SMART
PLANNING & DESIGN

Environmental Impact Statement

8 Noonan Road, Ingleburn

Prepared On behalf of Shine Motor Corporation Pty Ltd

P0176/21 | April 2023

Contents

Document Control

Date Prepared		Version	Author	Reviewed
17 April 2023		Version 1	Harry John	Vivian Liu

1.0 Executive Summary

Address

8 Noonan Rd,
Ingleburn NSW 2565

Applicant

Smart Planning and Design
'Creative Cubes'
333 Drummond Street,
Carlton VIC 3053

Operator

Hussain Mohammed - Shine Motor Corporation Pty Ltd

Proposal

The proposal seeks to change the use at 8 Noonan Road, Ingleburn from a Motor Vehicle Repair Station and associated Truck Wash to a Waste Management Facility (Resource Recovery Facility) that use the existing warehouse for scrap metal yard. The change of use proposes no demolition or construction works, with the existing office and industrial building on the site to be retained. The proposal is considered appropriate and is considered consistent with the broader State and Local Planning Policy Frameworks of Campbelltown City Council.

Supporting Documents

1. Planning Secretary's Environmental Assessment Requirements (SEAR) dated 14/01/2022.
2. Contour and Detail Survey Plan prepared by Burton and Field dated 29/03/2019.
3. Architectural Plans prepared by Smith and Tracey Architects dated 06/10/2022.
4. Air Quality Amenity Assessment by SLR Consulting Australia dated 28/06/2022.
5. Fire Safety Report by Warrington Fire dated 25/08/2022.
6. Hazardous Materials Management Register by JMB Environmental Consulting dated 09/05/2022.
7. Noise Impact Assessment by Octave Acoustics dated 25/05/2022.
8. Stormwater Assessment by SLR Consulting Australia dated 28/09/2022.
9. Traffic Impact Assessment Report by Quantum Traffic dated 05/09/2022.
10. Visual Impact Assessment by Urbaine Design Group dated 29/07/2022.
11. Waste Management Plan by Quantum Traffic dated 05/09/2022.

2.0 Background Information

This report responds to the requirements of the Planning Secretary's Environmental Assessment Requirements (SEAR) and Campbelltown Council Development Plan, which requires an Environmental Impact Statement (EIS) to form part of a Planning Permit Application.

A Pre- Lodgement meeting has been held with the Responsible Authority and are outlined in Table 1 below.

Table 1: Pre-Lodgement Meeting

Authority	Officer	Date
Campbelltown City Council	Rana Hadid - Coordinator of Urban Renewal Team at Campbelltown City Council. Michelle Penna – Urban Planner at Campbelltown City Council.	08 February 2023

Details of comments from the Planning Officer during the meetings are provided below:

- There are no formal processes or procedures for conducting a community consultation before lodging a planning application. Council suggested advertising the application in the local newspaper or approaching the local library to put information on a community board or sending letters to the adjoining owners/operators within 100 metres of the development site. Identify community issues as early as possible and document the issues and how they are addressed on the EIS report. Please refer to Community Participation Plan as a general guide. Once the DA application is lodged, the Council will advertise the application as a standard practice.
- The Council has raised concerns over the car parking arrangement of the site. This includes insufficient car parking spaces proposed at the front, issues with widths and lengths, and turning circles for trucks and other vehicles entering and exiting the site. In particular, the Council requires 6 metres in length for car parks. The Council suggest providing adequate justifications for not meeting this requirement. The proposed car parking should comply with the Australian Standards.
- The Council raised concerns about the usage of the on-site existing stormwater system.

The EIS and external reports associated with this application have responded to the above comments.

3.0 Site Context

3.1 Overview

Address	8 Noonan Road, Ingleburn
LGA	Campbelltown Council
Lot	Lot 25 DP 809258
Size	2,765m2
Zone	IN1 – General Industrial
Max height	19m

4.0 Location

4.1 Regional

The subject site is located in 8 Noonan Road, Ingleburn, approximately 44 kilometres southwest from Sydney City Centre (Figure 1).

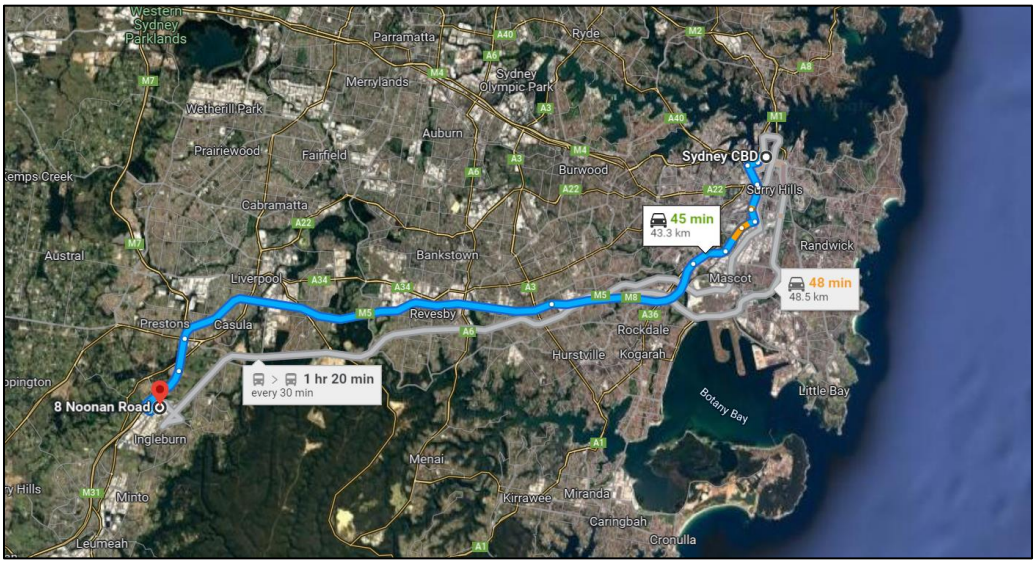

Figure 1: Proximity to Sydney City Centre (Source: Google Maps)

4.2 Local

The subject site is located on the south side of Noonan Road. The site is approximately 200m from Noonan Road and Lockwood Road intersection. The site is zoned as IN1 – General Industrial and is surrounded by similar land uses to the northeast, northwest and southwest. Bunbury Curran Creek adjoins the site to the southeast. The subject land is in a large general industrial area to the north of Ingleburn, half a kilometre from the Hume Motorway (M31), located at the end of Noonan Road which is on the eastern side of Williamson Road at 116m from the junction. The predominant development within the neighbourhood comprises of warehouses and storage facilities.

Figure 2: Location of the site (Source: Google Maps)

5.0 Site Conditions

5.1 Existing Development

The site is mostly rectangular, with a narrowing point joining the road to the north. The subject site currently contains a brick/rendered warehouse with a crossover located at Noonan Road, providing vehicle access to the property. The subject site features one canopy tree along the front of the site and another canopy tree on the nature strip.

The subject site currently operates as a scrap metal yard, with office and industrial buildings located along the northwest boundary of the site and all vehicle access via an existing concrete driveway (of approximately 8.0m width) to the cul-de-sac of Noonan Road.

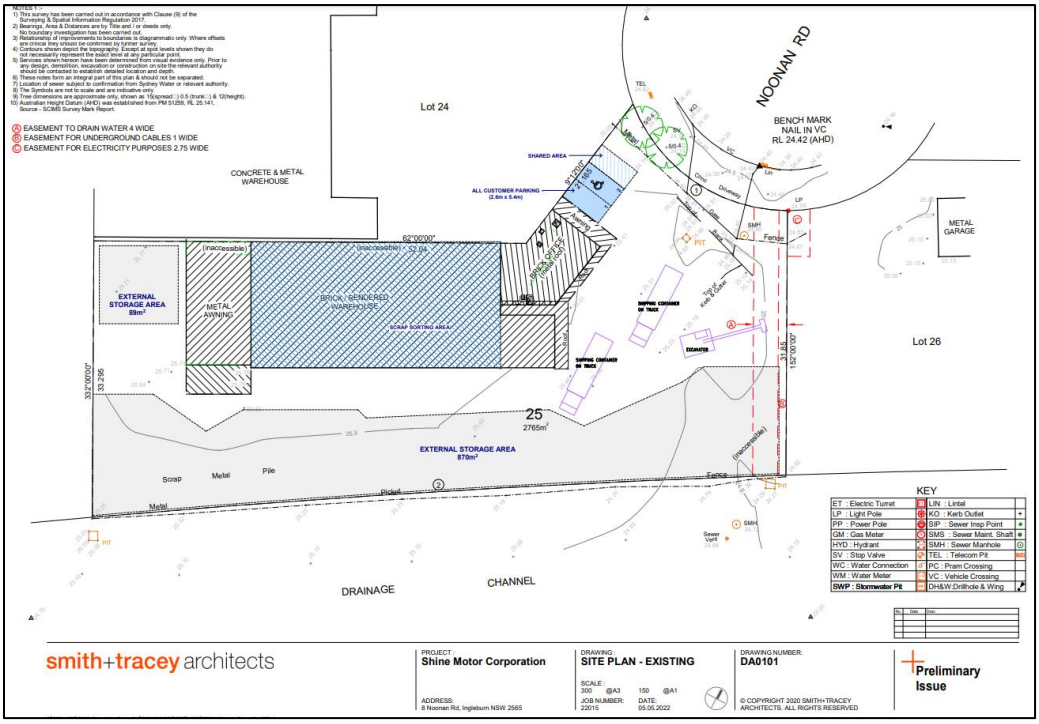

Figure 3: Existing Site Plan (Source: Architectural Plans)

