Your Reference: MP10_0028
Our Reference: NCA/2/2011
Contact: David Little
Telephone: 9806 5481
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Director, Urban Assessments
Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

Attention: Christine Chapman

27 April 2012

Dear Ms Chapman,

Major Project 10_0028 (1 Grand Avenue, Camellia)
Remondis Alternate Waste Treatment Facility - Objection

I refer to the public exhibition of the above Major Project that seeks approval for the Remondis Alternate Waste Treatment Facility including the following:

- A Commercial & Industrial Resource Recovery Facility (CIRRF) with a capacity to process up to 100,000 tonnes per annum (tpa) of commercial and industrial waste;
- A Source Separated Organic Resource Recovery Facility (SSORRF) facility with a capacity to process 50,000 tpa of food and green waste; and
- Ancillary infrastructure.

Parramatta strongly objects to this proposal and any proposal that may damage the capping over the highly contaminated site. The proposed development is contrary to Council's long term vision for the Camellia Precinct and Council urges the Department to refuse this application.

Waste treatment on the site will involve the following:

- Waste streams will be delivered to the site by waste collection contractors, and sourced from within the greater Sydney metropolitan area.
- The site would operate 24 hours per day, seven days per week throughout the year.
- Putrescible waste entering the 'wet' stream would undergo biological stabilisation in a static tunnel composting process in accordance with EPA/DEC Guidelines.
- Raw compost would be taken by truck to licensed composting facilities in southern and western Sydney for compost refinement, marketing and sale.
- Materials with a high recycling content would enter the 'dry' stream, where marketable recycling materials (paper, cardboard plastics, metal and timber) would be recovered and sold in bales to secondary processors according to their specifications.

- All non-putrescible waste which cannot be reused will enter a 'bulk nuisance' waste stream and be sent to a licensed Class II landfill in western Sydney for disposal.

The site is heavily contaminated with asbestos, as well as hydrocarbons and metals due to James Hardie manufacturing fibrous cement on the site prior to 1996. However, following completion of works in an earlier Voluntary Remediation Agreement with the EPA, the site was declared to pose no significant risk of harm provided remediation in accordance with the Site Management Plan (SMP) developed in 2004 was maintained at all times.

The proposed development will be constructed on an engineered platform above the site to minimise disturbance to site capping and the only penetration of the site seal will be to access underground services. It is understood that excavation of the site will occur generally in accordance with Figure 4.3 of the Environmental Assessment Dated February 2012.

According to the Site Management Plan – Eastern Portion Former James Hardie Site Grand Avenue Camellia (17 March 2004) contained in Annexure D of the Positive Covenant for the site, 95% of the site is currently covered with 'hard' surfaces, mostly concrete and bitumen. The rest of the site is unsealed being mostly grassed areas or garden beds.

The proposal will include a heavy duty concrete base on top of the existing hard surface. The base will have a concrete strength of 32-40Mpa and have a nominal slab thickness of 170-200mm.

A visit to the site revealed some erosion was occurring on the northern boundary of the site due to the Parramatta River.

It is noted that vehicles must pass over land owned by Rail Corporation New South Wales to access the site.

I wish to advise that Parramatta City Council have reviewed the Major Project application and has identified significant issues with the proposed development.

Council strongly objects to the proposed development for the following reasons:

- The proposed use of the site is not sympathetic to the preferred future use of the site and future plans for the Camellia Precinct.

- The subject site is considered to be a gateway way site for Parramatta and the proposed use would present a poor image for Parramatta.

- Council foresees the site being used in a more positive fashion, similar to other signature developments in the immediate area, such as the University of Western Sydney and Rosehill Racecourse.

- The proposed development will result in the disturbance of the integrity of the existing capping and ground water, resulting in an unacceptable potential environmental impact on the area.

- Access to the site from James Ruse Drive should be via north Grand Avenue across the railway line. Subject to this being allowed by RailCorp, the road pavement should be upgraded appropriately.

Council also raises strong concerns with regard to the integrity of the existing capping. It is understood the capping comprises of a mix of materials. Currently the capping does not appear to be a surface of acceptable quality to sufficiently and securely seal the contaminated area. Of particular concern is the erosion occurring on the northern side of the side as a result of the Parramatta River potentially exposing contaminated soil. The capping should be appropriately audited and upgraded immediately.

Council strongly objects to the proposed development, however, should the Department of Planning seek to approve the proposed development, the below comments and conditions should be considered and included in the assessment of the proposed development.

Comments to be taken into consideration should the Department of Planning seek to approve the proposed Remondis Waste Treatment Facility

The comments below relate to the following issues:

- Contamination;
- Air Quality;
- Noise;
- Environmental Protection Zone treatment including proposed vegetation, erosion prevention and Council's long term vision to have public access along both sides of the river;
- Traffic and Parking;
- Impact on Neighbouring Properties;
- Management of the site during construction;
- Management of the site during operation;
- Greenhouse Gas Emissions
- Flooding
- Heritage.

These issues are discussed in further detail within this submission.

Social Outcomes Comments

The proposal was reviewed by Council's Social Outcomes Team who provided the following comments:

The Social Impact Assessment (SIA) report has been compiled in relation to the proposed request for development of an Integrated Recycling Park comprising of two Alternative Waste Treatment Plants situated in Grand Avenue Rosehill:

- A Commercial and Industrial Resource Recovery Facility (CIRRF).
- A Source Separated Organic Resource Recovery Facility (SSORRF).

Rosehill - Camellia is a predominantly industrial area, with a residential area in the west. Residents from the bordering suburbs of Harris Park/Rosehill represent a high proportion of people born overseas, many of whom speak English as a second language. The majority of residents work in the manufacturing and retail industries and live in houses with more than two people.

Specific local stakeholders who are likely to be most affected by the development are:

- local residents
- local workers
- local businesses, including a childcare centre and the race course
- shoppers to Aldi
- Parents/ children of the childcare centre
- Local users of the railway

The main potential negative impacts are likely to be:

- odour
- increased traffic
- perceived and actual increased disruption due to 24 hour operation and heavy vehicle access to the site.

Several recommendations have been made about seeking further expert opinion regarding potential negative impacts, especially traffic and environmental impacts.

If the proposed development is to be supported, it is recommended that the conditions of consent include the items listed below. This would help to minimise the potential negative impacts as much as possible for the key local stakeholders that are likely to be most affected:

- Documented processes and procedures to minimise and manage odour impact in place.
- Documented process and procedures for the surrounding community and key stakeholders to report concerns with operations should they arise. This should include the provision of a 24 hour contact point for urgent issues.
- Documented consumer engagement plan and mechanisms to keep the local resident and business community informed of progress of the development. This is particularly pertinent for the occupants of the Tilrox building which includes the Child Care Centre. (Discussions with the Child Care Centre have not continued which would suggest that communication has not been as effective as it could be).

