

6 July 2021



Benbow Environmental
25-27 Sherwood Street
Northmead NSW 2170

Belinda Middleton
Benbow Environmental
belinda@benbowenviro.com.au

Dear Belinda,

Jemena Gas Networks
(NSW) Ltd
ABN 87 003 004 322

Level 14
99 Walker St
North Sydney NSW 2060
PO Box 1220
North Sydney NSW 2060
T +61 2 9867 7000
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www.jemena.com.au

Re: Proposed State Significant Development

Location: 30 Loftus Road, Yennora (Lot 8 DP1233715)

Proposal: Resource Recovery Facility

Jemena Asset Management Pty Ltd on behalf of Jemena Gas Networks (NSW) Ltd (collectively Jemena) has reviewed and assessed the proposal with respect to safety and impacts on or from the Jemena gas pipelines located in proximity of the proposed development site.

Jemena confirms that it has no objections to the proposed development application in proximity to its high pressure gas main.

In pre- assessing the development application, Jemena can confirm that it operates a high pressure main (Sydney Primary Main) within a road reserve of Loftus Road and Norrie Street.

- Sydney Primary Main (Horsley Park to Mortlake) – Pink
- Secondary gas main - Green



Jemena has consider the implications of the development adjacent to high pressure pipelines transporting dangerous goods in NSW as communicated in the ISEPP clause 66C and more recently the Planning Circular PS 18-010. Whilst the Sydney Primary Main is not considered a regulated pressure pipeline as defined under the Pipelines Act 1967, Jemena has undertaken a holistic review of the interface between its high pressure gas mains and land use within the heat radiation contours within Sydney's built urban, commercial and industrial precincts.

The proposed development of the Resource Recovery Facility does not materially change the prevailing Land Use in the immediate locality. Jemena will not have to alter its management and mitigation settings of the high pressure gas main under AS2885 to accommodate the future development of the site based on information shared by Benbow Environmental within the scoping report dated 14 September 2020.

The Sydney Primary Main is a significant gas main that in part, conveys gas from trunk pipelines at the 'City Gates', to the Jemena Gas Network (JGN) which provides gas to Sydney costumers.

The Sydney Primary Main asset is operated in accordance with Australian Standard - AS2885. The primary main operates at pressures greater than 3MPa. Under AS2885 requirements, Jemena takes its rights and obligations under these instruments seriously as they relate to ensuring the ongoing safety and integrity of its mains/ pipelines and the community at large.

Duty of care exists to ensure there is no compromise to the integrity of the Jemena assets during this procedure due to the existing ground conditions that currently exist.

If you have any questions or quires, please do not hesitate to contact the undersigned.

Kind Regards



Luke Duncan
Property Officer
Gas Distribution



CUMBERLAND
CITY COUNCIL

Ref: PL2021/0003

3 May 2021

Benbow Environmental
25-27 Sherwood Street
NORTHMEAD NSW 2152

Dear Sir/ Madam,

Subject:	Pre-Lodgement Meeting Advice
Proposal:	Operation of a Resource Recovery Facility to process up to 150,000 tonnes per annum of general solid waste (non-putrescible), consisting of construction and demolition waste and commercial and industrial waste – State Significant Development (SSD-9320662)
Application No:	PL2021/0003
Property:	30 Loftus Road YENNORA NSW 2161
Legal Description:	Lot 8 DP 1233715

Reference is made to the pre-lodgement meeting held on 1 April 2021 concerning the abovementioned property. Please find attached a copy of the meeting minutes.

As discussed during the meeting the proposal needs to address various issues and thus requires significant amendments. Alternate design options should be explored in order to adequately address the matters raised, particularly details of the proposed operation and flooding affectation on the site.

Please note, the pre-lodgement meeting advice does not constitute approval and is given in good faith and on a 'without prejudice' basis. Council's requirements may vary from time to time and applicants are expected to comply with all prevailing planning controls. Council's final position on the proposal can only be made once an application has been assessed.

Should you have any enquiries regarding this matter, please contact Olivia Yana on 8757 9544 during normal business hours, Monday to Friday and quote reference PL2021/0003.

