



Camden Council

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19 December 2016

Andrew Beattie – Principal Planner Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001
(via email to Andrew.Beattie@planning.nswg.gov.au)

Dear Sir,

RE: State Significant Development Application SSD 7424 – Notice of Response to Submissions

PROPERTY: 52 Anderson Road, Smeaton Grange
Lot 319, DP 1117230

I refer to the above state significant development application (DA) currently being assessed by your department (DPE).

Council maintains its objection to this proposal.

Council notes that as the proposed development is classed as state significant, the assessment of all issues and the ultimate determination of the DA will be made by the DPE.

This further submission provides a response from Council staff to the applicant's response to the original Council submission. For clarity, this further submission provides an update to the issues Council raised in its original submission.

Noise

Council reiterates that the proposal must comply with Council's Environmental Noise Policy (ENP).

24 Hour Operation

It is noted that the facility will be closed between the hours of 10pm-6am. Council does not support the operation or deliveries to occur between 10pm and 6am.

Air Quality/Odour

The facility should be managed to ensure that dust and odour are controlled at all times. Green waste should be stored and contained within an enclosed facility and should not be stored on site for an extended period of time.



Insufficient Parking

The RTS specifies there was an error in the initial description of the total number of staff. The assessment should have considered parking requirements for 8 employees and 2 visitors on site at any one time rather than 15 employees and 2 visitors. The site plan also incorrectly showed 7 parking spaces.

Council staff are satisfied that parking has been addressed with the provision of 10 spaces for 8 staff and 2 visitors. This is on the basis that the number of staff and visitors on site at any given time will be conditioned to not exceed 8 employees and 2 visitors. Council does not permit parking to be undertaken within the cul-de-sac or within the front setback/landscaped area.

Insufficient and inaccurate plans and documents

Number of staff - As referred to above, there was an error in the initial documentation and a maximum of 8 employees will be on site at any given time.

Bushfire Assessment - The NSW Rural Fire Service must be satisfied with the bushfire report undertaken for this proposal.

Architectural Plans - The revised site plan demonstrates the confirmed levels. The maximum height of the building shall not exceed 11m from natural ground level. A condition should be imposed to ensure compliance with the maximum building height.

Landscaping plans - A landscape plan has been submitted. The landscape plan is deficient of the following information:

- The number of upper canopy trees should be increased from 4 to 8. The four additional trees can be *Eucalyptus tereticornis* (Forest Red Gum) or *Corymbia maculata* (Spotted Gum). Upper canopy trees minimum container size 45lts;
- Mid story shrubs (2 - 4m mature height) planted at 2 metre centres is required. Plant selection is to consist of two or more native species e.g. *Callistemon*, *Grevillea*, *Hakea*, *Leptospermum*, and *Melaleuca*. Shrubs minimum container size should be 5lts;
- The proposed groundcover species is acceptable; however, the grid is required to be reduced from 1.0m to 0.5m. Grow tube or similar size container;
- A detailed landscape plan should be prepared to include details consistent with D4.3.1(g) of Camden Council's DCP 2011, including detail on proposed planting specification, garden edge treatment, staking, irrigation, soil cultivation and improvement, mulch and establishment maintenance regime; and,



- The plan should also include reference to protection of existing Street trees to be protected during construction in accordance with AS 4970 Protection of Trees on Development Sites.

Manoeuvrability – swept paths have been submitted to demonstrate that a 19m semi-trailer (being the largest vehicle to enter the subject site) can ingress/egress the property in a forward direction. Council requires all vehicles utilising the site enter and exit the site in a forward direction.

Traffic Management - The issue of queuing has been explained. Notwithstanding this, Council does not permit the stopping or parking of vehicles on Anderson Road at any time.

Bin storage and truck parking - Council will not permit deliveries outside of operating hours.

Signage - details of signage should be provided at the DA stage and not the CC stage.

Aboriginal Heritage - Council staff reviewed the SEARs information which identified that the applicant was required to address Aboriginal heritage. Council staff are satisfied with the applicant's response, provided the Office of Environment and Heritage raise no objections.

Waste Management - The waste shall be managed to ensure noise, dust and odour are controlled at all times. Green waste should be stored and contained within an enclosed facility and should not be stored on site for an extended period of time.

Salinity - A salinity investigation still remains outstanding. It was mentioned in the Water management plan that Council's Strategy in the Growth Centres DCP will be adopted. Smeaton Grange does not fall within any of the NSW Growth Centres Precincts. Salinity should be investigated in accordance with the guideline for Salinity investigation for urban salinity. Alternatively, the salinity report undertaken for the parent subdivision which created the subject land should be updated to include the updated Australian Standards.