- Implementation of a Heavy vehicle driver orientation program – to cover the site and surrounding area, potential risk areas (eg childcare, Aldi, railway) and risk times (eg event days, commuter times am/ pm etc)
- Documented emergency and evacuation procedures for the business and surrounding area. This information would need to be communicated to the surrounding businesses/ Tilrox building tenants to ensure that everyone is aware of the safety and evacuation procedures and measures that are in place. Documented mechanisms for ongoing updating also need to be identified.
- Completion of pathway upgrades and vegetation clearance (as sited in the RTA report) to support safer pedestrian travel and better amenity for all stakeholders in the immediate and surrounding area.
- That a safe and sympathetically landscaped pedestrian pathway be created between Camellia Railway Station and the proposed site entrance. This should include traffic calming devices at the entrance to the site and the road junction. The image below represents the kind of sympathetic treatment being proposed.
- That two landscaped recreational eating spaces be created for staff that include a table, benches and trees. One to be adjoining the car park situated near the river's edge for staff working in buildings three, six and eight. The second landscaped recreational eating space should be located on the river's edge near building five. This will be for staff working in buildings four, five, seven and nine as per diagram within Volume 1, Proposed Remondis Integrated Recycling Park Environmental Assessment (located between pages ES 4 and 1-2).
- Council's long term vision to have public access along both sides of the river as a shared use pathway should also be kept in mind.

Landscaping and Riverbank Treatment Comments

The proposal was reviewed by both Council's Landscape Officer and Council's Open Space and Natural Area Planner.

Council's Landscape Officer supported the removal of the following trees:

Tree No	Name	Common Name	Location	Reason
1 x	*Eucalyptus amplifolia*	Cabbage Gum	Front entrance	Proposed driveway and entrance area
1 x	*Jacaranda mimosifolia*	Jacaranda	Front entrance	Suppressed/poor form

Reason: To allow appropriate development of the site.

The majority of the Landscape Masterplan prepared by Context Landscape Design Pty Ltd (Revision 4) dated 16 May 2011 has been completed in accordance with Council's relevant DCP and could be incorporated into any consent issued.

Concern has been raised, however, by Council's Open Space and Natural Area Planner with regard to the 30m wide Environmental Protection Zone. The proposed

development abuts the Parramatta River which is an important habitat corridor and accordingly, the following comments were provided:

- significant concerns that the existing landscape masterplan proposing the use of moveable containers in the 30m Environmental Protection Zone (EPZ) allows for the potential storage of materials which will create visual and stormwater impacts;
- the proposed moveable containers only comprise of a portion of the EPZ and would require high levels of maintenance to successfully maintain the health of mature trees due to the significant heat-island effect of the large concrete surface of the EPZ;
- replace proposed moveable containers with a non-moveable contained raised mounded area covering the majority of the EPZ (except provision for future 3m wide cycleway) utilising a similar construction methodology as a rooftop garden. This will greatly increase habitat value / screening / minimise heat island effect / minimise & filter stormwater runoff into the Parramatta River without disturbing / exposing the toxic soil layers present under the concrete surface. This vegetated area should comprise of grasses, shrubs and trees utilising species from Cumberland Plain Woodland / Sydney Coastal River Flat Forest as described in the landscape masterplan.

Concern is also raised with regard to erosion currently occurring on the northern edge of the site, under the concrete slab as a result of the Parramatta River. The applicant should investigate and implement appropriate measures, minimizing the impacts of erosion on the riverbank on the northern boundary of the site.

Heritage Comments

The proposal was reviewed by Council's Heritage Adviser who provided the following comments:

Assessment

1. As it is assumed that the consent authority has a Heritage Advisor, it is recommended that this proposal be referred to him (or her) for evaluation and comment. Any potentially new information may be re-referred to the Council for consideration.

2. The following heritage matters were considered:

    - The site affected by the proposal comprises a heritage item, deemed to be the oldest European grave in Australia.
    - The site affected by the proposal is adjacent other heritage items, and its use may have impact on these heritage items, just like its construction.
    - Known Aboriginal sensitivity of the affected grounds is to be considered.
    - Archaeological potential of the affected grounds is to be considered. However, it is noted that, should any relics be discovered, significance of these relics is not likely to exceed the local level.

- Design of the proposal is typical relatively standard design for this type of development. The design is thus considered generally acceptable.

Environmental Comments (Air Quality and Noise)

Comments were provided by Council's Environmental Health Officers and Council's Environmental Outcomes Team and the comments following are provided:

Air Quality Management

Construction Phase

Potential dust generating activities have been identified during Stage 1 and Stage 2 of the construction phase. It is understood from the report that excavation of any contaminated soil will be carried out as recommended by the Site Management Plan with all excess material being taken off site to an approved waste disposal facility. The work will be supervised by a licensed asbestos removal (AS1) contractor and a suitably qualified occupational hygienist will be engaged to prepare an air monitoring program for the excavation, storage and offsite removal of fill material containing asbestos.

Considering the known fact that the site contains asbestos, there is a real possibility that dust generated during the construction phase will concern neighbouring premises. It is therefore recommended by the E&PH Team that an Occupational Hygienist and a Third Party EPA Approved Contaminated Site Auditor be engaged to develop, review and monitor the construction phase works to ensure contaminated soil and potential dust emissions do not occur. Monitoring sites should be set up at the perimeter and validated by these experts to ensure no pollution and/or public health impacts occur.

Operation Phase

The Protection of the Environment Operations Act includes the term 'offensive odour', which is defined as an odour:

(a) that, by reason of its strength, nature, duration, character or quality, or the time at which it is emitted, or any other circumstances:
(i) is harmful to (or is likely to be harmful to) a person who is outside the premises from which it is emitted, or
(ii) interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted, or
(b) that is of a strength, nature, duration, character or quality prescribed by the regulations or that is emitted at a time, or in other circumstances, prescribed by the regulations.

It is acknowledged that when odours are persistent or strong, they can have a significant effect on the lifestyle, mental health and amenity of residents. The submitted air quality report explains that the assessment of odour and the

determination of an offensive odour is a difficult subject that the submitted documentation reviews.

The modelling has been carried out in accordance with the NSW EPA "*Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*". It is noted that the "*EPA Technical notes: assessment and management of odour from stationary sources in NSW*" (November 2006) is not referenced within the Air Quality Assessment, clarification on why this technical note was not considered relevant should be sought.

The DECCW Approved Methods include ground-level concentration (glc) criterion for complex mixtures of odorous air pollutants. They have been refined by the EPA to take account of population density in the area, consideration should be made not only to the residential premises to the West of the site, but the mixed industrial areas to the East. The report uses a less stringent criterion for these sites within the industrial area, although the E&PH Team understands there are sites which may be just as sensitive to odour such as a child care centre and commercial premises, the results of the modelling however indicate that these sites will also comply with the more stringent criterion 2 "odour units" (ou).

It is understood that a TAPM and CALMET/CALPUFF air dispersion modelling system was used by the consultants and whilst the technical understanding of this type of modelling system is limited. It is noted that CALPUFF is an EPA approved model, however advice and opinion is recommended from the EPA that this modelling system has been used correctly.

Predicted odour concentrations were predicted at ground level at surrounding receptors to comply with the EPA odour criteria of 2 ou. The maximum predicted off-site odour concentration is less than 0.6 ou, which is less than the minimum theoretical level at which odour can be detected.

However, there is no discussion within the assessment regarding the potential for cumulative odour impacts from all odour sources from Camellia that may impact on a receptor. Additional clarification should be made with the author of the Air Quality Assessment that the odour assessment criteria incorporated a cumulative assessment so that the additional odour increase (although minimal) does not contribute to the cumulative odour from neighbouring emitters that may adversely impact on the neighbouring community.

