



Dear Sir/Madam,

**Re: Major Projects – New Request for Advice - Yennora Liquid Waste Treatment Plant (SSD-10407)**

Please find below comments from Cumberland Council below:

**Environmental Health Unit:**

A Scoping Report has been prepared by Benbow Environmental (report reference - 191251\_Scoping\_Rev4, dated November 2019). The Consultant has advised the following:

The applicant seeks approval for the following additions to an existing liquid waste treatment facility:

Increase the waste processing capacity to 100,000 Tonnes of waste per year – This requires changes to their existing EPA License and is considered integrated development under the EP&A Act and Regulation.

Increase the maximum waste storage capacity to 200 tonnes per year.

Increase operating hours to 24 hours per day/7 days per week.

No construction work will allegedly take place. The applicant proposes that the existing equipment on site and the proposed changes to the hours of operation is enough to cater to the increased processing capacity of 100,000 tonnes of waste per year.

Note: The business currently has approval to process 900 tonnes per year with a maximum storage capacity of 110 tonnes per year.

**Noise Impact Assessment**

Benbow Environmental have advised in their scoping report that a Noise impact assessment was undertaken and found that the proposed changes to the site activity will not have an impact on surrounding receivers. I could not locate a copy of the report on Council's file and as such, an assessment of the report could not be undertaken. It is requested that a copy of the report be provided to Council for further review. It is expected that the report will be submitted as part of the EIS.

The applicant must ensure that the acoustic assessment makes reference to the EPA's Noise Policy for Industry. The report must include although is not limited to:

Long term unattended background noise monitoring at the closest sensitive receivers. The consultant must also refer to the impact of the premises on neighbouring industrial receivers in addition to residential receivers. The background noise monitoring should be conducted at times where the current equipment used on site is not in operation.

It should include all noise from the site including additional vehicle movements and the use of equipment/machinery on site on a 24/7 basis.

## **Environmental Impact Statement (EIS)**

The Scoping Report prepared by Benbow Environmental (report reference - 191251\_Scoping\_Rev4, dated November 2019) states that Benbow Environmental has been engaged by Enviro Waste Services Group Pty Ltd (Enviro Waste) to undertake an Environmental Impact Statement (EIS). It is understood that the current scoping report sets out the relevant matters to be addressed in the EIS, and that an EIS will be provided to Council once the Department has issued the SEARs. A more detailed review of the issues raised in this memo will be undertaken once the EIS has been provided to Council for review and comment, along with the other technical reports alluded to in previous comments.

## **Waste Management Plan and Contaminated Waste**

A Waste Management Plan will need to be prepared and submitted to Council for review. The waste management plan must include although is not limited to reporting on the type of waste received, how it is processed, transported, managed and stored/stockpiled on site and include all measures that the business aims to manage the environmental impact of these activities.

The consultant has advised that contaminated waste is brought and processed on site. Details of this contaminated waste and how it is managed must also be included in the EIS so that an assessment can be made of the potential risk/mitigation measures to be installed at the facility. It is understood that contaminants which are currently processed on site include:

- Residues from industrial waste treatment/disposal operations – landfill leachates;
- Liquid waste material in glass, plastic or aluminium containers;
- Surface active agents (surfactants) containing principally organic constituents and which may contain metals and inorganic materials;
- Waste oil/hydrocarbons mixtures/emulsions in water;
- Sewage sludge & residues; and
- Grease trap waste

## **Odour Impact Assessment and Dust Control**

The consultant has advised that “A full quantitative odour assessment (OIA) has been conducted for the operation of the proposed liquids waste recycling facility in accordance with the “Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales” (EPA 2016).”

A copy of the odour impact assessment could not be located on Council’s file. EHU can therefore not comment on the report to determine the odour/air quality impact on surrounding sensitive receivers. It is recommended that this is submitted to the EHU for review. It is expected that the report will be submitted as part of the EIS.

The consultant also stated that “Dust is not considered as a potential emission that would be generated from the proposed development and therefore was not assessed.” Given the site is a waste facility and will store to an extent, some solid wastes. It is recommended that an assessment be undertaken on the presence of airborne dust and its management if

applicable. Wherever possible dust should be controlled through the use of physical means (such as a physical building structure) and dust should not create in external areas of the premises with only mechanical means of control such as water sprays.

### **Environmental Management Plan**

An environmental management plan (EMP) should be prepared and submitted to Council for review. It is expected that the report will be submitted as part of the EIS. The EMP must be written in accordance with the Department of Environment – Environmental Management Plan Guidelines 2014.

The EMP must include although is not limited to how the following pollution risks will be managed:

Stormwater pollution;

Acoustic amenity;

Air/odour pollution including dust mitigation measures;

Emergency management and spill response procedures;

Any required contamination management/control measures required to be installed at the site; and

Any other source of pollution that is identified as a risk onsite.

