

30 November 2020

Ms Emma Barnet  
Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

By email: [emma.barnet@planning.nsw.gov.au](mailto:emma.barnet@planning.nsw.gov.au)

Dear Ms Barnet,

**RE: SSD 8593 – Proposed expansion of an existing resource recovery facility  
No.16 Kerr Road, INGLEBURN**

Thank you for referring the response to submissions to Campbelltown City Council for comment. The following comments are provided to assist the Department with its assessment.

**Traffic and Operational Issues**

Council is still concerned with the potential traffic and operation of trucks to and from the site as well as access and manoeuvring on site. Appendix E - Revised Traffic Management Within Site states that trucks will not be required to queue within Kerr Road or other surrounding roads as previously proposed due to the pre-booking of all jobs and the turning away of trucks if the yard cannot accommodate them. It is also stated that truck drivers will be informed to avoid parking their vehicles in any streets within the vicinity of the site and where possible in dedicated truck parking/stopping bays to assist in traffic flow and minimise congestion. There has been no further information on where these dedicated truck parking/stopping bays are and how the trucks will be managed to ensure they will not be parking within the local streets.

In addition, the swept path diagrams submitted show that manoeuvring on site is very tight especially the Vehicle Turning Path truck and dog: C & D Tip and Spread plan which shows that the existing acoustic wall interferes with manoeuvring of trucks as they come through the wheel wash bay to the rear of the site.

If the Department is satisfied in regards to these matters, then it is requested that the conditions of consent require compliance with the revised Traffic Stacking and Queueing Procedure dated September 2020.

**Environmental Operations Management Plan**

Council previously requested an overarching management plan that details the site's operations and provides detailed information regarding the means by which methods and equipment would be employed at the site to reduce its potential impacts on the local

environment. This has not been submitted. This environmental operations management plan would tie in the operations and environmental outcomes described in consultant reports provided with the application. The submission of this report would ensure that the range of reports provided and operational management details either provided or implied are accounted for.

It is also requested that the Department ensure that the environmental matters raised in submissions from government agencies are satisfactorily addressed prior to the determination of the application. Further Council's position remains that any unloading and loading of waste materials should occur within the building.

### **Work within the Easement**

Whilst it is noted that there would no longer be and works other than the sound wall nor any storage within the rear easement, it is requested that a condition of any approval be applied prohibiting the storage of any material within the area of the easement in the rear portion of the site.

### **Unauthorised works**

The office space inside the building is currently subject to separate investigation by Council as it has been constructed without approval. Further investigation may also need to be undertaken regarding the building's status as a 'fire isolated building' pursuant to the Building Code of Australia and the implications this has for structures (tanks) and bulk storage areas that are located on the southern and eastern sides.

### **Conclusion**

There are limitations to the scale of the operation that can occur on the site without having impacts on neighbours and the public road system. The site of the proposed development is constrained by the location of the existing buildings, easements and the overall size of the site. Council requests that the Department ensure that the proposed development is limited to a scale, and to operational procedures, that prevent any unreasonable impacts from the proposed development on nearby residents, other industrial neighbours and on the environment.

I trust that this information assists with the assessment of the proposal.

Should you require any further information please contact Council's senior town planner, Michelle Penna on (02) 4645 4608.

Yours sincerely,



David Smith  
**EXECUTIVE MANAGER URBAN CENTRES**