The site currently contains an existing industrial building. On site, there are currently:

- Ground floor
  - Industrial Workspace including two container rooms – 430.87m^2.
  - Admin A including Storage, Kitchen, Bathroom, Entry/Lobby, Reception and Office/Conference rooms – 79.42m^2.
  - Admin B Office and Storage – 37.18m^2.
  - Mechanical – 78.5m^2.
  - Compressors and Pumps – 18.59m^2.
  - Storage Area 11.84m^2.
- Mezzanine Level
  - Two container rooms and platform – 38.56m^2.
  - Office 37.18m^2.

The total industrial space is 578.36m^2.

539.80m^2 on the Ground Floor.
38.56m^2 on the Mezzanine Level.
The total administration space is 153.78m^2.
116.60m^2 on the Ground Floor.
37.18m^2 on the Mezzanine Level.

There are currently 2 on-site customer car parks including 1 disabled parking space to the north-east corner of the site.

5.2 Orientation and Topography

The subject site is orientated in a southwest direction, fronting Noonan Road. The land can be described as flat, with very minimal rise or fall in any direction.

5.3 Hydrology

The site is bordered by Bunbury Curran Creek to the south.

6.0 Proposal

Smart Planning and Design have been engaged by Shine Motors to prepare and submit a planning application for 8 Noonan Road, Ingleburn. We are seeking to change the use from a Motor Vehicle Repair Station and associated Truck Wash to a Waste Management Facility (Resource Recovery Facility) that use the existing warehouse for scrap metal yard. This would include activities such as recycling of vehicles, and export of scrap metals and spare parts. The development proposes no demolition or construction works, with the existing office and industrial building on the site to be retained, as shown at Figure 4 below.

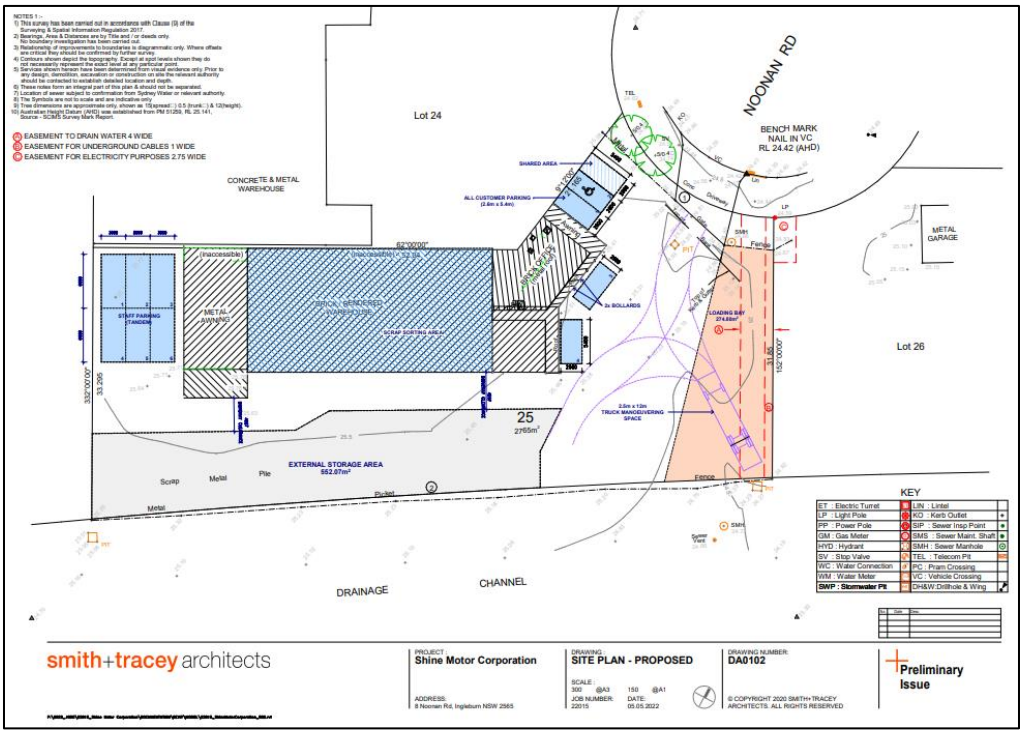

Figure 4: Proposed Development (Source: Architectural Plans).

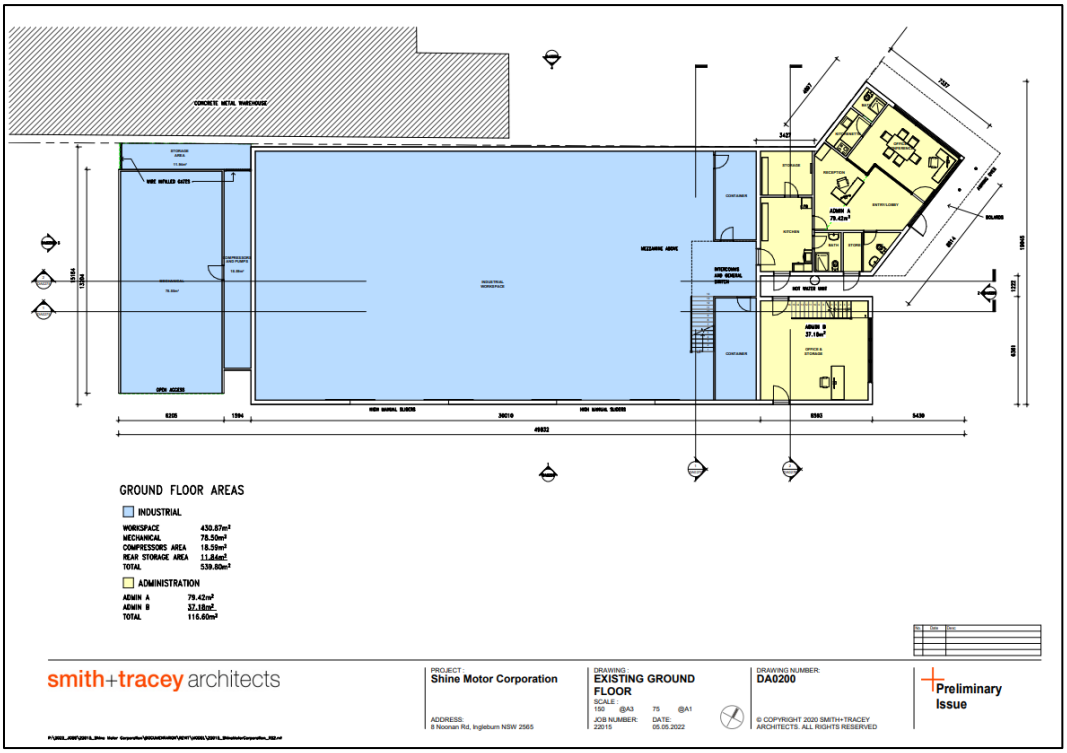

Figure 5: Proposed Ground Floor Plan (Source: Architectural Plans).

Figure 6: Proposed Elevations (Source: Architectural Plans).

7.0 Planning Secretary's Environmental Assessment Requirements (SEAR) 1616

The Department of Planning, Industry and Environment (DPIE) issued the Planning Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the Project Site on 14th January 2022.

