

9 January 2018

Dear Sir Madam,

**INTEGRATED DEVELOPMENT APPLICATION - CEMETERY, CHAPEL & RELATED CREMATORIUM & FUNCTION ROOMS, ADMINISTRATION BUILDING, SERVICES OUTBUILDING, PARKLAND AREAS, INTERNAL ROADS, CAR PARKING & ASSOCIATED LANDSCAPING & SITE SERVICING WORKS AT 13-15 PARK ROAD, WALLACIA NSW 2745**

I refer to the above development application and your correspondence received [REDACTED] on 23 November 2017. Thank you for the opportunity to examine the application to which Council provides the following comments.

A Plan for Growing Sydney - Metropolitan Rural Area

The site is located within the Metropolitan Rural Area (MRA) as identified in the recently released Western City District Structure Plan 2036. The MRA's are mapped across Western Sydney and highlight the intrinsic value these areas have to the district.

Wallacia has been identified in the MRA map primarily due to its scenic quality and its value in supporting tourism in the area.

A Plan for Growing Sydney adopted the term 'Metropolitan Rural Area' to describe the non-urban areas at the periphery of Greater Sydney. The draft Western Sydney District Plan (October 2017) provides actions to better manage these areas under:

Planning Priority W17 'Better managing rural areas' as follows:

*74. Maintain or enhance the values of the Metropolitan Rural Areas using place based planning to deliver targeted environmental, social and economic outcomes, including rural residential development.*

*75. Limit urban development to within the Urban Area, except for the investigation areas at Horsley Park, Orchard Hills, and east of The Northern Road, Luddenham.*



Given this, consideration for how the proposal supports the broader vision and value of Wallacia as a town within the MRA should be given.

#### Impact on the Catchment

##### *Sydney Regional Environmental Plan No. 20 Hawkesbury - Nepean River*

The site is identified in the Sydney Regional Environmental Plan No. 20 Hawkesbury - Nepean River (SREP 20). Part 2 of the SREP provides that consideration must be given to ensure that total catchment management and any cumulative impacts are considered in any development proposal.

As the proposal will involve disturbance to the ground for approximately 88,000 burial plots in proximity to the Nepean River, the impact on the catchment, including any impact on water quality and quantity should be fully considered prior to any approval.

The Preliminary Geotechnical, Groundwater and Salinity Assessment carried out for the proposal concludes that any:

*“adverse impact on groundwater conditions is considered to be low across the majority of the site, except low lying areas associated with Jerrys Creek” and that “further assessment of groundwater condition be undertaken for confirmation of the above to include:*

- *Detail surveying of the groundwater well locations and levels to obtain more accurate groundwater data.*
- *Ensure groundwater monitoring period includes at a minimum 2-3 significant wet weather events and corresponding dry weather periods.*
- *Detailed groundwater modelling (using MODFLOW) of the site to determine groundwater levels over the entire site*

The Statement of Environmental Effects (SOE) submitted with the application recommends that these issues be addressed through conditions of consent.

As SREP 20 applies to the site these further assessments should be undertaken prior to consent.

Land adjoining the Nepean River on the Wollondilly Shire is mapped as being within the 1:100 flood and the PMF flood. As the site is located within 400 metres of the Nepean River, the potential for flooding and pollutants entering the catchment from the proposed use is real and should also be investigated.

##### Sydney Regional Environmental Plan No. 9 Extractive Industry (No 2 1995) (SREP 9)

The site is within 400 metres of land identified in Schedule 1 of the Sydney Regional Environmental Plan No. 9 Extractive Industry (No 2 1995). This land is within the Wollondilly Local Government Area and is located at 2595 Silverdale Road, Wallacia on Lot 1 DP 1154130. The site is listed in Division 8 of the SREP ‘Crushed sandstone quarries of regional significance’ under its former Lot D of DP 339526 and is identified as Nolan Quarrying and Mining.

Clause 6 of SREP 9 outlines that when land within the vicinity of land described in Division 1, 4, 6, 7, 8 or 9 of Schedule 1:



*(2) A council must not grant an application for consent to carry out development of land to which this clause applies unless it is satisfied that, if the development is carried out in accordance with the consent:*

*(a) the proposed development will not be adversely affected by noise, dust, vibration or reduced visual amenity from any nearby extractive industry, and*

*(b) the proposed development will not in any way adversely affect any existing nearby extractive industry or prevent any such extractive industry from realising its full economic potential by adversely affecting future expansion of the extractive industry of which the council is aware.*

Therefore, any potential impact on the quarry operations needs to be considered.

#### Traffic

It is anticipated that if approval is granted some access to the site may be from the Wollondilly LGA along Silverdale Road and across Blaxlands Crossing Bridge, it is recommended that signage directing future users to the site be provided at the intersection of Silverdale Road to ensure appropriate way finding measures are in place.

#### Potential for toxic emissions from the crematory

The proponent has had an Air Quality Impact Assessment (AQIA) carried out by Northstar Air Quality, Wallacia Park, Park Road Wallacia, Crematory ref: 18.1014.FR1V3 and dated 2 November 2017.

The AQIA carried out an assessment of in stack concentrations and ambient air quality on two cremators in accordance with the Approved Methods for the Modelling and Assessment of Air Quality in NSW. Dispersion modelling shows some areas of Bents Basin and Silverdale may be exposed to low levels of mercury and NO<sub>x</sub> emissions. The assessment advises that all NSW EPA and NEPM ambient air quality criteria can be achieved during worst case scenario, maximum cremation rate, at all sensitive receptors.

In addition the proponent will also be carrying out further emission control methods, such as dry scrubbing/filtration and regular monitoring using Best Available Techniques as outlined in the NPI Emission Estimation Technique Manual for Crematoria. Providing that these additional control methods are identified in the conditions of consent Council's officers do not have any concerns about the impact on Bents Basin and Silverdale at this stage.

Warragamba Dam is the main water supply for Sydney and is located approximately 5 km from the site. This was taken into account as a sensitive receiver and results have been predicted to contribute less than 1.5% of the relevant criteria for toxic air pollutants at the dam. However, the report stresses that it is not a Health Impact Assessment and that a full assessment of the likely deposition of heavy metals to the water has not been carried out.

Therefore, it is recommended that a preliminary Human Health Risk Assessment be carried out to predict the effect of any fallout, given prevailing winds, on the quality of the water at Warragamba dam.

It is also noted that the effect of the crematory on the proposed Badgerys Creek airport, including effect on flight paths from plumes was not considered. This should be included in any air quality assessment.



