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Secretary General
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Attention: Mazz Appleton

**Submission to State Significant Development (SSD) 7424
Proposed Resource Recovery Facility, 52 Anderson Road, Smeaton Grange (Lot 319 in
DP1117230)**

Dear Mazz,

This submission is made on behalf of Frasers Property Australia Pty Ltd (Frasers), c/o FLT Landowner Pty Limited as trustee for the Hartley Street Trust A, in relation to State Significant Development Application SSD 7424 for the proposed Resource Recovery Facility located at 52 Anderson Road, Smeaton Grange (Lot 319 in DP1117230).

Frasers currently own the land now known as 80 Hartley Road, Smeaton Grange (Lot 1 in DP874499) which contains a warehouse and distribution centre that is operated by Coles. The existing warehouse and distribution centre is located directly to the south of the subject development site, approximately 40 metres from the boundary of the site of the proposed Resource Recovery Facility.

Following review of the State Significant Development Application, concern is raised in respect of the proposed Resource Recovery Facility.

The areas of concern are discussed in the attached report.

Should you require further information, please contact the undersigned.

Yours Faithfully,

Andrew Cowan
Director
Willowtree Planning Pty Ltd

1. SITE LOCATION

The subject development site is identified as 42 Anderson Road, Smeaton Grange. The land owned by Frasers is directly adjoining to the south and is known as 80 Hartley Road, Smeaton Grange. Development Consent was granted on 23 February 1998 for the construction and use of a Warehouse and Distribution Centre (operated by Coles), and there have been a number of subsequent amendments to the consent to modify the design and operational particulars.

The relationship between the subject development site and the approved Warehouse & Distribution Centre is illustrated in **Figure 1** & **2** below.