The EIS have addressed and responded to the key issues that were raised on the SEARs to mitigate any potential impacts to the proposed development at 8 Noonan Rd, Ingleburn. As part of the EIS assessment, the following matters have been addressed:

- Strategic and statutory context
- Suitability of the site
- Waste management
- Noise and vibration
- Hazards and risk
- Fire and incident management
- Air quality and odour
- Soil and water
- Traffic and transport
- Visual amenity
- Relevant environmental planning instruments and other policies
- Community consultation

7.1 Strategic and Statutory Context

The site is suitable for the proposed development due to its location in an established industrial area and the absence of any significant residential developments nearby. The existing warehouse on the site is ideal for a scrap metal yard, which is a crucial aspect of the proposed development. The proposed use of the site for waste management purposes is also consistent with the broader environmental and sustainability objectives of the local council.

The proposed development aligns with the relevant planning strategies, environmental planning instruments, and DCPs. The proposal is consistent with the zoning of the land, which is zoned IN1 General Industrial, and the provisions of the State Environmental Planning Policy (Infrastructure) 2007. Additionally, the development complies with the relevant DCPs, including the Campbelltown Development Control Plan 2015, which provides guidelines for the location, design, and operation of waste management facilities.

7.2 Suitability of the site

The existing industrial building is well-suited to the activities proposed for the Resource Recovery Facility, including recycling vehicles and export of scrap metals and spare parts. The location of machinery, equipment and stockpiles is located within the existing warehouse space without requiring any additional construction works. The floor plan for the proposed Resource Recovery Facility has sufficient space to put the machinery and equipment, as well as areas for the storage and sorting of scrap metal and spare parts. The layout ensure that all activities can be carried out safely and efficiently, with appropriate measures in place to manage any potential risks or hazards.

7.3 Waste Management

The Waste Management Plan prepared by Quantum Traffic concludes that the use of a 240L MGB bin for mixed recycling and a 1.5m3 skip for general waste is a sensible approach for managing waste on the site. This is adequate for the proposed development.

A commercial waste contractor will be used for waste collection, which suggests that the waste generated by the facility will be managed professionally and efficiently. The fact that the waste truck can enter and exit the site in a forward direction is also important to ensure that waste collection does not disrupt normal operations on the site.

The proposed frequency of waste collection for the general waste and recycling streams is appropriate, with three collections per week for general waste and one collection per week for mixed recycling. This is sufficient to ensure that waste does not accumulate on the site, while also minimizing the number of vehicle movements required.

7.4 Noise and Vibration

The Noise Impact Assessment prepared by Octave Acoustics provides a thorough analysis of the proposed development's noise and vibration impacts, concluding that they will comply with applicable policies and regulations, and no mitigation measures are required. This is a positive finding that indicates the proposed development should not have significant negative impacts on the surrounding environment, particularly in terms of noise and vibration.

7.5 Hazards and Risk

The Hazardous Materials Management Register prepared by JMB Environmental Consulting outlines the findings of a survey carried out by a qualified surveyor regarding the presence of hazardous materials, specifically asbestos-containing materials (ACM), on the site at 8 Noonan Road. The report indicates that while every effort was made to identify all hazardous materials, the scope of the survey was limited to non-destructive sampling, and as a result, some areas may not have been accessible or inspected. Therefore, until such areas can be accessed, the probability of the presence of hazardous materials must be assumed until proven otherwise.

The report recommends that a destructive survey should be conducted in specific areas of the building before any major works begin to confirm the presence, or otherwise, of hazardous materials. Specific exclusions to the survey are listed in Appendix A, and areas not accessed are deemed to contain hazardous materials until proven otherwise.

Therefore, it is important that the proposed development takes into account the findings of the report and ensures that all necessary precautions and safety measures are taken to manage any potential hazards. This may include conducting a destructive survey in specific areas of the building before any major works begin and implementing appropriate measures to mitigate any identified risks. It is also important that any future refurbishment or demolition of the building considers the potential presence of hazardous materials and takes appropriate measures to manage any identified risks.

7.6 Fire and Incident Management

The Fire Safety Report prepared by Warrington Fire recommends the proposed development to comply with the proposed solutions in Table 5, under Design issues to be addressed. The assessment of the building design against the FRNSW Fire Safety in Waste Facilities Guidelines found that it is capable of complying, subject to compliance with the recommendations in this report. In particular, the issues in Section 5.3 and Appendix B will be addressed and this can be conditioned if the council decides to grant a Planning Permit for the proposed changes of use.

7.7 Air Quality and Odour

The summary of the Air Quality Amenity Assessment by SLR Consulting Australia indicates that the proposed change of use at 8 Noonan Road, Ingleburn from a Motor Vehicle Repair Station and associated Truck Wash to a Waste Management Facility is not expected to have any adverse impacts on the surrounding residential areas in terms of air quality. The report suggests that the airshed has the capacity to assimilate a minor increase in additional emissions from the proposed operation of the project.

7.8 Soil and Water

The Stormwater Assessment prepared by SLR Consulting Australia identifies various potential pollutants that may enter the water environment and adversely impact aquatic flora and fauna, reduce aesthetic amenity, and increase health risks to people.

To address these potential impacts, the proposed development includes a stormwater treatment plan that will meet the pollutant retention requirements of the City of Campbelltown. The system is designed to capture pollutants such as litter, debris, oils, and greases from hardstand and driveway areas, preventing them from entering the water environment. The plan also includes regular inspection and maintenance of water quality devices to ensure their effectiveness in removing pollutants.

Additionally, discharges to the sewer system will be managed in accordance with Sydney Water's requirements, further minimizing the potential for pollutants to enter the water environment. If excessive dirt becomes evident on the driveway or hardstand areas, they will be cleaned by washdown to the first flush system during dry weather. The site's operational management procedures will include periodic inspection of the driveways and monthly water quality monitoring during rainfall events for the first 12 months of operation to evaluate the efficacy of the proposed water treatment train along with site management measures.

7.9 Traffic and Transport

Based on the Traffic Impact Assessment Report prepared by Quantum Traffic, the proposed development of changing the use of the existing warehouse at 8 Noonan Road, Ingleburn to a scrap metal yard is not expected to have a significant impact on traffic and road safety in the area. The proposed development has adequately addressed the potential traffic concerns related to the change of use of the site. The report suggests that the site is currently operating as a scrap metal yard and the proposed change is nominal, which means that the level of activity on the site is not expected to differ significantly as a result of the proposed change. Additionally, the report notes that the proposed development design meets the relevant standards, and the provision of on-site car parking is expected to exceed the demand for on-street parking within the vicinity of the site. Overall, the Traffic Impact Assessment Report suggests that there are no traffic engineering reasons why the proposed development should not be approved, subject to appropriate conditions.

8.0 Visual Amenity

Based on the Visual Impact Assessment prepared by Urbaine Design Group, the proposed development at 8 Noonan Road, Ingleburn appears to have been assessed in terms of its potential impact on the visual amenity of neighbouring residential properties and public viewing points along main vehicular thoroughfares. The report concludes that the proposed development will provide a functional solution to improve the site's utility without any negative impact on the overall architectural context of the area, in line with Council guidelines.

The report has been conducted in an objective and thorough manner, taking into account the potential impacts of the proposed development on the surrounding environment. The report concludes that the proposed development will have a minimal impact on visual amenity and may even improve the existing conditions to some extent.

8.1 Relevant Environmental Planning Instruments and Other Policies

Please see Section 11 of the EIS report that outlines the relevant Environmental Planning Instruments and Other policies related to the proposed development.

8.2 Public Consultation

As part of the EIS, we have taken steps to notify the surrounding landowners and occupiers likely to be impacted by the proposed development. We have sent out letters to the following properties that are within 100 metre radiuses of the subject site.

6 Noonan Rd, Ingleburn NSW 2565
5 Noonan Rd, Ingleburn NSW 2565
1/3 Noonan Rd, Ingleburn NSW 2565
4 Noonan Rd, Ingleburn NSW 2565
1 Noonan Rd, Ingleburn NSW 2565
4/2 Noonan Rd, Ingleburn NSW 2565
2/2 Noonan Rd, Ingleburn NSW 2565

We have sent out letters addressing both landowners and occupiers to inform them of our intentions and to invite them to share any concerns or objections they may have. Additionally, we have advertised the proposal on the local Campbelltown Library notice board on 07/03/2023. This notice has been displayed for a period of 14 days. We are pleased to report that we have received no objections from any surrounding landowners and community groups during this period.

