



CUMBERLAND
CITY COUNCIL

Our Ref: OA2020/0010
DPIE Ref: SSD-9320662

06 October 2020

NSW Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Susan Fox

Dear Sir/Madam,

Subject: Request for Comments - State Significant Development (SSD)
Application No: SSD-9320662
Property: 30 Loftus Road, YENNORA NSW 2161
Proposal: Cobra Waste Solutions Resource Recovery Facility – Operation of a Resource Recovery Facility to process up to 150,000 tonnes per annum of general solid waste (non-putrescible), consisting of construction and demolition waste and commercial and industrial waste

Reference is made to the Department of Planning, Industry & Environment referral dated 18 September 2020 regarding the abovementioned application. The application was referred to Cumberland City Council (**Council**) to provide details of key matters and assessment requirements for inclusion in the Secretary's Environmental Assessment Requirements (SEARs).

Council has reviewed the submitted information, and requests that the following matters be addressed.

PLANNING

1. The Environmental Impact Statement (EIS) shall further detail the proposed development, specifically the process following the sorting and separation of materials, and storage on-site.
2. The application constitutes *Integrated Development* under the *Protection of the Environment Operations Act 1997 (POEO Act)*, pursuant to Clause 4.46 of the Environmental Planning and Assessment Act, 1979 (**the Act**), which shall be discussed in the EIS. Particular reference is made to *Schedule A – Scheduled Activities* of the POEO Act, Clause 34 – Resource Recovery, and Clause 42 – Waste Storage.

Note: As further information is required to ascertain the full extent of the proposal, as noted under Point 1 above, Clause 39 - Waste Disposal (Application to Land), Clause 40 – Waste Disposal (Thermal Treatment), and Clause 41 – Waste Processing (Non-Thermal Treatment), may also be applicable.

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3. The application constitutes *Designated Development*, pursuant to the *Schedule 3 – Designated Development* of the *Environmental Planning and Assessment Regulations, 2000 (the Regs)*, which shall be discussed in the EIS. Particular reference is made to Clause 32 – Waste Management Facilities or Works.
4. As assessment of the Holroyd Local Environmental Plan 2013, and Draft Cumberland Local Environmental Plan 2020 shall be undertaken and discussed in the EIS.
5. The EIS shall provide confirmation on the application number of the original warehouse building, to which the application relies upon, including a copy of the consent/s and endorsed plans and documents.

ENGINEERING

Flooding

6. The subject site is located within the Flood Risk precinct. In this regard, a Flood Advice Letter shall be obtained from Council.
7. The subject development shall comply with the Flood Advice Letter, and should be designed in accordance with Part A, Section 8.0 - Stormwater Management of the Holroyd Development Control Plan 2013 (**HDCP**).
8. Stormwater runoff from the manoeuvring area, including access ways, will have to undergo some form of industrial standard primary treatment / separation prior to disposal into existing stormwater systems. In this regard, a stormwater treatment device capable of removing litter, oil, grease and sediment, shall be provided prior to discharge to the stormwater system.
9. Parking spaces shall be clear of the medium flood risk area.
10. Parking spaces shall be clear of Easement F2.

Stormwater

11. The development should be designed in accordance with Part A, Section 7.0 - Stormwater Management of the HDCP.
12. The stormwater plan shall be prepared by suitably qualified hydraulic engineer.
13. Overland flows up to the 1% Annual Exceedance Probability (AEP) storm, shall be addressed in accordance with Council's standards and specifications, and the Upper Parramatta Catchment Trust's O.S.D. Handbook
14. Stormwater runoff shall be minimised via reuse and recycling.

Traffic / Parking

15. A Traffic Impact Assessment (TIA) report shall be prepared. The TIA report shall address the impacts of the proposed development, and should include, but is not limited to; queuing, parking, traffic generation, entry and exit.
16. Left turn manoeuvring of trucks shall not encroach the centre of the road.

17. The parking layout shall comply with AS2890.1 and AS2890.6.
18. The loading area design shall comply with AS2890.2.
19. Sight distance at the entry / exit points shall be demonstrated to comply with AS2890.1. Details such as heights of fencing, parked vehicles on the road, or other structures adjacent to the driveway, shall be considered in the assessment.

ENVIRONMENTAL HEALTH

20. The proposed development incorporates scheduled activities as defined under the *Protection of the Environment Operations Act 1997*. Based on the information provided, and the amount of waste to be processed at the facility, an Environment Protection Licence (**EPL**) from the NSW Environment Protection Authority (**EPA**) will be required. The facility will need to comply with any licence requirements as issued by the EPA.

TREE MANAGEMENT

21. All trees that are to remain, are appropriately protected as per AS4970 – 2009 Protection of trees on development. During construction or any time during the development, any pruning works should be carried out in accordance with AS4373.

WASTE MANAGEMENT

22. Details of the ongoing management of waste generated by the office and employees shall be provided.

BUILDING CERTIFICATION

23. A Construction Certificate is required for the installations proposed, and an Occupation Certificate is required prior to the occupation of the premises. Details of the installations and fire safety compliance for the proposal shall be provided to the Certifier for assessment.

Should you have any further enquiries please do not hesitate to contact William Attard on 8757 9924 in relation to this matter.

Yours faithfully,



Michael Lawani
Coordinator Major Development Assessment