25 August 2016

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Secretary General
NSW Department of Planning & Environment
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Sydney NSW 2000

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 Goodman Property Services (Aust) Pty Ltd (Goodman), 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).

Goodman currently own the land now known as 42B Bluett Drive, Smeaton Grange (Lot 4332 in DP1194022) which contains recently constructed Data Centre which is now operational. The proposed Data Centre is located directly to the north-east of the subject development site, approximately 60 metres from the common boundary of the two properties.

Following review of the DA, concern is raised in respect of the proposed Resource Recovery Facility and the potential adverse impacts on the operation of the existing operational Data Centre given the emissions predicted from the proposed facility.

The particulars of this proposal and the points of objection are discussed below.

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 Goodman is directly adjoining to the north-east and is known as 42B Bluett Drive, Smeaton Grange. The land owned by Goodman is directly adjoining to the east and is known as 42B Bluett Drive Smeaton Grange. Development Consent was granted on 2 May 2014 (DA83/2014) for the construction and use of a Warehouse and Distribution Facility (Data Centre), 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 Data Centre is illustrated in **Figure 1** below.

Figure 1: Aerial Photo – Approved Data Centre and Subject Development Site

The operation of the Warehouse and Distribution Centre is subject to an intricate network of electronic systems and ancillary processes. It is considered that the proposed development will compromise the approved facility in this respect and that Department of Planning must consider the likely consequences on existing sensitive surrounding developments.

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 aportion 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 able to be recycled onsite (referred to as 'non-recyclable residues'). Non-recyclable residues will be stockpiled undercover prior 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 affect the operation of the Data Centre. It is consider that more detailed and substantial evidence is required to address these concerns as discussed in the following:

A. **Air emission modelling** as it would impact Northwest receptor sites is not considered, only facilities that are South or South East are considered. Despite prevailing winds blowing in the direction of the South and South East directions, on still days and those when North and Northwest winds prevail facilities may be impacted by emissions at a greater concentration than this Environmental Impact Statement considers.

B. **Air emission modelling** does not consider the impact of PM2.5 from testing, it is based upon a literature review. PM2.5 is a regulated pollutant under the National Environment Protection (Ambient Air Quality) Measure, 2015.

C. **Air emission modelling** does not consider the impact of sulfur dioxide which is dictated under the National Environment Protection (Ambient Air Quality) Measure, 2015. The EIS considers PM2.5, but not this other regulated pollutant.

D. **Management of emissions from garden and wood waste decomposition** release (methane and sulfides, e.g., hydrogen sulfide, dimethyl sulfide, mercaptans) to the environment. The proposed facility has provisions to ensure that received waste is stored under cover in the main processing shed, but is then moved to an external pay with piles up to 150m3 and 3 meters high. The air modeled emissions do not consider in any capacity the harmful impact methane and sulfides can have on nearby mechanical equipment and metals. Studies have demonstrated background concentrations as low as 5-10 ppb can lead to erosion in mechanical equipment. If we have specific data regarding the types of emissions that could potentially damage our Data Center, we should evaluate this immediately as this could significantly change the risk analysis as presented.

E. **Excessive Noise** Noise generating activities can occur 24 hours a day which may represent an increase of truck noise pollution in evening and night hours.

5. RECOMMENDATIONS

Based on the matters raised in this submission, the following recommendations are provided to NSW DP&E for consideration as part of the assessment process:

1) Request information on projected Sulfur dioxide, methane, and sulfide air concentrations during hot months and at what concentration gases will dissipate.
2) Request private analysis of PM2.5 from developer to ensure *National Environment Protection (Ambient Air Quality) Measure,* 2015 standards are met.
3) Request information on projected air emission impact for Northwest receptor sites equivalent to those in the South/South East quadrant.

Further detailed assessment of the proposal should be carried out and management and mitigation measures put in place prior to granting any approval for the proposal. While it is understood that the development is permissible in the subject to consent of NSW DP&E, any development should be objectively determined against the zone objectives and the strategic intentions of the locality. As the locality is experiencing rapid transformation, any proposal should ensure that amenity is not adversely affected and that business operations are not prevented from successfully operating over the longer term.

6. CONCLUSION

Based on the matters discussed above and expert evidence provided, it is recommended that the Development Application not be supported in its current form. Given the zoning of the land and surrounds, it is clearly evident that further detailed investigations are required to determine the impacts on the existing Data Centre and ensure that there will not be any unreasonable costs imposed. It is considered prudent for NSW DP&E to request the matters identified in this submission be addressed so that a decision can be made in the public interest, whilst not impeding the Data Centre and surrounding sites.