

3 September, 2015

Catherine Maddox
Sell & Parker
11 Meadow Way
BANKSMEADOW, NSW 2019
AUSTRALIA

Our Reference: 0313442L01_DPI RESPONSE.DOCX

Dear Catherine,

**RE: RESPONSE TO DPI DRAFT COMMENT ON FURTHER
SUBMISSIONS, SSD-5041, 45 AND 23-43 TATTERSALL ROAD,
KINGS PARK, NSW**



1. INTRODUCTION

This letter relates to the NSW Department of Primary Industries Water section (DPI Water) draft response to further submissions made by e-mail to NSW Department of Planning and Environment (NSW DPE), following DPI Water's review of Sell & Parker's revised Stormwater Management Plan. DPI Water provided recommended conditions regarding Breakfast Creek and the Riparian Land, and regarding groundwater.

DPI Water's proposed conditions are summarised as follows:

- a) The extent of the riparian zone should be specified. DPI Water notes that the 1996 Development Consent for the current Metal Recycling Facility specifies a 50m wide zone measured from the Breakfast Creek bank, which is to be "heavily vegetated"
- b) A permanent physical barrier (eg, bollards, logs, pathway or road) at the edge of the specified riparian zone to prevent damage to the vegetation
- c) Preparation of a Vegetation Management Plan

DPI Water's comment on groundwater requested clarification of the proposed stormwater retention basin base level relative to the water table, and requesting consultation should the base of the basin be below the water table.

2. EXTENT OF RIPARIAN ZONE

Figure 1 attached shows the location of the top of Breakfast Creek banks and the location of the 50m line from the banks superimposed on the proposed site layout. It is clear that on the eastern part of the site (currently occupied by Dexion and not part of the existing Sell & Parker facility) that the 50m zone cuts across areas proposed for operations. There are currently existing buildings in this area. Within the current site area, it would be possible to maintain the 50m zone, provided that the stormwater retention basin is permissible within the zone.

Figure 1 also shows the zone which currently forms the buffer between the site and the Creek, in which Council has recently undertaken extensive works on Sell & Parker land which are shown in the attached photographs. This has resulted in removal of vegetation that was previously present, which ERM understands was done without consulting Sell & Parker. Council's actions are outside the control of Sell & Parker; consequently if Council has decided to undertake works in the riparian zone, it should be Council's responsibility to maintain them. The shaded zone is outside the proposed area for the development, and is separated from the operational site by a boundary fence and an earth bund.

ERM considers that it is not reasonably possible for Sell & Parker to undertake management of Council's landscaping in the riparian zone outside the operational boundaries. Within the operational boundaries, the proposed layout provides for maintenance of the majority of the existing vegetation (which is present in a strip along the site boundary, with a wider area including trees around the stormwater retention basin). Replanting to improve the landscaping along the boundaries should be included as part of the proposed development.

3. PERMANENT PHYSICAL BARRIER

The site boundary fence and the earth bund provide for a physical barrier at the site boundary. Protection of existing vegetation within the site will be undertaken during the development works, and following completion of the works maintenance of barriers between operational areas and the landscaping will be achieved by a combination of kerbs, roadways and bollards (or similar) if necessary.

4. VEGETATION MANAGEMENT PLAN

A vegetation management plan for the on-site landscaping could be prepared according to DPI's suggested requirements and implemented. However, it does not appear to be practical to extend this to the area outside the site boundary fence since the landscaping and infrastructure was installed by Council.

5. GROUNDWATER

The proposed stormwater retention basin is 2.8m deep. The ground level in the proposed development is approximately equal to the current ground level in this area of the site. Based on the available information, it is expected that this depth is approximately 0.5-1m above the water table. During detailed design phase, a site investigation is planned, which will include obtaining groundwater levels in the area of the basin. The intention is that the basin will have a base above the water table by at least 0.5m. If intercepting the water table is unavoidable, DPI Water should be consulted.

The lining of the retention basin will be concrete sides and either a clay or concrete base. Detailed design will consider the integrity of the proposed liner (ie leakage prevention) together with geotechnical and structural considerations.

