

RESPONSE TO SUBMISSIONS

Issue	Response
Penrith City Council	
Landscaping The landscaping provisions to the western and southern boundaries have significantly improved.	The proposed landscaping is satisfactory to Council.
Architectural Merit of the Proposed Building Council is satisfied that the bulk, scale and character of the development will be compatible with other developments in the precinct but suggest the parapet finishes appears busy and resembles "barcode". This could be simplified to better integrating with lower portion of the elevation and highlight areas of interest by incorporating architectural elements.	Nicholas & Alexander Architects consider the design of the building 'appropriate in dealing with the proportions of the building, creating interest and a language that contributes to the greater urban environment.' Refer to their letter in Attachment 1. The elevation should also be read in conjunction with the screen landscaping to be provided to the street frontage which provides a suitable landscaped setting for the development.
Fencing The applicant is to use black, open style fencing to all boundaries with a high quality at the street frontage setback behind landscaping.	The development will incorporate black, open-style fencing to all boundaries behind the landscaping.

NSW Environment Protection Authority	
Environment Protection Licence (EPL) The EIS should contain an assessment undertaken by the proponent as to whether an environment protection licence (EPL) is required for an activity/activities that the proponent proposes to undertake at the premises. In undertaking the assessment the proponent should refer to the activities specified under Schedule 1 of the Protection of the Environment Operations Act 1997 (POEO Act).	The proposal is listed as a scheduled activity (<i>livestock and processing activities</i>) under POEO Act and requires an EPL from the EPA prior to commencing livestock processing activities. The operator will liaise with the EPA and obtain the necessary licence prior to operation of the facility.
Dust Dust emissions from the construction phase of this project have the potential to cause significant environmental impact and it is important that dust mitigation measures outlined in the EIS are implemented. The EPA notes that the proposed mitigation measures specified in the Air Quality Assessment (Section 10.2.3) to address dust from construction activities are more comprehensive than those specified in the EIS' Attachment 19: Proposed Mitigation Measures.	The dust mitigation measures in the Environmental Air Quality Assessment report by SLR Consulting in the EIS will be implemented. This information will form part of a specific element of a detailed Construction Management Plan for the development.

NSW Environment Protection Authority (Cont.)	
Odour EPA considers that the proposal has a number of potential odour generating activities/sources and that unacceptable levels of offensive odour could be emitted from these activities, if best management practice and best available technology are not applied. The activities that are considered to be a potential source of offensive odours include (but are not limited to); the operation of the wastewater treatment plant, storage of animal waste for disposal; removal and storage of sludge/screenings; and transfer of waste products from the facility to trucks for disposal off-site.	A comprehensive odour assessment will be completed in accordance with the relevant odour framework documents prior to the issue of an Occupation Certificate.
Air Quality Minimal information is provided in the EIS 'Air Quality Assessment' in relation to the potential odorous activities/sources and more detail is required to indicate how the facility will be managed particularly in the operation phase, to ensure that there are minimal environmental impacts due to the emission of odours, The EIS states that an objective of the wastewater treatment plant is that it will meet criterion of 1 odour unit or less at the Project boundary. The Proponent should demonstrate how this objective will be achieved. Similarly, the Proponent should demonstrate how it will ensure that odour prevention and minimisation measures are implemented at the site to avoid odour impacts or offensive odour. In an email dated 26 September 2013 to CIP, the EPA sought further information from the Proponent regarding: - the identification of potential odorous sources/activities; - location details of any potentially odorous plant and equipment (e.g. whether they are fully contained in enclosed buildings, whether negative pressure will be employed in buildings or ventilation / air changes are undertaken, temperature of building etc); - the specifics/plant design of the wastewater treatment plant; and - the odour controls that will be used at the facility, including any controls that will be employed at the wastewater treatment plant, sludge and screening waste facilities/bins, animal waste facilities/bins and on waste trucks. In their email response dated 18 October 2013 the Proponent advised that the Air Quality Assessment is equivalent to a Level 1 Odour Impact Assessment which provides a screening level assessment for the facility. The Proponent provided clarification on issues raised by EPA and additional information pertaining to operational odour management measures. The EPA notes that the final design of the wastewater treatment plant has yet to be achieved (including the sludge	Designs of the various waste streams from the facility are progressing and odour management is a primary consideration. The final design will incorporate best available technology and management practices to meet all EPA guidelines and ensure offensive odour is minimised. Several waste streams will be generated from the development and many of these will have a reuse and economic value. Waste Sources: Waste water treatment plant – 'waste' meats are being removed before they enter the drainage systems via sieves in the floor drains and a vacuum waste system discharging into sealed bins. Therefore, the odour risk from the waste water plant is low. The waste will be contained inside a building with carbon filters and enclosed in holding tanks to ensure no odour problems. There will be sludge produced by the waste water treatment facility. The use of a centrifugal press rather than a belt press will ensure the sludge is contained within the equipment and discharged into a sealed skip and serviced regularly by a commercial waste contractor. Possible reuse of this material for fertilisers is currently being investigated . Waste meat products – 'waste' meat will be minor in nature from trims off the meat and will be collected in sealed bins and contained within chilled areas inside the main building. Bins will be swapped over by the commercial waste contractor and remain in sealed containers when transported for reuse or disposal. Waste cardboard will be shredded on site and placed in sealed bins. Bins will be swapped over by the waste contractor and remain in sealed containers when transported for recycling if possible. Product within the cardboard cartons is sealed in plastic. Food scraps - there will be a canteen which will generate food waste from the staff meals and these will be collected in 3m² skip bins with lids adjacent the canteen kitchen area and serviced regularly by a commercial waste contractor. Quantities are not expected to be significant enough to warrant reuse considerations. Paper and general office waste- there will be office waste

