

18 November 2016

Mr C Ritchie
Director Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Ritchie,

**SSD 7349 – Resource Recovery Facility at the properties Nos.51-57 Violet Street in Revesby
Canterbury-Bankstown Council's submission**

Thank you for the opportunity to provide comments on the Environmental Impact Statement (EIS) for the proposed expansion of the resource recovery facility at the properties Nos. 51 -57 Violet Street in Revesby.

Council seeks the following issues to be considered as part of the assessment:

Traffic:

1. Truck travel routes – The proposed development envisages deliveries to occur between 6.00am and 12.00 midnight. Further, the Truck Distribution Map shows that 25% of trucks will use Henry Lawson Drive between Milperra Road and the M5 motorway.

Council is concerned that large trucks will travel through sensitive residential areas along Henry Lawson Drive outside of the normal business hours (8:30am to 6pm).

Council seeks the operational management plan to include monitoring of truck movements over a 12 month period (administered by the Environmental Protection Authority) to ensure that the truck movements along Henry Lawson Drive is minimal outside of the normal business hours.

Water Quality:

2. Water quality – The site is located within the Georges River floodplain and requires the consideration of the water quality targets in accordance with the Georges River Coastal Zone Management Plan (GRCZMP), namely:
 - Gross pollutants 90%
 - Total Suspended solids 80%

In light of the proposed increase in the resource recovery capacity of the site, Council seeks an upgrade of the existing oil and grip separator in Catchment 2, which has low to medium

treatment effectiveness to meet with the water quality targets set out in the GRCZMP. Council suggests upgrading the existing grip separator with the vortcapture GPT.

3. Soil and dust management – There is evidence that the trucks exiting the sites currently spread soil on Violet Street, beyond the frontage of the site. Further, there is evidence that soil is airborne and spread to parked cars opposite the site.

Although a street sweeping truck was in operation at the vicinity of the driveways, the extent of soil on Violet Street is extensive and impacts majority of the street.

With the proposed increase in capacity of the site, Council seeks monitoring of dust on Violet Street over 12 months administered by the Environmental Protection Authority to determine whether the proposed dust management plans are effective.

Hardstand area:

4. Hardstand area – Council is concerned the EIS does not show all the hardstand areas on the site, e.g. the proposed sketch layout shows only “approximate extent of concrete and gravel area” at the property No. 57 Violet Street in Revesby.

Council seeks confirmation that all operational area of the site occurs on top of approved hardstand areas to ensure that the use of the site will not contaminate the site.

Parking:

5. Off-street parking calculations – The proposed off-street parking calculations is based on the assumption that employees will carpool and a fixed number of employees. Council cannot support this method of calculation as both the assumptions are uncertain and may change over time.

Council seeks a proper assessment of the parking requirements in accordance with Council's Bankstown Development Control Plan 2015 – Part B5 for Parking. Please note that the existing DA 1029/2014 for the property at No. 51 Violet Street in Revesby (excluding the property at No. 57 Violet Street in Revesby) currently requires 23 car spaces.

6. Landscaping of car park – The proposed development does not provide landscaping on the proposed car park in accordance with the landscaping provisions of Council's Development Control Plan 2015 – Part B3 for Industrial Precincts.

Council seeks the provision of 1 tree per 5 car spaces provided in accordance with the DCP.

If you have any questions, please contact Council officer, Mr Kyou Won Rhee on 9707 9489.

Yours sincerely,



Kyou Won Rhee
Strategic Planner