

In reply please quote: 23/27767

19 October 2023

Industry Assessments
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

SEARS Advice – SSD-62947958 – Halgan Liquid Waste Treatment Facility at 10 Davis Road, Wetherill Park

Dear Sir/ Madam,

Fairfield City Council is in receipt of the request for Secretary's Environmental Assessment Requirements (SEARs) advice to the abovementioned proposed liquid waste treatment facility at 10 Davis Road, Wetherill Park.

Proposal

The proposed development is for the intensification of the existing waste and resource management facility. The premises currently has a development consent to processes up to 50,000 tonnes per annum (tpa) of grease trap waste under DA 286.1/2020 and EPA Licence No. 21629.

The development proposes to increase the amount of waste processed on the site by 70,000tpa, equating to a total of 120,000tpa. Other key features proposed of treated waste to be discharged to the sewer and other residual waste material to be transported off-site to an approved disposal facility.

No architectural plans and only limited information have been provided at this stage to support the proposal. As such, the following comments are provided on a preliminary basis and general areas of concern that are required to be addressed as part of the EIS.

1. Site suitability

From the information provided it appears that the proposal would not involve any works to the existing premises approved under DA 286.1/2020 by the Sydney Western City Planning Panel on 9 December 2020.

The existing aerial imagery appears that the development is not operating in accordance with the existing consent. It is noted from the aerial images that a significant number of drums and storage vessels are located externally within areas required to be used as parking spaces pursuant to condition 38 of DA 286.1/2020.

It appears that the current operation of the development is not able to be accommodated within the existing building and the substantial increase in waste to be processed at the facility will exacerbate this issue and will result in further externalisation of the operational impacts that are required to occur internally. It is unclear with the information provided if the site can be considered suitable for an intensification of the existing use of the premises.

2. Definition of the development

The existing development is identified as a 'waste or resource management facility' which is permitted with consent in the E4 General Industrial Zone.

Consideration is to be given to whether the intensification of the use will result in the development being defined as a different land use. It is considered that the development has the potential to meet the definition of 'heavy industry'. The future EIS is required to clearly demonstrate that the development does not meet the definition of heavy industry as prescribed in FLEP 2013 and meet the objectives within the prescribed zone.

3. Traffic, Access and Parking

- a. Traffic movements – It is considered that the intensification of the use would likely result in the increase of traffic and truck movements to and from the site. The EIS must satisfactorily consider the impact of the increased traffic generation and if the surrounding road network is capable to accommodate the increase.
- b. Vehicle manoeuvrability – All loading and unloading activities shall be carried out within designated areas inside the building. Swept path diagrams are to be submitted for the largest vehicles proposed to service the site demonstrating all vehicular movements to be made in a forward direction. In addition, all parking spaces and vehicular access shall be designed in accordance with AS 2890.1-2004 and AS 2890.2:2002.
- c. Loading operations – All vehicles awaiting loading and unloading shall be parked on-site and not on adjacent or nearby public roads. In addition, the number of servicing vehicles using the site on a daily basis shall be provided including onsite at any one time. Any potential conflicts between the number of vehicles generated on site shall be addressed.

4. Plan of Management

A Plan of Management (PoM) is required to be submitted detailing the daily operation of the premises. The information provided in the PoM is to include at a minimum:

- Number of staff members (maximum at any one time)
- Number of truck movements per day
- Types of vehicles/ machinery used on site
- Details of the general daily operation of the premises
- Types of waste and/ or chemicals and the management procedures
- Safety procedures/ protocols; particularly in regard to any dangerous/ hazardous goods stored on the site

- Complain register and procedures for resolution
- Pollution incident response management plan
- Fire and incident management plan
- Hours of operation – information regarding late night use and procedures given its 24 hour operation

The PoM is to be accompanied by the architectural plans that clearly identify what each area of the premises is to be used for and where vehicular manoeuvring would occur.

5. Air Quality and Odour Assessment

An Air Quality Assessment and/or Odour Report is required to be submitted to demonstrate the proposed development will not have adverse impact on the surrounding locality and adversely impact the existing uses in vicinity of the site.

6. Waste Treatment

A Trade Waste Agreement is required to be obtained with Sydney Water. All waste treatment and material handling areas shall be bunded to be separated from stormwater runoff areas.

7. Environmental Protection License (EPL) consistency

The NSW Environmental Protection Authority (EPA) is the relevant authority for monitoring the management and operation the development through an Environmental Protection License (EPL). The existing EPL No. 21629 would need to be amended to include the provisions for the proposed new waste streams.

8. Flooding

The subject site is identified as being within partly medium and partly low overland flood risk precinct. In this regard, a Flood Risk Management Report must be prepared by a qualified consultant demonstrating compliance with Chapter 11 of the Fairfield Citywide Development Control Plan 2013. A flood evacuation plan must be included within the report.

If you would like more information, please contact Ms K Ven on 9725 0878.

Yours sincerely



Kerren Ven
Strategic Land Use Planner