

12206
10 April 2012

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

Dear Ms Chapman

**SUBMISSION TO DEPARTMENT OF INFRASTRUCTURE AND PLANNING
REMONDIS INTEGRATED RECYCLING PARK (10_0028)**

JBA Planning has prepared this objection to the proposed Remondis Integrated Recycling Park (RIRP) on behalf of Linfox Armaguard Proprietary Limited (Armaguard).

Armaguard operates two facilities on two separate sites within the industrial area comprising Camellia and Rosehill. The Armaguard facilities are located on Grand Avenue (in Camellia) and on Shirley Street (in Rosehill). Armaguard has significant concerns in relation to the impact of the Remondis RIRP on the efficiency of the already overburdened traffic network which provides access into this industrial area. Any further deterioration in the operation of the traffic access arrangements for the industrial area will severely and detrimentally impact the performance and security of Armaguard's operations. Armaguard is currently seeking specialist advice and may submit more details regarding traffic impacts at a later date.

In addition to the key concern in relation to the traffic impacts of the Remondis RIRP JBA Planning has identified a number of additional issues which we consider require further consideration. These include:

- Contamination of the site and potential impacts on the surrounding land users.
- Noise impacts on the surrounding land users.
- Justification for exceeding the prescribed height limit for buildings.
- Consideration of alternatives.
- Project justification.

These issues are described in further detail in **Attachment 1**. Without further assessment of these issues it is considered that the proponent has not yet sufficiently justified the suitability of the site for the proposed RIRP or that there is sufficient public interest in proceeding with the facility. As such, having regard to Section 79C of the *Environmental Planning and Assessment Act 1979*, we consider that the facility should not be approved.

If you have any queries in relation to the above, or would like to discuss any matter raised in this submission, please contact me on 9409 4962.

Yours faithfully



Tim Ward
Associate

Attachment 1: Analysis of Issues

ATTACHMENT 1 – ANALYSIS OF ISSUES

1.0 TRAFFIC IMPACTS

1.1 Background

There are currently five access points for the industrial areas in Rosehill and Camellia. These are:

- The James Ruse Drive / Grand Avenue / Hassall Street intersection which provides for the full range of traffic movements and is signalised.
- The Wentworth Road / Parramatta Road intersection which provides for the full range of traffic movements and is signalised.
- The James Ruse Drive / Martha Street intersection which provides a left-out only movement onto James Ruse Drive.
- Kendall Street / Parramatta Road intersection which provides for left-in, left-out movements from Parramatta Road.
- Harbord Street / Parramatta Road intersection which provides for left-in, left-out movements from Parramatta Road.

As can be seen from the above, there are only two full access intersections providing access into the industrial areas.

Armaguard operates two facilities which utilise both of these intersections depending on the source and destination of each movement. Armaguard vehicles also make many internal traffic movements between the two facilities within the industrial area. Armaguard is a transport and logistics business and so has a comprehensive understanding of the effectiveness and efficiency of the local road traffic network within and around the Camellia/Rosehill industrial areas. Of particular concern to Armaguard is the impact on the shift change at 2 pm, which coincides with the peak traffic generation from the proposed Remondis RIRP.

1.2 Key Issues Raised by the Proponent

The Environmental Assessment Report (EAR) prepared by NECS included a Traffic Impact Assessment prepared by Traffix attached as Technical Report No. 6. The Traffic Impact Assessment provides an analysis of the James Ruse Drive / Grand Avenue / Hassall Street intersection, which operates at a Level of Service (LOS) F for the AM peak, the PM peak as well as around the critical 2 pm period. LOS F is the lowest level of service rating achievable and means that the intersection is operating at an unsatisfactory level and that the intersection requires additional capacity.

The proponent asserts that if the traffic situation is unacceptable during the peak periods (which is likely given the above), then an alternative access route can be implemented which directs the vehicles through Rosehill, utilising the signalised intersection at Wentworth Road / Parramatta Road. The proponent suggests that a condition of consent be so applied.

The Traffic Impact Assessment also considers the use of the Grand Avenue / Grand Avenue North intersection, identifying that it operates at LOS C during the peak period, and LOS B around 2 pm. An intersection operating at LOS C is considered to be satisfactory.

