



Planning &  
Environment

**STATE SIGNIFICANT DEVELOPMENT  
ASSESSMENT:  
Waste Recycling and Transfer Facility  
52 Anderson Road, Smeaton Grange  
SSD 7424**



Environmental Assessment Report  
Section 89H of the  
*Environmental Planning and Assessment Act*  
1979

November 2017

Cover Photo: Photomontage of Smeaton Grange Waste Recycling and Transfer Facility

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## ABBREVIATIONS AND DEFINITONS

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Applicant	Benedict Recycling Pty Ltd
C&D	Construction and Demolition Waste
C&I	Commercial and Industrial Waste
CEMP	Construction Environmental Management Plan
Commission	Planning Assessment Commission
Construction	Earthworks, erection of buildings and other infrastructure covered by this consent
Council	Camden Council
DA	Development Application
Day	The period from 7 am to 6 pm on Monday to Saturday, and 8 am to 6 pm on Sundays and Public Holidays
Department	Department of Planning and Environment
The Development	As described in the EIS and RTS and approved by this Development consent for the construction and operation of the Smeaton Grange Waste Recycling and Transfer Facility
EIS	Environmental Impact Statement titled <i>Environmental Impact Statement – Smeaton Grange Waste Recycling and Transfer Facility</i> prepared by EMM dated June 2016
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
EPL	Environment Protection Licence
Evening	The period from 6 pm to 10 pm
Infrastructure SEPP	<i>State Environmental Planning Policy (Infrastructure) 2007</i>
Minister	Minister for Planning (or delegate)
OEH	Office of Environment and Heritage
Night	The period from 10 pm to 7 am on Monday to Saturday, and 10 pm to 8 am on Sundays and Public Holidays
RRF	Resource Recovery Facility
RMS	Roads and Maritime Services
RTS	Response to Submissions titled <i>Response to Submissions Smeaton Grange Waste Recycling and Transfer Facility 52 Anderson Road, Smeaton Grange SSD7424</i> , prepared by EMM, dated January 2017
SEARs	Secretary's Environmental Assessment Requirements
Secretary	Secretary of the Department, or nominee
SEPP	State Environmental Planning Policy
Sensitive receiver	Residence, education institution, health care facility, religious facility and child care facility
SRD SEPP	<i>State Environmental Planning Policy (State and Regional Development) 2011</i>
SSD	State Significant Development
tpa	tonnes per annum
WARR	Waste Avoidance and Resource Recovery Strategy
Waste	as defined in the <i>Protection of Environment Operations Act 1997</i>
WRTF	Waste Recycling and Transfer Facility

## EXECUTIVE SUMMARY

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Benedict Recycling Pty Ltd (the Applicant) has lodged a Development Application (DA) and accompanying Environmental Impact Statement (EIS) seeking consent for the construction and operation of a new waste recycling and transfer facility (WRTF) at 52 Anderson Road at Smeaton Grange in the Camden local government area (LGA).

This greenfield site comprises 0.7 hectares (ha) and lies within a large industrial estate, referred to as the Smeaton Grange Industrial Estate, which is some 270 ha in area. The site is surrounded by industrial land uses to the north, south and west. Low density residential zoned land at Currans Hill is located 120 m from the site's eastern boundary beyond an embankment which acts as an environmental buffer between the two land uses. Adjacent the site to the north-east is Kenny Creek riparian corridor.

The Applicant is seeking development consent to construct a purpose-built facility that would process up to 140,000 tonnes per annum (tpa) of inert pre-classified general solid (non-putrescible) waste comprising construction and demolition (C&D) wastes and selected commercial and industrial (C&I) wastes from businesses and members of the public.

Waste processing activities are proposed to occur on site Monday to Saturday between the hours of 7 am and 4 pm. However, the acceptance and dispatch of waste on site is proposed to occur Monday to Friday between the hours of 6 am to 10 pm, Saturday between the hours of 6 am and 5 pm and Sundays between the hours of 8 am and 4 pm. As such, the Applicant has proposed that no operations would be carried out on site on any day between the hours of 10 pm and 6 am.

The proposed development is consistent with the NSW Government's direction in achieving the targets in the Waste and Avoidance and Resource Recovery Strategy 2014-2021, notably it would assist in the recovery of C&D and C&I wastes. The proposed development is also in accordance with the Premier's Priorities as well as current strategic planning policies including *A Plan for Growing Sydney*.

The proposed development has a capital investment value of \$2,541,096 and is expected to generate 10 full-time equivalent construction jobs and 15 operational jobs.

The proposed development is classified as State significant development (SSD) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as it meets the criteria in Clauses 23(2) and 23(3) of Schedule 1 in *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP). Consequently, the Minister for Planning is the consent authority for the application. However, as there were more than 25 public submissions in the nature of objections that were received and the local Council objected to the application, the Planning Assessment Commission (the Commissions) must determine the application.

The Department of Planning and Environment (the Department) exhibited the development application and accompanying EIS from Thursday 14 July 2016 to Friday 26 August 2016. A total of 161 submissions were received, including 6 Council and NSW Government Agencies 155 from the public. Of these, 154 public submissions objected to the application as did Camden Council (Council).

The key concerns raised in public submissions related to potential noise, traffic and air quality impacts. The issues related to loss of amenity and sleep disturbance due to increased industrial noise and additional traffic impacts on local roads. With respect to air quality, concern was raised about the potential health and amenity impacts.

Overall, many of the local residents from Currans Hill felt that developing a waste recycling and transfer facility on this site is too close to where they live and that it should be located someplace else.

The Applicant submitted a Response to Submissions (RTS) in January 2017 which had already been subject to a review by Council and key NSW Government authorities. Through the RTS, the Applicant amended the application by removing night time operations between 10 pm and 6 am and confirmed the facility would not accept kerbside green or putrescible waste collected by Council. The RTS also included additional information on proposed waste streams, traffic, drainage, noise and air quality to

address and clarify matters raised in submissions. A number of management and mitigation measures from the EIS were also updated at this time.

Through its assessment of the application and in response to issues raised by the public, the Department has required the Applicant to make changes to the proposal. The Department has also worked closely with the Environment Protection Authority (EPA) and the Applicant to ensure residential amenity is maintained during operations.

In response to community concern, and as requested by the Department, the Applicant reduced the site's operating hours to include a night time respite period. The Department has developed appropriate noise criteria in conjunction with the EPA for the one hour shoulder period between 6 am and 7 am during which time the Applicant would like the site to be permitted to receive waste deliveries. Whether the site is permitted to operate during this period in the future would depend on the outcome of a monitoring and verification program that the Department has required the Applicant to carry out. The program requires the Applicant to demonstrate the criteria is able to be met during this period.

The Department has also insisted the stockpiles and product bays be covered (which would assist in mitigating noise and dust emissions at source) and the acoustic fencing be erected prior to construction, rather than operation of the development as was proposed by the Applicant, to help mitigate noise emissions from the site straightaway.

A stringent set of conditions have been developed and are recommended which the Department is confident would ensure the level of noise experienced by the surrounding community would not have an adverse impact on existing amenity.

Following these changes to the proposal and through the provision of additional information in the RTS, most public authorities advised the Department that they were satisfied their concerns have been adequately addressed or can be managed through appropriate conditions of consent. Council acknowledged that many of the issues raised its original submission had been addressed, however maintained its objection to the application on the basis that the proposal is not in the public interest given the concerns of local residents.

The Department's assessment of the application has fully considered all relevant matters under Section 79C of the EP&A Act, the objects of the EP&A Act and the principles of ecologically sustainable development. The Department has identified the following key issues for assessment:

- noise
- transport
- air quality

The Department's assessment concluded that the impacts of the development can be mitigated and/or managed to ensure an acceptable level of environmental performance, subject to the recommended conditions of consent. In summary, the development:

- would positively contribute to the State's *Waste Avoidance and Resource Recovery Strategy* performance for both C&I and C&D waste
- would meet the relevant air quality and noise criteria at sensitive receivers
- would generate traffic which could be accommodated on the local and regional road network without any significant impacts on its safety, capacity or efficiency
- would provide a range of environmental and economic benefits for the region, through resource recovery and the provision of 25 new operational jobs.

Following from its assessment of the proposal, the Department considers that the proposal is approvable subject to any conditions of consent. This report is hereby presented to the Commission for determination.

# 1. BACKGROUND

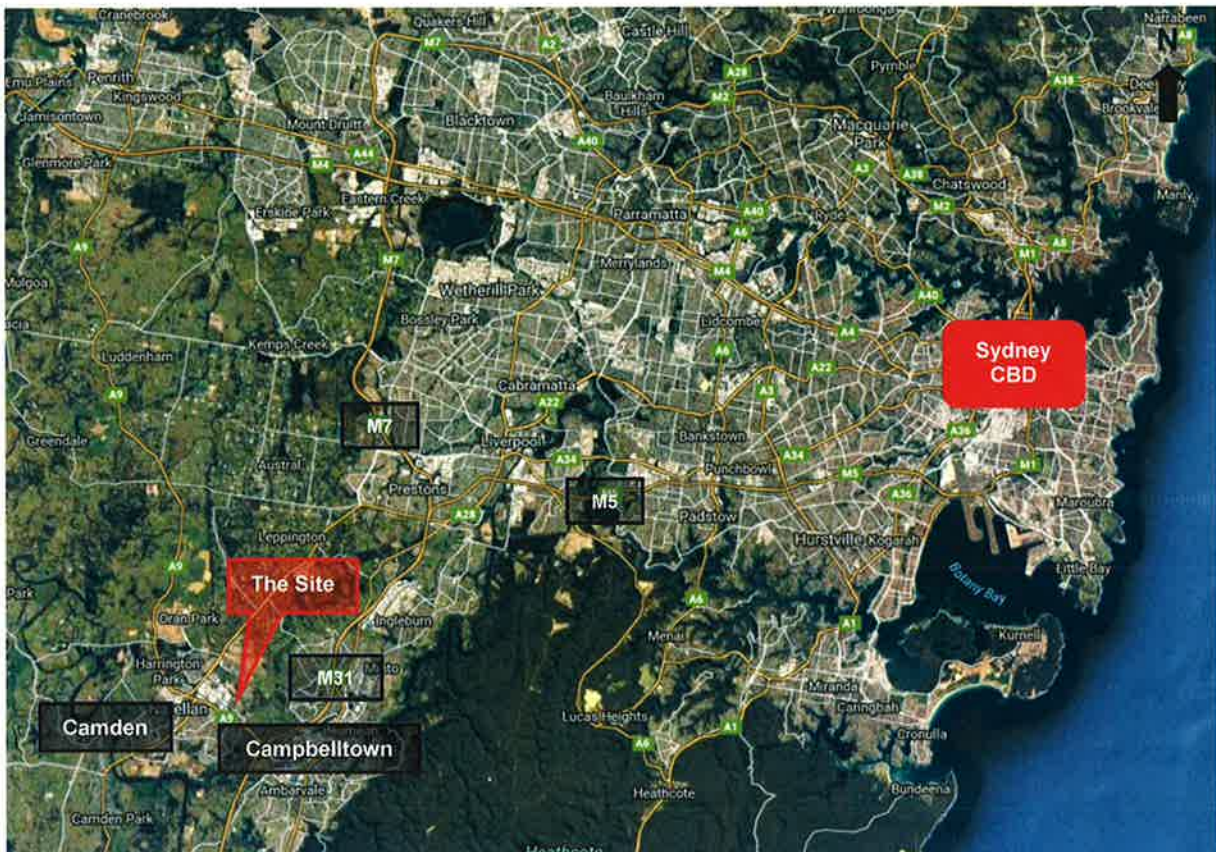
## 1.1. The Department's Assessment

This report details the Department of Planning and Environment's (the Department) assessment of the State Significant Development (SSD-7424) for a waste recycling and transfer facility (WRTF) located at 52 Anderson Road, Smeaton Grange. The proposed development involves the construction and operation of the WRTF on a vacant industrial lot within the Smeaton Grange Industrial Estate. The Department's assessment considers all documentation submitted by Benedict Recycling Pty Ltd (the Applicant), including the Environmental Impact Statement (EIS) and Response to Submissions (RTS), and submissions received from government agencies, stakeholders and the public. The Department's assessment also considers the legislation and planning instruments relevant to the site and the development.

