



File no: SSD-10449
MC-20-00002

21 April 2020

Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attention: Bianca Thornton

Dear Ms Thornton,

Council's comments regarding a request for SEARs for State Significant Development for a Waste and Resource Management Facility at 48-52 Edward Street, Riverstone (SSD-10449)

Thank you for your correspondence received by us on 3 April 2020, giving us the opportunity to provide comments for inclusion in the Secretary's Environmental Assessment Requirements (SEARs) for the above State Significant Development (SSD).

A review of the letter requesting SEARs prepared by City Plan has been undertaken and we have some serious concerns about the up scaling of this proposal as an SSD and its suitability next to the residential North West Growth Centre of Riverstone and Rouse Hill. We request that the list of issues outlined in **Attachment A** to this letter also be included in the final SEARs to the applicant for detailed reporting in their Environmental Impact Statement.

Should you require any further information regarding this matter, please contact our Senior Development Planner, Jared Spies, on 9839 6000.

Yours sincerely,

Judith Portelli
MANAGER DEVELOPMENT ASSESSMENT

Connect - Create - Celebrate

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All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

ATTACHMENT A

The Environmental Impact Statement must address the following matters:

Building, Traffic and Engineering:

1. The submission of an updated Traffic Impact Assessment and updated Stormwater Management Plan is required.

Environmental Health:

1. The applicant cannot rely on the old studies. Council requires that all the technical studies submitted with DA-18-01855 are to be revised to reflect this expanded proposal, updated using the latest legislation to be resubmitted with the SSD application. These studies must consider all possible additional environmental impacts associated with the proposed significantly expanded operation and intended increase in production capacity of the facility sought by this SSD application. In particular:
 - New Noise and Vibration readings must be carried out after COVID-19 is over as anything done now is not a true reflection of current activities. This is to include impacts to neighbouring premises due to proposed 24/7hr operation, truck movements, increase in crushing activity.
 - Waste and Hazardous material review to include new waste streams, what these are, why and monitoring control measures.
 - New Air Quality and Odour reporting must be completed to reflect new odorous waste streams proposed and how this will be managed. This must include waste holding times, new additional storage area (with plans) and additional delivery procedures.

Planning:

1. The applicant must provide a detailed description and updated drawings regarding any alterations and additions proposed to the approved facility under DA-18-01855 to cater for this SSD proposal.
2. Contamination: The applicant has stated that a Preliminary Site Investigation (PSI) was submitted with DA-18-01855, but a Detailed Site Investigation (DSI) was requested by Council and was provided before the consent for DA-18-01855 was issued. The DSI not just the PSI must be provided with the SSD application.
3. Environmental Protection Authority (EPA) requirements: A referral to the NSW EPA is necessary for comment on the proposed activity. The proposal is considered to be a Scheduled Activity as more than 500,000 tonnes of waste will be processed per year. It is expected that the EPA will require the Environment Protection Licences to be modified (if already issued for DA-18-01855) to include this increased production capacity. Their additional input into this proposal through additional General Terms of Approval is critical, particularly with regards to hours of operation, the new odorous waste streams to be accepted and the maximum amount of waste allowed to be stored on site at any one time.
4. The applicant must determine how it will ensure contaminated waste streams will not be accepted at the facility given the scale of the waste volumes and how this will be managed and monitored.
5. Hours of operation: when DA-18-01855 was lodged the applicant originally proposed a 24 hour a day, 7 days a week, 365 days a year operation which

included operating on Sundays and Public Holidays. We did not support this and neither did the EPA, hence the limited hours of operation conditioned in the consent of DA-18-01855. The applicant now proposes to revert to the original operating hours which were refused by the State Planning Panel and the EPA. This will have a negative environmental impact on nearby sensitive receivers. We don't support a 24hr operation due to the site's proximity to the North West Growth Centre of Riverstone and Rouse Hill and so this must be addressed in the report.

6. Social Impact Assessment: Because of the massive expansion proposed and its close proximity to the residential area, this warrants a social impact assessment for the benefit of the residents nearby.
7. Trucks: conditions were included to limit the amount of trucks allowed on the site at one time and to limit the amount of trucks travelling to/from the site to prevent queueing and parking of trucks on the site and the surrounding streets. Given the greatly expanded proposal will generate much more truck movements, this will result in proposed changes to these conditions and these need to be carefully considered to prevent creating traffic issues relating to queueing and parking of trucks on the site and in surrounding streets.
8. Four objections were received during notification of DA-18-01855 which raised valid concerns that required specific conditions of consent to be added prior to determination to address the issues raised. It is expected that the proposed increase in production capacity will generate even more objections from the public. We trust that any issues raised by any adjoining owner or occupier during notification of the SSD application will be considered carefully and addressed prior to its determination.
9. The Department needs to carefully consider what the State Planning Panel has already approved for this site having regard to the scale proposed at the time, the objections raised at the time and its close proximity to a residential area. Any existing conditions of consent of DA-18-01855 that need to be changed or deleted in order to allow what is being proposed in the SSD need to be considered carefully to not undermine the intent of the conditions and thereby create potentially detrimental environmental impacts.