### **Trade Waste Agreement**

It is unclear whether the current trade waste agreement with Sydney Water accurately reflects the waste water predicted to enter the sewer system with the new proposal. Information should be submitted demonstrating the trade waste agreement will cover all of the new loads.

### **Site Plans**

The scoping report states that the applicant does not propose any constructional changes to the site and advises that the existing setup will accommodate for the additional waste. It is advised that the business submit to Council processing details and a site layout plan as to how the business will be able to accommodate for the additional 99,100 tonnes of additional waste per year without the addition of new equipment used for processing or additional space.

Detailed existing and future site plans should be submitted to demonstrate the location of all equipment/machinery (and details as to what this equipment/machinery is used for), as well as the details of any stockpile locations of waste/material, parking of vehicles/trucks and any other equipment internally or externally used at this site.

### **Stormwater Pollution**

Details of the site's entire stormwater management and drainage plan setup should be submitted to Council for review. In addition to this, the location of any waste processing, storage, transportation of waste, parking of vehicles which will be carried out in close proximity to the sites stormwater system should be outlined on the plans.

Other information which must be provided:

Are all operations restricted to inside the buildings onsite? I.e. will there be any activities carried out outside the buildings, such as the need to have trucks waiting on the street prior to entry to the site. This could impact on whether any contaminated material to be processed onsite could enter the roadway area.

### **Traffic**

The applicant is to liaise with RMS in accordance with Schedule 3 – Traffic Generating under the Infrastructure SEPP.

### **Onsite Inspection**

A site inspection at 14 Kiora Crescent was completed on 6 January 2020 at approximately 10:15am. I spoke with the operations manager on site John Paul Hawach.

At the time of the inspection, all activities pertaining to waste disposal were carried out inside a shed at the premises. The site consisted of a large shed (where all equipment used to filter and dispose of liquid waste was located) and a concrete hardstand.

Odours, dust, waste, excessive noise was not observed at the road at the time of the inspection. Upon entering the premises, there was a strong odour present as well as noise from vehicles and machinery in use at the time.

It should be noted that an additional property across the road located at 5 Kiora Crescent Yennora (Lot 10/DP 1233715) was used to store IBC's (large plastic containers) some of which were empty although some of which contained some oils and other products used to service their trucks. The operations manager advised that this area was also used to park and service the business's vehicles as needed. The site consisted of some sealed areas however there were also some unsealed areas which were used to park vehicles. This site is also leased out to two other companies. EHU advises that this site be assessed as a part of the application.

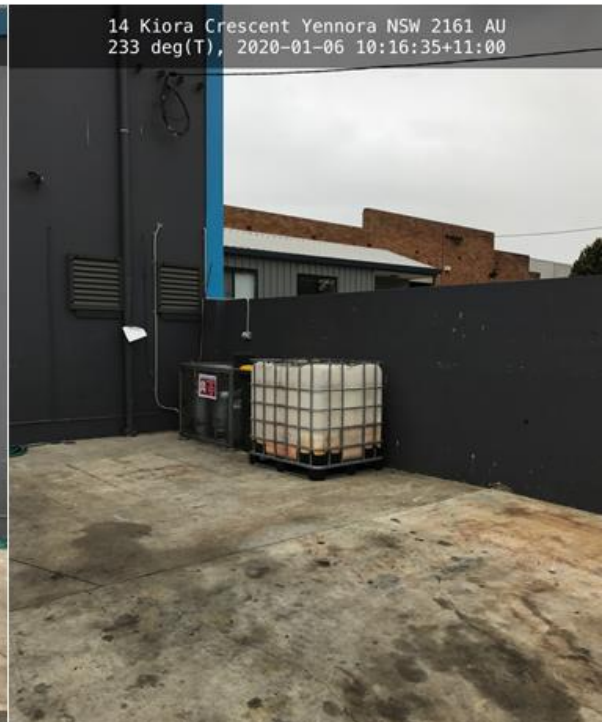
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## **Strategic:**

The site is identified as having a flood risk (floor level control building requirement). It is also in proximity to an area of stormwater overflow flood risk. This flood risk should be addressed in the EIS including, as appropriate, any measures to manage and mitigate this risk should a flood event occur.

The documentation does not confirm if any additional external lighting, for security or to support safety of operations including vehicle movements, will be required. This should be addressed and, if required, to assess the impact of the external lighting.

There is expected to be a considerable increase in traffic movements for the site (including outside current operational hours), and it is noted there are other transport/logistics businesses nearby and this is a dead-end street having one access point off Norie St. The individual and cumulative traffic & parking impacts of the proposal should be assessed as part of the detailed traffic & parking assessment (noted as to be undertaken in the submitted scoping report).

