



Our reference: ECM: 7836789
Contact: Gavin Cherry
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NSW Planning & Environment
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Dear Sir/Madam

Notice of Exhibition, St Marys Resource Recovery Facility at 21 and 25 Dunheved Circuit, St Marys (SSD 8200)

I refer to your letter dated 11 September 2017 regarding the above proposal for the expansion of an existing waste processing facility at 25 Dunheved Circuit St Marys. It is understood that the proposal now extends into the adjoining property at 21 Dunheved Circuit and involves the processing of up to 350,000 tonnes per annum of general solid waste. Council has reviewed the information submitted with the application and raises no objection to the proposal, subject to the following comments being considered with the assessment:

Engineering

Drainage

The development proposes to drain to Council's stormwater system through an existing Easement to Drain Water 3.0 Wide. The applicant shall demonstrate that the stormwater disposal system at the North-West corner of 25 Dunheved Circuit has adequate drainage capacity to drain stormwater from 25 Dunheved Circuit and the rear portion of 21 Dunheved Circuit.

Based on existing site improvements and the proposed hardstand area, it is considered the impacts from stormwater runoff will be minimal. Nevertheless, the applicant is to demonstrate that there will be no increase in runoff from the site as a result of the development under all durations for all the storms up to and including the 1% AEP event.

Road

Council Engineers have undertaken an on-site inspection on the 4th of October 2017, and have identified a number of large cracks on Dunheved Circuit leading to the driveways of properties 21 and 25 Dunheved Circuit. Penrith City Council requests the applicant to build a half road construction for the street frontage facing the properties on Dunheved Circuit.

Environment

Fuel Storage and Spill Containment

The application does not provide details of the proposed design of the above ground fuel storage area, however, it is noted that the Water and Hydrology Impact Assessment states that bunding arrangements to store fuel will be in accordance with AS1940:2004 and that an OEMP and PIRMP will be prepared to include spill management actions. Should consent be issued, a condition



should be imposed addressing this aspect of the development to ensure that satisfactory fuel storage and spill containment and management measures are implemented and maintained.

Water and Hydrology Impact Assessment

The Water and Hydrology Impact Assessment refers to the collection of leachate within the enclosed shed area. It is requested that, should consent be issued, a condition be imposed requiring all leachate and wastewater to be directed to the sewer in accordance with Sydney Water requirements, with only clean and unpolluted water to be discharged to Penrith City Council's stormwater drainage system. All sediment and solid waste captured within collection pit(s) within the shed should be removed and disposed of at a lawful waste management facility and this requirement should be reflected in any consent issued for the development.

Environmental and Operational Management

It is requested that any consent issued includes a condition(s) requiring the preparation and implementation (as well as ongoing review and, where appropriate, amendment to reflect current best management practices) of the environmental and operational management plans referred to in the EIS and supporting documents.

SEPP 33

Section 12 of the EIS addresses SEPP 33 and references a risk assessment and consequence analysis that was reviewed as part of the SEPP 33 assessment. The analysis referenced applies to the nearby St Marys Chemical Waste Facility and is dated 2006. The EIS does not confirm that the analysis undertaken in 2006 is still representative of the Chemical Waste Facility as it operates today, and this should be considered during the assessment process.

SEPP 55

Given the findings and recommendations of the Phase 1 Assessment, a detailed site investigation should be carried out to confidently ascertain whether the areas identified as being potentially contaminated are suitable for the proposed land use. This further investigation should be undertaken prior to determination of the application. Should contamination be identified and remediation be required, consent for remediation works will be required as all remediation work within the Penrith Local Government Area is considered Category 1 in accordance with SEPP 55 and SREP 20. In addition, an Unexpected Finds Protocol should be developed and incorporated in to the Construction Environmental Management Plan (CEMP) that will be developed for the project.

Should consent be granted, a condition(s) should be imposed addressing the management, removal and off-site disposal of asbestos generated during demolition activities.

Noise

The assessment report does not include noise logger data associated with the traffic noise monitoring undertaken by Wilkinson Murray and referred to in the assessment report as being undertaken at 173 Forrester Road. All noise data referenced in the assessment should be included in the assessment report. Furthermore, the period during which this monitoring was undertaken should be clearly detailed.

Air Quality

Whilst the Air Quality Impact Assessment (AQIA) includes predicted ground level concentration impacts at adjoining industrial/commercial premises and these are shown to exceed applicable criteria, the AQIA does not provide a full assessment of these impacts nor discuss potential management strategies directly relevant to these exceedances. It is understood that the EPA as the environmental assessment and regulatory authority for the development shall undertake a rigorous review of the air quality assessment, including the predictive modelling undertaken. It is requested that the EPA give consideration to the exceedances predicted at the adjacent industrial/commercial premises. It is noted that the "Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales" defines sensitive receivers as "a location where people are likely to work or reside" and whilst the definition states that it may include a dwelling, school etc., the definition does not limit sensitive receivers to those uses only, as interpreted in the AQIA submitted with the application.

The Air Quality Impact Assessment and Noise Impact Assessment do not detail whether assessment was based upon openings being present in the shed, such as door openings being in the open position, or whether doors and the like shall be closed and opened automatically as required. This aspect of site operations will need to be considered as part of the noise and air quality impact review.

Stockpiles

A detailed site plan should be prepared showing the location and maximum height(s) of stockpiled materials, including unexpected finds material. The Proposal Site Layout Plan included in the application does not detail stockpile heights nor nominate the location for the storage of unexpected finds.

Traffic Engineering

Should consent be granted for the proposed development, Council recommends the following conditions be applied in regards to traffic and access:

- All vehicles are to enter and leave the site in a forward direction;
- Appropriate signage is to be installed to direct staff/delivery vehicle drivers/ visitors to on-site parking and delivery areas;
- Prior to the issue of an Occupation Certificate signage which is clearly visible from the public road shall be directional signage and line marking shall be installed indicating directional movements and the location of loading areas and visitor/staff car parking to the satisfaction of the Principal Certifying Authority;
- All vehicle parking and manoeuvring must be in accordance with AS/NZS 2890.1:2004, AS/NZS 2890.1:2004/Amdt 1:2005, AS/NZS 2890.2:2002, AS 2890.3:1993, AS 2890.5:1993, AS 2890.6:2009 and Council's requirements. This includes vehicular access from Dunheved Circuit / Dunheved Circuit loop, access driveway and internal manoeuvring for a 4.6 metre high 26 metre long B-Double vehicle in accordance with Roads and Maritime Services guidelines, Austroads guidelines and AS2890.2:2002;
- All car spaces and loading areas are to be sealed/line marked and dedicated for the parking of vehicles only and not be used for storage of materials/products/waste materials etc;



- Secure bicycle parking is to be provided at convenient locations at the facility in accordance with AS 2890.3:1993;
- Accessible parking is to be provided at accessible paths of travel at the facility in accordance with AS 2890.6:2009;
- The required sight lines around the driveway entrances and exits are not to be compromised by street trees, landscaping or fencing;
- Sight distance requirements at driveways are to be in accordance with AS 2890.1:2009;

If you require any further information, please give me a call on (02) 4732 8125.

Yours sincerely

Gavin Cherry
Development Assessment Co-ordinator