This report describes the proposed development, surrounding environment, relevant strategic and statutory planning and the issues raised in submissions. The report evaluates the key issues associated with the development and provides recommendations for managing any impacts during construction and operation. The Department's assessment of the Smeaton Grange WRTF has concluded that the development is in the public interest and is approvable subject to any conditions of consent.

## 1.2. Development Background

The Applicant is seeking development consent to develop a WRTF on a site at Smeaton Grange in the Camden Local Government Area (LGA). The site is located approximately 60 kilometres (km) from the Sydney central business district, 9 km north-west of Campbelltown, 8 km north-east of Camden and 3 km west of the Hume Motorway (see **Figure 1**).



**Figure 1: Regional Location**

The site lies within an area of former agricultural land that has been rezoned, subdivided and is being progressively developed for industrial use. The Applicant has entered into a joint venture with the landowner to purchase the site for the purposes of developing a WRTF to service Narellan and other areas in the surrounding Macarthur region that are experiencing a period of sustained residential and

industrial growth. This, in turn, is generating additional demand for waste recycling and disposal activities.

The Applicant is seeking development consent to process up to 140,000 tonnes per annum (tpa) of inert pre-classified general solid (non-putrescible) waste. Waste types received would comprise construction and demolition (C&D) wastes and selected commercial and industrial (C&I) wastes from businesses and members of the public. This material would be screened and sorted on site to produce saleable recycled materials for dispatch to customers with unrecyclable material being sent to landfill for disposal. Products include soils and segregated recycled materials that would be sent to other recycling facilities for further processing (e.g. ferrous and nonferrous metals, dry paper/cardboard, timber, masonry and plastics).

The processing of this waste would take place within a purpose-built facility that would be constructed and operated on the site by the Applicant. In particular, development consent is sought for levelling and hard surfacing the site, constructing a 1,300 square metre (m<sup>2</sup>) shed at a maximum height of 11 metres (m), installing 7 product storage bays, constructing a demountable office with staff amenities and car parking, erecting perimeter fencing and installing ancillary infrastructure including a surface water management system, a bunded diesel storage tank, a dust suppression system, 3 weighbridges and wheel washes for outbound vehicles.

Benedict Recycling is part of Benedict Industries Pty Ltd which is a NSW based group of companies, established in 1966 and whose business involves quarrying, resource development and recycling. The Benedict Industries group provide a range of sands, soils, sandstone, decorative aggregates and recycled products to customers throughout the Sydney region and NSW including Roads and Maritime Services (RMS), Sydney Water, local councils, Holcim, Boral Concrete and Concrete. Benedict recycling are currently operating recycling facilities at Chipping Norton and Belrose and are soon to open additional facilities in Newcastle and Canberra, pending necessary approvals.

### 1.3. Site Description

The site comprises 0.7 hectares (ha) of industrial zoned land located at 52 Anderson Road, Smeaton Grange (see **Figure 2**). The site is legally described as Lot 319 in DP 1117230. The site is a relatively flat grassed area that is currently vacant and devoid of any vegetation (see **Figures 2 and 3**).



**Figure 2:** View across the site from Anderson Road



**Figure 3:** View north-west across the site from the embankment to the rear of the southern boundary

#### 1.4. Surrounding Land Uses

The site is located within the Smeaton Grange Industrial Estate which comprises some 270 ha in overall area. The site itself is surrounded by industrial land uses to the north, south and west. Low density residential zoned land at Currans Hill is located 120 m from the eastern boundary of the site beyond 2 m high fencing that is installed on top of an embankment which acts as a visual and acoustic buffer between the industrial estate and the suburb of Currans Hill. This was a mitigation feature that was a requirement of Camden Council's development consent for the original industrial subdivision (see **Figure 4**).

Adjacent to the site to the north-east is Kenny Creek riparian corridor. The vegetation along the creek corridor has been identified as being mainly re-vegetated dry sclerophyll shrub understorey. Further to the north-east is an Endeavour Energy data storage building. To the south-west of the site is a large warehouse and distribution facility and to the north-west on the adjacent lot is a metal roofing and building supply warehouse.



Figure 4: Site Context

The site is located in close proximity to the major arterial roads of Camden Valley Way and Narellan Road. These intersect with the M5 and M7 motorways and the M31 Hume Motorway, providing good road connections for the transportation of materials to and from the site (see **Figure 1**).



## 2. PROPOSED DEVELOPMENT

### 2.1. Description of the Development

The main components of the proposed development as modified by the RTS are summarised in **Table 1**, shown in **Figures 5 and 6** and described in full in the EIS and RTS, which is included in **Appendix D**.

**Table 1: Main Development Components**

Aspect	Description
<b>Development Summary</b>	<b>The development and operation of a WRTF to process up to 140,000 tpa of non-putrescible waste.</b>
Waste Type	General solid waste (non-putrescible) as defined by the <i>Waste Classification Guidelines – Part 1 Classification of Waste</i> (EPA, 2014).
Site area	0.7 hectares (ha)
Earthworks, civil works and services extension	<ul style="list-style-type: none"> <li>grading of land towards the north-eastern corner of the site</li> <li>minor ground excavation from installing anchors for demountable office and footings for fencing</li> <li>hard surfacing of the site with concrete or asphalt, with perimeter curbs along the south western, eastern and southern boundaries</li> <li>installation of a 68.4 m<sup>3</sup> concrete lined sediment basin to drain via pipe to the street kerb inlet pipe near the north-eastern corner of the site</li> <li>connection to services (water and sewer, electricity and telecommunications).</li> </ul>
Primary Site Components	<ul style="list-style-type: none"> <li>a receivable and processing shed with dimensions of 45.67 m to 61.96 m in length, 24 m wide and 11 m high with a floor area of 1,300 m<sup>2</sup></li> <li>a stormwater management system (see <b>Figure 6</b>)</li> <li>8 employee and 2 visitor parking spaces (including 1 disabled space)</li> <li>a weighbridge area comprising 3 weighbridges, wheel washes and site office</li> <li>demountable amenities, including lunch room and toilets</li> <li>7 product bays, which would be 4 m high and blockwalled, with associated hand unloading area and awning</li> <li>an enclosed, above ground bunded 30,000L diesel storage tank</li> <li>boundary fencing to a maximum height of 10 m along the south-eastern boundaries, 4 m along a portion of the eastern boundary, 3 m on the western boundary and 2 m at the rear and sides of the main shed</li> <li>a 2.1 m high palisade fence with automatic metal gates at the ingress and egress points</li> <li>waste/product stockpiles</li> <li>out of hours bin storage and waste truck parking.</li> </ul>
Main Processing Shed	<ul style="list-style-type: none"> <li>concrete tipoff inspection area</li> <li>flip-flow screen waste sorter</li> <li>an enclosed picking line under a metal roof</li> <li>waste/product stockpiles covered by an awning</li> <li>use of a 13 tonne excavator and front end loader.</li> </ul>
Traffic	<ul style="list-style-type: none"> <li>Construction: 20 light and 20 heavy vehicle movements daily (40 total)</li> <li>Operational: 170 light and 106 heavy vehicle movements daily (276 total)</li> </ul>
Road and infrastructure works	Construction of a 12.5 m wide two-way driveway at the site entrance with Anderson Road as road infrastructure within the wider estate is already in place.
Landscaping	<ul style="list-style-type: none"> <li>approximately 420 m<sup>2</sup> of the front setback area would be landscaped with native species being red gums and bottlebrush set behind a garden bed</li> <li>groundcover and shrubs would be planted around visitor car parking spaces.</li> </ul>
Construction timeframe	10 to 12 weeks
Hours of operation	<ul style="list-style-type: none"> <li>accept waste deliveries and dispatch: <ul style="list-style-type: none"> <li>Monday to Friday, 6 am to 10 pm</li> <li>Saturday, 6 am to 5 pm</li> <li>Sunday, 8 am to 4 pm</li> </ul> </li> <li>waste processing: <ul style="list-style-type: none"> <li>Monday to Saturday, 7 am to 4 pm</li> <li>Sundays or public holidays, no processing</li> </ul> </li> </ul> <p>(the site would be closed during the evening and night time periods outside these hours)</p>
Capital investment value	\$2,541,096
Employment	10 full-time equivalent construction jobs and 15 operational jobs