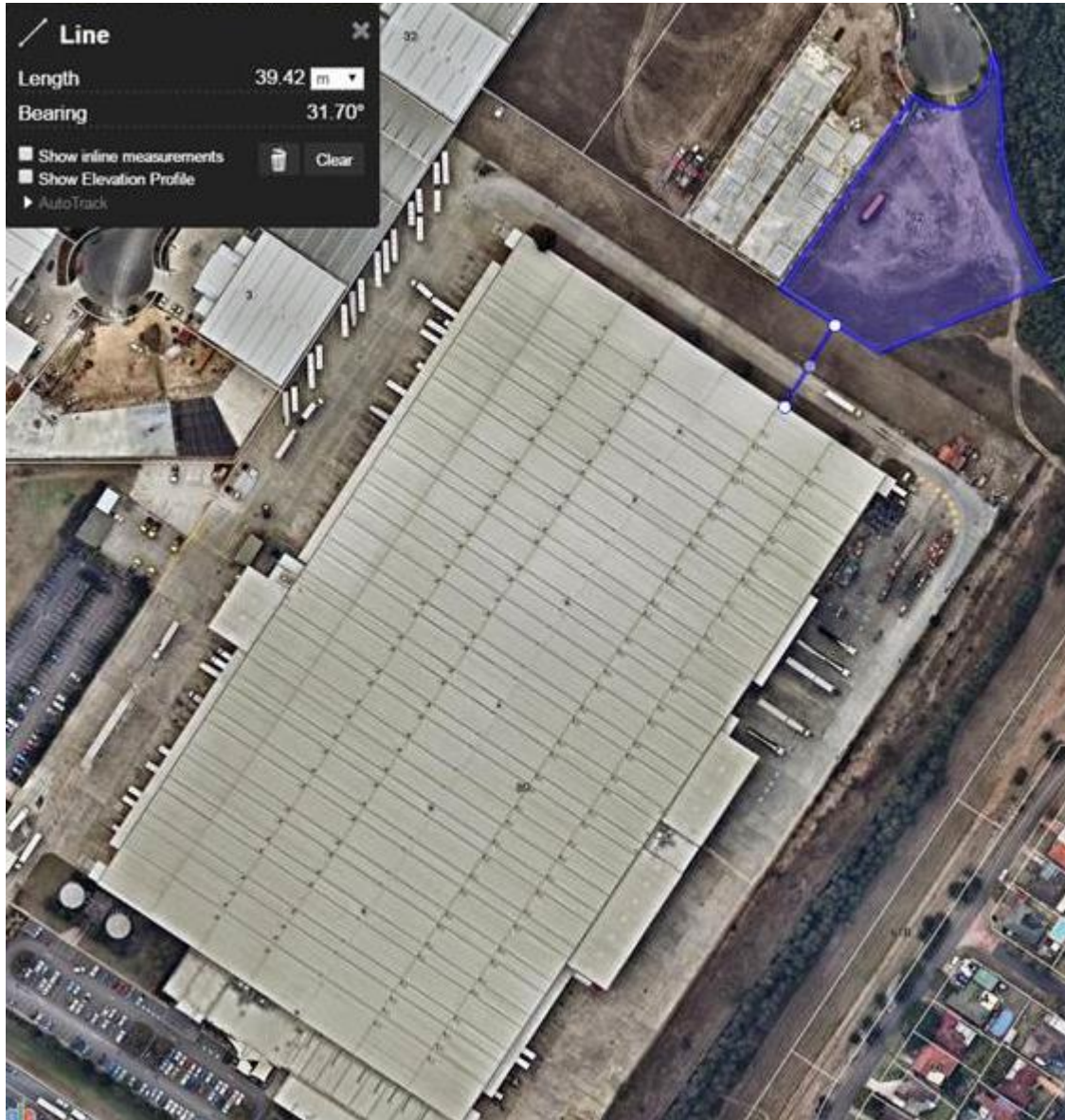


Figure 1: Proposed Development (shaded purple)



Figure 2: Aerial Photo - Existing Facility and Proposed Development Site

The operation of the Warehouse and Distribution Centre is subject to an intricate network of electronic systems and ancillary processes.

2. PROPOSED DEVELOPMENT

It is understood that the proposal seeks consent for the following as noted in the Environmental Impact Statement prepared by EMM dated June 2016:

- *a shed, constructed in colourbond, between approximately 45.67 m and 61.96 m in length, 24 m inwidth and 11 m high with a floor area of approximately 1,300 m²;*
- *a surface water management system;*
- *landscaping;*
- *eight on-site parking spaces for staff, including one disabled space;*
- *connection to services;*
- *a weighbridge area with weighbridges;*
- *wheel washes for outbound vehicles;*
- *a demountable office;*
- *demountable amenities including lunch room and toilets;*
- *seven product bays, which will be four metres high and blockwalled;*
- *an enclosed, above ground bunded diesel storage tank (approximately 30,000 L);*
- *establishment of hand unloading area (to replace 'waste storage area' under site establishment DA);*
- *a sprinkling site irrigation system to minimise airborne dust;*
- *a flip-flow screen waste sorter (housed in main shed);*
- *an enclosed picking line inside the main shed that extends outside along a portion of the southernboundary;*

- *boundary fencing to a maximum height of 10 m on the south-eastern boundaries, 4 m along a portion of the eastern boundary, 3 m on the western boundary and 2 m at the rear and sides of the shed;*
- *2.1 m high metal palisade fence with automatic colourbond gates at the ingress and egress point;*
- *waste/product stockpiles; and*
- *out-of-hours bin storage and waste truck parking.*

As per Section 2.4 of the EIS, it is understood that the waste transfer and recycling facility will include the following steps.

