



CUMBERLAND
CITY COUNCIL

Ref: OA2020/0013

03 December 2020

NSW Government - Planning Industry & Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Sir/Madam,

Subject: Request for comments-State Significant Development (SSD)
Application No: SSD-10407
Property: 14 & 16 Kiara Crescent YENNORA NSW 2161
Proposal: Ministerial Consent - Expansion of existing liquid waste treatment facility for increasing processing and storage quantities and hours of operations to 24/7

Reference is made to the Department of Planning, Industry & Environment referral dated 12 November 2020 inviting Council's comments on Planning Secretary's Environmental Assessment Requirements (SEARs) for the proposed expansion of existing liquid waste treatment facility for increasing processing and storage quantities and hours of operations to 24/7 at the subject site.

Council has reviewed the submitted information, and requests that the following matters be addressed.

Planning

1. The application constitutes Integrated Development under the Protection of the Environment Operations Act 1997 (POEO Act), pursuant to Part 4, Division 4.8, Section 4.46 of the Environmental Planning and Assessment Act, 1979 (the Act).
2. Council notes the proposal is State significant development in accordance with Schedule 1, Clause 23(3) of the *State Environmental Planning Policy (State and Regional Development) 2011* as it is a *waste and resource management facility* which involves the handling of more than 10,000 tonnes per year of liquid food or grease trap waste and 1,000 tonnes of other aqueous or non-aqueous liquid industrial waste per year of waste.
3. The proposed development constitutes Designated Development, pursuant to the Schedule 3 – Designated Development of the Environmental Planning and Assessment Regulations, 2000 (the Regs). However, as noted under point 2- State Environmental Planning Policy (State and Regional Development) 2011, the development is State Significant Development (SSD). Clause 4.10(2) of the EPA Act states that “Designated development does not include State significant development despite any such declaration.”
4. The proposed development shall comply with all the relevant development standards and provisions/guidelines applicable at the time of development application lodgement i.e. Holroyd

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Welcome *Belong* Succeed

Local Environmental Plan 2013, Holroyd Development Control Plan 2013 and Draft Cumberland Local Environmental Plan 2020.

Environmental Health Unit

1. The proposed development incorporates scheduled activities as defined under the *Protection of the Environment Operations Act 1997* including for waste processing. Based on the information provided and the amount of waste to be processed at the facility, the site currently holds an Environment Protection Licence from the NSW Environment Protection Authority (EPA). Based on the proposal this licence is required to be updated. The facility will need to comply with any licence requirements as issued by the EPA.