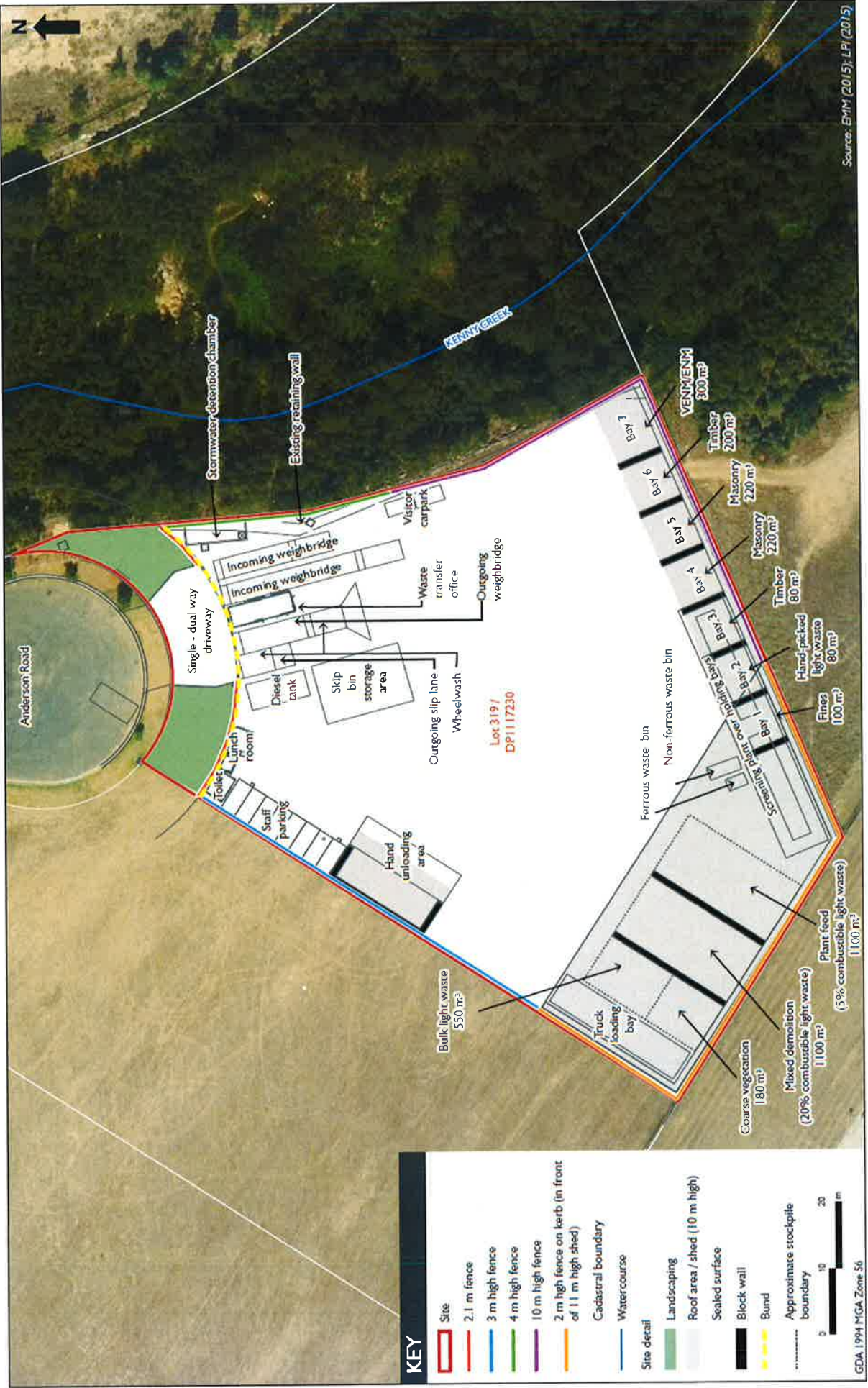


Figure 5: Site Layout Plan

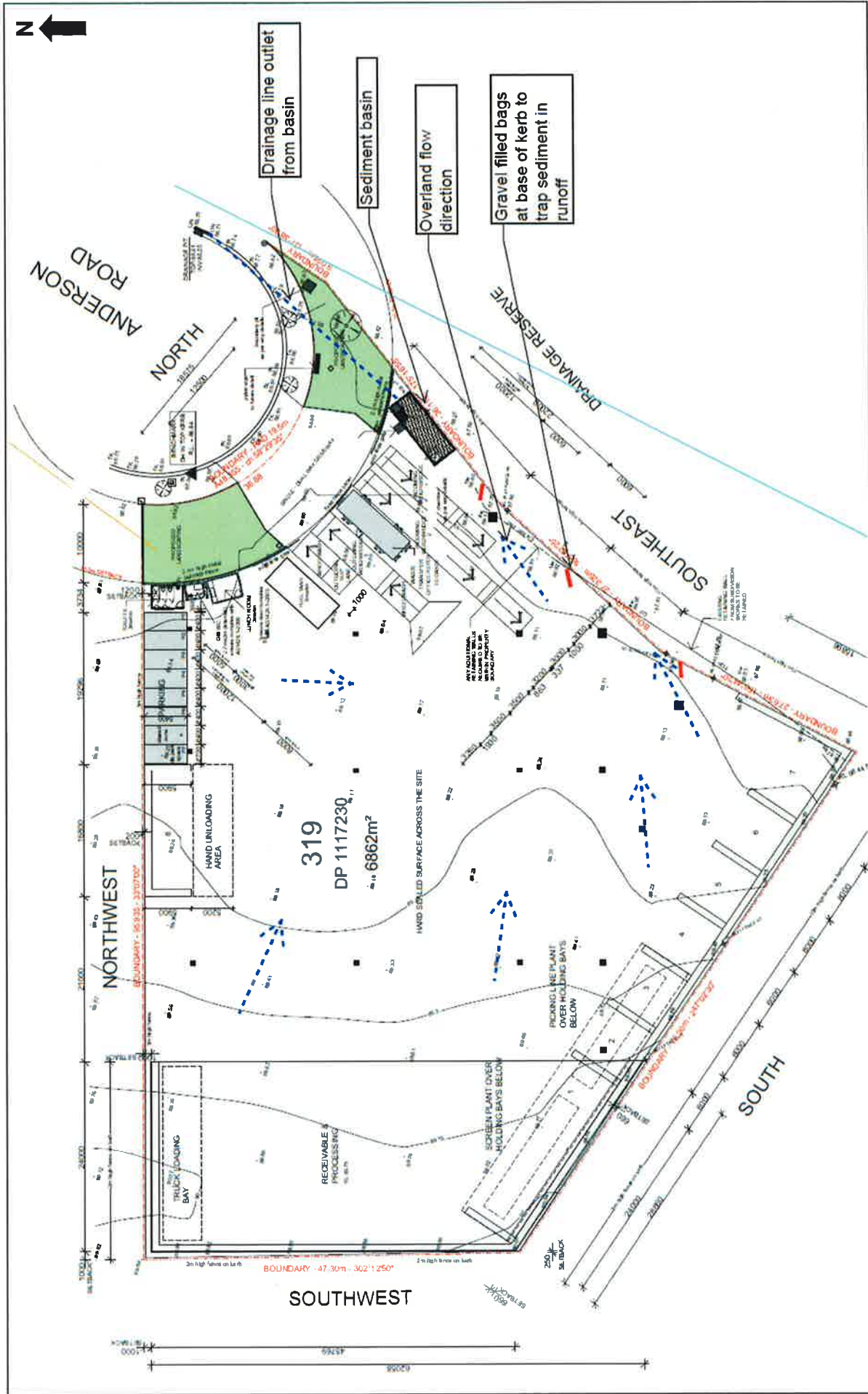


Figure 6: Stormwater Concept Plan

## 2.2. Waste Materials, Sources and Quantities

The WRTF would accept only pre-classified general solid waste (non-putrescible) as defined by the *Waste Classification Guidelines – Part 1 Classification of Waste* (EPA, 2014).

In particular, waste received would be made up of C&D wastes and selected C&I wastes, which would predominantly consist of the following waste types:

- co-mingled and segregated construction and demolition waste, including tiles, bricks, concrete, glass, metal, wood, asphalt, gyprock and vegetation and uncontaminated soils
- co-mingled and segregated commercial and industrial waste from factories and commercial premises such as paper/cardboard, cloth, plastics, rubber, wood, suitable slags (the residual by-product after a desired metal has been separated from its raw ore), concrete and asphalt batching wastes
- excavated natural materials (ENMs) including virgin natural excavated material (VENM) such as sand and sandstone which are generated during bulk earthworks and road and infrastructure construction and repair
- garden waste
- wood waste
- metals
- rail ballast and spoils.

The Applicant proposes to process up to 140,000 tonnes of these waste materials per annum. On average, the site would accept around 450 tonnes of waste per day. The Applicant has proposed to limit the stockpiling of waste on site at any given time to 4,141 m<sup>3</sup>.

## 2.3. Recycling and Transfer Process

The majority of waste accepted at the site would be from councils, contractors and businesses and the general public. Waste would be delivered to the site in a range of vehicles including:

- light vehicles such as Ute's with box trailers
- single or dual axle heavy vehicles such as skip bin trucks and semi-trailers
- multiple axle combination heavy vehicles such as truck and dog combinations.

Vehicles would access the site from Anderson Road via one of the two incoming weighbridges where the load would be classified and visually inspected for non-compliant waste. Should a non-compliant load be found, the weighbridge operator would turn away the vehicle. A non-compliant load would contain waste products which have not been pre-classified as general solid waste (non-putrescible) including, for instance putrescible wastes, liquid wastes or asbestos. Compliant loads would be directed to one of the unloading areas based on the type of vehicle and type of waste. Light vehicles would be directed to the under-cover 'hand unloading area', while heavy vehicles would be directed to an area within the main processing structure (see **Figure 5**). Heavy vehicle waste would be unloaded or tipped onto a clear portion of the hardstand under the processing structure where it would be visually inspected for potential non-compliant wastes. Any non-compliant loads would be immediately reloaded for removal from the site and recorded in a 'rejected load' register. Following the unloading of a compliant waste load, the truck or light vehicle would exit the site via the outgoing weighbridge utilising the wheel-wash.

Waste processing would include sorting, screening and picking. Whereas some resource recovery facilities (RRF) utilise a single piece of processing machinery to carry out these functions, the Applicant proposes to use multiple pieces of equipment depending on the waste type and size. This would include excavators for sorting and separating waste types into stockpiles, front end loaders for moving waste around the processing structure, a flip flow screen for separating fine materials (< 6 mm) and course materials and a picking line for separating residual wastes by hand from the flip flow screen (a screening machine designed to sort different materials) which are not considered suitable for further processing. Waste from the 'hand unloading area' would be transferred to the processing structure each evening for processing. No shredding or crushing would occur on site.

Once sorted, the materials would be stored in one of seven undercover bays depending on type, including:

- concrete, bricks, tiles, concrete batching waste and recycled construction materials (2,500 t storage capacity)
- wood (300 t storage capacity)

- screened soil (2,000 t storage capacity)
- co-mingled waste (2,000 t storage capacity)
- green waste (150 m<sup>3</sup> storage capacity).

These materials would be stockpiled until a sufficient amount is available to justify dispatch via a heavy vehicle for sale or further processing at another facility. Heavy vehicles which would transport recycled wastes include semi-trailers and truck and dog combinations. The Applicant suggests 20% of the incoming waste would be considered non-recyclable residual waste which would be sent to an EPA licenced facility for disposal.

A flowchart of the proposed recycling and transfer process for the site is shown in **Figure 7**.

#### **2.4. Applicant's Need and Justification for the Development**

The Applicant operates a well-established recycling business in NSW and is therefore supportive of the positive environmental benefits the operation would bring when compared to disposal of waste materials to landfill and the contribution it would make towards reducing waste and increasing recycling rates as promoted by current NSW Government waste strategies (see **Section 3.1**).

The area surrounding the site is experiencing rapid residential and industrial growth, which is in turn creating significant demand for mixed waste recycling services to process large volumes of C&D and C&I waste. The WRTF in Smeaton Grange would complement Spring Farm Advanced Resource Recovery Park (ARRT) which is located some 4 km to the south and is the only other waste recycling facility present in the immediate area capable of processing these waste streams. The WRTF would accept waste from businesses and the general public alike and allow additional waste generated in the Narellan, Camden and Harrington Park areas to be efficiently recycled.