Noise Impact Assessment

Council raises concerns about noise impacts; in particular on the nearby Child Care Centre.

In accordance with the NSW Industrial Noise Policy, unattended background noise monitoring was conducted between Tuesday 9 March 2010 and Thursday 18 March 2010 at three locations considered representative of the existing ambient noise environment in the vicinity of the proposed. Operator-attended (15 minute) noise surveys were conducted on Tuesday 9 March and Thursday 18 March 2010, in order to determine the character of the existing background noise levels. The attended noise monitoring confirmed that the measured background noise levels were

dominated by traffic noise. Also no other significant industrial noise sources were audible at any of the monitoring locations during the attended noise measurements.

The INP and Australian Standard AS/NZS 2107:2000 *'Acoustics – Recommended design sound levels and reverberation times for building interiors'* does not provide guideline values for internal noise levels in childcare centres. The Association of Australian Acoustical Consultants has a Technical Guideline - *Child Care Centre Noise Assessment* and this recommends an internal level of 40 dBA for playing and sleeping areas, which was adopted for the assessment. However, it is noted that noise emissions from earthworks and concreting construction activities during the daytime will be 44 dBA (this exceeds the criteria) at the child care centre. That is, the 20 dBA noise reduction from outside to inside is conservative and using the criteria outlined in the AAAC Technical Guideline, is likely to result in a noise impact on the centre for this construction phase – especially if the child care centre does not have all windows closed, as assumed by the acoustic consultant.

To assist in the determination of the indicative noise amenity area and hence determine the amenity criteria the INP notes and Parramatta Draft LEP Zoning map were used. The residences west of James Rouse Drive were described by the 'suburban' receiver type, residences on James Rouse Drive and 33 James Rouse Drive are best described by the 'urban' receiver type. The E&PH Team has not seen a "splitting" of the receiver type for the amenity criterion for a proposal as the most conservative receiver type is usually taken into consideration, the INP notes that a 'worst-case scenario' should be considered when reviewing a noise impact from a likely development. Further justification on the precedent and acceptability of splitting the receiver types should be sought should additional acoustic reports be undertaken as part of any condition of consent.

In accordance with the INP, trucks and cars travelling on the site access road are included in site noise emissions, the relevant document by the EPA, "*Environmental Criteria for Road Traffic Noise*" is referenced by the acoustic consultant. It is noted that noise levels from a truck reversing alarm is predicted to be 54 dBA, being 9 dBA below the criteria. However, it is noted whilst the sleep disturbance criteria is met, the alarm might be audible. In the event that reversing alarm noise is considered to be a source of disturbance, the alarm noise level will need to be managed with the premises to achieve an acceptable noise reduction like any other noise matter.

The facility is proposed to be open for waste delivery 24 hours per day and 7 days per week all year. Considering the proposed hours of operation, an Operational Noise Management Plan should form part of any consent to address noise complaints (such as truck reversing alarms).

Greenhouse Gas Emissions

It is disappointing that the greenhouse gas (GHG) emissions generated from the composting of waste materials have not been addressed in any way. The air assessment report states that 15,635 t CO2-e generated from the composting process were not included in the totals for the GHG assessment as these waste materials would undergo natural decomposition and release equivalent greenhouse gas emissions if sent to landfill.

Whilst this may be true, the composting process is the most significant contributor of GHG by far from the operation of the site.

Additionally, the proposal does not appear to address any matters relating to minimising electricity use on site, including whether the energy efficiency of fixtures (eg. lighting) and equipment or alternative/ renewable energy sources have been considered.

Recommendation:

- That further work be undertaken in relation to managing GHG emissions generated from processes on site, including investigating options for converting waste to energy from the composting process.
- That investigation of additional alternative/ renewable energy sources to supply electricity to the site be undertaken
- That details be provided of all other proposed energy efficiency measures for the site

- **Construction Environmental Management Plan**

  A **Construction Environmental Management Plan** (CEMP) must be prepared in accordance with the *Department of Infrastructure, Planning and Natural Resources (2004) Guidelines for the Preparation of Environmental Management Plans* and submitted to the relevant authorities at least 4 weeks prior to the commencement of construction.

  The CEMP must be prepared and implemented in accordance with the procedures, safeguards and mitigation measures identified in the EA and in consultation with relevant stakeholders.

  The CEMP must contain all the Construction Sub Plans, including:
  a) Construction Noise and Vibration Management Sub Plan,
  b) Construction Contaminated Land Management Sub Plan (to further assess the extent of asbestos and ensure the ash layer will not be disturbed during construction in addition to any relevant Remedial Action Plan),
  c) Construction Soil and Water Management Sub Plan.

  The approved CEMP must be made publicly available.

  An Occupational Hygienist and a Third Party EPA Approved Contaminated Site Auditor must be engaged to develop, review and monitor the construction phase works to ensure contaminated soil and potential dust emissions do not occur. Air Quality Monitoring sites should be set up at the perimeter and validated by these experts to ensure no pollution and/or public health impacts occur.

  Noise emissions from earthworks and concreting construction activities during the daytime will likely generate noise impacts on the child care centre. The CEMP must outline that the noise impacts during the construction phase will

comply with the Association of Australian Acoustical Consultants has a Technical Guideline - *Child Care Centre Noise Assessment.*

- **Operation Environmental Management Plan**

An **Operation Environmental Management Plan** (OEMP) must be prepared in accordance with the *Department of Infrastructure, Planning and Natural Resources (2004) Guidelines for the Preparation of Environmental Management Plans* and submitted to the relevant authority at least 4 weeks prior to the commencement of operation. The OEMP must be prepared and implemented in accordance with the procedures, safeguards and mitigation measures identified in the EA and in consultation with relevant stakeholders. The OEMP must incorporate a monitoring and review program which contains (but is not limited to):

a) an Operation Noise Management Sub Plan,
b) an Operation Air Quality/Odour Management Sub Plan

The odour assessment criteria must incorporate a cumulative assessment so that the additional odour increase (which may be minimal) does not contribute to the cumulative odour emissions that may adversely impact on the neighbouring community.

The "splitting" of the receiver type for the amenity criterion must be justified to ensure the most conservative receiver type is taken into consideration, the INP notes that a 'worst-case scenario' should be considered when reviewing a noise impact from a likely development.

The approved OEMP must be made publicly available.

- **Environmental Impact Audits**

An **Environmental Impact Audit Report – Construction** must be prepared and submitted to the relevant authority a maximum three months after Construction is complete. The Environmental Impact Audit Report – Construction must:

a) Identify the major environmental controls used during Construction and assess their effectiveness (the assessment of effectiveness should be based on a comparison of actual impacts against performance criteria identified in the CEMP).
b) Identify any innovation in Construction methodology used to improve environmental management, and
c) Discuss the lessons learnt during Construction, including recommendations for future projects.

An **Environmental Impact Audit Report – Operation** must be prepared and submitted to the relevant authority a maximum twelve months after the project begins operation and construction is complete. The Environmental Impact Audit Report – Operation must:

a) Compare the operation impact predictions made in the EA, and any supplementary studies with the actual impacts.

b) Assess the effectiveness of implementation mitigation measures and safeguards.
c) Assess compliance with the systems for operation maintenance and monitoring.
d) Be certified by an independent person at the Proponent's expense.