Yours faithfully,

Rennie Rounds
Executive Planner

16 Memorial Avenue, PO Box 42, Merrylands NSW 2160
T 02 8757 9000 E council@cumberland.nsw.gov.au W cumberland.nsw.gov.au
ABN 22 798 563 329

Welcome *Belong* Succeed

MINUTES OF PRE-LODGEMENT MEETING

Property:	30 Loftus Road YENNORA NSW 2161, Lot 8 DP 1233715
Proposal:	Operation of a Resource Recovery Facility to process up to 150,000 tonnes per annum of general solid waste (non-putrescible), consisting of construction and demolition waste and commercial and industrial waste – State Significant Development (SSD-9320662)
Meeting Date:	1 April 2021
Attendees:	Council Staff – Olivia Yana Ravi Tulachan Applicant – Linda Zanutto (Benbow Environmental) Carlo Ranieri

1. Details of Proposal

The proposed development is to be located at 30 Loftus Road, Yennora, legally described as Lot 8 DP 1233715 for the operation of a Resource Recovery Facility to process up to 150,000 tonnes per annum of general solid waste (non-putrescible), consisting of construction and demolition waste and commercial and industrial waste. The development is subject to State Significant Development Application (SSD-9320662). Early consultation has commenced on 2 September 2020 with the Department of Planning, Industry and Environment, and Council has provided comments dated 6 October 2020, which should remain as part of consideration for the proposed development.

The subject prelodgement application provides commentary only for the revised Scoping report no. 201156_Scoping_Rep_Rev4 dated 14 September 2020.

2. Key Issues

The summary of the issues discussed are provided as follows:

- a) The application should consider the provision of the Greater Metropolitan Regional Environmental Plan No. 2 – Georges River Catchment (1999) particularly Part 3, Clause 11 Planning control table, given the proposed works located within a flood liable land.
- b) Additional information required below need to be considered.

3. Environmental Health Unit Comments

Acoustic Report:

- a) An acoustic report is to be prepared by an appropriately qualified acoustic consultant having the technical eligibility criteria required for membership of the Association of Australian Acoustical Consultants (AAAC) and/or grade membership of the Australian Acoustical Society (MAAS). The report should consider the site specific impact from all operations on nearby sensitive receivers (residential, commercial, industrial where applicable) including but not limited to noise from construction activities, the proposed waste processing operations, proposed truck/forklift movements, any mechanical plant (specialised machinery, condensers, air compressors, etc), alarms/alerts, after-hours access, operating hours, etc. The acoustic report shall demonstrate that potential noise generated from the use of the activities on site and the operation of plant and equipment will satisfy the relevant provisions of the NSW Environment Protection Authority Noise Policy for Industry (NPI), *Protection of the Environment Operations Act 1997* and any Council planning policy requirements.

Layout Plan:

- b) Detailed plans showing all structures and activity areas on site, including internal and external storage areas (especially for solid waste, etc. Note: these items should all be stored in covered areas that are suitably graded and drained such that the stormwater system will not be impacted), loading/delivery zones, parking, mechanical plant, direction of traffic flow for trucks, exhaust stacks, waste storage areas etc.

Air Quality (Odour/dust):

- c) An air quality and odour impact assessment is required to be undertaken and should be prepared in accordance with the *Local Government Air Quality Toolkit*, AS 1668.2–2012, and NSW EPA guidelines for air emissions and odour. Details of any air treatment and dust suppression systems should be included as well as any proposed mitigation, management and monitoring systems.

Water pollution/stormwater:

- d) Submit to Council detailed plans showing stormwater outlets/pits on site, and provide details of protection measures (bundling capacity, canopies, etc). This would require drainage diagrams and associated plans for all pits, pipes and any proposed wastewater treatment systems.

Environmental Management:

- e) An environmental plan of management should be provided to detail how all environmental impacts from the use (noise, odours, stormwater, waste, etc.) will be managed.

Sediment and Erosion Control:

- f) It is advised that a sediment and erosion control plan be developed and implemented for the entirety of construction works on site. The sediment and erosion control plan must be designed to prevent the offsite migration of sediment from the proposed development.

Contamination:

- g) No excavation works and no disturbance to soil would be required apart from the installation of weighbridges which will require drilled piers or concrete pads. It is understood that existing contamination and the potential for contamination from the proposed site activities will be assessed in the EIS.

Waste Management:

- h) It is advised that a waste management plan be prepared by an appropriately qualified consultant that outlines waste minimisation and waste management strategies to be implemented for the duration of the construction and ongoing operational phases of the proposed development.

Activities to be undertaken on site:

- i) Further clarification is to be provided as to the specific activities to be undertaken on site.