8.0 Previous applications

8.1 Overview

There have been a number of previous applications at this site, summarised below:

- 791/2017/DA-U – Use of existing warehouse as a metal scrap and recycling yard. Lodged 15/03/2017. (Refused)
- E/21/2001 – Use of premises for storage and truck and car wash. Lodged 15/03/2001.
- 1857/2006/DA-U – Use of premises as storage and maintenance of construction hire equipment. Lodged 18/07/2006.
- 873/2010/DA-U – Use of premise for motor vehicle repair station and associated truck wash. Lodged 19/04/2010. (Approved)
- 791/2017/DA-U – Use of existing warehouse as a metal scrap and recycling yard. Lodged 15/03/2017. (Refused)

8.2 Response to Previous Application

The most recent application (791/2017/DA-U lodged 15/03/2017) was refused for the following reasons:

1) *Pursuant to the provisions within Schedule 2 of the Environmental Planning and Assessment Regulation 2000, the development application is considered to be designated development. The development application has not*

provided an Environmental Impact Statement to provide clarity on the likely impacts of the proposal on the environment.

This has been addressed within this Report.

2) *Pursuant to the provisions of Section 79C (1)(a)(i) of the Environmental Planning and Assessment Act 1979, the development application has not considered the requirements of the Water Management Act 2000 and Section 91A of the Environmental Planning and Assessment Act 1979.*

A Stormwater Assessment Report prepared by SLR Consulting Australia has been provided within the application and has provided recommendations within the report. This should address Council's concerns.

3) *Pursuant to the provisions of Section 79C (1)(b) of the Environmental Planning and Assessment Act 1979, the application fails to demonstrate that the proposed development will not produce adverse environmental impacts with respect to how the site has been adequately sealed to prevent leaching and other pollutants from flowing into the adjoining creek system.*

A Stormwater Assessment Report prepared by SLR Consulting Australia and Hazardous Materials Management Register by JMB Environmental Consulting have been included within the application and has provided recommendations within the report. This should address Council's concerns.

4) *Pursuant to the provisions of Section 79C (1)(a)(iii) of the Environmental Planning and Assessment Act 1979, it is considered that the proposed development is inconsistent with the Campbelltown (Sustainable City) Development Control Plan 2015 with respect to the objectives of Part 7.7 having regard to implementing appropriate measures that prevent stormwater pollution.*

A Stormwater Assessment Report prepared by SLR Consulting Australia has been provided with the application and has provided recommendations within the report. This should address Council's concerns.

5) *Pursuant to the provisions of Section 79C (1)(a)(iii) of the Environmental Planning and Assessment Act 1979, it is considered that the proposed development is inconsistent with the Campbelltown (Sustainable City) Development Control Plan 2015 with respect to outdoor storage controls in Part 7.5.*

The proposed development is consistent with the Campbelltown Development Control Plan 2015 with respect to objectives of Part 7.5. See Section 11 within this Report.

6) *Pursuant to the provisions of Section 79C (1)(a)(iii) of the Environmental Planning and Assessment Act 1979, it is considered that the proposed development is inconsistent with the Campbelltown (Sustainable City) Development Control Plan 2015 with respect to the objectives of Part 7.6 having regard to appropriate measures being implemented for the storage and collection of industrial waste and recycled materials.*

The proposed development is consistent with the Campbelltown Development Control Plan 2015 with respect to objectives of Part 7.5. See Section 11 within this Report.

9.0 Local Planning Policy

The subject site is located in the City of Campbelltown and is within the *General Industrial (IN1) Zone* as shown below.

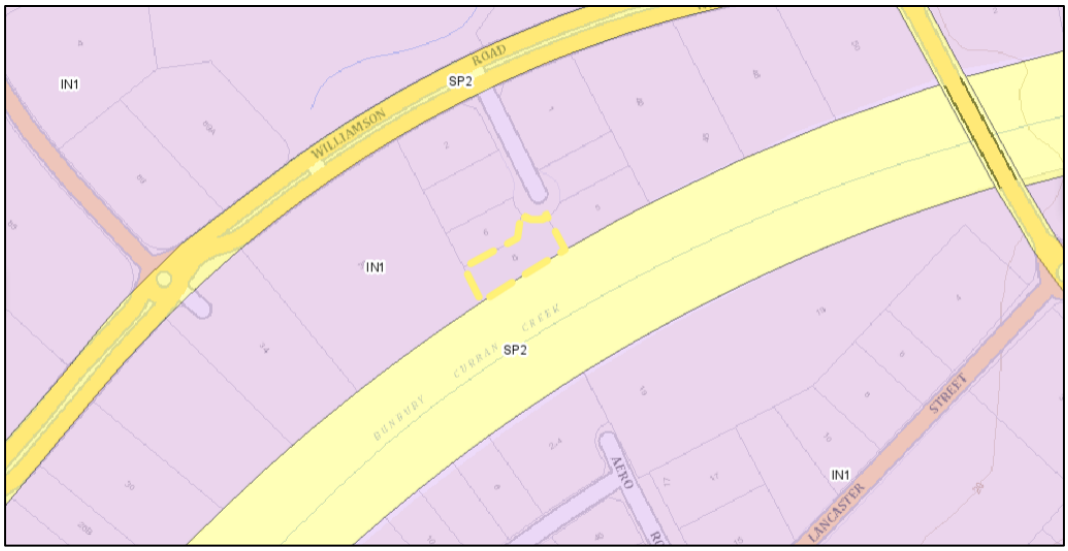

Figure 7: Zoning for subject site area (Source: Planning Report).

The General Industrial (IN1) Zone has the following objectives:

- To provide a wide range of industrial and warehouse land uses.
- To encourage employment opportunities.
- To minimise any adverse effect of industry on other land uses.
- To support and protect industrial land for industrial uses.
- To provide for a range of facilities and services to meet the day-to-day needs of workers in the area.

Response:

The following uses are permitted with consent, please note that as per our assessment and discussions with the duty planner at Campbelltown City Council, the proposed metal scrapping use would be categorised as General Industrial. General Industries is a permitted land use with consent as per the below table:

Animal boarding or training establishments	Boat building and repair facilities	Car parks	Depots	Environmental facilities	Environmental protection works
Flood mitigation works	Freight transport facilities	Garden centres	**General industries**	Hardware and building supplies	Helipads
Highway service centres	Industrial retail outlets	Industrial training facilities	Kiosks	Landscaping material supplies	Light industries
Mortuaries	Neighbourhood shops	Oyster aquaculture	Passenger transport facilities	Places of public worship	Roads
Rural industries	Rural supplies	Service stations	Sex services premises	Signage; Storage premises	Take away food and drink premises
Tank-based aquaculture	Transport depots	Truck depots	Vehicle body repair workshops	Vehicle repair stations	Veterinary hospitals

Warehouse or distribution centres

The current use of the land is a Motor Vehicle Repair Station and associated Truck Wash.

The following are development objectives for the General Industrial (IN1) Zone:

- Ensure that industrial development is both functional and attractive in the context of its local environment through appropriate design.
- Reduce the visual impact of industrial development on the streetscape and surrounding areas.
- Ensure that sufficient areas are available for landscaping, access, and car parking and manoeuvring of heavy vehicles on site.
- Ensure that building materials are high quality and durable.
- Ensure that fencing and walls for security purposes have positive impacts on the streetscape and other public domain areas.
- Ensure that industrial development does not significantly impact on adjoining residential zones.

Part 7: Industrial Development from the Campbelltown Development Control Plan applies to the site. The policy outlines a number of planning objectives and requirements related to industrial uses. Refer to the 5.0 Compliance Table for an assessment against Part 7.

10.0 Site Opportunities and Constraints

The proposal is to change the use from a motor vehicle repair station with a truck wash bay to a general industrial use, specifically for a scrap metal business. A scrap metal business means a commercial establishment, which, as one of its principal business purposes, purchases scrap metal for purposes of resale or processing including transient buyers of scrap metal and itinerant businesses. The use also includes the scrapping vehicles and selling the metal and parts.

Operation Hours:

Monday to Friday - 7 am to 5pm
Saturday - 7 am to 1 pm
There are 8 employees with 5 to 7 being on site at any one time. There are anywhere from 6 to 20 clients each day visiting the site each day. No heating or melting of materials takes place on site.

The following are summaries of issues/reasons for refusal for the previous application:

Provision of an Environmental Impact Statement

- *The development application has not provided an Environmental Impact Statement to provide clarity on the likely impacts of the proposal on the environment.*

This report constitutes the Environmental Impact Statement. Environmental Impacts have been addressed in this report.