management process), and that the proponent should ensure best available technology and best management practices are considered in the final design for the wastewater treatment plant to ensure that offensive odour is minimised.	generated by the office facilities which will be collected in a skip bin near the canteen area and serviced regularly by a commercial waste contractor. Stormwater runoff – rain water will be collected in tanks onsite for reuse in toilets, wash down externally and irrigation. There is a stormwater collection tank appropriately sized for stormwater water run off from the pavements and over flow from the rain water collection and this structure will remove debris before water is discharged into the adjacent creek. There is a <i>Stormwater</i> 360 filter unit which will treat the water quality. Plastic waste is ground up and collected via a vacuum system in sealed bins and serviced regularly by a commercial waste contractor. Possible reuse is being investigated. Other possible odour sources are: • Forklifts – these will be electric and not a source of odour; • Vehicles – trucks will comply with current vehicle emissions legislation to minimise odours; and • Refrigeration system – this is a sealed system and unlikely to cause any odour issues.
The EPA recommends that the odour mitigation measures identified in the EIS, including those in the Air Quality Assessment report and Attachment 19: Proposed Mitigation Measures, are implemented.	Each of the proposed mitigation measures outlined in the Air Quality Assessment report by SLR Consulting and the mitigation measures in Attachment 19 of the EIS will be implemented.
The EPA notes that the proponent will be undertaking stack verification testing of the boilers once operational, to verify that the boiler emissions are in compliance with the POE0 (Clean Air) Regulation 2010 and the relevant air quality criteria. The EPA supports this testing and intends to include a special condition on the EPL relating to boiler stack verification testing and reporting of the associated results.	Noted. The design of hot water systems is currently in progress and as such the specification for the boiler is not confirmed at this stage. However, the boiler selection in regards to emissions will comply with the POEO Act and represent best-practice. Refer to Attachment 2.
Noise and Vibration The EPA recommends that the operational noise mitigation measures identified in the EIS are implemented. These include the preparation of an operational noise management plan. The operational noise management plan should also address any other potential operational noise sources at the facility and should including appropriate noise control / mitigation measures.	All operational noise mitigation measures identified in the EIS will be implemented and an operational noise management plan adopted to ensure compliance with all relevant requirements.
Waste Management The EPA considers the Waste Management Plan that is included in the EIS to have insufficient detail for both construction and operational phases of the proposal, and needs to be prepared and implemented prior to commencement of works. The EPA understands that the proponent is exploring available options for the reuse of sludge from the wastewater treatment plant and meat waste. The EPA advises that when a preferred option is decided, this option needs to be included in the Waste Management Plan.	Noted.

