



Your ref: SSD-10396  
File no: MC-19-00007

29 October 2020

Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

**Attention: Emma Barnet**

Dear Ms Barnet,

**SSD-10396 – Proposed Kings Park Metal Recovery and Recycling Facility (RRF) expansion at 23-43 and 45 Tattersall Road, Kings Park**

Thank you for your correspondence dated 24 September 2020 requesting our comments on the Environmental Impact Assessment (EIS) from Sell and Parker (the applicant) which seeks to receive and process an additional 250,000 tonnes per annum, up to a total of 600,000 tonnes per annum, of scrap metal on the above property, which is a State Significant Development proposal under section 4.36 of the *Environmental Planning and Assessment Act 1979* ('the Act').

The Applicant's reports have been reviewed by our officers and our comments and issues to be addressed are listed in the attachment to this letter.

We object to this proposal until all our concerns detailed in the attachment are comprehensively addressed and the necessary information is referred back for our comment and conditions before any determination is made on the proposal.

In addition, a number of Councillor and resident submissions were referred to you by us during the exhibition period. Please ensure that the issues raised in these submissions are also carefully considered and addressed.

If you would like to discuss this matter further, please contact Judith Portelli, Manager Development Assessment, on 9839 6228.

Yours faithfully

Glennys James PSM  
Director Planning and Development

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All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

# Blacktown City Council submission to SEARs request for SSD-10396

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## 1. Traffic comments

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Further information is required to address the following specific issues:

- a. There will be substantial delays and queuing at the existing 2 signalised intersections (between Sunnyholt and Vardys Roads, and Sunnyholt and Tattersall Roads). Transport for NSW must ensure that these signalised intersections can operate sufficiently in light of the proposal and the existing surrounding developments. TfNSW's concurrence is necessary to ensure the expansion does not adversely impact on the local and State road network.
- b. In the current operation, there are already trucks parking on Tattersall Road as early as 6 am causing safety concerns. Considering that the proposed scrap metal throughput limit will be significantly increased, this on street truck parking and stacking problem is only going to get worse. This problem suggests that the road network and subject site cannot adequately cater for the current use, let alone a major expansion as proposed by this SSD application. The Applicant must advise how they are going to stop this problem continuing, and getting worse with the expansion, and the proposal cannot be supported until this issue is resolved.

## 2. Environmental Health comments

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Further information is required to address the following specific issues:

### a. Noise Impact Assessment

- It is unclear from the report if the activity *"Operation Oxy-acetylene torch cutting Monday to Saturday 9 am to 3 pm"* has been incorporated into the predicted noise modelling (Pg 20 S.7). The Applicant is required to clarify this.
- Page 30 of the noise report states that *"Vibration measurements were also taken for a large metal shear located at the Sell & Parker Darwin plant with a capacity of 350,000 tonnes a year which is similar to the proposed metal shear for the Kings Park development"*. However, the proposal is to increase to 600,000 tonnes per annum, being far greater.

On this basis this comparison is flawed and, if so, the vibration measurements are being under-estimated and are misleading.

- 427 heavy vehicle movements are proposed per day, but the acoustic modelling undertaken assumes 7 trucks on site at any one time. The proposal would result in an *"additional 215 vehicles on a daily basis or 15 vehicles per hour across a 15-hour workday"* (Pg 59 of EIS).

It is noted that recent aerial views of the premises show more than 7 trucks on the premises at one time and, on this basis, the expansion will undoubtedly result in more than 7 trucks on site, and the acoustic modelling is not a true reflection of



what is currently happening on site, or intended to happen on site, and therefore the acoustic modelling is flawed and misleading.

- Section 8 of the noise impact assessment does not include truck noise along Tattersall Road. During Council's survey of the Kings Park industrial area between 6 am and 7 am on various days in July, August and October 2020, trucks were parked and lined up for entry into the premises at 6 am. This included 2-3 trucks in the truck entry driveway before the weighbridge and 3-4 on Tattersall Road.

Table 7.1 in Section 7 of the noise impact assessment provided a summary of the sound power level of 7 trucks travelling in and out of the premises, but not in relation to trucks idling on Tattersall Road.

There does not appear to be any worst-case scenario being measured or assumed within the predicted noise levels to include trucks parked/idling on the street and especially during the 6-7 am shoulder period for sleep disturbance criteria.

Council is very concerned that this has not been measured accurately and will have a much greater noise impact on nearby residents than has been presented in the acoustic report accompanying this EIS.

- Page 19 of the EIS states that *"The pre-shredder has been partially constructed at the approved location". However, as a result of the recent COVID-19 situation (both machinery and personnel availability), there have been delays to the completion of construction and commissioning of this equipment. The pre-shredder in its existing location remains operational. The pre-shredder will be relocated and ready for operations prior to activities associated with this proposal being undertaken. It is understood that the pre-shredder will be operational at this proposed location as soon as possible (subject to global influences – 4th QTR 2020)."*

More information is required to clarify if the noise impact assessment report has included the assessment of the proposed pre-shredder end location. The Applicant is also required to confirm if the existing pre-shredder location will remain operational or be removed. Should the existing pre-shredder remain at its current location, a collective noise impact assessment is required for our reconsideration.

- Council is also concerned with the absence of noise monitoring during the COVID-19 period as we would like to review and compare that data with the existing data.

#### **b. Air Quality Impact Assessment**

- Page 63 of the report states that *"the annual average PM2.5 concentrations are predicted to exceed relevant air quality criteria at R33"*. However, as highlighted in Section 4.4, the background is (in itself) exceeding the air quality criterion.

The Applicant is required to provide further details as to how the above prediction is made.

- The report recommends the *"Provision of dust screens (that also act as acoustic screens) on site boundaries including:*
  - A 10 metre high screen on the northern boundary of 45 Tattersall Road
  - An 8 metre high screen on the western boundary
  - An 8 metre high screen on the eastern boundary
  - A 4 metre high screen on the southern boundary of 23 Tattersall Road."

The Applicant is required to explain how a static wall is capable of controlling dust and particulate matter on a windy day, given that the wall's primary use is only for acoustic attenuation.