

14 July 2023

General Manager  
Cumberland City Council  
Memorial Drive  
MERRYLANDS

Dear General Manager

**Letter of OBJECTION - re Organic Waste Transfer Station, 109A Church Street, Lidcombe (DA2023/0130)**

In the document Environmental Impact Statement – 109A Church Street Lidcombe – Organic Transfer Station (EIS) page iii states “Contains information that is neither false nor misleading”, I refute this statement as in my opinion this DA has been poorly presented, due to having no evidence to support its opinion/statements, detail is inconsistent, and very confusing.

For example, in the EIS section “Executive Summary” “Preferred option”(page xii) it states “... Option 1 is preferred due to the ....” which is Option 1: Business as Usual (BAU). Actually, the text is referring to Option 2 (on page xi). Then section 3.2.6 Preferred Option (page 47) is actually referring to option 2 (on page xi).

VERY, VERY, VERY CONFUSING, particularly since we have such a diverse community, of which, many people have great difficulty in understanding content of documentation. So what is the preferred option ?

Based on the above reasoning and given example, Cumberland City Council (CCC) must accept the stated preferred option (Option 1 – do nothing) as stated in the Executive Summary NOT what is embedded (hidden) in the middle of the DA ,therefore, REJECTING outright this submission. As this sub-standard application gives the residences of Lidcombe no confidence that the operator will operate within the rules. This content error may seem ‘minor’ to some, but it is not ‘minor’ to the general community. An Executive Summary is intended to be a correct summarised version of a report – this is NOT the case.

Other concerns that need to be explained in detail are;

**Transport - Definition of Traffic Peak Hours**

Traffic Peak Times are different for all suburbs. As there is no definition of traffic peak hour times (length of period and when), it gives me no confidence re the calculation correctness for the number of truck movements per hour (Traffic Solutions – Traffic Impact Assessment Report (TS-TIAR) – section 6).

## Transport - Traffic Impact

In my readings of various documents associated with this application, reference to traffic impact is mostly associated with the number of vehicle movements likely to be generated at the DEVELOPMENT ACCESS and during the commuter peak periods (as stated no definition of time/when).

The TS-TIAR (page 8) details calculations re the number of truck movements, however, these are only AVERAGE calculations and we all know due to Sydney traffic movement that these calculations are only AVERAGE and will not give a true indication of truck arrival times. Therefore, the indicated 8 truck entry and 8 truck exit movements during the commuter peak hours TS-TIAR (page 9) are only an assumption and NOT FACT and UNREALISTIC.

It is stated that truck access to the Transfer Station is left in – Left out and that truck access will be by Centenary Drive, Arthur Street, Railway Parade then Church Street. If this statement is true (as a local resident) I KNOW FOR FACT that trucks will have to turn right across the opposite direction lane to enter the site. THIS IS CONTRADICTORY to the Left In – Left out statement.

It is also stated in the minutes of the “Record of Kick-Off Briefing – Sydney Central City Planning Panel” dated 15 June 2023 that the applicant advised that trucks transporting organic matter will not access the site via the streets within the residential community. An operational mechanism (left in left out only) is proposed to enforce this.”. As explained above this CAN'T BE TRUE.

Also, TS-TIAR page 9 indicates that ‘the vast majority of trucks are expected to arrive from the east and then upon exit, all trucks will be directed to turn left out of the site’. MAJORITY does not mean ALL. Therefore, some trucks will definitely be coming along residential areas – that are already congested with traffic movement.

In my readings, of documents associated with this DA it states that identified streets to be used by the trucks are Centenary Drive, Arthur Street, Railway Parade then Church Street, in fact these are to the east of the site so this left-in left-out is FALSE and CAN'T WORK – MISINFOMATION.

Can someone please explain to me (a local resident) how this left in left out mechanism will work. This access mechanism will only work if trucks come from a westerly direction.

So, based on the above, I can only assume that the trucks will be using streets to the west to access the transfer station (LEFT IN LEFT OUT). This means driving down residential streets . The nearest westerly street which is Bachell Ave. This is a residential street (residents will be impacted BIG TIME).

In fact, all streets to the west/north are residential streets. Is Bachell Avenue the only Residential street that will be used/impacted by the trucks? I DON'T THINK SO - I BELIEVE OTHER RESIDENTIAL STREETS WILL BE IMPACTED (as the EIS page 126/7 details how Olympic Drive and other streets connect to Church Street and so the left-in left-out mechanism is questionable) EITHER BY TRUCK MOVEMENTS OR TRAFFIC FLOW

The document TS-TIAR Section 6 details the calculations re the number of trucks that will use/movements the roads (therefore accessing the transfer station) and the last paragraph of this section states "On the basis of the above forecast traffic movements, it is considered that that the number of generated traffic movements are minimal and well within the road carrying capacity of Church Street would not represent an adverse impact upon the operation of the surrounding road network".

So, 118 big truck movements per day (mostly every day) is a LOT of trucks using these streets (and other streets that have not been identified in this DA) SO HOW CAN IT BE THAT THESE TRUCKS WILL HAVE MINIMAL impact on these streets – NOW COME ON. WHAT DO YOU TAKE US FOR? (more CCC costs to maintain these roads for sure).

These roads are old and (to my knowledge) have not been upgraded.

I also note that there are 2 bridges and 1 very narrow underpass bridge that have not been referenced in this document TS-TIAR.

If the trucks do come from the stated direction of Arthur Street, Railway Street and Church Street then this document does not provide an impact assessment of the "OLD" Railway Street bridge over the train lines nor the "OLD" Church Street underpass bridge.