4. Development Engineering Comments

Flooding

- a) The site is noted in the council's system as flood affected lot. The flood information must be obtained from council, (if not already obtained). The information obtained must be recent one (validity of 6 months from date of issue).
- b) The subject development must incorporate and comply with the requirements outlined in the Flood Advice Letter, and must be designed in accordance with Part A, Section 8.0 - Stormwater Management of the Holroyd Development Control Plan 2013 (HDCP).
- c) Storing of the material within the flood affected area is prohibited. The material storage area must not be lower than 500mm above the % flood level. Further, the material storage area must be covered to prevent being exposed to rain.

The southern part of the site will be inundated during the flooding. The proposed location of the bin storage on the south-eastern corner is not supported.

Further, the proposed car parking area on the southern side encroaches the drainage easement for food mitigation. Any alteration to the approved land conditions within the easement is not supported.

- d) The flood affected area including the flood storage area must not be obstructed that results in loss of flood storage volume or alters the flow characteristics such as change in velocity, depth, or redirection of flood.

Water Sensitive Urban Design (WSUD) measures / Stormwater Quality Improvement Devices

- e) Stormwater runoff (roof runoff) shall be reused and/or recycled to minimise the site runoff.
- f) In accordance with the section 7.5 of Holroyd DCP 2013 the development must incorporate the Water Sensitive Urban Design Measures to comply with the controls outlined therein and achieve the pollutant removal targets. The WSUD measure must accompany a MUSIC model.

Stormwater runoff from the area exposed to rain such as the manoeuvring area around the building including access ways must undergo appropriate industrial standard primary treatment / separation to achieve the pollution removal target prior to disposal into existing stormwater systems. The water quality treatment device must be capable of capturing and removing letters, sediments grits and hydrocarbons (oil/ grease). The area prone contaminated with hydrocarbon (oil and grease) must be segregated and the stormwater runoff from the area must be collected separately and treated for removal of hydrocarbon. The effluent must not be discharged into stormwater system. It rather be disposed into the sewer system with the approval of Sydney water.

Stormwater Management

- g) No stormwater plan detailing the management measure was submitted. The stormwater runoff from the site must be controlled by provision of On-Site Detention system as a part of site stormwater management measure. The on-site detention system must be designed with the OSD parameters of site storage requirement (SSR) of **300m³/ha** and the Permissible site discharge (PSD) of **140l/s/ha**.

Further, the On-site Detention storage must not cause the blockage or obstruction of flood/ through the site. The design needs to be accompanied with the OSD design calculation summary sheet and prepared by a qualified with an engineer's design certificate.

- h) Information on the point of disposal such as the council's stormwater system, channel etc on to which the site stormwater is intended to be discharged must be obtained from the relevant authority (Council, Sydney water, or RMS whichever is applicable) or by appropriate survey investigation and the details clearly shown on the plan.
- i) If part of whole of the existing site stormwater system is to be utilised for the disposal of stormwater from the proposed development the details drawing of the existing stormwater system must be included in the stormwater plan. The proposed layout and existing layout of the stormwater system must be delineated clearly on the plan. The drawing must include stormwater pipe line layout plan and the cross-sectional details.

Traffic and Manoeuvring

- j) A Traffic Impact Assessment (TIA) report must be prepared. The TIA report shall address the impacts of the proposed development, and must address the issues related to queuing, parking, traffic generation, entry and exit related matters including the following information.

- details of all traffic types and volumes likely to be generated during construction and operation, including a description of key access / haul routes.
 - an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model.
 - numbers and location of loading dock, waiting/queuing bay, on-site parking provisions, and sufficient pedestrian and cyclist facilities, in accordance with the relevant Australian Standards.
 - details of the largest vehicle anticipated to access and move within the site, including internal movement swept path analysis.
 - swept path clearance diagrams depicting vehicles entering, exiting, and manoeuvring throughout the site.
- k) The pedestrian access to and from the car parking spaces to the building/work area must be safe with nil or minimal chances of being in collision with oncoming traffic. They must be line marked to guide pedestrian safely to the car spaces.
- l) The sight line and sight distance at the entry/exit location must demonstrate compliance with requirements as specified in AS2890.1.2004, AS2890.2.2004, and AS2890.6-2009. Details such as heights of fencing/obstructions, parked vehicles on the road, or other structures adjacent to the driveway (Entry/exit), shall be taken into considered in the design.
- m) The vehicular manoeuvrings must not encroach or overrun into adjacent parking spaces of structure. Swept path clearance diagrams must demonstrate the provisions.