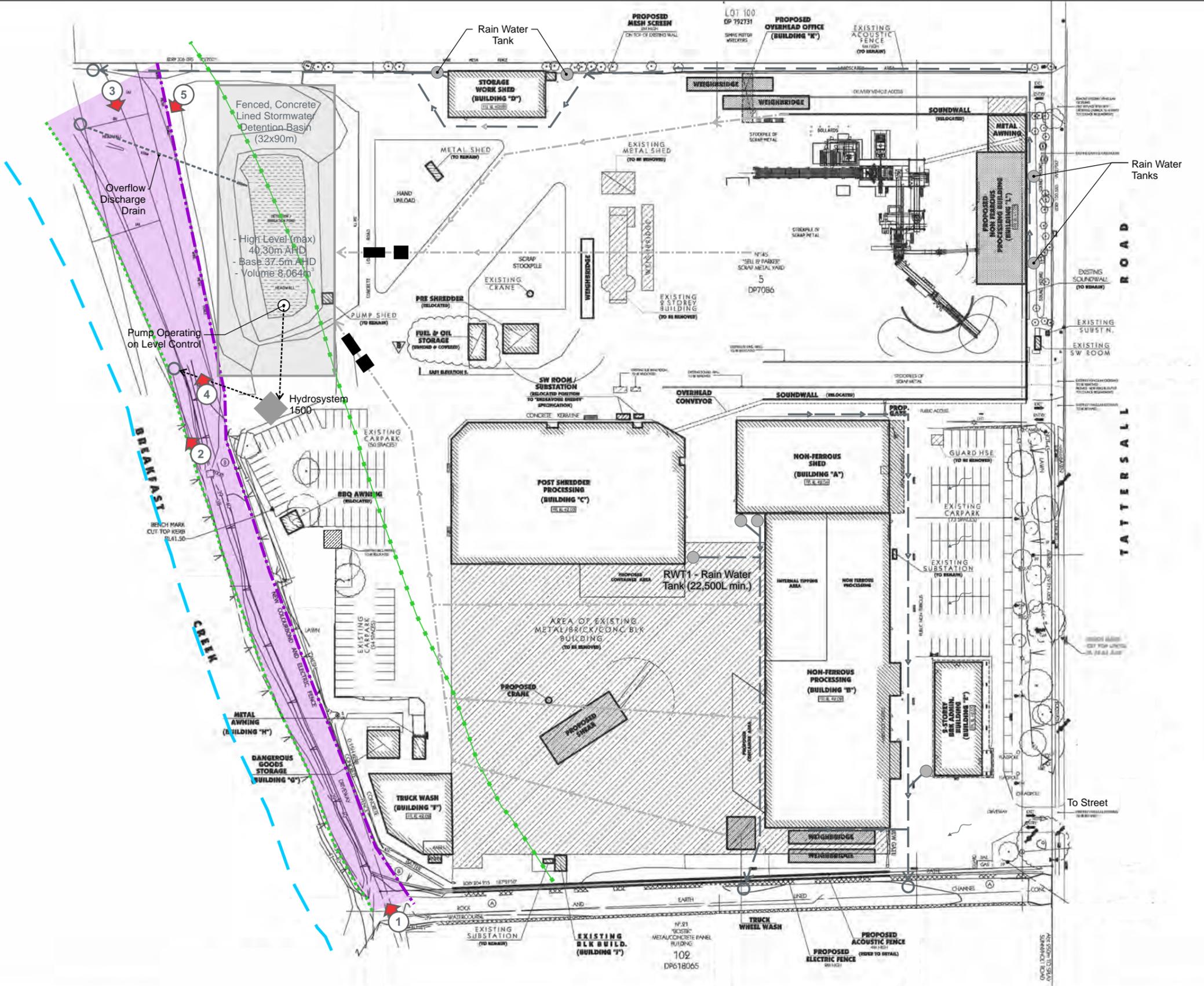
Yours sincerely,
for Environmental Resources Management Australia Pty Ltd



Sophie Wood
Partner

Annex A

FIGURES



- Legend**
- Existing Structure to Remain
 - Existing Structure to be Removed
 - Proposed New Structure
 - Existing Structure to Reuse or to be Relocated
 - 50m from Creek Bank
 - - - Top of Creek Bank
 - - - Area of Council Works
 - - - Line of Creek
 - ⊙ Photo Location
 - Discharge Locations
 - Rain Water Tank
 - Ecoceptor (Primary Treatment)
 - Stormceptor (Secondary Treatment)
 - Hydrosystem - 1500 (Tertiary Treatment)
 - - - 'Dirty' Drainage (Dish Drain)
 - Clean Drainage (Underground - No Grates)

Source:
 Alگوی Zappia & Associates Pty Ltd,
 P4144, 18/05/15.

Drawing Not to Scale

Client:	Sell & Parker Pty Ltd
Drawing No:	0313447s_RDPI_C001_R0.cdr
Date:	03/09/2015
Drawn by:	GC
Reviewed by:	SW

This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.

Figure 1 - Proposed Site Layout

Waste Metal Recovery, Processing and Recycling Facility
 45 and 23- 43 Tattersall Road, Kings Park, Blacktown
 Environmental Resources Management ANZ
 Auckland, Brisbane, Canberra, Christchurch,
 Melbourne, Newcastle, Perth, Port Macquarie, Sydney





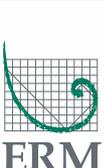
Photograph 1



Photograph 2



Photograph 3

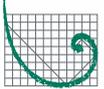
Client: Sell & Parker Pty Ltd	Photolog	
Drawing No: 0313447s_RDPI_PL-C001_R0.cdr		
Date: 03/09/2015 Drawing size: A3	Waste Metal Recovery, Processing and Recycling Facility 45 and 23- 43 Tattersall Road, Kings Park, Blacktown	
Drawn by: GC Reviewed by: SW	Environmental Resources Management ANZ Auckland, Brisbane, Canberra, Christchurch, Melbourne, Newcastle, Perth, Port Macquarie, Sydney	
<small>This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.</small>		



Photograph 4



Photograph 5

Client: Sell & Parker Pty Ltd	Photolog	 ERM
Drawing No: 0313447s_RDPI_PL-C001_R0.cdr	Waste Metal Recovery, Processing and Recycling Facility 45 and 23- 43 Tattersall Road, Kings Park, Blacktown	
Date: 03/09/2015 Drawing size: A3 Drawn by: GC Reviewed by: SW	Environmental Resources Management ANZ Auckland, Brisbane, Canberra, Christchurch, Melbourne, Newcastle, Perth, Port Macquarie, Sydney	
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