The Environmental Impact Audit Report – Operation must be made publicly available.

- **24 Hour Contact Number**

The proponent is to provide a 24 hour phone number for members of the public to contact should any complaints/ issues arise relating to impacts from the construction and/ or operation of the site. A record of all complaints/ concerns raised shall be kept in a logbook and detail how such matters were addressed by the proponent.

Environmental Comments (Contamination)

Contamination Issues

The Contamination technical documentation informs Council that the soil and groundwater on the premises was contaminated by asbestos, hydrocarbons (TPH, BTEX and PAH) and metals associated with the activities of James Hardie Industries prior to 1996.

The subject site was subject to an NSW EPA voluntary remediation agreement (VRA) under the Contaminated Land Management Act 1997 and was rehabilitated with a concrete 'cap' to secure the contaminated material. The NSW EPA deemed that the premises posed no significant risk of harm provided all remediation was done in accordance with the Site Management Plan (SMP) developed in 2004.

Penetration of the site seal will occur during the installation of underground services for the RIRP which could expose site occupants and the environment to the identified contamination.

It is imperative that site management plan controls are in place during construction and ongoing maintenance of services for Council to be satisfied that site contamination will pose no risk to workers and the environment during the operation of the RIRP.

Council is not satisfied that the safety of workers, residents, and children of the nearby childcare centre will be protected.

Traffic & Parking Comments

If the development is approved, the proposal must be modified so that:

- the Grand Avenue access to Camellia is highly congested and alternate access to this site from Grand Avenue north at James Ruse Drive should be explored. If this access is used, the road must be upgraded to Council's Satisfaction.

- the disabled parking spaces are to be modified in accordance with the dimensions and configuration as specified in AS 2890.6-2009,

- the width of parking spaces 5 and 10 are widened to a minimum of 2.4m;

- the 'No Stopping' zone on the eastern side of Grand Avenue North by 6m to the south of its existing position to allow simultaneous passing of an HRV and B85 car on this section of Grand Avenue North. All costs associated with the relocation of the appropriate signage are to be paid for by the applicant. The applicant is to apply to Council's Service Manager-Traffic and Transport for the extension of the 'No Stopping' zone at least 3 months prior to the occupation of the building;

- the applicant fund alterations to line marking at the intersection and construction of a concrete island on the north side of Grand Avenue immediately west of Grand Avenue (north). Council will undertake the design of the work and manage the construction. The intention of the work is to set the vehicle holding lines for Grand Avenue (north) further into the intersection, therefore improving sight distance and reducing the effective travel lane width; and

- the applicant undertake an assessment of the exit from Grand Avenue (north) to Grand Avenue in regards the Safe Intersection Sight Distance and Minimum Gap Sight Distance for cars and trucks as set out in Austroads Guide to Road Design Part 4A Unsignalised and Signalised Intersection Section 3. The assessment is to include the proposed improvements to linemarking detailed above. This information is to be provided to Council to determine if any turn bans for traffic turning right from Grand Avenue (north) are to be installed; and

- Any approval should be subject to the following traffic related conditions:

  a) 44 off-street parking spaces (including 2 disabled and 2 motorbike parking spaces) are to be provided, permanently marked on the pavement and used accordingly. The dimensions for parking spaces and aisle width to be in accordance with AS 2890.1-2004 (minimum of 2.4m wide x 5.4m long clear of columns plus 300mm clearance adjacent walls and 6.2m aisle width minimum. At blind aisle, the aisle is to be extended by 1.0m (minimum) beyond the last parking space).

  b) The dimensions and configuration of the disabled parking spaces are to be modified to comply with AS 2890.6-2009 (a dedicated space plus a shared space - 2.4m wide x 5.4m long each with a bollard installed on the shared space).

c) A combined entry and exit driveway off Grand Avenue North as shown on the plan is to be provided and constructed according to AS 2890.1- 2004 and Council's specification.

d) Driveway gradients are to comply with Clause 2.5, Clause 2.6 and Clause 3.3 of AS2890.1-2004.

e) The driveway width (w) at the concrete layback is to comply with Council's Standard Heavy Vehicular Crossing plan (DS9).

f) Traffic facilities to be installed, such as; wheel stops, bollards, kerbs, signposting, pavement markings, lighting and speed humps, shall comply with AS2890.1-2004.

g) The 'No Stopping' zone on the eastern side of Grand Avenue North should be extended by 6m to the south of its existing position to allow simultaneous passing of an HRV and B85 car on this section of Grand Avenue North. All costs associated with the relocation of the appropriate signage are to be paid for by the applicant. The applicant is to apply to Council's Service Manager-Traffic and Transport for the extension of the No Stopping zone at least 3 months prior to the occupation of the building;

h) Occupation of any part of footpath or road at or above (including construction and/or restoration of footpath and/or kerb or gutter) during construction of the development shall require a Road Occupancy Permit from Council. The applicant is to be required to submit an application for a Road Occupancy Permit through Council's Traffic and Transport Services, prior to carrying out the construction/restoration works.

i) Oversize vehicles using local roads require Council's approval. The applicant is to be required to submit an application for an Oversize Vehicle Access Permit through Council's Traffic and Transport Services, prior to driving through local roads within Parramatta LGA.

Catchment Management Comments

Council's flood mapping shows that the subject site is flood prone. Council's Catchment Management provided the following comments:

"...

1. ***Flood Levels & Hydraulic Hazard***

Lower Parramatta River flood levels provided to Bewsher Consulting by Council show the following:

CH 4823 Flood Levels near the upstream boundary of No. 1 Grand Avenue

20 year ARI	*3.92m AHD*
100 year ARI	*4.52m AHD*
PMF	*8.36m AHD*

CH 4987 Flood Levels near the downstream boundary of No. 1 Grand Avenue

20 year ARI	*3.75m AHD*
100 year ARI	*4.33m AHD*
PMF	*7.99m AHD*

The associated flood inundation map shows that the site has a minor area (in the north-west corner) inundated in the 20 year event and a slightly larger area (in the same corner) inundated in the 100 year event. The whole site is inundated in the PMF event.

The hydraulic hazard map shows that the vast majority of the site lies within the Low Hydraulic Hazard zone with only a portion of the north-western corner falling within the High Hydraulic Hazard zone.

2. Review of Cardno December 2010 Flood Study report

The report states that the area subject to development is capped with a concrete slab whose surface level is approximately 5.3m AHD. It also states that an area west of the project site (and which appears to include that portion of No. 1 Grand Avenue which falls within the High Hydraulic Hazard zone) will not be used for the proposed development.

2.1 Assessment of Flood Risk Precinct

The report deduces that the project site is located within a Low Flood Risk Precinct. While it is true that the project site is above the 100 year floodplain and lies within a Low Hydraulic Hazard area, the report has not examined other floodplain development matters including the safety of individuals, such as flood warning, flood time evacuation, etc. in order to justify its adoption of a Low Flood Risk Precinct (as is required in Section L5 of the 2005 NSW Floodplain Development Manual).

However we note that Figure 7-2 of the 2005 Lower Parramatta River Floodplain Risk Management Study report defines the project site as being within the Low Flood Risk precinct. Therefore the Cardno determination is consistent with that report.

