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**From:**  
**Sent:** Sunday, 16 July 2023 4:08 PM  
**To:** Records Department  
**Cc:**  
**Subject:** [EXTERNAL] Objections to and Concerns about Proposed Organic Waster transfer site - Church Street Lidcombe. DA2023/0130

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Dear Council,

Further to my email of 28/6/23 regarding the proposed transfer site, I have read in further detail the following documents:

a) Environmental Impact Statement document (EIS)

and b) Traffic Impact Assessment report (TIA)

and have the following concerns and comments regarding these documents and thus the proposal, which I believe now should NOT PROCEED:

1 Areas provided within this DA for operational purposes

EIS - page x, xiii – material for Sydney Council areas;

EIS - page 19 – site is central to the Sydney region and can be effectively used for drop off of FOGO materials;

EIS - page 25 and 44 – An OTS station situated in the central west of Sydney would provide a strategically located transfer option for many of the surrounding councils, providing incentive to update food waste collection services;

EIS - page 46 – Sydney metropolitan region – in particular, inner and central west Council areas;

EIS - page 46 – this option provides a centrally located organics waste transfer station within range of several Council areas that have indicated an interest or have commenced trials with domestic food waste collections;

EIS - page 90 – provide a significant opportunity for increasing confidence in neighbouring Council's to consider their transition to FOGO given the proximity to a viable and cost effective bulk transfer option for organic waste;

EIS - page 96 - Furthermore, the proximity of the proposed development to major Inner and Central Western Sydney Councils would provide a cost-effective destination for material which is currently subject to reform and is yet to enter the waste management market.

NOTE - Indicating the site is central to the Sydney region, meaning materials would come from all Council areas within the Sydney 'metropolitan' area (north, south, east and west) shows an intent for Lidcombe to be a waste site for a large part of the entire Sydney metro area. This site being centrally located is more accessible for the business allowing them to make greater profits; it is not at all for the betterment of the Lidcombe community, given how close to residential area (approx. 60 metres) it would be; in fact quite the opposite, it would be to the detriment of Lidcombe.

## 2 Proposed Option by the applicant

EIS - pages xi - xii – option xi preferred option 1

EIS - page 46 - preferred option – option 2

NOTE - Option 1 is 'do nothing' – 'Business As Usual'. Option 2 is the DA operational procedure at the highest level. The most simplistic of matters is that the executive summary has the 'wrong' intent of the application. If they can't get this aligned, what can be deemed as 'correct'? It leaves no confidence for people reading this material.

## 3 What is included in 'organic waste'

EIS - Page xii – food and garden organic waste from domestic and commercial sources;

EIS - page 25 – domestic and commercial derived food organic and garden organic (FOGO) waste;

EIS - page 34 – would receive up to 80,000 tonnes per annum of domestic and commercial derived food organic and garden organic waste for bulking and transfer offsite for secondary processing.

EIS - page 40-41 – waste classification [details]

NOTE - It should be noted that, as per the waste classification details on page 40-41, this is information from the Department of Environment. Whilst it is implied it will solely be food and garden waste it currently has other aspects, as there is no formal or legal definition of FOGO waste. Additionally, domestic and commercial sources could include a plethora of aspects (inclusive of decaying foods and animal carcasses). Detail of 'organic' should be provided for clarity but, currently, there is no updated information available so, regardless of what is said, we need to take the information from page 40-41 as potential.

## 4 Traffic issues

EIS - page xii – up to 59 trucks per day; - approx. 8 trucks per hour or one truck every 7.5 mins. Access is via Church St.;

EIS - page 25 – Church St is connected to the Western Motorway via Centenary Drive;

EIS - page 46 – industrial area close to major arterial roads that would connect the site to the rest of metropolitan Sydney without causing undue disturbance to residents.;

EIS - page 56 – heavy vehicles would access the site via the western-most driveway and travel one way through the site, through the industrial building and utilize the truck exist in the south-eastern corner of the site.;

EIS - page 94 - All trucks exiting the site from this location would be required to make a left hand turn onto Church Street to access nearby main arterial roadways (it is access to, but not directly to, main arterial roadways – would need to go under the viaduct and onto Railway street, then onto Arthur St – meaning that the travel for such trucks is not as 'simple' as implied. I would question the word 'nearby')

EIS - Page 126 – indicates the proposed location of the FOGO transfer station and the surrounding streets (with proximity to major roadways) – it doesn't say they wont use the streets.

EIS - Page 128 – On the basis of the above, material receival would result in approximately 52 trucks per day which is summarised in further detail as follows (Table 29): they then had other info in table 30. As a collective, this is 59 trucks listed. Also, one other item had said 60 trucks per day (page 9 of the traffic report below)

EIS - Page 129 - Heavy vehicle traffic associated with the proposed use of the facility (traffic volume described in Section [7.6.5.1](#)) would make up the predominant traffic to and from the site. The majority of trucks are expected to arrive from the east and then upon exit, all trucks would be directed to turn left out of the site. Signage would be located at the exit access stating 'left turn only'. On this basis, heavy vehicle traffic will generally frequent intersections between Church St, Railway St, Arthur St and Centenary Dr (through to other major arterial roads or motorways).