As such, the Applicant argues the site is ideally suited for the development of a waste recycling facility of this nature because being centrally located in Narellan, it is well located to meet the resulting demand for waste recycling in the context of development growth in the region. The site is also considered suitable as it is already zoned for industrial use, is located with an estate of this nature (with readily available connections to utilities and services) and is easily accessible from arterial roads and major freeways.

The Applicant suggests the development proposal has the following economic, social and environmental benefits:

- diverting recyclable and reusable wastes away from landfill thereby preserving space for less recyclable materials
- extending the life of landfill operations by reducing the pressure for new landfill sites to be developed
- providing a depository for co-mingled waste for which there is limited recycling alternatives in the immediate area
- making recycled soil materials which would be used by the construction industry and on government projects to assist meeting their environmental commitments to use such materials
- producing segregated recycled materials for further processing including ferrous, non-ferrous metals, gyprock, timber and plastics
- processing materials so as to be 'crusher ready' for masonry recyclers (i.e. bricks, concrete, tiles, asphalt)
- contributing to the economy of NSW through local business turnover
- creating 10 jobs during construction and 15 jobs once operational.

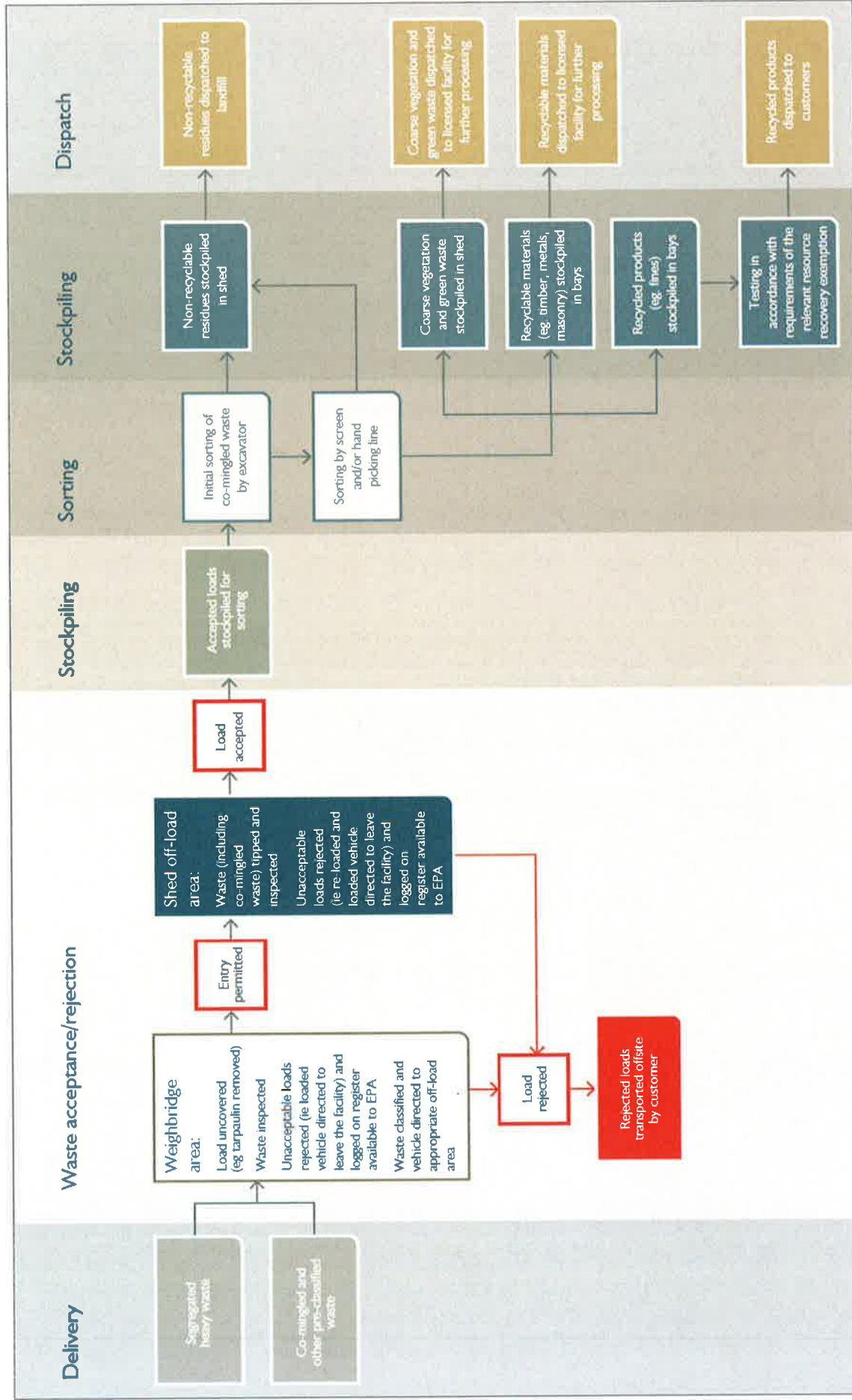


Figure 7: Waste Handling Flowchart

### 3. STRATEGIC AND STATUTORY CONTEXT

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#### 3.1. Strategic Context

##### 3.1.1. Premier's Priorities

The NSW Government has announced the Premier's Priorities which cover 12 key areas including economic growth, provision of infrastructure, protection of vulnerable communities, improving education and environmental protection. One of the Premier's key priorities is 'Creating Jobs'. The NSW Government aims to provide 150,000 new jobs by 2019.

The development would contribute toward 'Creating Jobs' by providing 10 new construction jobs and 15 operational jobs in the Camden LGA. The development also represents a \$2,541,096 million capital investment that would generate local business turnover in the area.

##### 3.1.2. A Plan for Growing Sydney

A Plan for Growing Sydney was produced by the Greater Sydney Commission (GSC) and is the current regional plan applying to the Greater Sydney Region. The WTRF is also consistent with the goals, directions and actions outlined in A Plan for Growing Sydney as it would:

- provide additional employment opportunities in the Campbelltown Macarthur region (Action 1.7.1)
- provide an industry which will stimulate economic activity and support local businesses and the local community in the Campbelltown Macarthur region (Action 1.7.4)
- meet government's requirement to identify and protect land for new waste management facilities by providing recycling infrastructure to process commercial and industrial waste (Action 4.3.2) and
- leverage off improved access to services and jobs following improvements to Camden Valley Way (Strategic Centres Priorities).

In October 2017, the GCS released five draft district plans encompassing Greater Sydney that will guide the implementation of the draft Greater Sydney Regional Plan at a district level, which will in time supersede A Plan for Growing Sydney.

##### 3.1.3. Draft Greater Sydney Regional Plan

In the Draft Greater Sydney Region Plan, the site is located within the Narellan Strategic Centre which is targeted for jobs and growth through Planning Priority W11: Growing investment, business opportunities and jobs in strategic centres. This Planning Priority delivers on Objective 22: Investment and business activity in centres of the Draft Plan.

##### 3.1.4. Draft Western City District Plan

The Draft Western City District Plan – Our Greater Sydney 2056 is a 20-year plan to manage growth in the context of economic, social and environmental matters to achieve the 40-year vision for Greater Sydney.

The proposal also accords with Planning Priority W19 of the Draft Western City District Plan – Our Greater Sydney 2056 which is aimed at reducing carbon emissions and managing energy, water and waste efficiently. In doing so, this Planning Priority contributes to several objectives in the draft Greater Sydney Region Plan, namely Objective 33: A low-carbon city that contributes to net-zero emissions by 2050 and mitigates climate change, Objective 34: Energy and water flows are captured, used and re-used and Objective 35: More waste is re-used and recycled to support the development of a circular economy.

##### 3.1.5. NSW Waste Avoidance and Resource Recovery

The NSW Waste Avoidance and Resource Recovery (WARR) Strategy 2014–21 is produced every five years and is a key component of the Government's vision for the environmental, social and economic future of the state that is supported financially by the Waste Less, Recycle More initiative.

The primary goal of this strategy is to enable all of the NSW community to improve the environment and community well-being by reducing the environmental impact of waste and using resources more efficiently. Using resources efficiently and keeping materials circulating in the productive economy can also help to create jobs and grow the NSW economy.

The WARR Strategy for 2014-2021 sets resource recovery targets for C&I and C&D waste and other waste types. In particular, the revised WARR Strategy aims to increase recycling rates by 2021–22, as follows, to which the facility would contribute to:

- C&I waste from 57% (in 2010–11) to 70%
- C&D waste from 75% (in 2010-11) to 80%
- increase the waste diverted from landfill from 63% (in 2010-11) to 75%.

### 3.1.6. Draft Standards for Managing Construction and Demolition Waste in NSW

The EPA's consultation paper Standards for Managing Construction and Demolition Waste in NSW (the draft Standards) outlines proposed waste industry reforms, including standards for licensed C&D waste facilities. Whilst the proposed Standards are currently in draft form, it is considered appropriate for facilities processing large quantities of C&D waste to address the proposed requirements, as they represent 'best practice' for the industry. The Department's assessment of compliance with the draft Standards the development would address the EPA's C&D draft Standards and is presented in **Table 2**.

**Table 2: Assessment of the Development against Proposed EPA Draft C&D Waste Management Minimum Standards**

Requirement	Assessment
<b>Standard 1: Inspection requirements</b>	<ul style="list-style-type: none"> <li>• the draft Standards requires three inspection points – at the weighbridge, at the receival area ('tip and spread'), at the waste storage area. Staff must also be appropriately trained to undertake inspections.</li> <li>• the Applicant has identified the required inspection points will be provided and a protocol in place to ensure compliance with the standard and appropriate staff training.</li> </ul>
<b>Standard 2: Sorting requirements</b>	<ul style="list-style-type: none"> <li>• as described in Section 2, the Applicant has proposed a variety of processing equipment to sort wastes into individual waste types in separate stockpiles for easy dispatch to another lawful waste facility for further recovery.</li> </ul>
<b>Standard 3: No mixing of waste</b>	<ul style="list-style-type: none"> <li>• the RRF has been designed so that unprocessed and processed (inspected and sorted) waste would not come in contact with one another.</li> </ul>
<b>Standard 4: Storage requirements</b>	<ul style="list-style-type: none"> <li>• the development provides separate, dedicated storage areas for the following waste materials: <ul style="list-style-type: none"> <li>○ incoming waste – in designated incoming waste receival/stockpile area in the processing building</li> <li>○ contaminants (non-conforming waste) – covered skip bin (asbestos) and covered and banded cage (used batteries, gas bottles and fire extinguishers)</li> <li>○ separated soil, brick and concrete, timber, scrap metal, and green waste – storage bays.</li> <li>○ residual waste</li> </ul> </li> <li>• non-conforming waste would be removed to a facility lawfully permitted to accept that waste type.</li> <li>• all waste stockpiled or stored on site would be stored under cover.</li> </ul>
<b>Standard 5: Transport requirements</b>	<ul style="list-style-type: none"> <li>• pursuant to implementation of all the requirements above, C&amp;D waste would not be transported from the RRF unless it has been inspected, sorted and stored in accordance with the standards.</li> </ul>

### 3.2. State Significant Development

The proposal is State significant development pursuant to Section 89C of *Environmental Planning and Assessment Act 1979* (EP&A Act) because it meets the criteria in Clauses 23(2) and (3) of Schedule 1 in *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP). Consequently, the Minister for Planning is the consent authority for the proposed development.