2.2 Assessment of Land Use Category

Commercial or Industrial

The report describes the project as a resource recovery facility and hence concludes that it falls under the draft DCP definition of "Materials recycling or recovery centres". They therefore adopt the land use type as being

"Commercial or Industrial". However it is unclear to us as to whether in fact the project should rather fall under the category of "Critical Utilities and Uses" since it appears to include food and green waste processing facilities. This distinction is important since – as dealt with below - there are additional Planning and Development Controls within Council's Floodplain Matrix which would apply to a proposed "Critical Utilities and Uses" project.

But for one exception, we concur (on their assumed basis that it should be treated as a Commercial or Industrial land use) with the Cardno floodplain development assessment of the project. The exception relates to their deduction that the project will have nil effect on the PMF event since "the extent of cross sections used to assess the PMF levels do not extend into the area to be developed" and in that extension area the site area has been assumed "to be hydraulically ineffective". It is our contention that since the depth of calculated PMF flood water is about three metres throughout the project site it is a flood modelling error not to have extended the cross sections further rather than any suggestion that the area beyond the cross section limits is not hydraulically effective. Nonetheless we would anticipate that the local area PMF flood levels would drop substantially if the cross sections were to be extended and hence the potential impact of the project on extreme flood events would be likely to be reduced.

Alternative Critical Utilities and Uses

Under this land use category there would need to be consideration of an additional eight development controls under Council's Floodplain Matrix. They are:

(i) *Floor Level Item 3 which requires all floor levels to be equal to or greater than the PMF level plus freeboard. (Comment: However it is noted that this requirement is more likely related to flood time impacts associated with proposed "public utility undertakings" which also fall within the Critical Utilities and Uses category.)*

(ii) *Building Components Item 2 which requires all structures to have flood compatible building components below the PMF;*

(iii) *Structural Soundness Item 2 which requires certification that the structure can withstand all the flood-related forces up to and including a PMF level. (Comment: It might also be considered that this requirement is more related to the flood time impacts on "public utility undertakings" which also fall within the Critical Utilities and Uses category. However for this site there would appear to be the possibility that the proposed Main Building may need to also serve as a flood evacuation centre for the project and in that scenario it would be essential for the building to withstand the worst possible – i.e. PMF - flood forces.);*

(iv) *Evacuation Item 2 requires access for pedestrians and vehicles to a publicly accessible location during the PMF flood. (Comment: As noted in Section 3.1 in this memo there are "island" impacts for the Camellia peninsula at the peak of the 100 year event. We have sighted mapping of the PMF event (reference Figure 7-2 in this*

memo's Section 3.1) and it shows that essentially the whole of the Camellia peninsula is inundated in the PMF flood level and therefore the potential for finding a local "accessible location" would appear to be unlikely.);

(v) *Evacuation Item 6 requires adequate flood warning to achieve evacuation without increased reliance on SES, etc. (Comment: As already identified in this memo (reference Section 3.1) the local area which includes the project site becomes "an island" at the peak of the 100 year flood. It follows that issues related to flood warning – and the potential/likely need to evacuate all on-site persons out of that "island" before the floodwaters continue to rise – may be significant for the project.);*

(vi) *Management and Design Item 2 relates to a flood plan being prepared for a 100 year flood affected site. (Comment: This item is not relevant to this project site since it sits above the 100 year flood level.);*

(vii) *Management and Design Item 3 relates to capacity to store goods above the 100 year plus freeboard level. (Comment: Given the significant freeboard that is available relative to the existing slab/surface level at the project site, it is evident that this item can be readily satisfied.);*

(viii) *Management and Design Item 4 relates to no storage of materials below the 100 year level. (Comment: Given that the existing slab/surface level is well above the 100 year flood level at the project site, it is evident that this item can be readily satisfied.)*

2.3 Concluding Flood Study Comments

Although the applicant has undertaken an assessment against Council's floodplain risk management policy, it is unclear to us whether the correct land use type has been adopted for that assessment.

3. Conclusions

Since the Director General's requirements (DGR) dated 5 August 2010 do not detail the expected treatment of the project's "potential flooding impacts", it is unclear how the Cardno flood assessment might be deemed to have addressed that particular requirement.

Although the applicant has undertaken an assessment against Council's floodplain risk management policy, it is unclear to us whether the correct land use type has been adopted. Should the project be assessed under "Commercial and Industrial" land use or under "Critical Utilities and Uses" within Council's floodplain risk management policy?

It is our consideration that ONLY on the basis of adopting "Commercial and Industrial" land use would the applicant NOT (as per Council's floodplain policy) be required to evaluate and report further on flood warning and flood evacuation issues for the project. Under this scenario – which was adopted by Cardno in their December 2010 project site report - we consider that the

Cardno report has satisfactorily addressed all the Planning and Development controls within Council's Floodplain Matrix (and in so doing has satisfactorily addressed the requirements of Council's Floodplain Risk Management Policy)."

The applicant has not undertaken an assessment against correct land use type as defined in Council's floodplain risk management policy. The land use falls under the definition of "Critical Utilities and Uses". As such, the applicant must undertake another assessment against Council's floodplain risk management policy using the correct land use, i.e. "Critical Utilities and Uses". Following this, the report should be forwarded back to Council for further comment.

Stormwater Engineering Comments

Stormwater Disposal

During a site visit, Council's Development Engineer observed a box-culvert (size 1.0m2) for stormwater work done recently last year, crossing through the site towards the river at the northern part of the site not affected by the proposed development.

The connection point at the other end of the stormwater work could not be located due to the presence of many freight containers.

It is noted that the plans show a proposed dotted line easement to drain water 1.5m wide connecting into existing drainage channel, which is the channel observed on site.

To ensure appropriate drainage infrastructure is provided onsite if the application is approved, various conditions have been included in Appendix A.

Conclusion

Parramatta City Council objects to the proposed development. The following issues must be addressed in accordance with the abovementioned comments:

- Improved treatment of and increased landscaping within the 30m Environmental Protection Zone (EPZ)
- The applicant should investigate and implement appropriate measures, minimizing the impacts of erosion on the riverbank on the northern boundary of the site.
- The site affected by the proposal is adjacent other heritage items, and its use may have impact on these heritage items, just like its construction.
- Known Aboriginal sensitivity and archaeological potential of the affected grounds is to be considered.
- Appropriate management and auditing of the site during construction, particularly in terms of air quality, odour, noise and site contamination.
- Appropriate management and auditing of the site during operation, particularly in terms of air quality, odour, noise and site contamination.