- A. Waste will be inspected prior to being accepted on site and any loads suspected to contain material that cannot be accepted by the site will be rejected.*
- B. Wastes will generally be stored undercover in the main processing shed prior to processing. However, some segregated heavy materials (eg separated concrete, screen soils, VENM, ENM and timber) will be stored in the bays along the southern boundary.*
- C. Waste processing will include sorting, screening and picking. There will be no shredding or crushing on site.*
- D. Waste deposited in the hand unloading area will be collected at the end of each day and taken to the main shed for processing.*
- E. Sorting will mostly occur within the main processing shed. A range of mobile plant (eg excavator, front-end loader) and a screening/picking line, will be used to handle and process the waste and products in the shed.*
- F. Some waste (less than 20%) will not be able to be recycled onsite (referred to as 'non-recyclable residues'). Non-recyclable residues will be stockpiled undercover prior to being sent for further off site recycling or disposal at an EPA licensed facility.*
- G. Recycled products generally will be dispatched by heavy vehicle for sale or further processing at another facility.*
- H. Non-recyclable residues will generally be dispatched to a licensed landfill by heavy vehicle.*

3. ENVIRONMENTAL RISK ASSESSMENT

Review of the specialist reports proposed that accompany the EIS indicates that the proposal has potential to adversely impact surrounding development particularly in terms of odour, noise, dust, fire, etc. It is considered that more detailed and substantial evidence is required to address these concerns as discussed in the following:

Building Height

The site is subject to a 10m maximum building height limit as per the provisions of Camden LEP 2010. While Table 3.2 of the EIS acknowledges the proposal complies with this limit, no indication is provided of the actual height of the proposed development. It is requested that this detail is provided within the EIS so that the visual impacts can be fully understood.

Air Quality

As stated in the Air Quality Review prepared by Northstar consulting dated 24 August 2016 (which is attached to this submission), it is requested that the following conditions be attached to any development consent which may be granted:

- *A dust management plan should be developed for both the construction and operational phases of the Facility.*
- *The dust management plan should include commitments to a range of dust mitigation techniques which are appropriate to ensure that dust emissions do not impact upon surrounding sensitive receptors.*

- *The dust management plan should take into consideration the range of sensitivities in the area, including commercial and residential, and be suitable to minimise impacts upon each of those land uses.*
- *The Facility should be constructed and operated in a manner that minimises dust emissions.*
- *Any sorting, processing or storage of materials should be performed within the waste transfer holding shed. Should any sorting, processing or storage of materials be required to be performed outside of this area for any reason, then sufficient dust mitigation should be implemented to effectively eliminate dust emissions.*
- *Monitoring of air quality impacts should be performed at the nearest sensitive receptor (considering that the range of sensitivities includes commercial receptor sensitivity to dust deposition) during both construction and operation of the Facility. Monitoring during the construction phase should be performed for the entire duration of construction. During operations, monitoring should be performed for an appropriate duration to allow the demonstration that no exceedance of the NSW EPA nuisance dust criterion is being experienced at any sensitive receptor, which includes non-residential locations.*

Evacuation

Given the isolated nature of the site and the single access road, concern is raised regarding site evacuation in the event of an emergency such as a fire. It is requested that Frasers and Coles are notified and included as part of any emergency protocol to ensure the Coles facility and all the employees on site are not placed at risk.

4. RECOMMENDATIONS

In addition to the conditions raised above the following conditions are requested to be attached to any development consent which may be granted for the proposed development;

- A. The applicant shall be required to carry out verification testing in respect of noise at a period of 6 and 12 months from the commencement of operation to ensure compliance with the NSW EPA Industrial Noise Criteria.
- B. That the owners and occupiers of 80 Hartley Road, Smeaton Grange be included on any emergency response network so they can be notified accordingly in the event of an emergency.

As the locality is experiencing rapid transformation, any proposal should ensure that the amenity of the locality is not adversely affected and that business operations are not prevented from successfully operating over the longer term.

5. CONCLUSION

Based on the matters raised in this submission and expert evidence attached, it is requested that any development consent granted for the State Significant Development Application for a Resource Recovery Facility at 52 Anderson Road, Smeaton Grange, be subject to the conditions referenced in this submission to ensure that the amenity of the locality is not detrimentally impacted by the proposed development.

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