Waste Management

1. Details of the ongoing management of waste generated by the office and employees shall be provided.

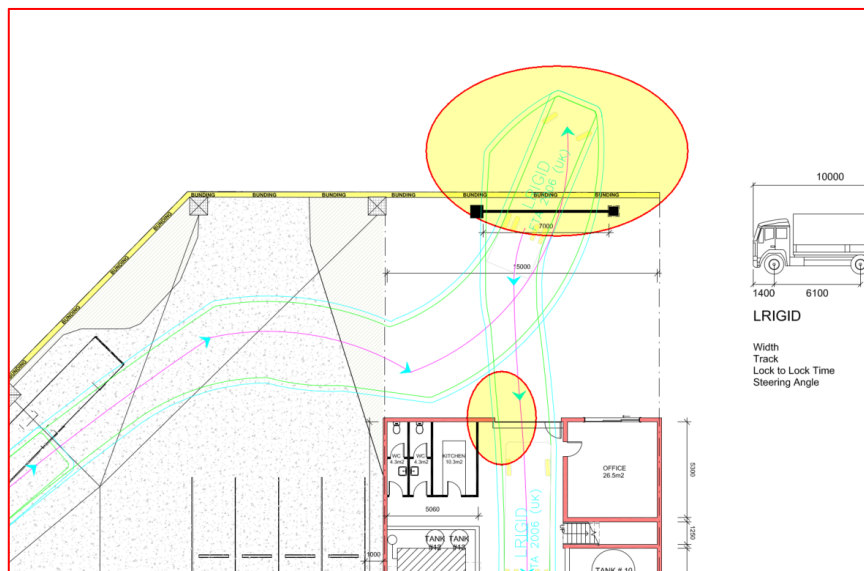
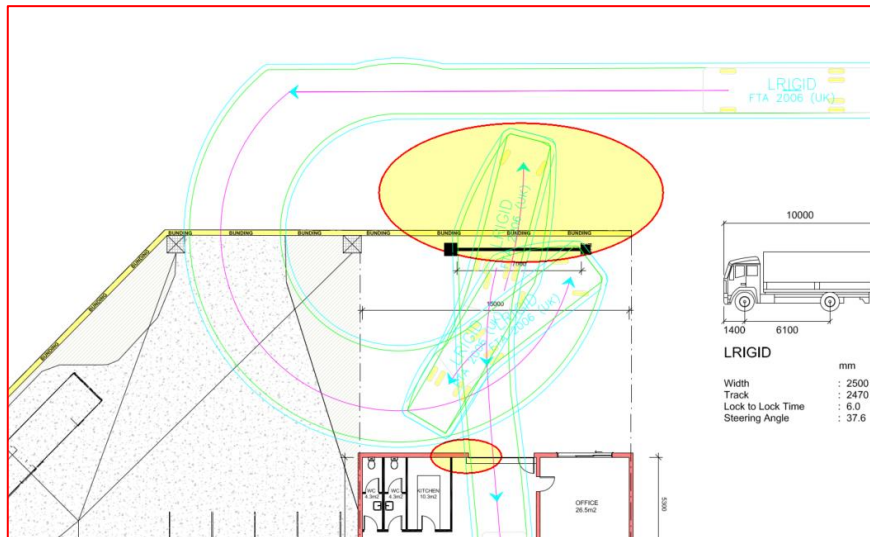
Development Engineering

Council notes that there is insufficient information on the existing and proposed stormwater management plan and water sensitive urban design measures. Also, the issues noted earlier do not appear to have been addressed.

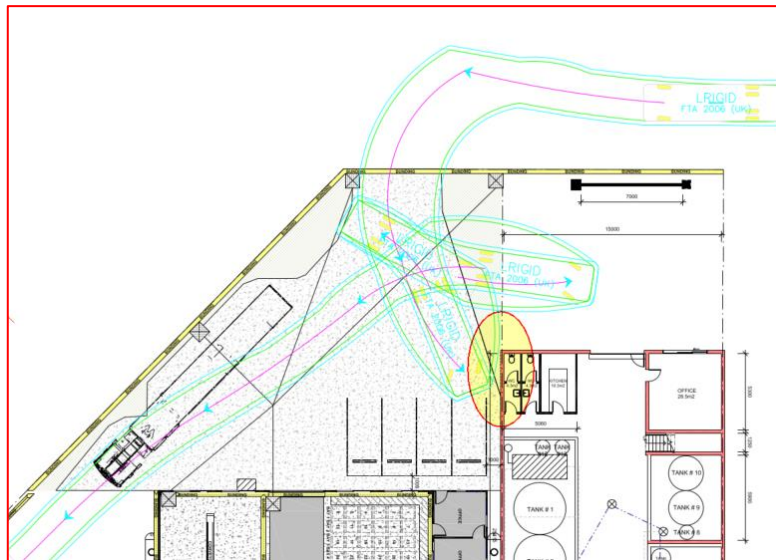
1. *Vehicle access manoeuvring*

The following issues were notified to the applicant earlier. However, no amendments, addressing the issues appear to have been carried out.

- a) The 10.0m truck used in the swept path analysis is not a standard truck that is defined in Australian standard AS2890.1. Further, the swept path clearance turning with 12,5 standard turning circle must be used.
- b) The manoeuvring and turning of the vehicle must be completed within the site and must not cause encroachment into nature strip or the footpath. The swept path diagrams demonstrate otherwise with the encroachment into nature strip.
- c) Sufficient swept path diagrams must be provided to demonstrate that the turning and manoeuvring of the truck is possible for all, entry and exit for both processing plant. The swept path must demonstrate with a truck in the waiting/stand-by bay.
- d) Further, the Truck swept path diagram also indicates the runover into the structure (entrance door jamb) and the car space for 16 Kiora Place.
- e) Reverse manoeuvring in Council's land is not acceptable. It will compromise the safety. Vehicles should enter and leave the site in a forward direction.