Stormwater, Drainage and Waste Management

- *The proposed development is inconsistent with the DCP with respect to the objectives of Part 7.7 having regard to implementing appropriate measures that prevent stormwater pollution.*

- *The application fails to demonstrate that the proposed development will not produce adverse environmental impacts with respect to how the site has been adequately sealed to prevent leaching and other pollutants from flowing into the adjoining creek system.*
- *The development application has not considered the requirements of the Water Management Act 2000 and Section 91A of the Environmental Planning and Assessment Act 1979.*

As per the previous application, the proposal dismantles vehicles for recycling, including but not limited to the batteries, oil, diesel fuel and petrol. However, the waste generated that is not sold is recycled and is limited to timber and PVC. The office portion of the site generates approximately 3kg of waste per week and it is collected by JJ Richards when the bin is full, which is approximately every two months. The batteries that are collected are sold to Enirgi Pvt Ltd, a recycling company. Oily water, petrol and diesel are collected by a company called Cleanaway.

A Drainage Report have been provided within this application and provides recommendations for efficient on-site water management system. This would address the lack of adequate documentation and provide clarity as to how the proposed development will mitigate any runoff into the adjoining creek system.

Outdoor Storage

- *The proposed development is inconsistent with the Campbelltown (Sustainable City) Development Control Plan 2015 with respect to outdoor storage controls in Part 7.5.*
- *The proposed development is inconsistent with the DCP with respect to the objectives of Part 7.6 having regard to appropriate measures being implemented for the storage and collection of industrial waste and recycled materials.*

The proposal includes external storage area to the south side of the site. Scrap metals, upon delivery, is proposed to be separated, with any scrap which does not require processing, to be immediately stored ready for resale (i.e. in shipping container or steel bin) on the south side of the site. Scrap metal which does require processing (i.e. wiring), is proposed to be stockpiled, ready for processing. On this basis, it is anticipated that scrap metal will occupy up to approximately 85m3 of storage volume, within the subject site, while it is awaiting re-sale. This volume can be comfortably accommodated within the 550m2 of external storage area proposed on the subject site. Collection (resale) of scrap metal will occur on an as-needs basis, using rigid or articulated trucks (for steel bins and shipping containers, respectively). Therefore, the proposed development is consistent with the outdoor storage controls and DCP under Part 7.5 and Part 7.6 respectively.

Parking

Section 7.3.1 of the Campbelltown (Sustainable City) Development Control Plan 2015 (DCP) prescribes the number of car parking spaces to be provided for the proposed development, as follows:

• 1 car parking space per 35m2 of office space, plus
• 2 car parking spaces per industrial unit, plus
• 1 car parking space per 100m2 for parts of industrial buildings up to 2,000m2 , plus
• 1 car parking space per 250m2 for parts of industrial buildings which exceed 2,000m2 , plus
• 1 car parking space per 300m2 of outdoor storage space.

On this basis, the proposed development has a statutory requirement for 13 car parking spaces.

The proposed development includes a total of 10 on-site car parking spaces, comprising six (6) in tandem arrangements at the rear of the site and four (4) located adjacent to the office building. This represents a shortfall of three (3) car parking spaces compared to the statutory requirements and a surplus of two (2) car parking spaces compared to the anticipated car parking demand.

Section 7.3.3 of the DCP specifies that the proposed development must accord with the requirements of the Building Code of Australia (BCA) as it relates to access for people with disabilities. Table D3.5 of the BCA specifies that office and process buildings (classes 5 and 8, respectively) require a minimum of one (1) accessible car parking space for every 100 total car parking spaces, or part thereof. On this basis, the proposed development has a statutory requirement for one (1) accessible car parking space. The proposed development includes one (1) accessible car parking space (and associated shared area) located adjacent to the office building. This provision meets the statutory requirement for accessible car parking.

Please refer to Traffic Impact Assessment Report prepared by Quantum Traffic that supports the reduction of car parks on the site.

Access and Traffic

The site is located at the end of a cul-de-sac in an industrial area.

Swept path analysis has been undertaken to demonstrate that vehicles up to and including the standard AV can enter and exit the site in a forward direction. The design of parking and vehicle access arrangements at the proposed development have been reviewed and found to accord with the requirements of the Council's DCP and the relevant Australian Standards.

Within Noonan Road, the anticipated reduction in demand for on-streetcar parking and the provision for heavy vehicles to both enter and exit the site in a forward direction is expected to improve safety for road users.

Given that the level of activity on the subject site is not expected to differ as the result of the proposed nominal change in use, the proposed development is not expected to significantly impact the safety or performance of the road network.

Landscape Plan

Landscaping this site is impractical due to the site being paved.

11.0 Compliance Tables

Campbelltown Local Environmental Plan 2015

Clause	Provisions	What is proposed and statement of compliance
1.1	Name of Plan	N/A
1.1AA	Commencement	N/A
1,2	Aims of Plan	The proposal generally complies with the aims of the plan
1.3	Land to which Plan applies	The plan applies to the site
1.4	Definitions	The proposed use is General Industry, specifically for a scrap metal business. A scrap metal business means *a commercial establishment, which, as one of its principal business purposes, purchases scrap metal for purposes of resale or processing including transient buyers of scrap metal and itinerant*

		businesses The use also includes the scrapping vehicles and selling the metal and parts.
1.5	Notes	N/A
1.6	Consent Authority	Campbelltown Council is the consent authority for this site
1.7	Maps	N/A
1.8	Repeal of planning instruments applying to land	N/A
1.8a	Savings provisions relating to development applications	The proposal will comply with relevant SEPPS
1.9	Application of SEPPs	N/A
1.9a	Suspension of covenants, agreements and instruments	N/A
2	**Permitted or prohibited development**	**Some provisions apply as per the below**
2.1	Land use zones	N/A
2.2	Zoning of land to which Plan applies	The land is zones Industrial 1 – General Industrial.
2.3	Zone objectives and Land Use Table	The objectives are noted.
2.4	Unzoned Land	N/A
2.5	Additional permitted uses for particular land	N/A
2.6	Subdivision – consent requirements	N/A
2.7	Demolition requires development consent	N/A
2.8	Temporary Use of Land	N/A
3	**Exempt and Complying Development**	N/A
4	**Principle Development Standards**	**Some provisions apply as per the below**
4.1	Minimum Subdivision lot size	Minimum subdivision side is 4000m2. Site is not proposed to be subdivided.
4.1aAA	Minimum subdivision lot size for community title schemes	N/A
4.1B	Minimum subdivision lot sizes for dual occupancies in certain zones	N/A
4.1C	Minimum qualifying site area and lot size for certain residential and centre-based child care facility development in residential zones	N/A
4.1D	Minimum lot sizes for certain land uses in certain environment protection zones	N/A
4.1E	Exception to minimum lot sizes for certain land in Mount Gilead Urban Release Area	N/A
4.1F	Exception to minimum lot sizes for certain land in Glenfield	N/A
4.1G	Exception to minimum subdivision lot sizes for certain residential development in Maryfields Urban Release Area	N/A
4.2	Rural subdivision	N/A
4.2A	Erection of dwelling houses or dual occupancies (attached) on land in certain rural and environment protection zones	N/A
4.2B	Erection of rural workers' dwellings on land in Zones RU2 and E3	N/A
4.2C	Exceptions to minimum subdivision lot sizes for certain land in Zones RU2 and E3	N/A
4.2D	Exceptions to minimum subdivision lot sizes for certain land in Zone E4	N/A
4.2E	Subdivision of land in Zone E3	N/A
4.3	Height of buildings	Compliant. The mapped maximum building height is 19m. No changes to the existing building are proposed.
4.3A	Height restrictions for certain residential accommodation	N/A
4.4	Floor space ratio	N/A
4.5	Calculation of floor space ratio and site area	N/A
4.6	Exceptions to development standards	N/A

