

12 August 2019

Ms Susan Fox
Industry Assessments
Department of Planning, Industry and Environment.
GPO Box 39
SYDNEY NSW 2001

By email: susan.fox@planning.nsw.gov.au

Dear Ms Fox,

**Re: SSD 8593 - Proposed expansion of an existing resource recovery facility
No. 16 Kerr Road, INGLEBURN**

Thank you for referring the subject application to Campbelltown Council for comment.

As part of preparing this response, Council's officers have reviewed the information supplied with the application and have visited the site.

Council understands that the proposal is to increase the permitted tonnage of waste processed at the site per annum from just under 30,000 tonnes to 225,000 tonnes. To facilitate this increase, there would also be some physical changes to buildings and surrounds as well as the operations undertaken on site.

The following comments are provided to assist the Department with its assessment:

Traffic and Operational Issues

It is noted that the two existing weighbridges on site are within 20 metres of the Kerr Road cul-de-sac. As part of the increased storage and processing capacity of the plant, it is considered likely that a number of additional incoming loads would be delivered by truck and 'dog' tipper trailers and, as this vehicle configuration is up to 19 metres in length, would only allow one of these trucks to queue directly behind the entry to either weighbridge. As a result, there is a risk of vehicles queuing on Kerr Road, which may inhibit vehicle manoeuvring through the cul-de-sac.

There also appears to be some conflict on submitted drawings showing either both or one of the weighbridges as being used for incoming weigh-in, rather than outgoing. Clarification from the applicant on the entry/exit procedure should be sought. Council understands that vehicles need to be weighed both in and out; as such there appears to be potential for conflict with the queuing proposed. Should only one weighbridge be used for incoming

vehicles in order to facilitate more orderly ingress/egress of vehicles, there is likely to be greater potential for vehicle queuing in Kerr Road, which is not a desirable outcome.

Council would also recommend further investigation/information be provided on the proponent's means for delivering materials inside the building, noting the size of the vehicles shown on drawings and the size/location of proposed stockpiles. Of particular interest is the means of loading/unloading at the hazardous AAS soils location. Reliance on a single medium rigid vehicle operating internal to the building does not appear to reflect regular operations at this and other similar waste recovery facilities and is not consistent with the pre-dominant transport vehicle for this type of waste, being the 'truck and dog' tipper.

Previous assessments by Council and the Sydney West Joint Regional Planning Panel had encouraged and approved internal loading/unloading of materials that have a propensity to create dust and noise. It is recommended that the Department consult conditions of 'deferred commencement' consent 1113/2013/DA-DE at the site, which required internal only loading and unloading of waste at the site.

Section 4.1.1 of the EIS includes a table listing all the waste streams to be accepted on site including, among other items, virgin excavated natural material (VENM), building and demolition waste, soil, asphalt, garden waste, bulky goods waste, street sweepings, grits/sediments collected from stormwater management systems, office and packaging waste, hazardous soils and cured concrete waste.

By nature, some of these materials will be delivered as pre-sorted loads, (i.e. entire loads of VENM, building and demolition waste and/or material etc.). Given the unloading area proposed, all deposited waste would need to be cleared from the discharge area prior to the next vehicle's delivery to prevent cross-contamination of these waste streams. This may delay unloading, resulting in reduced inbound vehicle movements per hour and increased potential for queues to form in Kerr Road. More information should be provided to explain how the proponent proposes to maintain the integrity of each pre-separated waste stream. This is especially important for VENM, and other categories of contaminating wastes, where avoidance of cross-contamination is imperative.

Licensing requirements for the EPA are also likely to stipulate an inspection regime for incoming loads. Further details on where this would take place (with a view to reducing queuing potential) should be provided by the proponent.

In order to accurately review the potential traffic impacts of the development, Council recommends that the proponent be requested to produce weighbridge data for the past 12 months in order to gain a more accurate view of traffic movements at the site – including (but not limited to) typical vehicle size/mass and typical time spent at the site loading or unloading.

Environmental Issues

Council recommends that further investigative works or information be provided in relation to the migration of airborne dust emanating from the premises travelling from the site – either by air or by deposit on roads and in local stormwater systems.

The SEARs include a requirement for a *"risk assessment of the potential environmental impacts of the development . . ."*, and *"a description of the measures that would be*

implemented to avoid, minimise and if necessary, offset the potential impacts of the development, including proposals for adaptive management and/or contingency plans to manage any significant risks to the environment" and, in respect of air quality and odour, "details of proposed mitigation, management and monitoring measures".

As mentioned earlier, it is Council's position that (ideally) incoming waste would be deposited and sorted internally to minimise the transfer of noise and dust from the site.