1.3 Key concerns with the Traffic Assessment

Armaguard has a detailed understating of the nature of traffic movements on the local traffic network, and the efficiency of this network. Armaguard agrees with the key finding of the Traffic Impact Assessment that the James Ruse Drive / Grand Avenue / Hassall Street intersection is highly constrained and currently operating at an unacceptable level. There is however a failure by

the proponent to sufficiently analyse the issue and identify measures to prevent further deterioration of the network's service level. This is especially important due to the high intensity of heavy vehicles generated by the proposed RIRP facility. In particular:

- The Traffic Impact Assessment does not specify on what days background traffic surveys were carried out, and whether these were considered reflective of normal traffic on the network. Armaguard operational staff note that there are particular days when there seems to be a larger amount of traffic on the local traffic network with a resultant reduction in the efficiency of the network.
- There is no discussion of the potential implications of events at the Rosehill Gardens Racecourse.
- There is no discussion of the impact of the James Ruse Drive / Grand Avenue / Hassall Street intersection on the operation of the Grand Avenue / Grand Avenue North intersection. In practice, during constrained traffic periods vehicles queue along Grand Avenue well beyond the Grand Avenue / Grand Avenue North intersection. This means that there is little or no potential for right-hand turn movements from Grand Avenue North into Grand Avenue. To avoid blocking the eastbound traffic on Grand Avenue vehicles will be forced to turn left and then make use of the roundabout at the Grand Avenue / Colquhoun Street intersection, thereby contributing to the queue.
- The Traffic Impact Assessment provides no broader or strategic analysis of the operation of the local traffic network, or any consideration of what future traffic arrangements might be implemented to alleviate the current unacceptable situation. While the unacceptability of the current traffic situation is acknowledged in the Traffic Impact Assessment, possible road works to improve capacity on Grand Avenue are brushed off as being too costly and therefore not justified for the purpose of the subject application. This is clearly an insufficient assessment of a key issue.
- An alternative traffic route is proposed by the proponent, however the Traffic Impact Assessment does not consider or assess the potential traffic impacts on the Grand Avenue / Colquhoun Street intersection nor the Wentworth Road / Parramatta Road intersection. It is highlighted that at times traffic queuing along Grand Avenue for the James Ruse Drive / Grand Avenue / Hassall Street intersection can extend as far as the Grand Avenue / Colquhoun Street intersection.
- There is no evidence in the EAR or the Traffic Impact Assessment that the proponent has consulted with Roads and Maritime Services (RMS) in relation to the operation of the James Ruse Drive / Grand Avenue / Hassall Street intersection nor whether there are any plans in the short, medium, or long term to improve the operation of this unacceptably performing intersection.

Armaguard consider that a detailed and comprehensive analysis of the local traffic network has not been provided in the EAR. Additional detailed consideration of the local traffic network needs to be provided by the proponent to ensure a comprehensive assessment of the likely traffic impacts resulting from the proposal can be considered.

In order to carry out this additional assessment, it is considered necessary for the proponent to consult with the RMS in relation to the short, medium and/or long term plans for addressing the current unacceptable performance of the James Ruse Drive / Grand Avenue / Hassall Street intersection.

2.0 CONTAMINATION

The EAR included a Contamination Summary Report prepared by CES attached as Technical Report No. 1. This Contaminated Summary Report clearly identifies that the site is contaminated with, amongst other things, asbestos materials.

The Contaminated Summary Report concludes that the management procedures outlined in an existing Site Management Plan would be adequate in minimising the exposure of site occupants and the environment to the identified contamination during the construction of the proposed facility. However, nowhere in the EAR or its attachments is the Site Management Plan reproduced. Given the very sensitive nature of asbestos contamination, and the obvious caution that has been applied to the site in its recent history in relation to asbestos contamination, further consideration of the management measures set out in the Site Management Plan, in the context of the current surrounding environment, should be provided.

We note that a Site Work Plan (SWP) has been prepared and provided in Appendix D of the EAR. However, it is not clear whether this SWP has been prepared with specific consideration of the potential for off-site impacts on nearby sensitive receptors. In particular, we note that there will be exposed asbestos contaminated materials immediately adjacent to an existing child care centre. Given the proximity of the works to the child care centre it is considered that as a minimum all of the measures set out in the SWP should be implemented – including that:

- All excavation of material potentially contaminated with asbestos must be carried out within a tent or similar structure.
- All stockpiles of material potentially contaminated with asbestos must be contained within a tent or similar structure.
- An air monitoring program to be prepared by a qualified occupational hygienist which will assess the nature of the asbestos material, different wind movements across the site, location of nearby receptors such as child care centre, train station and residential housing, be carried out prior to the determination of the application.

3.0 NOISE IMPACTS

The EAR includes a Noise Impact Assessment carried out by SLR attached as Technical Report No. 5. We note a number of anomalies in relation to the application of the Industrial Noise Policy (INP) to the child care centre as follows:

- The Noise Impact Assessment does not provide a background noise level for this receptor.
- The Noise Impact Assessment does not specify a project specific noise goal for this receptor.
- In Table 25 a daytime $L_{Aeq,15-min}$ noise goal of 60 dBA is put forward based on achieving an internal noise level of 40 dBA and assuming that the child care centre has fixed and closed windows at all times. Firstly, we understand that the child care centre includes an outdoor area, and this would be better assessed as an active recreation area (the INP provides for an Amenity Noise Goal of 55 dBA for this type of receiver). Secondly, if such an assumption is to be relied upon for the purposes of a noise impact assessment then it should be verified by the proponent.
- The Noise Impact Assessment calculates an intrusive noise level of 58 dBA $L_{Aeq,15-min}$, which is 3 dBA above the 55 dBA Amenity Noise Goal.
- Because of the above it is not clear whether an intrusive noise criterion or an amenity noise criterion should be applied. If an Intrusive Noise Goal is to be applied then it would need to be based on the measured or predicated background noise level. Since no background noise level has been calculated we have considered the applicability of the closest background noise measurements provided – which is for 33 James Ruse Drive. Given the proximity of 33 James Ruse Drive to James Ruse Drive, it is likely that the background noise level is higher at this

location than at the child care centre. The background noise level measured at 33 James Ruse Drive is 54 dBA, which would lead to an Intrusive Noise Goal of 59 dBA. If it is agreed that the background noise level at the child care centre is lower than at 33 James Ruse Drive, then it would follow that the Intrusive Noise Goal would be lower than 59 dBA, and therefore the predicted noise level of 58 dBA would exceed this noise goal.

It is considered that the proponent should carry out a more detailed analysis of the noise impact assessment to take into account the potential impacts on the closest sensitive receptors including the child care centre.

4.0 VISUAL IMPACTS AND HEIGHT LIMITS

The EAR identifies that Parramatta Local Environmental Plan 2011 sets height limits of 9m and 12m variously for buildings across the site. The proposed RIRP includes buildings that exceed the respective height limits across the site by several metres.

The EAR justifies the proposed exceedance of the height limit on the basis that the RIRP facility needs to be constructed on a concrete slab to minimise excavations and piling beneath the concrete cap. While it is accepted that this is a good reason for constructing a concrete slab base for the facility, neither the EAR nor the Visual Impact Assessment (attached as Technical Report No. 8) provides an assessment of the visual impacts arising from the exceedance of the height limit.

The proponent should provide a detailed assessment of the visual impacts resulting from the height of the proposed buildings, with consideration of the height of the adjacent buildings, and the nature of the surrounding land uses. The proponent should also justify the proposed exceedance of the height limit with consideration of the outcomes of this detailed assessment.

5.0 CONSIDERATION OF ALTERNATIVES

The EAR states that Remondis has evaluated a number of alternatives including sites at Bankstown, Chullora, and Greenacre with consideration of size, distance from the market, zoning, cost and potential environmental constraints. The EAR states that the Camellia site was selected due to operational and environmental benefits based on its location, access to the major road transport networks, size and suitability for construction and operations of the RIRP.

The level of analysis of alternatives provided by the proponent is inadequate for the purposes of carrying out a meaningful assessment of the proponent's evaluation of alternatives. The analysis of alternatives should inform the justification for the project, and provide a clear explanation for all stakeholders why the proposed site was selected.

In particular, given the obvious and critical traffic and environmental issues described above there seem to be significant constraints at the proposed site that have not been taken into account in the evaluation of alternatives.

Further, there are other alternatives that have not been raised in the EAR, including:

- Locating the facility in closer proximity to the final landfill and/or composting facility destination: this is particularly relevant considering that over 60% by mass of all the Construction and Industrial Waste will be sent to landfill and almost 50% by mass of all green/food waste will be sent to a composting facility.
- Incorporating the transport of waste by rail: This is particularly relevant due to the highly constrained nature of the local traffic network (see above) and presence of a goods rail spur line immediately adjacent to the site (the site has a large frontage directly onto the freight line).

6.0 PROJECT JUSTIFICATION

The EAR provides no justification for the project other than to claim that the RIRP is an appropriate response to the recycling and resource recovery targets at a National and State level and that to do nothing would be to lose an opportunity to contribute to meeting such targets by not recovering and utilising materials from the specified waste streams and reducing landfill demand.

There is no question that at a National and State level there are objectives to reduce the amount of waste being directed to landfill and to increase the amount of material that is reused, recycled, or reprocessed. However, there is limited explanation in the EAR what benefits this facility would provide. In particular, there is no explanation as to what happens to the 24,400 tonnes per annum (tpa) in the Commercial and Industrial Resource Recycling Facility and 26,130 tpa in the Source Separated Organic Resource Recovery Facility which the EAR simply states as being “mass loss”. The explanation of the processing systems in the EAR should explain and substantiate this mass loss – especially since it is the predominant contributor to the implied benefit of the RIRP being the reduction in the amount of material ultimately being sent to landfill (i.e. less than 13% of the construction and industrial waste is recovered recyclables, whereas almost 25% is “mass loss” and over 60% is sent for landfill). If this mass loss is not able to be achieved then the level of benefit as a result of the operation of the facility would be substantially reduced.

Further, achieving the above waste management objectives should not come at the expense of unacceptable local impacts. Given the critical constraints on the local traffic network, the nature of the ground contamination at the site, the sensitivity of the receptors immediately adjacent to the site and the lack of analysis provided in relation to the consideration of alternatives, it is considered that the proponent has not justified the development of the proposed RIRP at 1 Grand Avenue, Camellia.