

Your ref: SSD-7013  
File no: MC-15-909

7 May 2015

Secretary  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Ashley Cheong

Dear Sir,

**Re: Request for key issues and assessment requirements - State Significant Development proposal - Kings Park Waste Metal Recovery, Processing and Recycling Facility (SSD-7013)**

Thank you for your email on 23 April 2015 about the above topic. Blacktown City Council appreciates the opportunity to provide comments on the key issues and assessment requirement for the proposal.

We have undertaken a preliminary review of the proposal. Attached to this letter a list of key issues and matters for consideration, which Council would like to see addressed and included within the final Environmental Impact Statement. It is trusted that the Department of Planning and Environment will endeavour to ensure the application addressed the attached matters to Council's satisfaction.

Please note that this letter is in no way to be perceived by the Department as an endorsement of the proposal, or a reflection that Council will not be making a further submission once the proposal is placed on formal public exhibition. Council would appreciate the opportunity to comment on the detailed plans as part of the public exhibition. Council also reserves the right to raise additional issues as deemed necessary upon exhibition of the final Environmental Impact Assessment.

If you would like to discuss this matter further, please contact Assistant Team Leader Projects, Melissa Parnis on 9839 6182.

Yours faithfully,



Judith Portelli

Manager Development Assessment

**Council Chambers** • 62 Flushcombe Road • Blacktown NSW 2148

**Telephone:** (02) 9839 6000 • **Facsimile:** (02) 9831-1961 • **DX** 8117 Blacktown

**Email:** [council@blacktown.nsw.gov.au](mailto:council@blacktown.nsw.gov.au) • **Website:** [www.blacktown.nsw.gov.au](http://www.blacktown.nsw.gov.au)

**All correspondence to:** The General Manager • PO Box 63 • Blacktown NSW 2148

**Attachment 1 – Matters to be addressed in future EIS for Kings Park Metal Recycling Facility, Tattersall Road, Kings Park (SSD-7013).**

Issue	Matters to be addressed in EIS
<b>Statutory controls</b>	<p>Detailed assessment of the proposal against all relevant environmental planning instruments and development controls including:</p> <ul style="list-style-type: none"> <li>○ SEPP 33 - Hazardous and Offensive Development assessment.</li> <li>○ SEPP 55 – Remediation of Land</li> <li>○ Blacktown Local Environmental Plan 1988</li> <li>○ Draft Blacktown Local Environmental Plan 2012</li> <li>○ Blacktown City Council DCP – Part A (General), Part E (Industrial) and Part R (WSUD).</li> </ul> <p>The proposal is to be consistent with the above and any variations are to be justified.</p>
<b>Details of the Use</b>	<ul style="list-style-type: none"> <li>▪ Processes to be undertaken on-site (current and proposed),</li> <li>▪ Employee numbers</li> <li>▪ Hours of Operation including any extended operating hours proposed and the '1 off' security processing arrangements</li> <li>▪ Details of the relationship between the increased processing volumes and the current and proposed processing hours</li> <li>▪ Staging and interim arrangements while the development/building is being constructed. How does this impact upon the current operation and parking arrangements?</li> <li>▪ Details of the operation of the business, including truck sizes, movements, etc.</li> <li>▪ Details of any proposed signage including any illumination. All signage shall comply with SEPP 64 and Council's LEP. At no time would Council support "General Advertising".</li> </ul>
<b>Hazards and Risks</b>	<p>Assessment of the hazards and risks associated with the proposal. This includes preparation of reports by a suitably qualified person that demonstrates compliance with <i>SEPP 33 - Hazardous and Offensive Development assessment</i>.</p>
<b>Site contamination</b>	<p>Assessment of site contamination in accordance with <i>SEPP 55 – Remediation of Land</i>. This must include Phase 1 Site Assessment and further Phase 2 Assessment and Remediation Action Plan if required. The extent and type of site contamination evident on site should be identified and addressed as part of the development application process.</p>



