

# Referral Response - Environmental Health - Environmental Management

<b>Application Number:</b>	DA17/1092
<b>Referral Officer</b>	Teresa Dalton
<b>Referral Unit</b>	Environmental Health - Environmental Management
<b>Date of referral</b>	29 June 2018
<b>Land to be developed (Address):</b>	Lot 2 DP 1108408 13 - 15 Park Road WALLACIA NSW 2745
<b>Proposed Development:</b>	Staged Construction of Wallacia Memorial Park including Cemetery for 88,000 Burial Plots, Chapel & Related Crematorium & Function Rooms, Administration Building, Services Outbuilding, Parkland Areas, Internal Roads, Car Parking & Associated Landscaping & Site Servicing Works

## Recommendation

Not supported

## Detailed assessment

I have reviewed the additional information response by URBIS Doc ref: SA6970 dated 21 May 2018 and Acoustic Studios Doc ref: 20180320 CMC3216.0002.Let dated 20 March 2018. The information submitted to the Environmental Health Team is deficient for the purposes of enabling a thorough assessment of the application. In this regard, the following must be submitted to enable further consideration of the application:

### 1. Acoustic

#### **Intensification of use of the Clubhouse**

The Clubhouse will be used as a wedding and wakes function centre which may intensify its existing approved use.

Further information is therefore required to be provided relating to noise impacts the operation and use of the club would generate and impact on nearby residents for the day and night. Noise impacts include but are not limited to entertainment/music, delivery times of service vehicles, vehicles and noise from guests entering and exiting of vehicles and effects on sleep disturbance

### 2. Construction

A Construction Noise and Vibration Management Plan will need to be prepared prior to CC. Conditions of consent will be applied to achieve the relevant criteria.

### 3. Air Quality

In my previous response, it was noted that there the air quality impact assessment contained a clam wind conditions figure of 7.5% for the Badgerys Creek automatic weather station, whilst the meteorological input into the dispersion model used a calm wind conditions figure of only 2.5.%. In this respect a statement addressing this variation and its potential impact on the modelling results, and therefore impacts, was requested. It appears this statement has not been provided. This item needs to be addressed.

In addition, further information needs to be provided regarding seasonal inversion effects on the air quality and emissions from the crematorium, its effect on the neighbouring residents and surrounding areas.

### 4. Availability of Sewerage Services

The Civil Engineering Services Report Appendix K which was to address sewerage management was not submitted.

Other buildings on the site do not appear to be connected to sewer. There are limited existing sewer lines however there is no proposal within the application as to how future sewer or waste water connections are to occur specifically areas east of the Clubhouse.

If any areas are not connected to Sydney Water, or proposed to be connected to sewer, Council must be provided further information demonstrating how connection to the current sewer line is to occur.

Alternatively, a Waste Water Report, prepared from an appropriately qualified person outlining how the proposal will comply with Councils On-Site Sewer Management (OSSM) and Greywater Reuse Policy is to be submitted to council. Information to be provided to council is listed in Table A1 of the Council's Policy.

The report must also provide detail on management of the potential impact the wastewater disposal may have on burial locations, areas of public access, and salinity at the site.

#### **5. Waste Management**

The site has been identified through the DIPNR, 2002 'Salinity Potential in Western Sydney' as having 'moderate salinity potential'. The report states that scattered areas of scalding and indicator vegetation have been noted but concentrated levels have not been mapped. Saline areas may occur in this zone, which have not been identified or may change if risk factors change adversely.

Further assessments are required as recommended in the Preliminary Geotechnical, Groundwater and Salinity Assessment (Document Id 7912803) report **which states that additional assessments would need to be carried out to confirm improved characterisation of the site salinity conditions, such as low lying areas/drainage depressions**. This aspect is particularly important if wastewater is to be disposed of on-site.

#### **6. Land Contamination**

Report on Preliminary Site Investigation - Contamination by Douglas Partners project #76652.02 dated 6 November 2017 recommends further intrusive investigation is carried out to determine:

- The extent of each potential area of environmental concern (PAEC) and identify any further potentials contaminants of concern.
- Current possible contamination of land/grounds through leakage from asbestos piping, chemical storage/sheds and hazardous building materials and chemicals stored /spilt in sheds and areas of filling on site, 2x1000L above ground storage tanks containing diesel and the other with petroleum
- The presence of hotspots of pesticides, herbicides and fertilisers contaminants in the soil.
- The extent of each PAEC and identify any further potentials contamination of concern.

Given the above, the requirements of clause 7 of SEPP 55 have not been met, and site suitability for the proposed development has not been established.

The applicant is required to prepare and submit a Detailed Site Investigation of the site. The DSI is to be prepared by a suitably qualified and experienced land contamination consultant in accordance with NEPM 2013 and relevant NSW EPA Guidelines. Should remediation be required, a Remediation Action Plan will also need to be prepared and submitted to Council prior to determination of the application.

Yours sincerely,

Teresa Dalton

**Environmental Health Officer**