### 3.3. Permissibility

The site is zoned IN1 General Industrial under the *Camden Local Environmental Plan 2010* (CLEP). Development for the purposes of a waste or resource management facility is permissible with consent in the IN1 General Industrial zone. The development is also permissible with consent under Clause 121(2)(c)(iii) of *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP). Therefore, the Minister or a delegate may determine the carrying out of the development.

### 3.4. Consent Authority

On 14 September 2011, the Minister delegated the functions to determine SSD applications to the Planning Assessment Commission (the Commission) where more than 25 public submissions in the nature of objections were received and the local Council has objected.



Under the Ministerial Delegation, the Commission must determine the SSD application as 155 objections were received from the general public during the exhibition period of the development application and the accompanying EIS and Council objected to the application.

### 3.5. Other Approvals

Section 89K of the EP&A Act requires further approvals to be obtained, considered or determined in a manner that is consistent with any Part 4 approval for SSD projects under the EP&A Act. In the case of the proposed development, an Environment Protection License (EPL) will need to be applied for and issued by the Environment Protection Authority (EPA) under the *Protection of the Environment Operations Act 1997*.

### 3.6. Considerations under Section 79C of the EP&A Act

Section 79C of the EP&A Act sets out matters to be considered by a consent authority when determining a development application. The Department's consideration of these matters is set out in **Section 5** and **Appendix B**. In summary, the Department is satisfied the proposed development is consistent with the requirements of Section 79C of the EP&A Act.

### 3.7. Environmental Planning Instruments

Under Section 79C of the EP&A Act, the consent authority, when determining a development application, must take into consideration the provisions of any environmental planning instrument (EPI) and draft EPI (that has been subject to public consultation and notified under the EP&A Act) that apply to the proposed development.

The Department has considered the development against the relevant provisions of several key EPIs including:

- State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)
- State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)
- State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33)
- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)
- Sydney Regional Environmental Plan No 20 – Hawkesbury – Nepean River (No 2 – 1997)
- Camden Local Environmental Plan 2010.

Development Control Plans (DCPs) do not apply to SSD under Clause 11 of the SRD SEPP. However, the Department has considered the relevant provisions of the Camden *DCP 2011* in its assessment of the development in **Section 5** of this report.

Detailed consideration of the provisions of all EPIs that apply to the development is provided in **Appendix C**. The Department is satisfied the proposed development generally complies with the relevant provisions of these EPI's.

### 3.8. Public Exhibition and Notification

Under Section 89F(1) of the EP&A Act, the Secretary is required to make the development application and any accompanying information of an SSD application publicly available for at least 30 days. The application was on public exhibition from **Thursday 14 July 2016 to Friday 26 August 2016**. Details of the exhibition process and notifications are provided in **Section 4.1**.

### 3.9. Objects of the EP&A Act

In determining the application, the consent authority should consider whether the development is consistent with the relevant objects of the EP&A Act. These objects are detailed in Section 5 of that Act. The objects of relevance to the merit assessment of this application include:

- (a) to encourage:
  - (i) the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,
  - (ii) the promotion and co-ordination of the orderly and economic use and development of land,
  - (vi) the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and

- (vii) *ecologically sustainable development, and*
- (b) *to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and*
- (c) *to provide increased opportunity for public involvement and participation in environmental planning and assessment.*

The Department has fully considered the objects of the EP&A Act, including the encouragement of Ecologically Sustainable Development (ESD), in its assessment of the application (see **Table 3**).

**Table 3: Considerations Against the Objects of the EP&A Act**

Object	Consideration
5(a)(i)	The proposal would enable development of former rural land that has been rezoned for industrial use to meet the demands of waste recycling from residential and industrial growth within this region of south west Sydney. In addition, the development would promote social and economic growth for members of the local community through the provision of 10 construction and 15 operational jobs and in the form of turnover for local businesses.
5(a)(ii)	The proposed development would ensure the orderly and economic use and development of a parcel of land that is suitably zoned for industrial use to be used for the purposes of waste recycling. The site is also strategically located with access to the major regional road network of M7, M5 and M31 motorways and the upgraded Camden Valley Way and Narellan Road.
5(a)(vi)	The Department's assessment in <b>Section 5</b> of this report demonstrates that with the implementation of a series of recommended conditions of consent, the impacts of the development can be mitigated and/or managed to ensure the environment is protected.
5(a)(vii)	The development is consistent with the principles of ESD (see <b>Section 3.10</b> ).
5(b)	The Department has assessed the development in consultation with, and giving due consideration to, the technical expertise and comments provided by Council and other relevant Government authorities. This assists with the object of sharing responsibility for environmental planning between the different levels of government in the State.
5(c)	The Department provided the public with an opportunity to comment on the proposal and considered all issues raised in public submissions during its assessment of the application. The applicant also consulted with relevant stakeholders before submitting the application and has provided a response to submissions received during the exhibition period ( <b>Section 4</b> ).

### 3.10. Ecologically Sustainable Development

The EP&A Act adopts the definition of ESD found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- (a) *the precautionary principle*
- (b) *inter-generational equity*
- (c) *conservation of biological diversity and ecological integrity*
- (d) *improved valuation, pricing and incentive mechanisms.*

The potential environmental impacts of the development have been assessed and, where potential impacts have been identified, mitigation measures and environmental safeguards have been recommended.

As demonstrated by the Department's assessment in **Section 5** of this report, the development is not anticipated to have any adverse impacts on native flora or fauna, including threatened species, populations and ecological communities, and their habitats. As such, the Department considers that the proposal would not adversely impact on the environment and is consistent with the objectives of the EP&A Act and the principles of ESD.

### 3.11. Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

Under the EPBC Act, assessment and approval is required from the Commonwealth Government if a development is likely to impact on a matter of national environmental significance (MNES), as it is considered to be a 'controlled action'. The EIS for the development considered this matter and concluded the development would not impact on any of these matters, and is therefore not a 'controlled action'. As such, the Applicant determined a referral to the Commonwealth Government was not required.

## 4. CONSULTATION AND SUBMISSIONS

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### 4.1. Consultation

The Applicant, as required by the Secretary's Environmental Assessment Requirements (SEARs), undertook consultation with relevant local and State authorities as well as the community and affected landowners. The Department undertook further consultation with these stakeholders during the exhibition of the EIS and throughout the assessment of the application. These consultation activities are described in detail in the following sections.

#### 4.1.1. Consultation by the Applicant

The Applicant undertook a range of consultation activities during the preparation of the EIS including:

- sending letters to agencies inviting input into the EIS
- door knocking surrounding landowners/occupiers (and leaving a card and fact sheet if no answer)
- meetings with immediately adjacent neighboring industrial properties
- a pre-DA meeting with Camden Council
- a briefing with RMS.

#### 4.1.2. Consultation by the Department

The Department consulted with Camden Council and other relevant public authorities during the preparation of the SEARs.

After accepting the EIS for the application, the Department:

- made it publicly available from **Thursday 14 July 2016 to Friday 26 August 2016**:
  - on the Department's website
  - at the Department's Information Centre (22-33 Bridge Street, Sydney)
  - at Camden City Council offices (initially at 37 John Street, Camden and 19 Queen Street, Narellan, then at 70 Central Avenue, Oran Park from 8 August 2016 to exhibition close)
  - at Narellan Library (corner Queen and Elyard Streets, Narellan).
- notified landowners in the vicinity of the site about the exhibition period by letter
- notified relevant NSW Government authorities and Camden Council by letter
- advertised the exhibition in the Camden Campbelltown Macarthur Advertiser on 13 July 2016.

On 22 July 2016, the Department met on site with local residents and Mr Chris Paterson, MP to understand the community's issues with the proposal. Following this, representatives of the Applicant met with the same local residents to discuss how their specific concerns could be addressed.

### 4.2. Submissions

The Department received 161 submissions during the exhibition, comprising:

- 6 from public authorities, including Camden Council and NSW Government agencies
- 155 public submissions from local residents and businesses in the area.

A summary of the issues raised in these submissions is provided below. A full copy of these submissions and the Applicant's response to submissions (RTS) are provided in **Appendices E** and **F** respectively.

#### 4.2.1. Public Authorities

**Camden Council (Council)** raised significant concerns regarding the suitability of the development proposed on the site and objected to the application for the following reasons:

- noise impacts for local residents especially at night and during the morning shoulder period
- potential air quality and odour impacts particularly on residential properties in Currans Hill
- insufficient car parking provision
- inadequate and inaccurate plans and documents submitted relating to on-site employees, bushfire assessment, architectural and landscape plans, traffic management and internal circulation, bin storage and truck parking, signage, Aboriginal heritage, waste management, saline soils and boundary fencing.

Council also considers that in light of concerns raised by local residents, the development would not to be in the public interest (see **Section 4.2.2**).

Other than Council, no other public authorities objected to the application. However, most of the public authorities raised issues or expressed concerns with specific aspects of the proposal in their submissions and/or advice, and made recommendations relating to their administrative and regulatory responsibilities.

The **Department of Primary Industries (DPI)** requested the Applicant clarify how excavation into the alluvium would be avoided, where feasible, noting that should groundwater be intercepted during construction, and there is a requirement to extract groundwater or to dewater the aquifer, including ongoing groundwater take, a water licence would be required. The DPI further advised the capture of clean roof water in dedicated rainwater tank rather than a sediment basin as currently proposed may negate the need to obtain a water access licence and sought clarification around why the proposed fencing is located within a riparian corridor and not along the site boundary.

The **Environment Protection Authority (EPA)** advised that further detailed analysis should be undertaken to justify the proposed 24-hour operation given that the sleep disturbance criteria is likely to be exceeded during certain night time hours. The EPA also requested additional information relating to how garden waste would be managed on site to ensure any potential odour impacts do not cause adverse amenity impacts for nearby local residents.

The **Office of Environment and Heritage (OEH)** advised that as there are no biodiversity, natural hazards or Aboriginal cultural heritage issues that require a formal response from the OEH, it has no further need to be involved in the assessment of this application.

The **Rural Fire Service (RFS)** recommended that since the proposed facility would store and handle potential fuel sources that may be difficult to control during a bushfire event, a series of bushfire protection measures should be incorporated into the detailed design of the facility in accordance with *Planning for Bush Fire Protection 2006*.