Roads & Maritime Services	
All works/regulatory signposting associated with the proposed development are to be at no cost to RMS.	The cost of all works/regulatory signposting associated with the proposed development will be borne by the developer.
The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1-2004 and AS 2890.2-2002 for heavy vehicle usage.	The car parking areas comply with AS 2890.1-2004 and AS 2890.2-2002 for heavy vehicle usage.
The swept path of the longest vehicle (including garbage trucks) entering and exiting the subject site, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS. In this regard, a plan shall be submitted to Council for approval, which shows that the proposed development complies with this requirement.	The swept paths of the longest vehicle comply with AUSTROADS. A plan will be submitted to Council for approval prior to the issue of a Construction Certificate for the building.
The car parking provision is to be to Council's satisfaction.	Penrith City Council raised no issues with the number of car parking spaces provided. Notwithstanding, the proponent will obtain written confirmation from Council that they are satisfied with the provision for car parking prior to the issue of a Construction Certificate for the building.

NSW Food Authority	
NSW Food Authority advises that the operator is required to contact the Commonwealth Department of Agriculture, Fisheries & Forestry if it is intended to export any product.	Noted.

Department of Primary Industries – NSW Office of Water	
The Office of Water supports the implementation of weed control measures on the site to protect the biodiversity/riparian corridor from further weed infestation.	Weed control measures will be implemented on the site during and post construction to minimise further potential weed infestation of the biodiversity corridor.
The Office of Water recommends native plant species from the relevant local vegetation community are used in the landscape areas located in proximity to and adjacent to the corridor and exotic plant species are avoided.	The landscaping will include native plant species that require minimal watering and exotic plant species will be avoided.
The Office of Water agrees that some form of demarcation is required along the site boundary and the biodiversity/riparian corridor to prevent potential clearing of the corridor associated with maintenance of the site landscaped areas and fuel management within the Asset Protection Zones on the site.	A barrier fence will be provided to the edge of the site abutting the biodiversity corridor.

Sydney Water Corporation	
Submit to Sydney Water relevant system design information including: effluent volumes; machine details; waste water characteristics; layouts and schematics.	Sydney Water approval will be obtained prior to the issue of an Occupation Certificate.
Sydney Water trade waste representatives to inspect the installation to confirm they are as per the design, and there are sufficient sampling points on the system.	This will be undertaken in accordance with standard Sydney Water procedures and requirements.
The drinking water main available for connection is the 200mm main on the Western side of Templar Road.	Noted – this water main will be extended into the site following the relevant authority approvals.
The wastewater main available for connection is the 225mm main constructed in Lockwood Road.	Noted – this sewer main will be extended into the site following the relevant authority approvals.

NSW Fire & Rescue	
No response provided.	Noted.

Nature Conservation Council	
No response is provided.	Noted.

NSW Trade & Investment	
Mineral Resources Branch do not have any issues with the Proposal but highlights the subject area is currently covered by Petroleum Exploration Lease (PEL) 2 held by AGL Upstream Investments Pty Ltd.	Noted – this is a broad ranging lease that does not directly impact the proposed development.

Office of Environment & Heritage	
The OEH has no comment to make on the subject State Significant Development.	Noted.