These are "HUGE" trucks and I have concerns that these trucks cannot be manoeuvred through the very narrow Church Street underpass bridge without crossing over onto the opposite direction lane and therefore placing oncoming traffic at HUGE SAFETY RISK. It is also a strong curvature, so visibility from vehicles in the opposite direction is zero, so it is a massive safety risk.

I have grave concerns re the safety of these bridges as they are old and that no assessment has been undertaken to prove their safety re the number of daily truck movements (RESIDENTS and VEHICLE users SHOULD BE INFORMED) re the safety of this infrastructure.

SO it is noted that there is no REFERENCE to any traffic study to support their "...CONSIDERED ..." opinion that that the 118 truck movements are minimal and would not have an adverse impact on the surrounding road network. I REFUTE this statement and assumption OUTRIGHT.

In my reading of CCC website, I can't find a traffic study of the LIDCOMBE suburb that the CCC can measure the impact of this DA in the future. I strongly believe before the DA is considered, that CCC undertakes a comprehensive traffic study for all suburbs within the council area (not just Lidcombe) so DAs of this nature can be measured in a factual way and not just as "CONSIDERED" as done in this DA application.

Once again, I REFUTE OUTRIGHT that the DAs considered (or assumptions) 118 daily truck movements will have minimal impact on the local road network.

PLEASE TAKE THE TIME TO VISUALY and PHYSICALLY assess the impact this DA will have on our local roads.

ALSO, have a traffic study undertaken to have some formal way of assessing DAs of this nature. How can this DA (and others) be reviewed in a years' time when local traffic has been KNOWINGLY grossly impacted by a DA.

REMEMBER, LOCALS KNOW BEST

#### Health and Safety

EIS - Summary sheet – page xii – stated as follows:

The storage of mixed-organic waste is likely to be odorous due to the nature of materials. The proposed storage area would be entirely enclosed in an industrial shed, maintain a best practice odour management system and utilise a number of odour control measures.

EIS - Page 84 – stated as follows:

Impact - Odour impacts on sensitive receivers from site operations.

Comment - Due to the nature of the organic waste received onsite odour poses a significant risk to the local area surrounding the site.

Risk - High

EIS - Page85 – stated as follows:

Impact - Fire

Comment - Potential fire risks associated with operating an OTS, machinery used on site, temporary storage of materials.

Risk - High

We all know, the weather comes from 360 degree direction, all residents and industry workers in the vicinity of the Transfer Station will be effected by any of the above airborne contamination no matter what.

From a technical point of view, it is stated that the proposed storage area is entirely enclosed in an industrial shed. How can this be TRUE as trucks need to enter and

exit from the shed and therefore an open/close gate mechanism will be installed. So the shed will NOT BE ENTIRELY ENCLOSED allowing airborne contamination to escape into the air and therefore the surrounding suburb(s).

As the industrial shed is not entirely enclosed, odour WILL ESCAPE into the atmosphere and therefore there will be a VERY HIGH RISK to the health of residences and workers from nearby business and industries (Sydney food production and selling area, Sydney Flemington Fruit and Vegetable Markets and Parmalat (Old Dairy Farmers) just to name a few).

Where there is fire there is smoke, and as above, as the storage area WILL NOT BE ENTIRELY ENCLOSED smoke will escape along with any odours associated with the fire into the atmosphere putting the local area at VERY HIGH RISK. When a fire breaks out, issues of human health, extra traffic congestion re emergency services (HAZMAT, Police, Ambulances, etc) will increase.

As Sydney's air quality is always under scrutiny (burn offs, pollution, etc), this Transfer Station proposed for Lidcombe (situated in the near middle of Sydney) only adds to the increasingly high risk of Sydney air quality declining.

The impact of any airborne contamination (odour, fire/smoke, etc) will not only affect the nearby residences (including the near completed Church Street high rise development which includes public housing, affordable living, and private apartments) and workers of Lidcombe but also the surrounding suburbs, as these smells will spread to neighbouring suburbs and linger for long periods of time.

### Hours of Operations

The CCC DCP - Development in Industrial Zones document (page D12) Hours of operation (C1) states " Where an industrial site is located adjoining or adjacent to, within 200m of residential development, or where in the opinion of Council, truck movements associated with the industry will intrude on residential street, hours of operation shall generally be restricted to 7am to 6pm Monday to Saturday with no work on Sundays".

The DA states Hours of Operator (IES page 36 and Traffic Solutions page 8) as Monday to Friday being 6am to 10pm (16 hours) and Saturday being 8am to 6pm (10 hours).

The proposed development site is less than 100m from the nearest residences and the DA applicant is requesting that Hours of Operation be increased by 50% (5 hours) more than the stated requirement (11 hours) by CCC.

Rules are put in place to protect individuals, residences and industries to uphold a standard of living. WHY SHOULD THIS DA BE ALLOWED TO OPERATE OUTSIDE

OF APPROVED operation hours. RESIDENCES WILL BE GREATLY IMPACTED IF THIS DA IS APPROVED TO OUTSIDE OF CCC DCP Hours of operations.

Definition of FOGO

EIS page 14

FOGO Definition – Food Organic and Garden Organic Waste

EIS page 40 Waste Classification

Food Waste lists many possible items

Garden Waste lists many possible items.

WHAT IS FOGO? and what is going to be transferred to this station? How is this going to be sorted?

(As a person who mows lawns, I know humans are their worst enemy as anything and everything goes into “Green” bins. There is going to be a lot of contamination)

Oddly enough, in ‘Quality Control’, page 95 of the EIS, an item reads –

*‘Rejection of heavily contaminated or non-complaint material loads’*

They even have this content WRONG. It is NOT non-complaint, it should be ‘NON-COMPLIANT’, which is vastly different and really makes the title ‘Quality Control’ farcical.

I strongly object to this proposal as it will have detrimental affect to the standard of living in Lidcombe. We don’t deserve this.

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