- The structural integrity and suitability of the concrete surface "cap" for the proposed use.
- Further work should be undertaken in relation to managing GHG emissions generated from processes on site, including investigating options for converting waste to energy from the composting process.
- A 24 hour phone number for members of the public to contact should be provided, should any complaints/ issues arise relating to impacts from the construction and/ or operation of the site. A record of all complaints/ concerns raised shall be kept in a logbook and detail how such matters were addressed by the proponent.
- Access from Grand Avenue is not appropriate and should be from Grand Avenue North, with a left in/left out arrangement from James Ruse Drive.
- The disabled parking spaces are to be modified in accordance with the dimensions and configuration as specified in AS 2890.6-2009,
- The width of parking spaces 5 and 10 are to be widened to a minimum of 2.4m;
- The 'No Stopping' zone on the eastern side of Grand Avenue North by 6m to the south of its existing position to allow simultaneous passing of an HRV and B85 car on this section of Grand Avenue North.
- Documented consumer engagement plan and mechanisms to keep the local resident and business community informed of progress of the development.
- Implementation of a Heavy vehicle driver orientation program – to cover the site and surrounding area, potential risk areas (eg childcare, Aldi, railway) and risk times (eg event days, commuter times am/ pm etc)
- Documented emergency and evacuation procedures for the business and surrounding area. This information would need to be communicated to the surrounding businesses/ Tilrox building tenants to ensure that everyone is aware of the safety and evacuation procedures and measures that are in place. Documented mechanisms for ongoing updating also need to be identified.
- Completion of pathway upgrades and vegetation clearance (as sited in the RTA report) to support safer pedestrian travel and better amenity for all stakeholders in the immediate and surrounding area.
- That a safe and sympathetically landscaped pedestrian pathway be created between Camellia Railway Station and the proposed site entrance. This should include traffic calming devices at the entrance to the site and the road junction. The image below represents the kind of sympathetic treatment being proposed.
- That two landscaped recreational eating spaces be created for staff that include a table, benches and trees.
- Council's long term vision to have public access along both sides of the river as a shared use pathway should also be kept in mind.
- The applicant must undertake another assessment against Council's floodplain risk management policy using the correct land use, ie "Critical Utilities and Uses". Following this, the report should be forwarded back to Council for further comment.

- Alterations to line marking at the intersection and construction of a concrete island on the north side of Grand Avenue immediately west of Grand Avenue (north).
- The applicant must undertake an assessment and alterations to the exit from Grand Avenue (north) to Grand Avenue to the satisfaction of Council's Traffic Services Unit.

Parramatta City Council reiterates its view that the proposed development is incompatible with the future vision for the Camellia Peninsula and urges the Department to refuse the application.

In addition to the above issues being addressed, if the proposed development were to be recommended for approval, the conditions in Appendix A (but not limited to) should be included within any determination notice issued.

Should you wish to discuss any of the above matters, please contact Council's Development Assessment Officer, David Little on 9806 5481.

Yours sincerely

Dr. Robert Lang
Chief Executive Officer
Parramatta City Council

APPENDIX A

1. Trees to be removed are:

Tree No	Name	Common Name	Location
1 x	*Eucalyptus amplifolia*	Cabbage Gum	Front entrance
1 x	*Jacaranda mimosifolia*	Jacaranda	Front entrance

Reason: To allow appropriate development of the site.

2. All approved tree removals shall be carried out by a qualified Arborist and conform to the provisions of AS4373-2007, Australian standards for Pruning Amenity Trees and Tree work draft code of practice 2007. The developer is responsible for all tree removal and stump grinding.
   Reason: To ensure works are carried out in accordance with Tree work draft Code of practice 2007.

3. All trees supplied above a 25 L container size for the site must be grown and planted in accordance with *Clarke, R 1996 Purchasing Landscape Trees: A guide to assessing tree quality. Natspec Guide No.2.* Certification that trees have been grown to Natspec guidelines is to be provided upon request of Council's Tree Management Officer. **NOTE**: All tree planting shall be located a minimum of two (2) metres to any boundary or underground services and shall have a minimum container size of 25 litres.
   Reason: To minimise plant failure rate and ensure quality of stock utilised

4. All trees planted within the site must have an adequate root volume to physically and biologically support the tree. No tree within the site shall be staked or supported at the time of planting.
   Reason: To ensure the trees are planted within the site area able to reach their required potential.

5. An AQF Level 5 arborist report is required that will identify all trees located within the subject site and all affected trees located on the adjoining properties. The report must evaluate all trees proposed to be retained and removed throughout the development process. The arborist report must provide details of:

   - A plan at 1:100 or 1:200 scale showing the location of all trees located within the subject site and all affected trees located on the adjoining properties (tree survey);
   - The plan must show the existing ground levels at the base of each tree, the actual canopy spread to scale, the location of and DBH (diameter at breast height) of the trunk of the tree and a tree number;
   - The plan must show tree retention values, tree protection zones and recommended developable area given constraints imposed by trees;
   - A schedule showing all the trees information such as botanical/common names, age, dimensions inclusive of height, canopy spread and DBH (trunk diameter at breast height), the health, structure condition and provide recommendations in relation to retention values;

- Address likely impacts of the proposed development on trees to be retained and provide recommendations of any construction mitigation measures that will minimise the impact; and
- Detail the methodology that has been used to evaluate the health and condition of the trees; determine retention values and determine tree protection zones.

Where retained trees have a development setback and tree protection zone established, a recommended tree protection specification and diagram should be provided. All site plans are to be amended to indicate the tree protection zone requirements as set forth in the arborist report along with any other note requirements that the arborist deems necessary to ensure the long term health and retention of the trees. **NOTE**: Comments and recommendations provided within the arborist report should reflect the Australian Standard AS4970 – *'Protection of Trees on Development Sites'.*

6. The trees identified on the endorsed plans shall be protected prior to and throughout the demolition/construction process in accordance with the specifications contained within the Arborist Report.
Reason: To ensure the protection of the tree(s) to be retained on the site.

7. A Tree Protection Zone (TPZ) is to be established prior to any works commencing around those trees that are to be retained. The area is to be enclosed with protective fencing consisting of 1.8m high fully supported chain-wire link or welded mesh fence. The area enclosed shall be a designated a "No-Go Zone" and is required to be kept weed and grass free for the entire duration of works. "Tree Protection Zone' signage is to be attached to protective fencing; this must include the name and contact details of the site Arborist.
Reason: To protect the trees to be retained on the site during construction works.

8. Prior to works commencing, tree protection signage shall be attached to each tree protection zone, displayed in a prominent position and the sign repeated where the fence changes direction, Each sign shall contain in a clearly legible form, the following information:
(a) That the tree protection zone is a No Go Zone
(b) This fence has been installed to prevent damage to the trees and their growing environment both above and below ground and access is restricted
(c) The name, address, and telephone number of the developer and site Arborist.
Reason: To protect existing trees during the construction phase.

9. The consent from Council is to be obtained prior to any removal or pruning works being undertaken on any tree, including tree/s located in adjoining properties. Pruning works that are to be undertaken must be carried out by a certified AQF Level 3 Arborist. This includes the pruning of any roots that are 30mm in diameter or larger.
Reason: To ensure the protection of the tree(s) to be retained.

10. No materials (including waste and soil), equipment, structures or good of any type shall be stored, kept or placed within five (5) metres from the trunk or within the drip line of any tree.
Reason: To ensure the protection of the tree(s) to be retained on the site.

11. All excavation within three (3) metres from the tree/s identified to be retained on site is to be supervised by an AQF Level 3 arborist, who shall undertake any remedial work, including the pruning of roots, if necessary.
Reason: To provided adequate protection of trees

12. No service, structure, conduit or the like shall be fixed or, attached to any tree.
Reason: To ensure the protection of the tree(s).

13. The Certifying Authority shall arrange for a qualified Landscape Architect/Designer to inspect the completed landscape works to certify adherence to the DA conditions and Construction Certificate drawings. All landscape works are to be fully completed prior to the issue of an Occupation Certificate.
Reason: To ensure restoration of environmental amenity.