5	**Miscellaneous provisions**	**No provisions apply**
6	**Urban release areas**	**No provisions apply**
7	**Additional local Provisions**	**Some provisions apply**
7.1	Earthworks	Compliant as no earthworks are proposed
7.2	Flood Planning	N/A
7.3	Riparian land and watercourses	Compliant, the site is not within 30m of Bunbury Curran Creek
7.4	Salinity	N/A
7.5	Preservation of the natural environment	N/A
7.6	Scenic protection and escarpment preservation	N/A
7.7	Considerations for development on environmentally constrained land	N/A
7.8	Development on steep land in the Scenic Hills	N/A
7.8A	Use of certain land at 166–176 St Andrews Road, Varroville	N/A
7.9	Mixed use development in Zone B3 and Zone B4	N/A
7.10	Essential services	Compliant – the site has access and connection to all essential services
7.11	Advertising on bus shelters	N/A
7.12	Converting serviced apartments to residential flat buildings or shop top housing	N/A
7.13	Design excellence	N/A
7.14	Development for agriculture and animal boarding or training establishments	N/A
7.15	Agricultural related business development in Zones E3 and RU2	N/A
7.16	Requirements for roadside stalls	N/A
7.17	Development in Zone RE1	N/A
7.18	Restrictions on access to or from public roads	N/A
7.19	Location of sex services premises	N/A
7.20	Terrestrial biodiversity	N/A
7.21	Use of certain land at Glenfield Waste Site	N/A
7.22	Floor area in Zone B7 within Maryfields Urban Release Area	N/A

Campbelltown (Sustainable City) Development Control Plan 2015

Clause	Provisions	What is proposed and statement of compliance
1.1	Introduction	Compliant. Volume 1 is applicable to the site.
1.2	Aims of the Plan	Provision is noted.
1.3	Campbelltown 2025 and the Plan	Provision is noted.
1.4	Definitions	Provision is noted.
1.5	Acronyms	N/A
	Requirements applying to all types of development	**Provisions apply**
2.1	Application	Volume 1 applies
2.2	Site analysis	

	A Site Analysis Plan shall be lodged with the development application for all development involving the construction of a building and the Torrens title subdivision of land. The scope of the site analysis will depend on the scale and nature of the development and shall address: i) contours, slope and north point; ii) existing landscaping and vegetation; iii) existing buildings and structures; iv) location of windows and other openings on adjoining buildings; v) roads, access points, parking, and traffic management devices and the like; vi) linkages; open space networks, pedestrian/cycle paths and the like; vii) easements, services, existing infrastructure and utilities; viii) hydraulic features, drainage lines, water features, drainage constraints, and the like; ix) natural hazards (e.g. flooding, bushfire); x) solar orientation, overshadowing, prevailing winds; xi) views and vistas to, from and within the site; xii) a streetscape analysis; xiii) special environmental features such as threatened species habitat, endangered ecological communities and wetlands; xiv) items and relics of and/or aboriginal place of heritage significance ; and xv) any identified road widening applying to the subject land.	The site analysis plan has been provided. Constraints and opportunities have been identified in Section 5 above.
2.3	Views and vistas	N/A
2.4	Sustainable building design	N/A
2.5	Landscaping	The site is existing and hard paved – landscaping cannot comply with the requirements.
	Design requirements	
	a) Landscape design shall enhance the visual character of the development and complement the design/use of spaces within and adjacent to the site.	See above
	b) Landscape design shall retain and enhance the existing native flora and fauna characteristics of a site wherever possible.	See above
	c) Landscape design shall add value to the quality and character of the streetscape.	See above
	d) A Landscape Concept Plan is required to be submitted with a development application for: xii) industrial development	See above

	e) The Landscape Concept Plan shall illustrate mature height, spread of species, trees to be removed/retained and shall be prepared by a suitably qualified person.	See above
	f) Landscaping shall maximise the use of locally indigenous and other drought tolerant native plants and avoid the use of invasive species.	See above
2.6	Weed management	N/A
2.7	Erosion and sediment control	N/A – Construction is not proposed
2.8	Cut, fill and floor levels	N/A
2.9	Demolition	N/A
2.10	Water cycle management	The proposal is to utilise the existing stormwater management system, and to incorporate any design changes proposed by the additional Water Sensitive Urban Design Report and Stormwater Drainage Report to manage runoff from scrap metal recycling.
2.11	Heritage conservation	N/A
2.12	Retaining walls	N/A
2.13	Security	
	Design requirements	
	a) Development shall be designed to: i) maximise, where possible, casual surveillance opportunities to the street and surrounding public places; ii) minimise dead ends and other possible entrapment areas; iii) clearly identify and illuminate access points to buildings and designated public places; and iv) clearly differentiate between private and public space.	Compliant. The site is fenced to clearly define the separation of public and private space.
	b) External lighting shall be designed to: i) encourage the use of safe areas; ii) define safe corridors for movement of people; and iii) allow facial recognition of approaching pedestrians at 15 metres.	Compliant
	c) Development shall incorporate appropriate landscaping, fencing and security devices to assist in crime prevention.	Compliant. The development incorporates fencing and the use of cameras.
	d) Commercial and industrial buildings that are not secured from public access after close of business shall have external finishes that are graffiti resistant.	N/A
	e) Development applications for multi dwelling housing, attached dwellings residential flat buildings, mixed-use development, boarding houses, shop top housing, commercial development, industrial development and large scale subdivision comprising more than 10 dwellings/units allotments or incorporating works to be dedicated to Council shall be accompanied by a crime prevention plan to be prepared by a suitably qualified person addressing how the development embraces the principles of Crime Prevention Through Environmental Design. Note: For requirements relating to the preparation of a Crime Prevention Plan refer to Appendix 13	N/A

2.14	Risk management	N/A
2.15	Waste management	
2.15.1	Waste management plan design requirements	
	a) A detailed Waste Management Plan (WMP) shall accompany development applications for certain types of development/land uses, as detailed in Table 2.15.1 and for any other development that in the opinion of Council a WMP is required	A waste management plan can be obtained, and the proposal can implement any recommendations
	b) Council may require a WMP for any other development, where in Council's opinion, such a development	Can comply
	c) Plans submitted with a development application shall detail the following (as applicable): i) the size and location of waste and recycling storage areas; ii) routes for occupants to access waste and recycling areas; iii) collection point and/or access route for collection vehicles; iv) ventilation of waste and recycling storage areas; v) location of garbage chute and service rooms; vi) bin and storage area washing facilities; and vii) occupants' disposal points for all 2.15 waste streams.	c) Compliant. Waste bins are shown on the plans, and access is available on site.
2.15.2	Waste management during demolition and construction design requirements	N/A
2.15.3	Ongoing waste management design requirements	
	a) Provision shall be made for all waste and recycling storage containers to be located behind the primary and secondary building line and out of public view	Due to the nature of the business and siting of the industrial building the proposal cannot comply. They are located behind the fence.
	b) Any room(s) for storing garbage and recycling shall be located in a position that is convenient for occupants and waste collection staff. Collection rooms shall complement the development and not be visibly obtrusive when viewed from any public place	Noted
	c) A refuse collection point shall be nominated demonstrating that wasteloading operations can occur on a level surface not adjacent to steep gradients, vehicle ramps and pedestrian access points.	Compliant
	d) The path for wheeling bins between waste storage area(s) and the collection vehicle shall be free of steps or kerbs and have a maximum gradient of 1V:8H.	Compliant
	e) The maximum travel distance between any storage area/point and the collection point for all bins shall be 25 metres.	Compliant. The travel distance is 17.9m.
	f) Where it is intended that collection vehicles are to drive into a private property to collect waste and recycling, the development shall be designed to provide for: i) the safe and efficient service of the development with minimal need to reverse; ii) vehicles to enter and exit in a forward direction; iii) adequate clearance to accommodate the waste collection vehicle dimensions	Compliant. Waste collection vehicles have manoeuvring space to enter and exit the site in a forward direction

	detailed in Table 2.15.2. iv) where collection vehicles are required to enter the property, the pavement shall be constructed in such a manner that will not be damaged by a collection vehicle carrying the maximum legal weight.	
2.16	Provision of services	N/A
2.17	Work on, over or near public land	N/A
2.18	Work on land adjacent to the Upper Canal Corridor	N/A
2.19	Development near or on electricity easements	Noted
2.20	Development on land adjacent to, or affected by a gas easement	N/A
3	Low and medium density residential development and ancillary residential structures	Provisions are not applicable
4	Rural residential development and ancillary rural residential structures	Provisions are not applicable
5	Residential flat buildings and mixed-use development	Provisions are not applicable
6	Commercial development	Provisions are not applicable
7	Industrial Development	Provisions apply
7.1	Application	
7.2	Building form and character	
7.2.1	Building design	
	a) Building design shall incorporate the following features to assist in the reduction of the perceived bulk and mass of development: i) provision of vertical and/or horizontal offsets in the wall surfaces at regular intervals, including columns, projections, and recesses; ii) articulate architectural details around doors, windows front facades, roofs and entrances; iii) articulate walls through the use of texture, colour, material changes, shadow lines and other façade treatments, at least every 15 metres; and iv) at least 50% of the total surface area of the front elevation to be constructed of masonry material.	The building is an existing approved structure, no changes are proposed.
	b) Buildings located on corner allotments shall be designed to address both street frontages.	Site is not located on a corner
	c) Buildings shall be predominantly single storey (excluding basements, mezzanines and offices).	The building is an existing approved structure, no changes are proposed. The site complies.
	d) Mezzanines shall not comprise an area of more than 50% of the gross floor area of the ground floor of the respective unit.	The building is an existing approved structure, no changes are proposed.
	e) Offices shall not comprise more than 30% of the gross floor area of the respective unit.	The building complies. The gross floor area of the unit is 732.14m2. The office area is 153.78m2, which is less than 30% (219.64m2).