Issue	Matters to be addressed in EIS
<b>Traffic, access and car parking</b>	<ul style="list-style-type: none"> <li>▪ Preparation of a traffic, access and car parking assessment by a suitably qualified person. The traffic report shall make appropriate recommendations to address any traffic impacts, including any necessary off-site works;</li> <li>▪ Predictions of the traffic volumes likely to be generated as a result of the proposal;</li> <li>▪ An assessment of the impacts of this traffic on the safety, capacity and efficiency of the surrounding road network, including details of truck routes and modelling of key intersections;</li> <li>▪ Detailed plans of any proposed road/intersection upgrades;</li> <li>▪ Demonstration that the existing access points can continue to be safely and efficiently utilised to access the sites;</li> <li>▪ Details of the availability of non-car travel modes and measures to encourage greater use of these travel modes;</li> <li>▪ Parking both for customers/trucks and employees;</li> <li>▪ Details of the pedestrian links for employees parking over the road and walking to the site;</li> <li>▪ Details of any changes to vehicle types proposed to access the site.</li> <li>▪ Suitable provision of pedestrian and vehicle sight distances.</li> </ul>
<b>Air quality</b>	Air Quality Assessment including odour during operations and measures to reduce greenhouse gas emissions on-site.
<b>Noise and vibration</b>	<p>Submission of an acoustic report prepared by a suitably qualified person addressing impacts of the proposal on the surrounding locality, including nearby residential areas.</p> <p>This should address:</p> <ul style="list-style-type: none"> <li>○ impacts during operations including traffic noise;</li> <li>○ impacts from explosions;</li> <li>○ the use of equipment/machinery on-site as part of the process;</li> <li>○ the impacts of noise arising from the extended hours of operation on the residents within the locality.</li> </ul>
<b>Dust</b>	Dust control measures proposed to prevent impacts from crushing, tracking of vehicles, stock piles of unprocessed and processed materials.
<b>Water and soils</b>	Details of water supply, wastewater disposal and stormwater management during operation, flood liability and soil contamination of the sites;

Issue	Matters to be addressed in EIS
<b>Waste</b>	<ul style="list-style-type: none"> <li>▪ Identification of the quantity and type of waste that would be handled, stored, processed or disposed of at the facility;</li> <li>▪ A description of how this waste would be stored and handled on site, and transported to and from the site;</li> <li>▪ Preparation of a waste management plan that addresses the various stages of development including demolition, construction and on-going waste management.</li> </ul>
<b>Design</b>	<ul style="list-style-type: none"> <li>▪ Inclusion of details of building design and fit-out for the post fragmentation processing structure and any other proposed structures to be used for the handling of chemicals (e.g. bunding and tanker loading/unloading areas).</li> <li>▪ Compliance with Building Code of Australia.</li> <li>▪ Details of colours and finishes</li> </ul>
<b>Visual</b>	<ul style="list-style-type: none"> <li>• Submission of a landscaping plan showing additional planting to front setback and along the side elevations.</li> <li>• Details of screening measures to buffer any buildings and/or tanks visible from the road.</li> <li>• Details of upgrade / improvement works to the existing entrance gates/walls/driveway to improve the visual appearance of the site and street façade.</li> <li>• Detailed coloured elevations of development along Tattersall Road demonstrating Visual appearance and design impact from public roads.</li> </ul>
<b>Fire and incident management</b>	<ul style="list-style-type: none"> <li>• Technical information on the environmental protection equipment to be installed on the premises such as air, water and noise controls, spill cleanup equipment and fire management and containment measures;</li> <li>• Demonstration of emergency procedures in relation to any explosions which may occur on site.</li> </ul>
<b>Cumulative impacts</b>	Particularly in relation to hazards and risk associated with other nearby dangerous goods storage/major hazards facilities, air, noise and traffic.
<b>Engineering</b>	<ul style="list-style-type: none"> <li>• Submission of a Stormwater Concept Design Plan</li> <li>• Details of any cut and fill, including height, location and materials of any retaining walls on site.</li> <li>• Compliance with Blacktown City Council's Engineering Guide Development.</li> </ul>