**Roads and Maritime Services (RMS)** advised that it had reviewed the submitted application and raised no objection to the application.

#### 4.2.2. General Public

The public exhibition of the EIS attracted strong interest in the local community, with the Department receiving 155 public submissions, of which 154 were objections to the application.

Of these, 149 submissions were from local residents living in neighbouring residential suburbs. Over two thirds (68%) came from Currans Hill, which is to be expected given it is the closest suburb to the site of the proposed development. The suburbs of Harrington Park and Gregory Hills collectively accounted for 10% of submissions whilst the balance of submissions (12%) were received in equal share from local residents living in Narellan Vale, Mount Annan and Oran Park.

Local business landowners and operators from within the industrial estate made up the remaining 6 submissions.

A number of these submissions were fairly comprehensive, with the majority expressing concerns with the potential noise, traffic and air quality impacts. The key issues related to loss of amenity and sleep disturbance due to increased industrial noise levels and additional traffic impacts that could occur from proposed road traffic and heavy vehicle movements on local roads including Hartley Road. With respect to air quality, the key concerns included human health impacts from hazardous materials and harmful air pollutants, increased dust emissions and odour including from green waste. Overall, many of the local residents from Currans Hill felt that developing a waste recycling and transfer facility on the proposed site is too close to where they live and that it should be located someplace else.

Other issues raised in the 154 public submissions objecting to the proposed development included:

- *visual* – visual encroachment getting closer to residents and possible night lighting impacts (including glare from floodlighting and mobile equipment)
- *biodiversity* – potential impacts to biodiversity values in Kenny Creek and associated catchment from water pollution, toxic air pollutants and seed distribution from noxious weeds and plants and green waste
- *heritage* – possible impacts to Kenny Creek heritage protected creek corridor

- *hazards and risks* – transportation of hazardous waste through residential areas and risk of accidents from unsecured loads and bushfire
- *local community* – social costs and impacts on property values
- *vermin and pests* – increase in vermin and pests due to waste materials being introduced into the local vicinity
- *transportation* – increased congestion from heavy vehicles on local roads and residential streets including Hartley Road
- *site suitability* – an alternative location should be selected as it is too close to non-compatible uses including child care centres, clean storage warehousing and food and drink premises on the industrial estate, outdoor and indoor recreational uses, the wildlife corridor along Kenny Creek and remnant Cumberland Plain woodland
- *insufficient assessment and information provided* – especially relating to the effect of the proposal on other businesses within the wider industrial estate, the veracity and accurateness of certain aspects of the air and noise modelling, impacts to biodiversity values in Kenny Creek and effectiveness of management and mitigation measures committed to
- *cumulative impacts* – the proposal should be assessed in conjunction with a Hot Dip Galvanising Plant proposed on an adjacent site.

**Table 13** presents the key issues raised in public submissions and a summary of how the Department has considered each issue and **Section 5** is the Department's more detailed assessment of all issues raised.

#### **4.3. Response to Submissions and Supplementary Information**

In January 2017, the Applicant submitted a Response to Submissions (RTS) on the issues raised during exhibition of the EIS (see **Appendix F**), which was made publicly available on the Department's website.

The RTS (and supplementary information) included the following:

- removal of night time operations between 10 pm and 6 am (which would also remove the night time use of Hartley Road)
- removed company signage from the scope of the development application
- a commitment to cover the product stockpiles to reduce water pollution and dust emissions at the request of the Department
- confirmation the facility would not accept kerbside green or putrescible waste collected by Council with additional management measures for preventing green waste from composting
- strengthened a variety of management and mitigation measures proposed to ensure the facility would operate with minimal environmental impacts
- provided additional information on the proposed waste streams, traffic, drainage, noise and air quality including odour.

Before accepting the RTS, the Department consulted the key NSW Government authorities and Council on its content. The Department received additional submissions from four of those public authorities that had commented on the original application, which are summarised below.

Following the changes to the proposal and the provision of additional information in the RTS, most public authorities have advised the Department that they are satisfied their concerns have been adequately addressed and/or can be managed through appropriate conditions of consent. Accordingly, the following summary focuses primarily on the key residual issues or concerns, some of which require further consideration in Section 5.

Council's further submission provided an update to the issues raised in its original submission:

- the proposal should comply with Council's Environmental Noise Policy
- the operation of the facility and deliveries of waste are not supported between 10 pm and 6 am
- the facility should be managed to ensure noise, dust and odour are controlled at all times
- green waste should be stored and contained within an enclosed facility and should not be stored on site for extended period
- provision of 10 car parking spaces for 8 staff and 2 visitors is satisfactory as long as no parking is permitted in the road reserve or on the front setback/landscaped area
- the NSW Rural Fire Service should be satisfied with the bushfire assessment for the site
- the maximum height of the building should not exceed 11 m from natural ground level

- additional tree and shrub planting should be identified in the Landscape Plan together with further detail on planting specification, maintenance regime, soil cultivation and irrigation etc
- details of signage should be provided at the development application rather than the certification stage
- a salinity investigation should be undertaken
- a decorative masonry fence should be provided at the front of the property to screen the site in lieu of a metal palisade fence with automated metal gate as originally proposed
- a series of conditions were recommended to address certain matters including hours of operation, building height, traffic management and car parking.

Notwithstanding that many of the issues raised had been addressed by the Applicant, Council maintained its objection to the application on the basis that it is not in the public interest given the concerns of local residents (see **Section 4.2.2**).

The DPI recommended that clean roof water should be collected in a rainwater tank rather than within the sediment basin to avoid the need to obtain a water access licence from DPI Water. It was further advised that the volume of groundwater likely to be dewatered prior to the commencement of construction should be estimated to determine the need for a temporary dewatering licence from DPI Water.

The EPA acknowledged the site would now be closed between 10 pm and 6 am but had some residual concern regarding the continued potential for sleep disturbance during the one hour shoulder period between 6 am and 7 am due to uncertainties around the validity of the unattended noise monitoring that was used to determine maximum noise events during this period. As such, the EPA did not object to the application provided the proposed development is carried out in accordance with a series of recommended conditions including that the Applicant is not permitted to open before 7 am. The EPA further advised it was satisfied with the additional controls the Applicant has committed to put in place to minimise the likelihood of offensive odours that would be generated by green waste kept on the site.

The RFS advised that the comments made in its original submission remain applicable.

A revised RTS was lodged in February 2017 and incorporated the Applicant's responses to the further submissions received in the period leading up to its lodgement. The Department also requested additional information in relation to a number of issues, including the design of the material storage bays, noise, air quality, traffic movements, stormwater and signage, which was provided to the Department by the Applicant.

**Fire and Rescue NSW (FRNSW)** did not make a submission during the exhibition period but provided the Department with written advice in April 2017. The FRNSW submission focussed on the lack of information provided in relation to fire safety measures (being an adequate supply of water for firefighting purposes) and how polluted fire water runoff would be contained during an incident to ensure offsite stormwater management systems and watercourses such as nearby Kenny Creek do not become polluted. The advice included a series of comments and recommendations, which are summarised as follows:

- requires Dangerous Goods to be stored in accordance with *Australian Standard AS 1940-2004*
- the EIS lacks information on the proposed fire hydrant system performance including minimum flow rates and requires the facility to comply with Clause E1.10 of the National Construction Code (NCC)
- given the large quantities of combustible materials to be stored at the proposed facility, the proposed fire safety systems should be submitted for approval by FRNSW. This includes details of important components such as the location of the fire hydrant booster assembly, fire hydrants, sprinkler system and tank water supply
- a statement of available pressure and flow should be obtained from Sydney Water to demonstrate that adequate water pressure is available for firefighting purposes
- fire water containment and management has not been addressed
- recommends that a sprinkler system be installed in the main processing shed and the external bays be covered
- require details of stockpiles proposed within the 'yard' area of the proposed facility.

Following receipt of the Applicant's response to these comments, FRNSW provided a further submission in May 2017. The outstanding concerns related to the need to agree on a design for the fire

safety system in consultation with FRNSW that is in accordance with Clause E1.10 of the NCC. This further advice also reiterated the need to ensure that adequate firewater supply is provided and that a water sprinkler system be installed inside the main processing shed.

The Applicant provided a written response to this submission in August 2017 and the Department subsequently facilitated a meeting between FRNSW and the Applicant in September 2017 so that these outstanding matters could be resolved. Following the meeting, agreement was then reached between the two parties on the size and location of stockpiles proposed on the site, details of the fire safety system (including the hydrant system) and contaminated firewater containment capacity required. Around the same time, the Applicant also applied for and received a statement of available pressure and flow from Sydney Water before submitting the final design of the fire safety system to the Department.

## 5. ASSESSMENT

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The Department has considered the EIS, the issues raised in the submissions, the Applicant's RTS and supplementary information provided by the Applicant in its assessment of this development application. The Department considers the key assessment issues are:

- noise
- transport
- air quality.

A number of other issues have also been considered. These issues are considered to be minor and are addressed in **Section 5.4**.

### 5.1. Noise and Vibration

The proposed development has the potential to cause ongoing adverse noise and vibration impacts on surrounding receivers during both the construction and operational phases, particularly due to the relatively close proximity of the site to local residents in Currans Hill.

The EIS included a specialist Noise and Vibration Impact Assessment (NVIA) which was prepared by EMM in accordance with the EPA's *Interim Construction Noise Guideline (ICNG)*, the *NSW Industrial Noise Policy (INP)*, *Road Noise Policy (RNP)* and *Assessing Vibration: A Technical Guide*.

The assessment considered potential impacts from all onsite noise and vibration sources at potentially affected receivers in the immediate vicinity of the site (see **Figures 10 and 11**). The Department has considered the NVIA and relevant matters raised by relevant agencies and the local community in its assessment of the proposed development.

Overall, the Department is satisfied the noise assessment is robust and provides a sound basis for the characterisation and consideration of impacts associated with the development. It is considered the noise modelling undertaken is sufficiently conservative to ensure the actual noise impacts that occur will not be higher than those predicted in the NVIA.

Separating Currans Hill from the Smeaton Grange Industrial Estate is an embankment with 2 m high metal fencing running along the length of it. This mitigation measure was required by the Council to be implemented when development consent was granted in 2004 to subdivide the land to create Smeaton Grange Industrial Estate (Development Consent No. 1127/2003). The embankment is now well established with mature vegetation and it acts as an effective visual and acoustic buffer between the industrial and residential land uses (see **Figures 8 and 9**).



**Figure 8:** View south-west to rear of adjacent Coles site and the embankment



**Figure 9:** View along eastern site boundary to vegetated corridor beyond and the embankment



The Department recognises a number of members of the community expressed concerns over the predicted increases in industrial noise as a result of the new facility, particularly those residing in Currans Hill, the closest of which are approximately 120 m away. **Figure 10** shows the interface that is present between these land uses.