- f) Multiple point turn (more than 3 points) will result in additional time for the turning and manoeuvring thus overlapping with the arrival of another vehicle (truck) and causing obstruction and delay. Enough space must be provided for manoeuvring and turning with the minimum delay. The proposed 4-point turn truck manoeuvring movement is not acceptable. Manoeuvring shall be limited to three-point turn.



- g) Parking and loading design must comply with Australian standard AS2890.1 and AS2890.2. Further the design vehicle into consideration for the swept path analysis must be as per AS2890.2 (not UK standard as noted on the swept path diagram).
- h) The estimated peak hour traffic generation of the waste trucks is based on the assumption that the processing plant is operational 24 hours a day, 7 days a week. However, this is subject to the approval of the proposed operational management plan. Any variation to the operational hours will result in the increase in the frequency of the truck traffic. In such case the following must be complied:
 - (i) The traffic impact report must be revised and demonstrate how this will not result in adverse impact.
 - (ii) Additional facility/ area for holding the waste
 - (iii) Additional facility/area for the trucks waiting for unloading the waste.

2. Car parking provisions

- (iv) The proposed development is processing factory and the car parking provision must comply with Holroyd DCP 2013. The analysis in the section 4.1 of the Traffic report is noted to adopt incorrect parameter. A total of 14 car spaces are required for the proposed development. The proposal makes provision of only 7 car spaces and is deficient by 50%.

Factory

70

- 1 car parking space per ~~300m²~~ of GFA

Office Units (ancillary)

- 1 car parking space per 40m² of GFA

Table 3 summarises the car parking requirements of the proposed development.

Use	Number	GFAm ²	Parking Rate	Required Car Spaces	Provided Car Spaces
Warehouse	14 Kiora	324	0.003 1/70	1 4.6	7 13.8 = 14 Nos.
Office		106	0.025	3 2.7	
Warehouse	16 Kiora	318	0.003 1/70	1 4.5	
Office		78	0.025	2	
Total				7	7

Table 3: Summary of Car Parking Requirements

14

3. Stormwater

- (v) Existing and proposed stormwater details have not been submitted for assessment. The submitted stormwater plan is incomplete and does not specify whether it is proposed one of existing. The stormwater plan must demonstrate how the site runoff is collected, conveyed, and then appropriately disposed into the street stormwater system. Detailed stormwater drawing (layout plan, cross-sectional details, and connection details of the outlet pipe to street system must be provided.
- (vi) Development shall demonstrate compliance with the requirements as outlined in Section 7.0 (Stormwater Management) under the Part "A" of Holroyd DCP 2013.
- (vii) The runoff from the site must be managed by employing appropriate measure to control the site discharge not to exceed the rate 140 l/s/ha. The excess flow must be detained temporarily within the site.
- (viii) The runoff from the area that is likely to be contaminated by the transported waste or the by-product of the processing plant must be segregated and treated appropriately to the to the standard as outlined by NSW EPA and disposed accordingly. The contaminated stormwater runoff shall not be directed into the street stormwater system.

4. Water Sensitive Urban Design (WSUD) measures

- (ix) In accordance with the Section 7.5 under Part "A" of Holroyd DCP 2013, appropriate water sensitive Urban Design measures must be incorporated into the proposed development as a part of the site stormwater management system. The proposed measures must demonstrate compliance with all relevant requirement and controls as outlined in the Holroyd DCP 2013.

Tree Management

1. All trees that are to remain, are appropriately protected as per AS4970 – 2009 Protection of trees on development. During construction or any time during the development, any pruning works should be carried out in accordance with AS4373.

Should you have any further enquiries please do not hesitate to contact Nighat Aamir on 02 87579972 in relation to this matter.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Nighat Aamir', written in a cursive style.

Nighat Aamir
SENIOR DEVELOPMENT PLANNER