Our reference:ECM 7091033Contact:Mathew RawsonTelephone:(02) 4732 7522

# 4 December 2015

Kate Masters - Industry and Infrastructure Projects Department of Planning and Environment GPO Box 39 SYDNEY NSW 2001

### Dear Kate

### Development Application (DA) (SSD 7075) and Environmental Impact Statement (EIS) for a proposed Resource Management Facility at 85-87 Quarry Road, Erskine Park, NSW (Lot 1 DP 1140063)

I refer to the above development application and your email dated 28 October 2015 inviting comments. Council has examined the proposal, Environmental Impact Statement and other documentation provided. Council generally has no objection to the proposed development however the following comments are provided for your consideration:

# Property Address

Council's records show the property's address as 85-87 Quarry Road, Erskine Park, rather than 50 Quarry Road referenced in the application.

# <u>Design</u>

The proposal would benefit from a site set out approach similar to the surrounding development by including staff and visitor parking areas in front of the building set behind substantial landscaping. The driveway surrounding the proposed building would then be used solely for truck movements, reducing the requirement for duplicate driveways and terraced parking areas.

Greater articulation and architectural treatment is required. The use of colours, materials and additional articulation through projecting elements and parapets to roofs is suggested to achieve this. Additionally the use of a central office/staff break room/main entrance may be used as a focal point of the design which incorporates different materials, proportions and colours. Entrances should be distinguished for example through the use of awnings and/or colour. The use of exposed frames and oversized elements such as downpipes can be used to create visual interest.

Fencing should be black palisade and located behind landscaping at the street frontage.

#### <u>Access</u>

The proposed access arrangement should also be revised. Safe and efficient vehicle access may be provided without the provision of extensive hardstand space at the front boundary as proposed.

As noted above the development would benefit from relocation of the car parking space to the front of the site. Shared access and egress may be provided from to this space with separate access and egress for trucks at the northern and southern sides of the site respectively.

### Staging Plan

Typically it is beneficial for development to be staged from front to rear with the most important aspects carried out at the front such as landscape screening, staff car parking and entrances as well as the facades of the building with greater design treatment. This approach ensures that the undeveloped land is screened from view by the earlier stages.

The proposed first stage of the development occurs at the rear and leaves large portions undeveloped which will be visually prominent and expose the significant level changes upon the site. Given this staging plan is proposed, more detail should be provided in the staging plans showing how this undeveloped land will be managed. Particularly to ensure that materials and vehicles are not stored externally and that stage 1's visual impact has been assessed and deemed acceptable.

# Construction and Operation Noise Assessment

Due to the location of the development and that is partially shielded by other industrial development it is not expected that the development will have a major impact on residential receivers in relation to noise. However the community has raised concerns with Council in the past related to reverse beepers from other developments in the area. In this regard further consideration should be given to the nuisance/impact that could be caused by the use of reserve alarms (beepers) on the site and what restrictions can be imposed to minimise any impact.

# Air Quality Impact Assessment and Management

Although the applicant and their consultant has undertaken a thorough assessment of the air quality and odour impacts from the proposed development, the following points are provided for your consideration:

- The control of odour relies on the creation of a negative internal environment. This is created by the use of 'fast acting' roller doors. It would be important to understand if these are actually permitted when considering other statutory obligations such as work, health and safety. This is raised because should the appropriate authorities reject the 'fast acting' roller doors, then the overall odour assessment would be compromised.
- There does not appear to be sufficient assessment and discussion should the proposed develop experience ventilation and air control system breakdown. Without appropriate action this could result in significant impacts on the surrounding community.
- There does not appear to be sufficient assessment and discussions in relation to the cumulative impact on air quality and odour when you consider that there are several other waste facilities in the area.

- There does not appear to be sufficient assessment and discussions on what will they do if they find through their proposed odour assessments that odour generated by the development exceeds their predictions
- The EPA as the regulator must be satisfied that the odour will not pose an impact on the community and that the development does not create an adverse bio-aerosols.
- Council believes the assessment has not adequately assessed the impact on neighbouring industrial/commercial development directly adjacent to the development.

# Engineering

- There are many existing easements, such as electrical, water, sewer and road accesses to adjacent lots. These services or part of them need to be relocated with consents of the properties owners benefiting from the services. The proposed building and future development land is not supposed to be built over the existing easements.
- The accesses or access easements for neighbour properties shall be properly re-routed on site. Lawful point accesses and a sufficient capacity for the adjacent lots shall be clearly demonstrated on plans/report. Dimensions shall be annotated on plans.
- It is desirable to provide a separate pedestrian access from the street to proposed visitor parking space/offices.
- It is desirable to provide a separate vehicle access to staff/visitor parking.
- A 1.5m wide concrete pedestrian path shall be provided in verge areas for a full length of the property frontage.
- Any existing unnecessary property access must be removed, the kerb reinstated to suit the existing kerb, and the verge area reinstated to suit existing with grass seeded topsoil or turf.
- Sediment & Erosion Control and Traffic Control Plan shall be provided prior to issue the construction certificate or commencement of any works on site.
- Works-As-Executed Drawings shall be submitted to Penrith City Council with notification of the issue of the Occupation Certificate.
- A restriction as to user and positive covenant relating to stormwater management systems (including on-site detention and water sensitive urban design) shall be provided prior to the issue of any occupation certificate.

Thank you for the opportunity to comment on the proposal. Should you require any further information or would like to discuss this matter further, please do not hesitate to contact me on (02) 4732 7522.

Yours faithfully

Mathew Rawson Senor Environmental Planner