**Figure 10:** The interface between industrial and residential land uses

### Construction Noise

Construction is expected to take place over a period of some 10 to 12 weeks and would involve some minimal earthworks and civil works following which the site would be hard surfaced and the surface water management system installed. Once complete, the main shed, demountable buildings, stockpile bays, weighbridges and fencing would then be constructed and installed. The NVIA assessed construction noise assuming a worst-case scenario of all equipment operating simultaneously, being a dump truck, concrete truck, scraper, excavator and crane.

The conservative nature of the noise modelling undertaken means the level of noise predicted often represents a worst-case, maximum impact scenario, whereas in actuality, the duration of work and intensities of noise would probably be shorter and less intense. In addition, construction would only take place during standard day time construction hours when background noise levels are generally higher and the community is less sensitive to noise.

Construction noise levels of up to 60 dB(A) are predicted which would exceed the Noise Management Level (NML) of 46 dB(A) by up to 14 dB(A) at the most affected receivers (R10 and R11). However, this noise level would remain below the highly noise affected level of 75 dB(A) at all receivers (the point above which there may be strong community reaction to noise).

To reduce operational noise from the facility, the Applicant has proposed boundary fencing to be installed at a maximum height of 10 m along the south-eastern boundaries, 4 m along a portion of the eastern boundary, 3 m on the western boundary and 2 m at the rear and sides of the main shed. The Applicant indicates this fencing is expected to achieve a noise reduction of up to 11 dB(A) at the nearest residences to the east and south east of the site. The Department therefore recommends a condition requiring this fencing to be installed along these site boundaries prior to the commencement of the construction phase to mitigate against both construction and operational noise impacts.

With the acoustic fencing in place, minor exceedances of the NML of up to 4 dB(A) may still occur. In such cases, the ICNG recommends Applicant's apply all reasonable and feasible work practices to meet the NML. The Department has reviewed the measures that would be employed to manage and

mitigate construction noise impacts as set out in the NVIA and it is satisfied they are consistent with the best practice measures outlined in the ICNG.

Conditions are recommended requiring the Applicant to place a restriction on construction hours to standard daytime hours only (unless works are inaudible or there are exceptional circumstances that warrant out of hours work) and to require the Applicant to prepare and implement a Noise and Vibration Management Plan (NVMP) as part of a wider Construction Environmental Management Plan for the proposed development.

The NVMP would describe the management and mitigation measures and procedures for achieving the NML's, identify high emission generating construction activities, including proposed times when these works will be carried out (including respite periods if required) and mitigation measures to minimise adverse impacts from these activities. The NVMP would also include strategies for managing high noise generating works, describe the community consultation undertaken to develop these strategies and include a complaints management system that would be implemented for the duration of the construction phase.

With these measures in place, the Department considers noise generated during construction of the facility would not adversely affect existing residential amenity particularly since it would take place over a period of 10 to 12 weeks, with the noisiest activities taking place during the initial site establishment works. The EPA provided no comment on construction noise or vibration impacts but recommended construction works take place during day time hours only which is consistent with the Department's position as outlined above.

In relation to construction vibration, the Applicant advises it is difficult to predict the level of vibration that may occur at nearby structures and would therefore follow the recommended safe working distances and applicable criteria for vibration intensive plant for both cosmetic damage and human comfort. As certain vibratory activities would occur in close proximity to some nearby buildings, some management of vibration levels would be required. These have also been identified and set out within the NVIA.

This is considered reasonable to the Department and conditions are recommended to ensure this approach is followed, the details of which would be outlined in the NVMP. Overall, it is considered that construction vibration impacts can be satisfactorily addressed.

#### Operational Noise

The NVIA determined the existing acoustic environment by undertaking a period of unattended noise monitoring at one location in Currans Hill from 10 to 21 December 2015 which was supplemented by observations made on site during noise logger deployment and collection. The monitoring data collected were used to derive Project Specific Noise Levels (PSNL) for the development (see **Table 4**).

**Table 4: Project Specific Noise Levels**

Period	Intrusive Criteria dB(A), LAeq(15 min)	Amenity Criteria dB(A), LAeq(period)
Morning Shoulder	39	48
Day	41	55
Evening	40	45
Night	36	40

Noise generated during the operation of the development would primarily arise from the delivery of waste materials, waste sorting, stockpiling and from mobile plant operating on site, including from excavator and front-end loader movements. The operational noise sources and sound power levels that were included in the noise model are provided in **Table 5**.

**Table 5: Operational Noise Sources**

Noise Source	Sound Power Level (dBA)
Excavator	104
Heavies sorter (screen)	101
Picking line	88
Front end loader	105-108
Road truck	105
Road truck – idling	90

The facility is proposed to operate during the day and evening with the site being shut at night between 10 pm and 6 am. It was originally proposed for the facility to receive certain waste deliveries over a 24 hour period of operation, however the operating hours were restricted in response to submissions received from the local community and the new hours of work are now as presented in **Table 6**.

**Table 6: Hours of Operation**

Activity	Day	Time
Receipt and dispatch of materials	Monday to Friday	6am to 10pm
	Saturday	6am to 5pm
	Sunday and Public Holidays	8am to 4pm
Waste processing	Monday to Saturday	7am to 4pm
	Sunday and Public Holidays	No processing

The Department accepts the Applicant's argument in principle that the ability to receive waste materials between 6 am and 7 am is important since deliveries of waste material from major infrastructure projects currently being undertaken across Sydney are often delivered at this time. However, this should not be at the expense of residential amenity so the Department has carefully considered whether this should be permitted to take place in this instance.

In response to the EPA's submissions, the Department reviewed the background noise monitoring and taking into account the noise characteristics of the area (including a gradual rise in ambient noise due to early morning activities in the Smeaton Grange industrial area), considers noise levels from the facility are not expected to have an adverse impact on the amenity of residents in Currans Hill. In consultation with the EPA, the Department considers that a noise criteria of 40 dB(A) is appropriate for all time periods.

The Applicant modelled potential noise levels at 22 sensitive receivers in accordance with the INP (to identify each surrounding receiver (see **Figures 10 and 11**). Taking into account all reasonable and feasible management and mitigation measures proposed to be incorporated into the detailed design of the new facility, including the proposed acoustic fencing, the results show that noise levels would comply with applicable noise criteria at all sensitive receivers at all times (see **Table 7**).

**Table 7: Predicted Operational Noise Levels**

Receiver ID (Figures 10 and 11)	Daytime/Evening (40)	AM Shoulder (40)
R1	37	36
R2	38	36
R3	38	37
R4	39	37
R5	39	38
R6	39	37
R7	40	38
R8	39	38
R9	40	38
R10	40	38
R11	39	38
R12	39	38
R13	39	38
R14	40	39
R15	40	39
R16	40	39
R17	39	38
R18	38	38
R19	38	37
R20	37	37
R21	37	37
R22	40	40

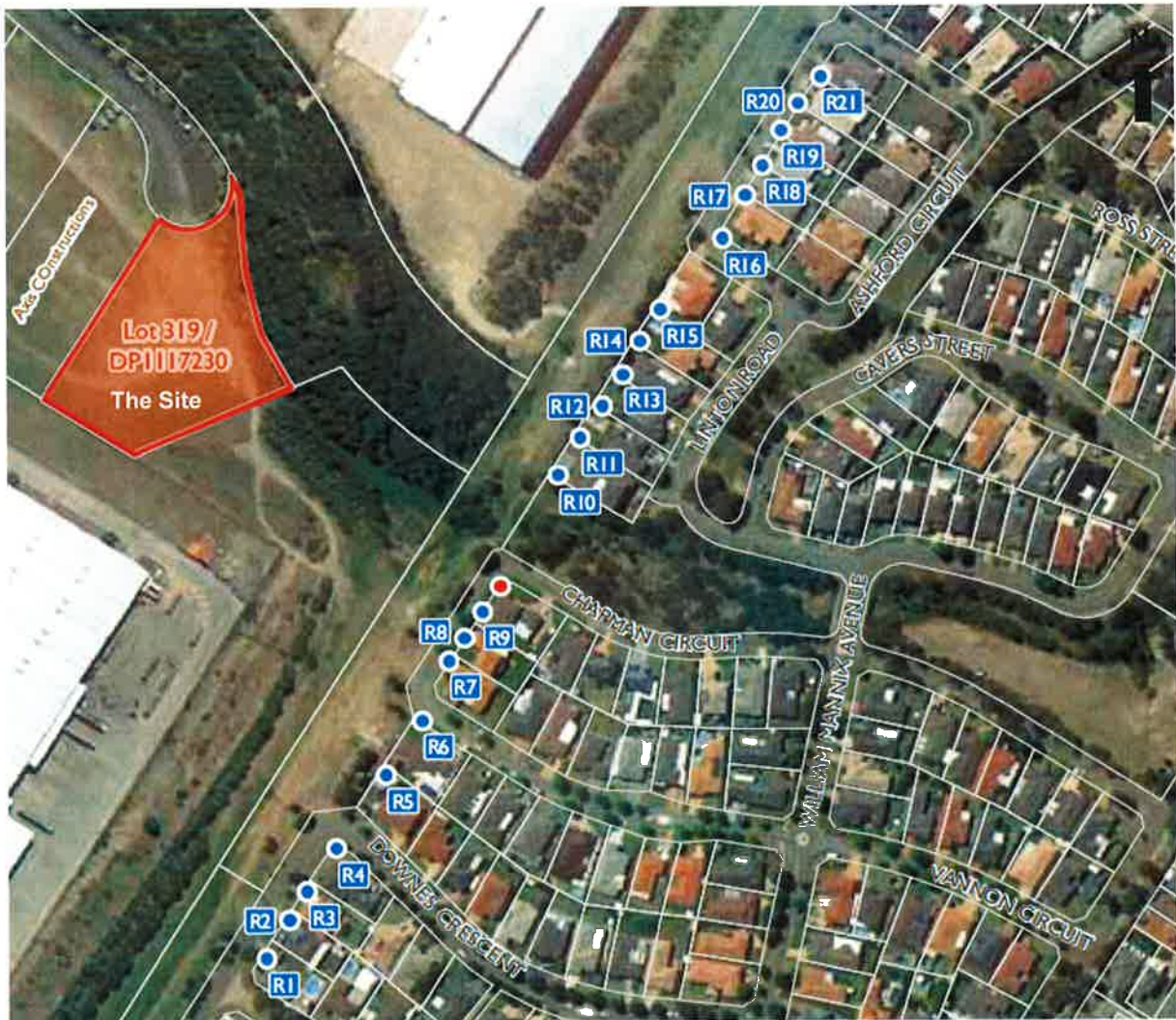


Figure 11: Nearby sensitive receivers and noise monitoring assessment location

With regards the possibility of sleep disturbance during the morning shoulder period (6 am to 7 am), the Department and the EPA consider the nature and level of background noise levels in the area means that noise generated by the facility would not significantly increase noise events in this environment.

