
From:
Sent: Friday, 14 July 2023 11:25 PM
To: Records Department
Cc:
Subject: [EXTERNAL] Objection to Application No: DA2023/0130

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Name: _____
Address: _____
Phone: _____
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To Cumberland City Council,

As a local and affected resident, I am writing to express my objection and opposition to development application DA2023/0130 due to multiple and significant concerns raised by the proposal, the major negative effect on residential amenity and the inadequate mitigation measures presented. My residence is a townhouse located at 7-11 Bachel Avenue, less than 150 metres from the proposed site and would be one of the residences most affected if this proposal was to be approved due to my very close proximity to the site.

My concerns include:

- The proposed significant number of truck movements per day.
 - This will add to noise levels, traffic, pollution from exhaust emissions and odour from the transported waste of the area including my residence. The only mitigation measure presented for this is to install a 'left turn only' sign for exiting the site and to routinely service trucks. How can the routes trucks take coming to the site be enforced? Regularly serviced trucks will still emit noise and exhaust pollution and this does not address any odour coming from their carried loads. The increased movements will also contribute to increased wear and degradation of surrounding public roads, requiring more maintenance and council funds.
- The proposed hours of operations as 6am - 10pm on weekdays and 8am - 6pm on Saturdays.
 - The Cumberland DCP specifies where an industrial site is located within 200m of residential development (which this is), hours of operation shall generally be restricted to 7am - 6pm Monday to Saturday to ensure residential amenity is protected. These generally allowed hours of operation outlined by the

Cumberland DCP are also acknowledged in the proposal, yet no sufficient justification is provided for why this operation should be allowed to operate significantly outside of the hours specified in the Cumberland DCP. By operating at these hours, there will be a definite and significant negative impact on the residential amenity which is against the stated objective of the Cumberland DCP.

- Odour and air quality issues from site operations.
 - The Odour Modelling and Management Assessment and EIS (Environmental Impact Statement) notes my residence as a sensitive receptor (Receptor 3 in the document) at which testing and modelling were conducted at ground level. All 30+ units (including my own) within the complex are multi-storey townhouses - what will happen if I would like to open my top floor window, will the odour at that height be above the specified threshold? Why was the modelling and assessment not conducted to also include heights above ground level, such as at my address and the multi-storey apartments under development at 2-36 Church St?
 - The Odour Assessment and EIS mention that as a further mitigation measure, additives and hazardous chemicals (such as sodium hypochlorite, sodium hydroxide and others) may be used in the process to mitigate the odour. How will use of these additives affect the air quality in the adjacent residential zone and its residents? What other chemicals or additives could be used? How will they affect residents adjacent to the site? Are these chemicals carcinogenic or can they increase risk of birth defects if exposed to the surrounding air? No detail is provided in the EIS regarding what or how these additives will be used and their potential impact on the surrounding environment.
 - If odour is an issue insufficiently mitigated by the proposed measures, the EIS specifies that further mitigation will be a 'complaint logbook', in which complaints will be noted. A logbook to record complaints is absurd as a serious mitigation measure for something as negatively impactful to local residents and the residential amenity as the odour of organic waste and is unacceptable as a measure of mitigation should the odour be offensive to surrounding residents.
 - The Traffic Impact Assessment Report specifies that up to 2 trucks can wait outside the odour-controlled facility to unload when ready. There are no mitigation measures proposed (or potentially even possible) to reduce the odour from the waste these trucks will be loaded with while waiting to enter the facility.
- Noise from site operations.
 - The Noise Impact Assessment states that the modelling was performed 1.5m above ground at the receptors. Similar to the Odour Assessment, my address is a tested receptor (Receptor 1 in this document). Again, these are multi-storey dwellings - what is the expected noise impact on the upper levels? What will be the expected noise level if I open an upper level bedroom window while the site is operating at night, is this above the specified threshold?
 - What measures can be taken if the noise levels are in fact above the modeled and expected levels? Section 5.2.2 of the document states that "the location of major plant items and the exact selection to be installed are not known. As such, a detailed assessment of noise associated from engineering services cannot be undertaken." If these are unknown, then how can the impact of these major plant items be accurately assessed?
- Increased fire risk.
 - The storage of 400 litres of diesel as well as other hazardous chemicals creates a greatly increased risk of fire on the site, with the only protection measures mentioned ([7.11.3.4](#) of the EIS) being the warehouse access can accommodate fire trucks and the train rail line provides some buffer before reaching residential dwellings, these don't appear to be serious fire protection or mitigation measures.
- Site location is not suitable.

- The EIS fails to demonstrate the site suitability as adequately separated from sensitive receivers and how it is not a potentially offensive development, negatively impacting the residential amenity. The proposed site is 75 metres away from a R3 residential zone as well as less than 600 metres away from local primary schools, childcare centres and the town centre itself, making the site completely unsuitable to the type of operations proposed (waste transfer). There are much more suitable sites in surrounding areas and suburbs in industrial zones that have much larger distances to residential and densely populated areas than this site does.
- The Justification section of the document (12.1) fails to present any reason why this particular site, which is in such close proximity to residential areas, is more suited than other sites further away from residential areas and roads.
- EIS is inaccurate and has mistakes.
 - The EIS itself appears to be inaccurate in places as well as have some mistakes. One example is in the Executive Summary where 4 options are presented on page xi and the 'Preferred Option' on page xii is noted as Option 1, which is actually the BAU scenario where the site is not developed at all, which does not appear to be in line with the rest of the document. Further, alternative options Option 3 (processing less than 80,000 tpa of waste) and Option 4 (finding an alternative site) are not mentioned anywhere else in the document as being considered or why they are not suitable beyond it wouldn't provide as much return on investment (i.e. profit) for Option 3 and that the owner of the site has already spent some time and money on this site for Option 4 - both reasons being insufficient in my opinion to offset the significant negative impact to local residents and the residential amenity.
- Community consultation period and process was inadequate.
 - The community consultation undertaken was limited as noted in Section 5.1 of the EIS to a one-page flyer in November 2022 to residents within 250m of the proposed site. This level of community consultation with minimal information and details is completely insufficient for the level of negative impact to the residential amenity of the wider area due to the scope of operations on the proposed site.

Regards,