On the basis of the above forecast traffic movements, EBTS have concluded that the number of generated traffic movements are minimal and well within the road carrying capacity of Church Street or connected roadways, and would not represent an adverse impact upon the operation of the surrounding road network.

NOTE - Majority of trucks from the east would then be turning right (as would come from Arthur Street area). Does not mean all. Also, road carrying capacity of Church Street or connected roadways could also imply other streets.

TIA - page 8 – 47 trucks (94 truck movements) – very early morning or afternoon; then 12 trucks (24 movements) / 16 hours 6.00 am to 10.00 pm;

TIA - page 9 – 60 trucks (120 truck movements) or around 8 truck entry and 8 truck exit movement during the commuter peak hours

TIA - page 9 – 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. Signage will be located at the exit access stating 'left turn only'. However, minutes of the Sydney Central City Planning Panel on 15 June says 'The applicant advised the proposal is approximately 70m from the neighbouring residential area. 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. The applicant noted that further to this, conditions could be imposed to restrict movements of vehicles carrying waste to roads outside of the residential area.

NOTE - The traffic cannot be 'left in and left out' and be coming from the east. From the east would be Arthur Street, Railway Street and right onto Church Street, then right into the site.

Also, whilst there's a difference of only one additional truck in the numbers, they should have correct and consistent information across these reports.

## 5 Effect on residents and amenity of the area

EIS - page 31 – sensitive receivers – includes residences, schools, hospital and educational facilities;

EIS - page 34 – site suitability (includes ‘separated from sensitive receivers; accessible by public transport and road access’);

EIS - page 39 – scrubber vessels would also be capable of being dosed with chemicals to further improve order management if required;

EIS - page 67 – reduce risks to human health and prevent the degradation of the environment (then goes on to say a licence is needed, which is after the development consent has been granted);

EIS - page 97 - Operations such as the movements of trucks and handling of materials have the potential to generate dust and release particulates into the air

EIS - page 98 - By design of the proposed facility and OMS, the single discharge stack at roof level would be the only source of odour emission release to air.

NOTE - While it is written that work will be done indoors, this recognises that operations have the potential to generate into the air, and indications of dust and particulates into the air (this is also odour emission), as well as the potential outcome of chemicals onto scrubber vessels.

## 6 Working staff, and potential subsequent effect on the community

EIS - page 36 – The hours of operation for the proposed facility are outlined as follows: • 6am to 10pm – Monday to Friday, inclusive; • 8am to 6pm – on Saturday; and • No operations on Sunday and public holidays.

EIS - page 36 - 10 temporary FTE constructions jobs for construction; and 2-4 FTE depending on scale of operations

EIS - page 50 – Certain activities may involve handling, storing or processing a range of materials, which, when all measures have been employed to reduce the impact to the locality, may pose a significant to human health, life, property or the biophysical environment. Such activities are defined by Clause 3.3 (1) as a ‘hazardous industry or hazardous storage establishment’.

NOTE – how could 2-4 FTE undertake the responsibilities of the operational jobs, when it is intended to be operational from 6.00 am to 10.00 pm Monday to Friday? Given the potential hazards as per page 50 and the associated operational arrangements, what is the safety of such a small amount of employees to ensure all operations are done correctly and carefully; and the then impact on the community, with an emphasis on the residents in close proximity?

## 7 Temporary storage arrangement

EIS - page 39 – Organic material which is deposited in the industrial shed’s central storage area would be moved into consolidated stockpiles by a front-end loader for temporary storage. Material storage would be limited to less than 24 hours to reduce the potential for odour generation and build up of excessive material stockpiles.

NOTE – there is no listing of where to store it at. Other content indicates everything is internal, but storage moved by a front-end loader doesn't indicate where it is to be stored. Additionally, as this is not to operate on a Sunday (or public holiday), if this occurred on a Saturday, it would be longer than 24 hours. There is insufficient information provided here.

## 8 Risk rankings

EIS - page 88 – Key issues (High and Moderate) - • Acoustics • Air quality (Odour) • Amenity • Traffic and access • Waste management

NOTE - If traffic is allegedly ok, and the storage area is to be entirely enclosed in an industrial shed (air quality matter), then why are these 'key issues' of the risk?

As you can see, the developer's own documents have inconsistencies, raise concerns and have inaccuracies in them, as well as detailing a large, highly polluting operation that will negatively impact Lidcombe residents with little or no benefit. This development proposal should NOT proceed in Lidcombe.

Sincerely,

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