The submitted plan cannot be assessed as the reduction scale is inconsistent with the dimension shown on the plan. However, it is noted that the manoeuvring of truck into the parking aisle for the car is not acceptable. The manoeuvring / turning area for the trucks must be separated from the car parking area.

Parking and Car Spaces

- n) The parking provision must comply with the requirements and controls as outlined under Holroyd DCP 2013 together with the general requirements as specified in AS2890.
- o) Provision for the car parking spaces must comply with the Holroyd DCP 2013. Based on the car parking rate for the factories use, 1 space will be required per 300m², and 1 space will be required per 40m² for the office use. Reconfiguration of the car parking spaces based on the car parking rates will allow for the car parking spaces to be located outside the drainage easement encroachment area. Provision for parking space for heavy vehicle will depend on its operation plan.
- p) The parking provision must comply with the requirements as outlined in “AS2890.1-2004”, and “Holroyd DCP 2013”. The aisle width of parking modules and the parking space dimensions are to be based on the type of user (e.g. resident guests, employee, or non-resident visitors using the facilities).

19 July 2021

Linda Zanotto

Senior Environmental Engineer

Benbow Environmental

E: ljanotto@benbowenviro.com.au

CC: ehansma@benbowenviro.com.au

Sydney Water input to SEARs for Yennora Resource Recovery Facility at 30 Loftus Road, Yennora (SSD-932066)

Thank you for responding to Sydney Water's input to the Secretary's Environmental Assessment Requirements for the abovementioned development which proposes the construction of a resource recovery facility (RRF) that would process an estimated 150,000 tonnes of waste per annum. Sydney Water have reviewed your response to our submission and provide the following comments for your consideration:

- As mentioned, this proposed development will utilise water for dust suppression and fire-water purposes on-site. Although the proposed source of water for this use is rainwater tanks, this is not a reliable water supply source and will likely require top-ups from our mains.
- It is worth mentioning there is a private recycled water main fronting your site which may be utilised for these industrial purposes and will hence not require any potential water amplifications from us as a result of industrial usage. However, permission to connect to this main is subject to approval by the private provider.
- As wastewater will be generated as the result of dust suppression, firewater run-off, and as there is a potential EPA requirement to dispose of the first stormwater runoff from the premises because of potential contamination, it is more than likely Sydney Water will require a Trade Waste Agreement with the proponent for this development. This is unless sufficient information is provided to ascertain that no trade-wastewater will enter our sewer system.
- Sydney Water does not have enough information regarding this proposal's detailed water demand and wastewater flows for both domestic and industrial uses to determine whether this development will require upgrades to our local system.
- This is understandable given detailed studies regarding this SSD have not been finalised or released as yet under the EIS exhibition, **however, we will require a clear breakdown of water and wastewater usage details at the EIS stage.** Please see the attached level of data that we require in Attachment 1 that we ask be provided at the EIS stage.
- **Once we have received this information, we will assess your proposal in detail and provide you preliminary servicing requirements as part of our EIS submission.**

If you require any further information, please contact the Growth Planning Team at urbangrowth@sydneywater.com.au.

Yours sincerely,



Kristine Leitch

Commercial Growth Manager

City Growth and Development, Business Development Group

Sydney Water, 1 Smith Street, Parramatta NSW 2150

Attachment 1

Growth Data Information

This data collected will inform Sydney Water's planning investigations for servicing the proposed development and wider area. Ideally updates should be provided every quarter for each development. Development intel helps to ascertain demonstrated demand and development confidence which supports business cases, planning studies, and commercial opportunities. The data collected will be treated as commercial in confidence. It is understood that the data may be indicative only at this stage.

	Ultimate Growth	Ultimate EP (if known)	Number of Stages
Industrial Use	(express as maximum daily and/or yearly demand)		
Jobs			

	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Jobs Numbers										
OR: Jobs in GFA										

High water users

Insert details on water usage (daily/yearly maximums and average demands), source of water supply (how much from our mains, rainwater and potentially recycled water and for each use), and proposed wastewater disposal options (methods that prove no trade wastewater will enter our sewers or and indication of how much will to inform the necessary trade waste agreement requirements).