If this is not practical (although it appears possible on the 'proposed site plan' that through routing of vehicles inside the building could be undertaken), it is recommended that all areas of the site where waste is to be stored and/or loaded, unloaded and relocated are to have misting systems installed which must always remain operational for dust suppression purposes.

Environmental Operations Management Plan

An overarching management plan that details the site's operations and provides detailed information regarding the means by which methods and equipment would be employed at the site to reduce its potential impacts on the local environment does not appear to have been provided with the application.

This all-encompassing plan would 'tie in' the operations and environmental outcomes described in consultant reports provided with the application. Council recommends that the Department pursue submission of such a plan at this stage of its assessment as a means to ensure that the range of reports provided and operational management details either provided or implied are accounted for.

Suggested requirements that the plan should include are (but are not limited to):

- Identification of all statutory and other obligations that the proponent is required to fulfil in relation to operation of the facility, including all consents, licences, approvals and consultations
- A description of the roles and responsibilities for all relevant employees involved in the operation of the facility
- Overall environmental policies and principles to be applied to the operation of the facility
- Standards and performance measures to be applied to the facility, and a means by which environmental performance can be periodically reviewed and improved, and
- Management policies to ensure that environmental performance goals are met and to comply with the conditions of this consent.

Flooding

Council advises that the subject property is a Flood Control Lot with respect to 1% Annual Exceedance Probability (AEP) flood due to overland flow through the 30m wide easements on the northern and eastern sides of the property.

This property is also affected by overland flow through the cul-de-sac head of Kerr Road, where another drainage easement runs parallel to the adjacent property (15 Kerr Road). The

weighbridges and site shed/office are currently located in this easement and are relied upon in the subject application. This appears to contradict a restriction on the land's title.

The proposed stock piles and associated bay walls and receivals area is within the 30m wide easement for drainage of water. These would have an impact on flood behaviour and potentially an adverse impact on neighbouring properties. The stockpiled materials and sump water are also likely to be mobilised in a storm event, potentially creating a detrimental impact on water quality. The stockpile and receivals areas must not be located within these easements. Works and storage in these areas appear to contravene a restriction on the land's title, which notes that 'no building, erection of structure, excavation, filling or alteration of surface levels is permitted.'

The finished goods bays which are located on the common boundary of the subject property with 14 Kerr Rd are considered likely to have a significant impact on flood behaviour. Council has undertaken modelling and determined that these works are likely to cause an increase in flooding on the upstream property (up to 200mm in the 20% AEP Event, and an additional 100mm in the 1% AEP Event), which is considered unacceptable.

With these matters in mind, it appears that operations across the site need to be reconsidered by the proponent. At the least, further detailed information and modelling on water control across the site must be provided by the proponent should the current site operations wish to be pursued as the easements to drain water are heavily relied upon for storage and other integral components of the development.

Council is able to provide further information in relation to site flooding to assist the Department should it request such.

Compliance with existing approved plans and the Building Code of Australia

Council's review of the 'approved site plan' provided with the subject application notes some inconsistencies with the most recent development consent (as modified) issued for the site (Council ref. 948/2015/DA-I, modification B). The 'approved site plan' appears to be missing required landscaping, particularly along the northern boundary. The setback of the wheel wash bay from the 'approved site plan' and Council's approved plan are also not consistent. Council's development control plan requires landscaping within boundaries of industrial sites to soften their appearance and enhance streetscapes.

The office space inside the building nominated on the 'approved site plan' is currently subject to separate investigation by Council. Further investigation may also need to be undertaken regarding the building's status as a 'fire isolated building' pursuant to the Building Code of Australia and the implications this has for structures (tanks) and bulk storage areas that are located on the southern and eastern sides.

Conclusion

The application exhibits a number of logistical challenges having regard to the constraints of the site. These constraints include its size, the floor plan of the existing buildings and the restrictions on land use on all sides of the building for either flooding or fire access purposes.

Council is concerned that not enough information has been provided in some key areas, including site operation and flooding to fully demonstrate the site's potential to cater for such

a tonnage increase. Until this information is provided, there is limited certainty regarding opportunity to minimise development impact on existing nearby residents and other industrial neighbours.

I trust that this assists your assessment of the proposal.

Thank you again for the opportunity to comment on the ~~subject~~ state significant development proposal and I apologise for the delay in sending this response to you.

If you require any further information please contact me on (02) 4645 4616.

Yours Sincerely

A handwritten signature in black ink, appearing to be 'Fletcher Rayner', with a long horizontal stroke extending to the right.

Fletcher Rayner
Executive Manager
Urban Release and Engagement