

OBERON COUNCIL

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29 November 2021

Pamela Morales
Principal Planner, Industry Assessment
Department of Planning, Industry and Environment

By Email: pamela.morales@planning.nsw.gov.au

Dear Pamela

MODIFICATION OF STATE SIGNIFICANT DEVELOPMENT – SSD 7016 MOD 4 – 124 LOWES MOUNT ROAD, OBERON - BORG MANUFACTURING PTY LTD

Thank you for the opportunity to provide comments on the proposed modification of SSD 7016 for the Borg manufacturing facility at 124 Lowes Mount Road, Oberon.

Council has considered the Statement of Environmental Effects for the proposed modification and supporting technical reports and provides the following comments.

1. The Statement of Environmental Effects relies heavily on EIS and the technical reports provided in support of the original development proposal. Very little additional work has been undertaken to demonstrate that the proposed modifications will have minimal environmental impact.
2. The Statement of Environmental Effects does not demonstrate that the existing environmental impact of the facility is acceptable in terms of compliance with the conditions of the development consent as modified or the site's Environmental Protection Licence (EPL). Council considers it appropriate to ensure that the existing operations comply with the relevant requirements prior to the approval of further modifications.

Council notes that the operator of the facility is undertaking regular reporting of its environmental performance as required and provides those reports on its website, including an Independent Environmental Audit conducted in 2018. Council also notes that a further Independent Environmental Audit was required in 2021 and that an independent consultant was engaged to undertake this audit in April 2021.

Council requests that the results of this second independent audit, if available, be taken into consideration prior to the approval of further modifications. The audit should demonstrate that the facility is meeting all of its environmental obligations.

3. The proposed modification includes a significant enlarging of a “hardstand” area. At one point in the SEE, it is referred to as the “new concrete hardstand”, but other references to concrete surfacing apply only to the new mechanical repair workshop. It is unclear what the surface treatment of the whole of this hardstand area is proposed to be. If any of the surface area where trucks and other vehicles are to be driving is compacted dirt, Council is concerned at the potential for sediment to be tracked from this area onto surrounding roads. An inspection of Endeavour Road on 26 November 2021 found that significant dirt is currently being tracked onto the road. The sealing of the driveway to the hardstand area will assist in reducing this impact, but it is unclear if the proposed automated truck washing machine will adequately prevent any dirt tacking onto the road.
4. The proposed modification includes the replacement of five press vent fans at ceiling height (approximately 16m) with one new combined stack at 40m height. It is also proposed to increase two other stacks from 20m to 30m. These changes represent significant increases in height on a site that is visible from the surrounding area, including from the Oberon town centre.

The visual impact assessment provided in the SEE is considered inadequate to address the potential visual impacts.

5. The site contains a noise mound along part of the western and northern boundaries. This mound is currently weed infested with very little actual landscaping contained on the mound. Council requests that the Department require the proponent/operator to remove the weeds from the mound and provide appropriate landscaping.
6. The SEE refers to an Endangered Ecological Community (EEC) occurring on the eastern part of the site and states that the development has no impact on this EEC. The SEE does not consider any potential indirect impacts on the EEC. Council suggests that further assessment of potential indirect impacts be undertaken.
7. The SEE states that there will be no changes to the traffic movement of the project outside of the boundary of the development. However, the SEE also acknowledges the growing fleet of vehicles and the larger mechanical repair workshop is proposed as a result. The Acoustic Report submitted with the modification application states that the new workshop location will result in an increased number of truck movements in the area.

The improved access to Endeavour Road will almost certainly increase traffic movements from the facility on this road and the intersection with Albion Street. It is considered that the traffic impact assessment provided in the SEE is inadequate.

8. During the inspection of Endeavour Road referred to above, Council noted a large stockpile of material that appeared to be wood chips or wood shavings on land to the east of the subject site. Council also noticed trucks from the facility leaving the site, turning into Bounty Street and parking on a separate lot at the end of Bounty Street. Council suggests that the Department seek clarification from the proponent as to whether the facility has expanded its operations onto adjoining and nearby lands.

If you have any questions regarding Council's comments, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D O'Shannassy', with a large, sweeping flourish extending to the right.

Damian O'Shannassy

Planning and Development Director