	f) No building shall rely upon a required path of egress (as defined within the BCA) over adjoining private land.	Compliant.
	g) No building or structure shall be erected within a right of carriage way or easement.	Compliant.
	h) A schedule of proposed colours, materials and finishes shall accompany all development applications for new industrial buildings.	The building is an existing approved structure, no changes are proposed.
	i) The main entry to the building shall be easily identifiable from the street and directly accessible from the front of the building or driveway in the case of a multi unit complex.	The building is an existing approved structure, no changes are proposed. The site complies.
7.2.2	Building setbacks	The building is an existing approved structure, no changes are proposed.
7.2.3	Fences	
	a) Industrial fencing shall be a maximum 2.4 metres in height.	The existing fence complies – it is 1.9m high.
	b) All fencing in industrial developments shall be of recessive colours, palisade design, or plastic coated and framed chain wire with a maximum height of 2.4 metres, unless required as part of an acoustic solution.	Compliant.
	c) The use of sheet metal fencing is not permitted unless required as part of acoustic solution and is appropriately screened with landscaping.	Noted.
	d) All fencing in industrial developments shall be setback a minimum of 3.0 metres from property boundaries addressing a primary and/or secondary street.	Not compliant, however the building is existing. Due to the boundary being on a cul-de-sac, the fencing and gate is not 3m from the boundary for the entire width.
	e) Fencing on corner allotments shall not obstruct the sight distance of traffic entering or within an intersection or roundabout.	Site is not on a corner allotment.
	f) Fencing shall not obstruct power, water, sewer, gas or telephone services, drainage systems, (including overland flow paths) or any easements or rights of way.	Compliant.
	g) Details for fencing shall be submitted with the development application.	Can comply
7.3	Car parking and access	
7.3.1	General requirements	
	a) Off street parking and loading shall be designed in accordance with A*ustralian Standard AS 2890.1 and 2 (as amended),* except as otherwise provided by this Plan.	Compliant
	b) For that part of the gross floor area occupied by office areas, lunch rooms and any associated office storage areas, car parking shall be provided at a rate of one space per 35sqm.	Compliant, 4 spaces required and have been provided.

	c) For that part of the gross floor area occupied by uses other than office areas, lunch rooms and any associated office storage areas, car parking rates shall be provided in accordance with the following: i) a minimum of two (2) spaces (per unit), plus ii) one space for every 100sqm of gross floor area for buildings up to 2000 square metres; plus iii) one space per 250sqm for that part of the building exceeding 2000 square metres in gross floor area.	Compliant. 5 spaces required and have been provided.
	d) In addition to clauses 7.3.1 (b) & (c), one car parking space shall be provided for every 300sqm of outdoor storage space.	The proposal is not compliant. 552m2 /300m2 = 1.84 car parking spaces. This rounds up to 2 spaces needed, however only 1 space is currently available. We request to vary from this on the basis that ample parking is available for the staff and number of clients accessing the site.
	e) Mezzanine areas that are exclusively used for storage purposes shall be excluded from the calculation of total gross floor area for the purpose of calculating the required number of car parking spaces, providing that the mezzanine areas: i) are not divided into smaller spaces by internal walls; and ii) have no external windows.	Noted.
	f) In addition to clause 7.3.1 (c), motor vehicle industries shall provide a minimum of three (3) car parking spaces per work bay/hoist.	Can comply pending discussions if vehicle scrapping is considered as a motor vehicle industry.
	g) Sufficient space shall be provided on site so that no vehicle shall be required to make more than a three-point movement to exit the site in a forward direction.	Compliant
	h) No car parking spaces shall be designed in a stacked configuration.	Tandem parking is necessary for the staff parking area, but no parking is stacked.
	i) No required car parking spaces shall be created as a separate strata or Torrens title allotment.	Compliant
	j) Each site shall have a: i) maximum of one ingress and one egress for heavy vehicles (combined or separated), ii) each site may have an additional ingress/egress for cars (and other light vehicles).	Compliant
	k) A minimum of 10% of the required car parking spaces, including disabled spaces, shall be located within close proximity to the main pedestrian entry to the building.	Compliant
7.3.2	Loading and unloading	
	a) Each industrial factory/unit shall be provided with a loading bay.	Compliant
	b) Provision shall be made for all loading and unloading to take place wholly within the designated loading area.	Compliant
	c) No loading or unloading shall be carried out across parking spaces, landscaped areas, pedestrian aisles or on roadways.	Compliant

	d) Each industrial building/unit having a gross floor area: i) up to 400 square metres shall provide a loading area to allow for a small rigid vehicle to manoeuvre on site; ii) more than 400 square metres, but up to 1500 square metres shall provide a loading area to allow for a medium rigid vehicle to manoeuvre on site; and iii) more than 1500 square metres shall provide a loading area to allow for a heavy rigid vehicle to manoeuvre on site.	Compliant. The total area is 732.14m2. The site allows for a medium rigid vehicle to manoeuvre on site.
	e) Heavy rigid vehicle swept turning paths shall be provided demonstrating that a heavy rigid vehicle can enter and exit the site in a forward direction for all industrial sites.	Not relevant. It is not required to show manoeuvring for heavy rigid vehicles for industrial units of this size.
	f) Where it is proposed to service the site with articulated vehicles exceeding 12.5m in length, swept turning paths are to be provided for that vehicle type.	Cannot comply. A variation will be needed to continue to allow vehicles exceeding 12.5m in length to access the site. There is not enough room on site for swept turning paths. Articulated vehicles are currently entering the site in reverse.
7.3.3	Access for people with disabilities	
	a) Industrial development shall comply with the minimum access requirements contained within the BCA, the Disability (Access to Premises — Buildings) Standards 2010 and *Australian Standard 1428 – Design for Access and Mobility* (as amended).	No alterations or additions to the existing approved building are proposed.
7.4	Landscaping	
	a) A detailed landscape plan and report shall be prepared by a suitably qualified person and submitted with all development applications for the industrial development.	It is considered that for this site being an irregular lot on a cul-de-sac and entirely paved that a landscape plan is unnecessary.
	b) Landscaping shall be provided to a minimum depth of 50% of the following required setback area located: i) along the full width of each street frontage (other than vehicle driveways); and ii) along the full width of setbacks from adjoining open space, residential and/or commercial areas.	See above
	c) The first three (3) metres of all required street front landscaped area (as measured from the street boundary) shall be planted of advanced canopy trees that are: i) a minimum of two (2) metres in height with a minimum 400 litre pot size at the time of planting; ii) of native species; and iii) planted /placed every 10 metres.	See above

