

Bianca Thornton

From: Stephen Pratt <Stephen.Pratt@camden.nsw.gov.au>
Sent: Tuesday, 17 May 2022 1:03 PM
To: Bianca Thornton
Subject: Advice on SEARS - Spring Farm Advanced Resource Recovery Technology Facility - Modification 7

Hi Bianca,

I refer to the above matter and the applicant's scoping letter dated 11 March 2022 prepared by Element Environmental.

It is understood that SUEZ is in the process of preparing a proposal to modify the existing approval (05_0098) to increase the capacity of the facility from 160,000 tonnes per annum to 272,000 tonnes per annum. According to the applicant's scoping letter, the proposed modification will include three new waste streams and processing activities including, 40,000 tonnes per annum of glass, 30,000 tonnes per annum of product destruction and 2,000 tonnes per annum of plastic flaking. The information indicates that these processes will be undertaken within the existing facility and provides a brief overview of the plastic flaking, glass and product destruction activities.

Please accept the following as Camden Council's comments in relation to this proposal:

Section 4.55(2) Modification or New DA

While noting the applicant's position as discussed in the scoping letter, Council raises some question about whether the proposal meets the necessary tests pursuant to Section 4.55 of the Environmental Planning and Assessment Act, 1979 given the significant increase in capacity of the facility and the various changes to waste streams proposed by this modification. In this regard, Council requests that the Department carefully consider whether the application is appropriately considered under the provisions of Section 4.55 as a modification rather than a new development application in its early deliberations on the project.

Noise Impacts (including road noise)

Consideration will need to be given to any potential noise impacts from the new processes. Any application will need to clearly demonstrate what additional noise impacts are generated by the new processes and potential impacts on surrounding residential development.

Road Traffic Noise

Page 9 and 10 of the scoping letter under the heading 'Environmental Assessment Approach' indicates that a road noise assessment will be provided to demonstrate the predicted impact of additional heavy vehicles on residential properties along Liz Kernohan Drive. It should be noted that this assessment should also assess the impact from the facility to Camden Bypass including the future residential development fronting Barrow Road.

Odour Impacts

Page 10 of the scoping letter indicates that additional odour impacts are not expected with the new waste streams, however a qualitative review of the previous odour assessment for the ARRTF will be provided. It is also noted that majority of odour concerns associated with the site relate to the garden and organic operations.

Complaints

Following on from the issue above, a review of Council's Customer Request Management Records shows that there has been a number of complaints received by Council over the last three or more years in relation to:

- Odour emanating from the development site;
- Generator type noise emanating from the development site;
- Early morning noise (as early as 4.00am commencement); and,
- Truck noise throughout the evening, including road traffic noise.

These complaints, mainly received from residents in Mount Annan and Spring Farm, have generally been referred to the NSW Environment Protection Authority (EPA) as the appropriate regulatory body under the Protection of the Environment Operations Act. It is suggested that the Department liaise with the EPA about the extent and nature of these complaints and any potential implications for the proposed activities.

Other General Comments

It is understood that hours of operation have not previously been imposed on Development Approvals for the subject premises. While including hours of operation as a condition of consent as part of a modification may be difficult, it is Council's view is that there would be an environmental benefit if hours of operation were included as a condition of any consent or modification to this facility. In addition, or in lieu of including hours of operation as a condition of consent, further consideration need to be given to acoustic and lighting attenuation to ensure that the increased capacity and the increased waste streams can be suitably undertaken without unreasonable impacts of adjoining residential neighbourhoods.

Council also recognises the recent heavy rainfall events across the entire Sydney Basin, including resulting water inundation and flooding, has impacted most waste management facilities in Sydney in recent times. The resulting effects, aside from delays in waste pick-ups, has been increased odour. In this regard, and having regard to these recent rain events that have been experienced, a detailed assessment of the capacity of the site to receive, process and store more waste material needs to be seriously considered.

Hoping this information is of assistance and for any further details, please feel free to contact me.

Regards

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