Issue	Matters to be addressed in EIS
Drainage	<p>Compliance with Blacktown Council DCP Part R – WSUD and Integrated Water Cycle Management. In particular the following should be noted:</p> <ul style="list-style-type: none"> <li>• The proposed sound walls and any new internal structures will restrict flood flows and may cause an adverse impact on flood levels or flood impacts to the surrounding properties. An Engineer's Flood Study &amp; Report will be required to certify that the development will not increase flood affection elsewhere, having regard to: <ul style="list-style-type: none"> <li>i) Loss of flood storage. The new dwelling is to be designed to provide flood storage under with sufficient openings to allow floodwaters to enter, store and leave.;</li> <li>ii) Providing pre and post development flood models.</li> <li>iii) Changes in flood levels (maximum 0.01 m), flows, velocities and hazard caused by alteration to flood flows; and</li> <li>iv) Setting floor levels for the new development a minimum of 0.5m above the 1 in 100 year ARI flood levels.</li> </ul> </li> </ul> <p>Note:</p> <ul style="list-style-type: none"> <li>a) No active flow is permitted under the buildings.</li> <li>b) Allow for a minimum Mannings n of 0.1 for the creek, a minimum Mannings n of 0.05 generally and a Mannings n of 0.025 for hard paved areas and roadways.</li> <li>c) Ensure the site has a maximum provisional hazard of 0.4 for pedestrian access and 0.6 for driveways in a 1 in 100 year ARI event;</li> <li>e) The preferred model is TUFLOW, however a hydraulic model such as HEC-RAS can be used to assess flood levels and velocities. The HEC-RAS section locations are to be clearly shown on the plans, maintaining where possible the same location for the pre and post model sections. Show all obstructions and provide ineffective flow areas for sections close to the obstructions.</li> <li>g) An electronic copy of the flood models are to be provided to Council for assessment.</li> <li>h) A separate application to Council may be provide additional information to assist in flood assessment at this site such as catchment boundaries or Areal Laser Survey (for a fee). Email <a href="mailto:Gregory.Hawkes@blacktown.nsw.gov.au">Gregory.Hawkes@blacktown.nsw.gov.au</a> for further information.</li> </ul> <ul style="list-style-type: none"> <li>• On-site detention is to be provided for any redeveloped area in accordance with the requirements of Council's Engineering Guide for Development 2005 based on the <b>Breakfast Creek</b> Catchment.</li> <li>• The development must provide a water quality system to achieve the following pollutant removal targets of Part R of DCP 2006 assessed using MUSIC (a MUSIC model is to be submitted as part of the proposal):</li> </ul> <p><i>Required percentage reductions in post development average annual load</i></p>

Issue	Matters to be addressed in EIS												
	<p data-bbox="454 246 614 280"><i>of pollutants</i></p> <table data-bbox="497 297 1377 551"> <tr> <th data-bbox="497 297 836 367">Pollutant</th><th data-bbox="836 297 1377 367">% post development pollutant reduction targets</th></tr> <tr> <td data-bbox="497 367 836 403">Gross Pollutants</td><td data-bbox="836 367 1377 403">90</td></tr> <tr> <td data-bbox="497 403 836 439">Total Suspended Solids</td><td data-bbox="836 403 1377 439">85</td></tr> <tr> <td data-bbox="497 439 836 474">Total Phosphorous</td><td data-bbox="836 439 1377 474">65</td></tr> <tr> <td data-bbox="497 474 836 510">Total Nitrogen</td><td data-bbox="836 474 1377 510">45</td></tr> <tr> <td data-bbox="497 510 836 551">Total Hydrocarbons</td><td data-bbox="836 510 1377 551">90</td></tr> </table> <ul data-bbox="454 571 1426 1545" style="list-style-type: none"> <li data-bbox="454 571 1426 1019">• An electronic copy of MUSIC is to be supplied to Council for assessment. The Humeceptors appear to be undersized in MUSIC based on previous information. To support the use of a Humeceptor STC model in MUSIC, the Humes calculator PCSWMM for Humeceptor is to be run. Under step 1 "Project Details" nominate 80% TSS removal. Under Step 4 using the Parramatta North (Masons Hill) Rainfall Data. Under Step 5 Particle Size Distribution highlight "MUSIC" and under Step 6 TSS Loading highlight "Buildup / Washoff". After running the simulation at Step 7, the Step 8 Design Summary STC model is to achieve a minimum of 80% TSS removal. A copy of the "Humeceptor Design Summary" report is to be supplied</li> <li data-bbox="454 1041 1426 1545">• Aim to achieve 80% of non-potable water demand to be met through the reuse of rainwater and/or stormwater assessed using MUSIC. Due the suggested high demand this target may not be achievable however the rainwater tan size needs to be maximised and it is suggested that the treated discharge though the bioretention filter subsoil pipes also be collected subject to fit for purpose The % reuse is to be assessed using the node water balance function within MUSIC using Blacktown's standard rainfall. Non potable water demand is to include landscape watering and toilet/urinal flushing as well as industrial uses. The design rainwater tank volume to be shown on the drainage plans is to be a minimum of 20% greater than the rainwater tank volume used in MUSIC to allow for anaerobic zones and mains make up water levels.</li> </ul>	Pollutant	% post development pollutant reduction targets	Gross Pollutants	90	Total Suspended Solids	85	Total Phosphorous	65	Total Nitrogen	45	Total Hydrocarbons	90
Pollutant	% post development pollutant reduction targets												
Gross Pollutants	90												
Total Suspended Solids	85												
Total Phosphorous	65												
Total Nitrogen	45												
Total Hydrocarbons	90												