



Our reference: ECM: 9337209
Contact: Kate Smith
Telephone: 02 4732 7705

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Sally Munk
Principal Planning Officer, Industry Assessments

Email: Sally.Munk@planning.nsw.gov.au

Dear Ms Munk,

Notice of Exhibition SSD-10395 Cleanaway's Western Sydney Energy and Resource Recovery Centre

I refer to the notice of exhibition for the above-mentioned development. Thank you for providing Council with the opportunity to comment on the proposal. The following submission provides the primary concerns raised by Council in relation to the proposed development.

- The suitability of the site is a key matter for consideration - given its location and proximity to residential areas and sensitive sites such as schools, childcare centres, recreational areas, water treatment facilities and Prospect Reservoir, which is an integral part of Sydney's drinking water supply. The compatibility of the proposed development with surrounding land uses must be demonstrated.
- The cumulative impacts of all proposed waste to energy facilities within the Blacktown Local Government Area including the Eastern Creek Energy from Waste proposal (SSD-6236). It is understood that the Eastern Creek Energy from Waste proposal is the subject of a current appeal and a modification to this proposal is also being prepared as a new State Significant Development Application (SSD-8477614).

The assessment of cumulative impacts must therefore be made against both proposals. This must involve an assessment of the cumulative impacts associated with air quality, human health, odour, traffic, noise, social and visual amenity. Council is concerned about the ongoing risks and impacts the concentration of facilities within a 3km radius may have on human health and the environment.

- The potential for impacts to human health and the environment is a key consideration that must be addressed. It is therefore requested that the Department of Planning, Industry and Environment (Department) ensure that all information (including technical reports and data) submitted by the proponent undergoes independent review and analysis by appropriately qualified specialists and key stakeholders including Government Organisations and Authorities. The technical nature of many of the issues relating to development such as air quality should not be based upon assumptions or reasoning that cannot be substantiated.
- A key requirement of the NSW Energy from Waste Policy Statement 2015 (EfW Policy) is that proven technologies are used, and this must be

Penrith City Council
PO Box 60, Penrith
NSW 2751 Australia
T 4732 7777
F 4732 7958
penrithcity.nsw.gov.au



demonstrated through the reference of fully operational plants using the same technologies and waste streams. Therefore, the proposed technology and referenced facilities should be rigorously scrutinised to ensure that they meet the requirements of the EfW Policy and the most contemporary international standards. The Department through its assessment should determine that the referenced facilities are appropriate for comparison.

- The development is of a visually significant size and scale and concern is raised in relation to the visual impacts the development will have on the existing and future character of key corridor settings such as the Westlink M7 and Western Sydney Parklands.

The architectural form is monolithic in nature which appears to be related to the operational requirements of the development, however, the buildings bulk and scale relative to its surrounds remains of concern, with landscape setbacks inadequate, particularly along the western boundary which has a direct interface with Westlink M7.

Council emphasises the need for the Department and its independent experts to exercise the precautionary principle in determining the application. If there is any doubt that the development poses any risks to human health and/or the impacts of the development cannot be suitably addressed, then development consent should not be granted.

It is important for Council to be advised of any changes to the application and issues that arise throughout the assessment of the development given the proximity of the development to Erskine Park and surrounds.

Should you wish to discuss any matters further, please do not hesitate to contact me on 4732 7705. Additionally, the opportunity to review or provide further comments on the development would be welcomed by Penrith Council.

Yours sincerely,

Kate Smith
Acting Development Assessment Coordinator