Contaminated waste

The EIS notes that vehicles delivering waste to the site will be inspected for potential contaminants and classified thereby potentially allowing contaminants into the site. All vehicles making deliveries to the site must be inspected and classed as contaminant free prior to delivering any waste to the site. No contaminated material must be brought onto the site at any time.

The response states that, "any incoming waste loads that are suspected to contain contaminants (i.e. loads that contain wastes that are not listed in Table 2.1 of the EIS) will be rejected, reloaded (if it has been tipped) and the customer will be required to take the contaminated load out of the waste recycling and transfer facility immediately".

Council reiterates its position that, no contaminated material must be brought onto the site at any time. All vehicles making deliveries to the site must be inspected and classed as contaminant free prior to delivering any waste to the site.



Fencing

Council's correspondence to CD Architects regarding the front fencing on 28 April 2016 was for a DA for an industrial building (with no proposed use or associated ancillary structures) on the subject site, and was entirely unrelated to the application for the waste transfer facility currently being assessed by the Department. The purpose of the decorative masonry fence to the front of the property is to effectively screen the proposed use from the street. Council maintains the position that the proposed metal palisade fence with an automatic Colorbond gate for ingress and egress is not supported. A decorative masonry fence to effectively screen the proposed use should be provided as part of the proposal.

Public interest

Council maintains its objection to this proposal. The proposal is considered not in the public interest in light of the concerns of the residents as documented in the submissions received by Council. The concerns include:

- Concerns are raised that the noise impact assessment confirmed that the 22 nearest residential receivers would be affected by the proposal. The residents would also like to be more involved in the placement locations of noise receptors as there are concerns that the noise readings have not been monitored accurately.
- Residents object to the proposed 24 hour operation of the site due to the impact of noise from the idling and driving of trucks and the tipping of waste on site. There are also concerns that the glare from flood lights would be visible from the residential zone.
- The odour assessment was unable to be viewed by the residents. Concerns are raised that they will be able to smell waste similar to that of Spring Farm Recovery Centre that can often be smelt in Currans Hill.
- The proposal will generate toxic air pollution which raises health concerns for residents and members of the community. Airborne particles will blow east over vast areas of Currans Hill.
- It was advised that green waste would be accepted into the facility. The dimensions of the green waste stockpile have not been provided. There are concerns that even if the green waste is removed after 48 hours of being on the site, the vegetation might have already started to breakdown and create odour prior to being received at the site.
- The proposal will have a negative impact on the immediate environment including Kenny Creek and local wildlife. A study of the existing wildlife within this corridor and potential impact on these species has not been undertaken. Vegetation from other areas brought onto the site will introduce seeds from noxious plants, infest Kenny Creek and flow onto Harrington Park Lake. There is also a concern that the proposed facility will attract pests such as termites in stored timber, rats, mice, Ibis birds etc.
- The traffic impact report states that the existing traffic volumes at the intersections of Hartley Road and Narellan Road were surveyed on Friday 11 December 2015. A SIDRA



analysis of the intersections of Hartley Road and Narellan Road found that the intersections are currently operating at near capacity during peak hours. Since the report was prepared, the Camden Valley Way upgrades have been completed and traffic has significantly increased on Hartley Road since December. Currans Hill has only two entrances/exits. The recycling facility will significantly change the volume of traffic within Currans Hill and surrounding suburbs.

- The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. A locality/context plan drawn at an appropriate scale indicating a 1-3km radius from the site to include nearby residential dwellings, local features such as heritage items, the location of schools, childcares, and recreation facilities. Residents request that the application be rejected based on it being 120m away from residential homes and within 1km of two schools, swimming pools, childcare centres and children entertainment facilities.
- The EIS does not confirm that the height of the facility will be a maximum of 11m.
- Questions are raised as to why the Minister of Planning advised that a public hearing should not be held.
- No funds have been spent by the State Government and Council in managing waterways and the remnants of the Cumberland Plain Forest in the area.
- Nearby residents request that the land closest to the residential homes be rezoned to change from IN1 General Industrial to IN2 Light Industrial.

Should you have any enquiries in relation to this matter, please do not hesitate to contact Jessica Mesiti, Senior Town Planner, on (02) 4654 7769.

Yours sincerely,

Ms Jessica Mesiti
Senior Town Planner
(Planning and Environmental Services)