	d) Side boundary landscaping of a minimum of one (1) metre width shall be provided between the street boundary and the building line.	See above
7.5	Outdoor storage areas	
	a) No outdoor storage shall occur without development consent.	Noted – we are seeking consent for outdoor storage.
	b) Outdoor storage areas shall not be located between the primary or secondary street boundary and any building on the allotment.	Compliant.
	c) Outdoor storage areas shall be adequately screened from public view.	The outdoor storage is screened with fencing. Additional screening may further limit vehicle manoeuvring on site.
	d) Goods and materials stored shall not be stacked higher than an approved screening structure.	Can comply.
	e) Screen fencing and structures shall be constructed of high quality materials that complement the buildings located on site.	Compliant
	f) All outdoor storage areas shall be sealed and drained to the storm water system in accordance with any environmental management requirements.	Compliant. The tenant indicates the hardstand area is sealed.
	g) Notwithstanding any other provision of this Plan, no external storage of used unregistered motor vehicles, vehicle parts, used building materials, scrap products or other industrial waste shall be permitted.	This provision effectively prohibits any external storage associated with this proposal and we request to vary from this requirement.
	h) No above ground tanks or other storage facilities shall be erected within a required setback.	Compliant
	i) Goods shall be stored above the flood planning level.	Complaint
7.6	Industrial waste management	
	a) Industrial development shall make provision for an enclosed on site waste and recycling facility that has adequate storage area to accommodate the waste generated from the development.	Compliant. Waste and recycling bins are provided on site.
	b) Any industrial premises that generates more than 20% of total waste generated by the development or 50 litres or 50 kg (whichever is the lesser) of meat/seafood product shall be collected daily or refrigerated awaiting collection.	N/A
	c) Adequate provision shall be made for the screening and storage of all industrial waste behind the front building setback.	Compliant
	d) All commercial premises shall produce evidence of a collection contract with a licensed garbage and recycling collection contractor.	Can comply

	e) Despite Clause 7.6. d) above, the design of the building shall provide for the collection system to be undertaken by Council at the time the development application is submitted to Council.	Can comply
7.7	Environmental management	
7.7.1	Liquid storage	
	a) The storage and handling of flammable and combustible liquids shall be in accordance with Australian Standard 1940 - The Storage and Handling of Flammable and Combustible Liquids and the Environment Protection Authority publication, "Bunding and Spill Management" (as amended).	Can comply
	b) All above ground liquid storage facilities, including waste shall be in a covered bunded area that is constructed of impervious materials.	Can comply
	c) Above ground tanks shall be contained in a bunded area that: i) is at least 110% of the volume of the tank or the largest tank, where a group of tanks are enclosed; and ii) walls shall be at least 250mm in height.	No above ground tanks are proposed
	d) The bunded area of drum storage facilities shall be able to contain 25% of the total volume of all drums and shall have a minimum capacity of at least 400L. Walls shall be at least 250mm in height	Can comply
7.7.2	Air quality	
	a) Any development that is likely to or capable of generating levels of air emissions exceeding the requirements of the *Protection of the Environment Operations Act 1997* shall demonstrate appropriate measures to mitigate against air pollution.	The proposed use will not include any heating or melting of metal; therefore it is unlikely that air emissions will be an issue. The activity of the site is listed under Metallurgical activities in Schedule 1 of the Act as scrap metal processing, meaning the crushing, grinding, shredding or sorting (but not smelting) of scrap metal of any kind. The use will be considered a scheduled activity provided that: scrap metal processing capacity to process more than 150 tonnes of scrap metal per day or 30,000 tonnes per year (if not carried out wholly indoors) or 50,000 tonnes per year (if carried out wholly indoors)
7.7.3	Noise	
	a) Any development that is likely to or capable of generating levels of noise exceeding the requirements of the *Industrial Noise Policy* (published by the *Office of Environment and Heritage*) shall demonstrate appropriate measures to mitigate against noise pollution.	This development is unlikely to generate levels of noise exceeding the requirements

7.7.4	Stormwater and drainage	
	a) All activities with the potential to pollute the stormwater system from a system failure shall be carried out within a covered and bunded area sited, designed and constructed to Council's satisfaction.	Can comply
	b) Liquid waste and waste water shall either be: i) recycled on site; ii) treated and discharged to the sewer in accordance with a trade waste licence issued by Sydney Water; or iii) collected, stored in a covered, bunded area and collected by the Office of Environment and Heritage; and iv) discharged to a licensed waste management facility.	Can comply
	c) Development shall not result in water run-off causing flooding or erosion on adjacent properties.	Compliant
7.8	Residential interface	N/A
7.9	Industrial unit/s	N/A
7.10	Subdivision	N/A
8	Child care centres	Not applicable
9	Public consultation	Noted
10	Places of public worship	Not applicable
11	Vegetation and wildlife management	Not applicable
12	Telecommunication facilities	Not applicable
13	Sex industry premises	Not applicable
14	Parking of heavy vehicles on residential, rural and environmental protection land	Not applicable
15	Animal boarding or training establishments	Not applicable
16	Advertising and signage	Not applicable
17	Boarding houses	Not applicable

State Environmental Planning Policy (Biodiversity and Conservation) 2021

Clause	Provisions	What is proposed and statement of compliance
2	Vegetation in non-rural areas	The site is zoned for industrial use and has been previously used for these purposes for many years. There is no significant vegetation located on the site. As such, the proposal does not involve the removal of any on-site trees, adjoining trees, or vegetation.
2.1	Preliminary	Noted.
2.2	Clearing vegetation in non-rural areas	Not required.
2.3	Council permits for clearing of vegetation in non-rural areas	Not required.
2.4	Approval of Native Vegetation Panel for clearing native vegetation in non-rural areas	Not required.

2.5	Clearing of native vegetation on primary production land in Zones R5, E2, E3 and E4 that does not require permit or approval	Not applicable.
3	Koala habitat protection 2020	Not applicable.
4	Koala habitat protection 2021	Not applicable.
5	River Murray lands	Not applicable.
6	Water catchments	Noted.
6.2	Development in regulated catchments	The proposal does not have any impacts in terms of water quality and quantity, aquatic ecology, flooding, recreation and public access, and total catchment management
6.11	Land within 100m of natural waterbody In deciding whether to grant development consent to development on land within 100m of a natural waterbody in a regulated catchment, the consent authority must consider whether— (a) the land uses proposed for land abutting the natural waterbody are water-dependent uses, and (b) conflicts between land uses are minimised.	While the site is located within 100m of Bunbury Curran Creek, the proposed alterations and operation of the business are all contained within the site. Therefore, no environmental impacts are expected to be produced on this waterbody from the proposal. Please refer to the Stormwater Assessment Report prepared by SLR Consulting Australia for further information.
6.12	Riverine Scenic Areas	Not applicable.

State Environmental Planning Policy (Resilience and Hazards) 2021

Clause	Provisions	What is proposed and statement of compliance
2	Coastal management	Not applicable.
3	Hazardous and offensive development	The proposed use is not considered to be hazardous or offensive development as it is defined as general industry. Therefore, the proposal can comply with these provisions. Please Refer to Hazardous Materials Management Register prepared by JMB Environmental Consulting for further information.
4	Remediation of land	Remediation is not required to accommodate the proposed business.

State Environmental Planning Policy (Transport and Infrastructure) 2021		
Clause	**Provisions**	**What is proposed and statement of compliance**
2	Infrastructure	
23	Waste or resource management facilities	
2.152	Definitions	The proposal is defined as a waste or resource management facility
2.153	Development permitted with consent	The proposal required development consent.
2.154	Exempt development	The proposal is not considered to be exempt development.
2.155	Exempt development—disposal of drug exhibit waste	Not applicable.
2.156	Additional permitted uses—Castlereagh Liquid Waste Disposal Depot	Not applicable.
2.157	Determination of development applications (1) In determining a development application for development for the purpose of the construction, operation or maintenance of a landfill for the disposal of waste, including putrescible waste, the consent authority must take the following matters into consideration— (a) whether there is a suitable level of recovery of waste, such as by using alternative waste treatment or the composting of food and garden waste, so that the amount of waste is minimised before it is placed in the landfill, and (b) whether the development— (i) adopts best practice landfill design and operation, and (ii) reduces the long-term impacts of the disposal of waste, such as greenhouse gas emissions or the offsite impact of odours, by maximising landfill gas capture and energy recovery, and (c) if the development relates to a new or expanded landfill— (i) whether the land on which the development is located is degraded land such as a disused mine site, and (ii) whether the development is located so as to avoid land use conflicts, including whether it is consistent with any regional planning strategies or locational principles included in the publication EIS Guideline: Landfilling (Department of Planning, 1996), as in force from time to time, and (d) whether transport links to the landfill are optimised to reduce the environmental and social impacts associated with transporting waste to the landfill.	The proposal will be managed effectively to ensure there will be negligible environmental impacts to the site and surrounding area.
Schedule 3	Traffic-generating development to be referred to TfNSW—Chapter 2	The proposal is defined as a waste or resource management facility and therefore requires referral to Transport for NSW for assessment. The proposal is accompanied by a Traffic Report prepared by Quantum Traffic that supports the proposal from a traffic and parking perspective.

12.0 Conclusion

In light of the above, the proposal is worthy of support in the context of the current Campbelltown City Council's Planning policy.