## **Background / Proposed development**

The subject site is zoned IN1 General Industrial and located on the south of the Yennora Intermodal Terminal, approx. 260m away. An additional permitted use for sex service premises applies to the certain precinct area within this IN1 General Industrial in Yennora. The proposed development consists of increasing a capacity of the waste processing quantity to 100,000 tonnes per annum (from 900 tonnes p.a) and store up to a maximum of 200 tonnes (from 110 tonnes) of liquid at any one time. No construction work is proposed for the expansion of the existing waste management facility. It is proposed to utilise the existing equipment with an increased capacity to the extended operational hours. The facility proposes to operate 24 hours a day, seven days a week. The proposal does not propose a change of use or a rezoning of the land.

## **Alignment to the strategic planning framework**

### **(Greater Sydney Region Plan, Central City District Plan and Cumberland 2030: Our Local Strategic Planning Statement)**

The existing and proposed development (waste management) is generally aligned to region, district plan and Cumberland LSPS. See details below.

- The Greater Sydney Region Plan (p.130) recommends safeguarding industries (such as waste handling facilities and freight activities) from residential encroachment which are impacted by noise, light and odours. Note that there is no residential development adjacent to the site. Its Objective 23 supports retention of local recycling and waste management facilities that are within industrial and urban services land. And at the same time it requires to address ongoing environmental issues such as odour, noise, truck movement and dust. Strategy 35.1 also recommends a protection of existing and identify new locations for waste recycling and management.

- The Central City District Plan encourages initiatives for re-use and recycle to support a circular economy and innovative solutions to reduce the volume of waste and waste transport requirements.



- The draft LSPS (p. 80), the Central City District Plan and the Cumberland Employment and Innovation Lands Strategy (EILS) identify the Yennora Intermodal Terminal as a protected freight corridor, with an opportunity for improved accessibility. Note that a future Western Sydney Freight through this industrial precinct is planned under the Future Transport Strategy, to improve accessibility for freight, warehousing and logistics businesses.

### **Consistency of the proposed development with SEPP**

#### **SEPP No 33 – Hazardous and Offensive Development**

Issue – The proposed greater increase in waste management capacity can be considered as a potentially hazardous industry. A preliminary hazard analysis may be required. See comments below.

- The current use of the site is a waste management facility that can process 900 tonnes per annum of waste liquids, with a maximum of 110 tonnes of liquid that can be stored at any one time. The proposal is to increase the processing quantity to 100,000 tonnes per annum and increase the maximum quantity to be stored at any one time to 200 tonnes.

- The proposed increase in capacity of the site can be viewed as a potentially hazardous industry. This greater increase in capacity could potentially pose a significant risk to its locality (to human health, life or property or to the biophysical environment) if such measures are not mitigated or monitored. The preparation of a preliminary hazard analysis is required for site if identified as a potentially hazardous industry.

#### **SEPP No 55 – Remediation of Land**

Issue – State 1 Preliminary Investigation may be required. See comments below.

Given the site's existing use as a waste management facility involving a waste treatment and a disposal, and its proposal to increase the capacity, the site can be potentially considered as a contaminated land. Whilst the proposal does not involve a rezoning or a change of use, the proposed greater increase in capacity of waste management, could further impact on the subject land or land immediately adjacent to the site. As per the contaminated land planning guidelines, Stage 1 – Preliminary Investigation may be required to determine whether the proposed greater increase in capacity for the subject site is adequate.

#### **SEPP (Infrastructure) 2007s**

Proposal needs to be referred to RMS.

According to this SEPP, Schedule 3 – 'Waste or resource management facility' that involves with any size or capacity increase under the Traffic-generating development, the proposal need to be referred to Roads and Maritime Services.

#### **SEPP (State and Regional Development) 2011**

Schedule 1 State significant development – general, Clause 23

According to this SEPP, the proposal is determined as a State significant development (SSD) under Clause 23, Schedule 1.

## **Development Engineering:**

### **Flooding**

Subject site is affected by flooding. In this regard, flood advice letter from Council shall be obtained. Development shall comply with flood advice letter.

### **Traffic**

Submitted information is not adequate for the assessment. It appears proposed modification will have adverse impact on the street traffic and on street parking. Following matters shall be addressed:

Proposed swept path analysis is not acceptable. The swept path analysis shows that the turning path encroaches into Council footpath and nature strip.

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.

Proposed 4 point turn truck manoeuvring movement is not acceptable. Manoeuvring shall be limited to three point turn.

Truck swept path interferes with the car parking space.

Parking space not available within the site for the delivery trucks to prevent any queuing or on street parking of trucks/delivery vehicles. Increase in traffic movement will have adverse impact on street traffic and the adjoining developments.

Parking and loading design shall comply with Australian standard AS2890.1 and AS2890.2.  
Stormwater

Existing and proposed stormwater details have not been submitted for assessment.

Development shall demonstrate compliance with Part a Section 7.0 Stormwater Management of Council DCP 2013.

Should you require any further information on this matter, please contact Sohail Faridy on 8757 9915 or [Sohail.faridy@cumberland.nsw.gov.au](mailto:Sohail.faridy@cumberland.nsw.gov.au)

Regards,

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**Coordinator Development Assessment**