Department of Planning & Infrastructure																																																			
Staging and Timing of Construction	Refer to Attachment 3.																																																		
Vibration The EIS does not appear to assess the vibration impacts of the proposed development.	Noise and vibration consultants, EMM, considered the potential for ground vibration impacts from the facility and concluded that the sensitive receivers (residences, retirement village and schools in the area) are well removed from site (hundreds of metres) and therefore away from any possible zones of vibration influence that could arise from the likely plant and equipment that would be used for the project. In their opinion, from 20 years of experience in noise and vibration assessment, construction related vibration impacts are highly unlikely. Refer to Attachment 4.																																																		
Water How much water will be used by the facility and whether the water supply main has adequate capacity for the development. The Department considers additional information should be provided on viable alternative trade waste disposal options that could be implemented in the event that Sydney Water does not accept trade generated by the development into its sewerage system.	This information is included in the EIS in Appendix 16 - Integrated Water Management Plan. <table><tr><th>Category</th><th>Minimum (kL/day)</th><th>Maximum (kL/day)</th><th>Average (kL/day)</th><th>Total annual demand (kL/year)</th></tr><tr><td colspan="5">Potable Demands</td></tr><tr><td>Process water</td><td>426</td><td>426</td><td>426</td><td>155,490</td></tr><tr><td>Staff & Administration – Kitchen & Ablutions</td><td>6.9</td><td>8.6</td><td>8.4</td><td>3,101</td></tr><tr><td>Potable Sub Total</td><td>432.9</td><td>434.6</td><td>434.4</td><td>158,591</td></tr><tr><td colspan="5">Non Potable Demands</td></tr><tr><td>Staff & Administration – Kitchen & Ablutions</td><td>2.7</td><td>3.4</td><td>3.4</td><td>1,206</td></tr><tr><td>Irrigation</td><td>0</td><td>8.6</td><td>4.5</td><td>1,660</td></tr><tr><td>Evaporative cooling Make up</td><td>79.9</td><td>79.9</td><td>79.9</td><td>29,163</td></tr><tr><td>Non Potable Sub Total</td><td>82.6</td><td>91.9</td><td>87.8</td><td>32,029</td></tr></table> - Appendix 1 - Sydney Water Flow & Pressure Statement Sydney Water was consulted in relation to the capacity of the water supply mains and their trade waste requirements, and they confirmed adequate servicing is available. It could also be augmented if necessary.	Category	Minimum (kL/day)	Maximum (kL/day)	Average (kL/day)	Total annual demand (kL/year)	Potable Demands					Process water	426	426	426	155,490	Staff & Administration – Kitchen & Ablutions	6.9	8.6	8.4	3,101	Potable Sub Total	432.9	434.6	434.4	158,591	Non Potable Demands					Staff & Administration – Kitchen & Ablutions	2.7	3.4	3.4	1,206	Irrigation	0	8.6	4.5	1,660	Evaporative cooling Make up	79.9	79.9	79.9	29,163	Non Potable Sub Total	82.6	91.9	87.8	32,029
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Traffic The EIS does not appear to contain an assessment of construction traffic impacts. Clarification is required on the gross floor area in the development in terms of operational traffic impacts. The Department considers operational traffic should be discussed based on 15 vehicle trips per developable hectare per peak hour, which was adopted by the RMS as a basis to plan for transport infrastructure in the WESA.	There is sufficient capacity in the road infrastructure in and surrounding Erskine Park to facilitate construction and operational traffic from the proposed development. The RMS and Council have raised no capacity issues with the existing road infrastructure. Recently, the RMS carried out a detailed survey of the actual traffic volumes in Erskine Park Industrial Estate and compared this to their original traffic modelling, which predicted 15 vehicle trips per hectare. It was found that actual volumes are far less than predicted, and capacity exists to facilitate the future development. TPA calculates the traffic generating components of the proposed development in accordance with Council's requirements being: • Factory 16,392 m² @ 1 per 75m² = 219 spaces; and • Office 1,036 m² @ 1 per 40m² = 26 spaces. The total spaces provided onsite (250) exceed Council's requirements of 245.																																																		
Air Quality The Department requests a detailed discussion on whether or not boiler emissions from the facility are predicted to comply with all relevant criteria.	Boiler emissions from the facility are predicted to comply with all relevant criteria. Umow Lai consultants confirmed the boiler selection in regards to emissions will comply with the POEO Act and represent best-practice. Refer to Attachment 2. Compliance testing will be performed prior to operation of the building.																																																		