these regulations at all times. Refer to Part 4.2 Children's health and Safety of the Regulations.**

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#### 4. Noise and Dust Impacts

The construction and operation of the facility will result in unacceptable noise impacts. Construction will occur over an extended period and involves major truck movements and dumping of large volumes of soil on the site. With the nearby sensitive businesses and child care facility this will result in both excessive noise and dust impacts. In particular, the EA suggests the child care facility will experience construction noise of up to 65 dBA, and assumes a 20 dBA reduction inside the facility. However the child care has a large open area to allow for an open learning environment so the 20 dBA reduction would be unachievable and is therefore unacceptable and would mean the relevant criteria WOULD NOT BE MET. While operational noise, including the significant traffic accessing the site, would result in noise levels of up to 60 dBA in the area including 58 and 59 dBA at the child care facility. The major soil stockpile will also result in significant dust generation, which particularly during the summer and autumn periods when the sensitive users on Grand Ave would experience significant impacts when the wind direction would be towards these areas.

This noise and dust generation from the project would result in significant impacts on the local area, and in particular an unacceptable impact to the sleeping regime and learning processes of the 80 odd children our child care centre. This is clearly which could be detrimental to their development and an unacceptable impact to the local and regional area of Parramatta.

**Under the children services Education and Care Services National Regulations I as the Approved Provider is required to comply with these regulations at all times. Refer to Part 4.2 Children's health and Safety of the Regulations.**

#### 5. Landuse Conflicts

The proposal will result in a clear landuse conflict with nearby and adjacent businesses. Why would an approval be granted to this proposal, which based on the issues outline in this letter, would result in a clear conflict with the existing and established businesses and operators of 1 Grand Avenue and the Parramatta area.

#### 6. Metropolitan Waste

As the proposal would be processing waste from all over Sydney and not Parramatta, why should the Parramatta LGA become Sydney waste management and dumping ground.

Yours sincerely

Irene Vidaic  
Approved Provider/Director  
0408625020

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