14. The landscaping shall be completed in accordance with the consent and approved plans, prior to occupation or use of the premises and shall be maintained at all times.
Reason: To ensure landscaping is completed in accordance with the approved plans and maintained.

PD08 Hours of work and noise

15. All work including building, demolition and excavation work; and activities in the vicinity of the site generating noise associated with preparation for the commencement of work (eg. loading and unloading of goods, transferring tools etc) in connection with the proposed development must only be carried out between the hours of 7.00am and 5.00pm on Monday to Fridays inclusive, and 8.00am to 5.00pm on Saturday. No work is to be carried out on Sunday or public holidays.

Note – Council may allow extended work hours for properties located on land affected by Parramatta City Centre LEP 2007 in limited circumstances and upon written application and approval being given by Parramatta City Council at least 30 days in advance.

Such circumstances where extended hours may be permitted include:

- Delivery of cranes required to the site outside of normal business hours;
- Site is not located in close proximity to residential use or sensitive land uses;
- Internal fit out work.

Reason: To protect the amenity of the area.

Section 94A Contribution

16. A monetary contribution comprising **1% of the value of the proposed works** is payable to Parramatta City Council pursuant to Section 94A of the *Environmental Planning and Assessment Act, 1979* and the *Parramatta Section 94A Development Contributions Plan*. Payment must be by cash, EFTPOS, bank cheque or credit card only. The contribution is to be paid to Council prior to the issue of a **construction certificate**. At the time of payment, the contribution levy will be indexed quarterly in accordance with movements in the Consumer Price Index (All Groups Index) for Sydney issued by the Australian Statistician.

    Parramatta Section 94A Development Contributions Plan (Amendment No. 1) can be viewed on Council's website at:
    http://www.parracity.nsw.gov.au/build/forms_and_planning_controls/developer_contributions

17. Drainage Stormwater Plan:
    A qualified practicing drainage engineer shall prepare a detailed stormwater plan considering the use of a filtration system that should include rainwater tanks collecting the roof water downpipes only as a retention system which will incorporates a first flush system. The ground surface runoff should be collected and pass through an oil interceptor, a gross pollutant trap followed by a Highly Effective Pollutant Removal stormwater filtration system such as 'StormFilter' (product of 'Stormwater 360') or equivalent. A design certificate should be prepared together with a copy of Music Model prior to the commencement of works.

18. All stormwater filtration system is to be considered with minimum disturbance to the underground layer due to the particular conditions of the site.

19. A Construction and Traffic Management Plan:
    Prior to the commencement of any works on the site the applicant must ensure that a Construction and Traffic Management Plan has been prepared. The following matters must be specifically addressed in the Plan:

    (a) Construction Management Plan for the Site
        A plan view of the entire site and frontage roadways indicating:

        i. Dedicated construction site entrances and exits, controlled by a certified traffic controller, to safely manage pedestrians and construction related vehicles in the frontage roadways,
        i. Turning areas within the site for construction and spoil removal vehicles, allowing a forward egress for all construction vehicles on the site,
        i. The locations of proposed Work Zones in the egress frontage roadways,
        i. Location of any proposed crane standing areas,
        i. A dedicated unloading and loading point within the site for all construction vehicles, plant and deliveries,
        i. Material, plant and spoil bin storage areas within the site, where all materials are to be dropped off and collected,

i. The provisions of an on-site parking area for employees, tradesperson and construction vehicles as far as possible.

(b) Traffic Control Plan(s) for the site:

- All traffic control devices installed in the road reserve shall be in accordance with the Roads and Traffic Authority, NSW (RTA) publication *'Traffic Control Worksite Manual'* and be designed by a person licensed to do so (minimum RTA 'red card' qualification). The main stages of the development requiring specific construction management measures are to be identified and specific traffic control measures identified for each,
- Approval shall be obtained from Parramatta City Council for any temporary road closures or crane use from public property.
- A detailed description and route map of the proposed route for vehicles involved in spoil removal, material delivery and machine floatage must be provided and a copy of this route is to be made available to all contractors.
- Where applicable, the plan must address the following:
- Evidence of RMS (previously) RTA concurrence where construction access is provided directly or within 20 m of an Arterial Road,
- A schedule of site inductions shall be held on regular occasions and as determined necessary to ensure all new employees are aware of the construction management obligations.
- Minimising construction related traffic movements during school peak periods,

The Construction and Traffic Management Plan shall be prepared by a suitably qualified and experienced traffic consultant and be certified by this person as being in accordance with the requirements of the abovementioned documents and the requirements of this condition.

Reason: To ensure that appropriate measures have been considered during all phases of the construction process in a manner that maintains the environmental amenity and ensures the ongoing safety and protection of people.

20. A work-as-executed plan is required to be prepared:
Works-As-Executed stormwater plans shall be prepared prior to the issue of the Occupation Certificate, certifying that the stormwater drainage system has been constructed and completed in accordance with the approved stormwater plans. The person issuing the Occupation Certificate shall ensure that the following documentation is completed and submitted:

- The Work-As-Executed plans are prepared on the copies of the approved drainage plans and variations are marked in red ink.

- The Work-As-Executed plans have been prepared by a registered surveyor certifying the accuracy of dimensions, levels, storage volumes, etc.
- The original Work-As-Executed plans and all documents mentioned above have been submitted to Council's Development Services Unit.

Reason: To ensure works comply with approved plans and adequate information are available for Council to update the Upper

21. Inter-allotment easement to drain the water by gravity to the river:
A inter-allotment drainage easement shall be created over the burdened Lot in favour of the benefitting Lot in order to drain the stormwater system by gravity. Proof of registration of the drainage easement with the NSW Department of Lands, must be provided to the Council prior to the issue of the Subdivision Certificate.
Reason: To ensure an appropriate easement is in place.

22. **Construction Environmental Management Plan**

A **Construction Environmental Management Plan** (CEMP) must be prepared in accordance with the *Department of Infrastructure, Planning and Natural Resources (2004) Guidelines for the Preparation of Environmental Management Plans* and submitted to the relevant authorities at least 4 weeks prior to the commencement of construction.

The CEMP must be prepared and implemented in accordance with the procedures, safeguards and mitigation measures identified in the EA and in consultation with relevant stakeholders.

The CEMP must contain all the Construction Sub Plans, including:
a) Construction Noise and Vibration Management Sub Plan,
b) Construction Contaminated Land Management Sub Plan (to further assess the extent of asbestos and ensure the ash layer will not be disturbed during construction in addition to any relevant Remedial Action Plan),
c) Construction Soil and Water Management Sub Plan.

The approved CEMP must be made publicly available.

An Occupational Hygienist and a Third Party EPA Approved Contaminated Site Auditor must be engaged to develop, review and monitor the construction phase works to ensure contaminated soil and potential dust emissions do not occur. Air Quality Monitoring sites should be set up at the perimeter and validated by these experts to ensure no pollution and/or public health impacts occur.

Noise emissions from earthworks and concreting construction activities during the daytime will likely generate noise impacts on the child care centre. The CEMP must outline that the noise impacts during the construction phase will comply with the Association of Australian Acoustical Consultants has a Technical Guideline - *Child Care Centre Noise Assessment.*

23. **Operation Environmental Management Plan**

An **Operation Environmental Management Plan** (OEMP) must be prepared in accordance with the *Department of Infrastructure, Planning and Natural Resources (2004) Guidelines for the Preparation of Environmental Management Plans* and submitted to the relevant authority at least 4 weeks prior to the commencement of operation. The OEMP must be prepared and implemented in accordance with the procedures, safeguards and mitigation measures identified in the EA and in consultation with relevant stakeholders. The OEMP must incorporate a monitoring and review program which contains (but is not limited to):

c) an Operation Noise Management Sub Plan,
d) an Operation Air Quality/Odour Management Sub Plan

The odour assessment criteria must incorporate a cumulative assessment so that the additional odour increase (which may be minimal) does not contribute to the cumulative odour emissions that may adversely impact on the neighbouring community.

The "splitting" of the receiver type for the amenity criterion must be justified to ensure the most conservative receiver type is taken into consideration, the INP notes that a 'worst-case scenario' should be considered when reviewing a noise impact from a likely development.

The approved OEMP must be made publicly available.

24. **Environmental Impact Audits**

An **Environmental Impact Audit Report – Construction** must be prepared and submitted to the relevant authority a maximum three months after Construction is complete. The Environmental Impact Audit Report – Construction must:

d) Identify the major environmental controls used during Construction and assess their effectiveness (the assessment of effectiveness should be based on a comparison of actual impacts against performance criteria identified in the CEMP).
e) Identify any innovation in Construction methodology used to improve environmental management, and
f) Discuss the lessons learnt during Construction, including recommendations for future projects.

An **Environmental Impact Audit Report – Operation** must be prepared and submitted to the relevant authority a maximum twelve months after the project begins operation and construction is complete. The Environmental Impact Audit Report – Operation must:

a) Compare the operation impact predictions made in the EA, and any supplementary studies with the actual impacts.

b) Assess the effectiveness of implementation mitigation measures and safeguards.
c) Assess compliance with the systems for operation maintenance and monitoring.
d) Be certified by an independent person at the Proponent's expense.

The Environmental Impact Audit Report – Operation must be made publicly available.

25. The proponent is to provide a 24 hour phone number for members of the public to contact should any complaints/ issues arise relating to impacts from the construction and/ or operation of the site. A record of all complaints/ concerns raised shall be kept in a logbook and detail how such matters were addressed by the proponent.

26. The proponent shall implement the Site Management Plan (SMP) – Eastern Portion Former James Hardie Site Grand Avenue Camellia (dated 17 March 2004) NSW EPA (ref no. 26012) during the construction and ongoing operation of the REMONDIS Integrated Recycling Park (RIRP). A copy of the Site Management Plan shall be submitted to the Principal Certifying Authority and Council prior to issue of the Construction Certificate.
Reason: To ensure compliance with site management plan during the construction and ongoing operations of REMONDIS Integrated Recycling Park.

27. All fill imported on to the site must be VENM and shall be certified as such by a suitably qualified industry professional. Fill imported on to the site shall also be compatible with the existing soil characteristic for site drainage purposes.

All fill imported onto the site must be certified and validated and copies of the validation report submitted to the Principal Certifying Authority and Council prior to the issue of the Occupation Certificate.
Reason: To ensure imported fill is of an acceptable standard.

28. Any new information which comes to light during construction works which has the potential to alter previous conclusions about site contamination shall be notified to the Principal Certifying Authority and Council immediately.
Reason: To ensure that the land is suitable for its proposed use and poses no risk to the environment and human health

29. Any contamination material to be removed from the site shall be disposed of to an NSW EPA licensed landfill.
Reason: To comply with the statutory requirements of the Protection of the Environment Operations Act 1997

30. Council must be notified immediately of any pollution incident where material harm to the environment is caused or threatened during the construction and operations of REMONDIS Integrated Recycling Park. This duty extends to persons carrying on an activity, employers and employees, contractors and the occupier of the premises where the incident occurs.

Reason: To comply with the requirements of the Protection of the Environment Operations Act 1997.

31. A structural engineer's report shall be submitted to the Principle Certifying Authority certifying that the structural stability of the concrete surface is appropriate for the proposed use. A copy of the report shall be provided to Council. Should the concrete surface be considered unsuitable, then the necessary works recommended by the engineer's report shall be implemented. The implementation of any further works may be subject to a Modification to the consent under the Environmental Planning & Assessment Act 1979.
Reason: To ensure that the site is suitable for the proposed use and that the use of the site does not expose contaminated soil.

32. 44 off-street parking spaces (including 2 disabled and 2 motorbike parking spaces) are to be provided, permanently marked on the pavement and used accordingly. The dimensions for parking spaces and aisle width to be in accordance with AS 2890.1-2004 (minimum of 2.4m wide x 5.4m long clear of columns plus 300mm clearance adjacent walls and 6.2m aisle width minimum. At blind aisle, the aisle is to be extended by 1.0m (minimum) beyond the last parking space).

33. The dimensions and configuration of the disabled parking spaces are to be modified to comply with AS 2890.6-2009 (a dedicated space plus a shared space - 2.4m wide x 5.4m long each with a bollard installed on the shared space).

34. A combined entry and exit driveway off Grand Avenue North as shown on the plan is to be provided and constructed according to AS 2890.1- 2004 and Council's specification.

35. Driveway gradients are to comply with Clause 2.5, Clause 2.6 and Clause 3.3 of AS2890.1-2004.

36. The driveway width (w) at the concrete layback is to comply with Council's Standard Heavy Vehicular Crossing plan (DS9).

37. Traffic facilities to be installed, such as; wheel stops, bollards, kerbs, signposting, pavement markings, lighting and speed humps, shall comply with AS2890.1-2004.

38. The 'No Stopping' zone on the eastern side of Grand Avenue North by 6m to the south of its existing position to allow simultaneous passing of an HRV and B85 car on this section of Grand Avenue North. All costs associated with the relocation of the appropriate signage are to be paid for by the applicant. The applicant is to apply to Council's Service Manager-Traffic and Transport for the extension of the No Stopping zone at least 3 months prior to the occupation of the building;

39. Occupation of any part of footpath or road at or above (including construction and/or restoration of footpath and/or kerb or gutter) during construction of the development shall require a Road Occupancy Permit from Council. The applicant is to be required to submit an application for a Road Occupancy Permit through Council's Traffic and Transport Services, prior to carrying out the construction/restoration works.

40. Oversize vehicles using local roads require Council's approval. The applicant is to be required to submit an application for an Oversize Vehicle Access Permit through Council's Traffic and Transport Services, prior to driving through local roads within Parramatta LGA.

41. Alterations to line marking at the intersection and construction of a concrete island on the north side of Grand Avenue immediately west of Grand Avenue (north) shall be funded by the owner of the site. Council will undertake the design of the work and manage the construction of this work.

42. An assessment of the exit from Grand Avenue (north) to Grand Avenue in regards the Safe Intersection Sight Distance and Minimum Gap Sight Distance for cars and trucks as set out in Austroads Guide to Road Design Part 4A Unsignalised and Signalised Intersection Section 3 shall be undertaken. The assessment is to include the proposed improvements to linemarking detailed in the above condition. This information is to be provided to and approved by Council to determine if any turn bans for traffic turning right from Grand Avenue (north) are to be installed.