The Department therefore agrees that the proposed facility should be permitted to receive waste from 6 am with the delayed start of waste processing from 7 am onwards. This extended opening time would be for an initial trial period during which the Applicant would be required to undertake regular attended noise monitoring to verify that actual noise emissions are as predicted in the NVIA and that no exceedances of the applicable criteria have occurred. If this does not prove to be the case, the site would revert to being completely closed from 10 pm to 7 am including for the delivery of waste materials.

The Applicant's assessment of road traffic noise indicated the nearest residences in Currans Hill that could potentially be affected by the proposal are located to the south of the site next to Hartley Road. Based on the predicted increase in traffic volumes (including heavy vehicles), of 1.7% which is associated with the operation of the proposed facility, any increase in road traffic noise would be negligible (<0.5 dB(A)) and remain within the 2 dB(A) allowable increase prescribed by the RNP.

Potential cumulative noise impacts from existing and successive developments are considered in the INP by ensuring that the appropriate noise criteria are established with a view to maintaining acceptable noise amenity levels. Therefore, the cumulative impact of the Project with existing industrial noise sources has been assessed in the determination of the acceptable amenity levels at the assessment locations.

The NVIA states that based on experience with similar sites, amenity noise levels are typically 3 dB(A) below the intrusive noise level. On this basis, the highest predicted daytime amenity level at any

residential Assessment location is up to 39 dB(A). This is greater than 10 dB(A) below the acceptable amenity level for a suburban receiver type and thus is predicted to not have the effect of increasing industrial noise above the relevant criteria.

### Conclusion

The Department concludes that potential construction noise and vibration impacts would have a negligible impact on surrounding receivers. Conditions of consent are recommended requiring the proposed boundary fencing to be installed prior to commencement of construction, limiting construction activities to daytime hours only (subject to exemptions in certain circumstances) and for a Construction Noise Management Plan to be prepared and implemented during the construction phase.

The Department has worked closely with the EPA and the Applicant to ensure residential amenity is maintained during operations whilst facilitating the development of the WRTF on the site.

In response to community concern, and as requested by the Department, the Applicant reduced the site operating hours to include a night time respite period, except for a one hour period between 6 am and 7 am during which time the Applicant would like the site to be permitted to receive waste deliveries. With the EPA's assistance, the Department has developed appropriate noise criteria for this shoulder period. Whether the site is permitted to operate during this period in the future would depend on the outcome of a monitoring and verification trial program.

The Department has also insisted that the stockpiles and product bays be covered and the acoustic fencing be erected prior to construction, rather than operation of the development as was proposed by the Applicant.

A stringent set of conditions have been developed to address community concerns and reduce noise amenity impact.

These conditions require the Applicant to:

- comply with operational noise criteria designed to protect noise intrusiveness
- require the acoustic fencing to be installed prior to commencement of construction
- prepare and implement an Operational Noise Management Plan, which incorporates all management and mitigation measures to be employed on site including how the noise levels would be minimised during adverse meteorological conditions or extraordinary events, identify high emission generating operational activities, describes the measures that would be employed to minimise adverse impacts from these activities and define what constitutes a noise incident
- develop a protocol for identifying noise incidents and notifying the Department and relevant stakeholders of any such incident
- conduct a quarterly trial monitoring program over a 12-month period that evaluates and reports on compliance with the applicable noise criteria, the management actions to be taken to address any exceedances of the criteria and the contingency measures that will be implemented in the event management actions are not effective in reducing noise levels to an acceptable level
- cease operating between the 6 am and 7 am if this monitoring program demonstrates systemic exceedances of the applicable noise criteria
- comply with vibration criteria for cosmetic damage and human comfort
- publicly report all noise monitoring results, and effectively respond to enquiries and complaints.

Taking into account the amendments that have been made to the proposal to address noise impacts and with these conditions in place, the Department concludes that potential noise impacts are likely to be adequately minimised and managed to within acceptable levels without having a detrimental impact on the amenity of local residents.

### **5.2. Transport**

The WRTF has the potential to generate additional traffic movements with delivery trucks and light vehicles depositing waste at the site, trucks transferring the waste to other facilities and staff trips. Increased traffic has the potential to have an adverse impact on the safety, capacity and efficiency of the surrounding road network.

The EIS included a Transport Impact Assessment (TIA) which was undertaken in accordance with the RMS's *Guide to Traffic Generating Developments* (2002), which assessed the potential traffic impact of the proposed development on the surrounding road network.

Smeaton Grange is an industrial estate located at the junction of Narellan Road and Camden Valley Way, with two multi-lane arterial roads providing access to Campbelltown, the Hume Motorway and most of the residential and employment areas within the Camden Local Government Area. The site can be accessed via two main signalised intersections: Narellan Road/Hartley Road for access to the Hume Motorway and Campbelltown and Camden Valley Way/Anderson Road for access to the north (see Figure 12).



Figure 12: Main arterial roads and haulage routes to and from the site

Construction Traffic

Construction of the proposed WRTF is anticipated to take approximately 10 to 12 weeks with an average of 20 vehicles visiting the site between 7 am and 6 pm (i.e. up to 40 vehicle movements during peak construction). The TIA noted that construction related traffic volumes are expected to be significantly less than the predicted operational traffic numbers and as such, no additional traffic modelling was undertaken.

The Department considers that these construction traffic movements can be accommodated within the existing road network given the relatively low estimated number of vehicles and short construction duration. In addition, access to the site is via a large, established industrial estate that already generates a significant amount of traffic movements. Notwithstanding, to ensure construction traffic is managed effectively, the Department has recommended a condition requiring the Applicant to prepare and implement a Construction Traffic Management Plan. With this in place, the Department does not anticipate any traffic related impacts during construction.

Operational Traffic

A summary of site generated daily traffic movements during operation of the development are set out in Table 8.

**Table 8:** Summary of site generated daily traffic movements

Activity	Total daily traffic movements	Daily car and other light vehicle movements	Daily truck traffic movements
Waste receivals	208	136	72
Recycled product and rejects	34	0	34
Site employees and visitors	34	34	0
<b>All site traffic</b>	<b>276</b>	<b>170</b>	<b>106</b>

For both waste received and the products dispatched from the site, traffic distribution to and from the site would utilise the following haulage routes (see highlighted routes in **Figure 10**):

- 60% to and from Camden Valley Way via Anderson Road, then travelling north or south on Camden Valley Way from the Anderson Road intersection
- 40% to and from Narellan Road via Anderson Road, Anzac Avenue and Hartley Road, then travelling either east or west on Narellan Road from the Hartley Road intersection.

The TIA predicted how the anticipated increase in daily traffic volumes would affect the surrounding road network by comparing them to existing daily traffic volumes. It was found the increase in traffic, including from heavy vehicles, is negligible in the context of existing traffic volumes (see **Table 9**).

**Table 9:** Summary of daily traffic volumes and increases with the recycling facility traffic

Vehicle Type Road	All vehicles			Heavy vehicles		
	Existing daily traffic	Additional daily traffic	Traffic Increase (%)	Existing daily traffic	Additional daily traffic	Traffic Increase (%)
Camden Valley Way (north of Anderson Road)	22,400	132	0.6%	1,120	50	4.5%
Anderson Road (east of Camden Valley Way)	15,000	166	1.1%	1,230	64	5.2%
Hartley Road (north of Narellan Road)	22,000	110	0.5%	2,490	42	1.7%
Hartley Road (east of Narellan Road)	57,400	72	0.1%	5,100	28	0.5%

The operational traffic impacts generated from site employees and waste/recycling traffic during both the morning (8:00 am to 9:00 am) and afternoon (3:30 pm to 4:30 pm) peak traffic hours would be:

- an extra 43 vehicle movements per hour (31 by cars and 12 by trucks) during the AM peak
- an extra 29 vehicle movements per hour (23 by cars and 6 by trucks) during the PM peak.

To analyse the performance of intersections before and after the development, taking into account these peak hour traffic volumes, SIDRA modelling was undertaken. The SIDRA analysis found that under existing conditions, the Camden Valley Way/Anderson Road intersection performs at Level of Service (LoS) D with an average delay of 46.5 seconds in the AM peak and LoS E with an average delay of 61 seconds in the PM peak. The Narellan Road/Hartley Road intersection performs at LoS E in both the AM and PM peak and experiences an average delay of 61.3 seconds and 60.6 seconds in the AM and PM peak respectively. The RTS confirms this data was obtained following the capacity upgrade of Camden Valley Way.

Modelling has confirmed that with the proposed WRTF operating at full capacity, there would be no change to the LoS at either intersection and a negligible change to the average delay of up to 1.3 seconds at the Narellan Road / Hartley Road intersection in the AM peak. Neither Council nor RMS raised any issues regarding the increased levels of traffic in the area nor the capacity of the surrounding road infrastructure to accommodate it. As such, the Department is satisfied that the volume of traffic that would be generated by the proposal would not have an adverse impact on the safety and efficient operation of the road network, including at key intersections within the industrial estate.

#### Site Access

Access to and from the site for both light and heavy vehicles would be directly via the cul-de-sac end of Anderson Road via separate entry and exit driveways. The layout of the site has been designed to

ensure the separation of light and heavy vehicles whilst unloading and loading, and that all vehicles enter and leave the site in a forward gear. The Department considers that satisfactory access arrangements are in place to, from and within the site.

Council initially raised concern over the potential for vehicles to queue on Anderson Road, however subsequently accepted the Applicant's explanation in the RTS regarding vehicle management to prevent this from occurring. The WRTF proposes two weighbridges with number plate recognition cameras. Initial load checking would be done either visually from the office or via camera for larger vehicles. These arrival procedures are expected to be complete in less than 1 minute to prevent the potential for queuing on Anderson Road. Council also accepted the swept path analysis provided by the Applicant which demonstrates a 19 m semi-trailer (the largest vehicle) can enter and exit the site in a forward direction.

#### Conclusion

The Department acknowledges the concerns raised by the community regarding potential traffic impacts, however the existing road network is well established and able to handle large volumes of traffic including traffic generated by the facility during both the construction and operation phases. It also noted that whilst there would be added heavy vehicle traffic on Hartley Road, the equivalent increase in road traffic noise to that which currently exists would be low and be well within the EPA's criteria for increases in road traffic noise (**see Section 5.1**).

Further, it has been demonstrated that the performance of the two main intersections would not be adversely affected with only a negligible (1.3 second) increase in average delay to the Narellan Road / Hartley Road intersection predicted as a result of the proposed WRTF.

The Department considers the site to be well located in close proximity to Camden Valley Way, Narellan Road and the Hume Motorway. RMS has been consulted and raised no objection to the application.

Conditions are recommended by the Department requiring the Applicant to prepare a Driver Code of Conduct to minimise traffic impacts on the local and regional road network, reduce conflict with other road users and ensure truck drivers use specified routes. A Traffic Management Plan (TMP) is also required to be prepared as a subcomponent of a wider Operational Environmental Management Plan (OEMP) for the site, which includes the measures that are to be implemented to ensure road safety and efficiency and achieving a series of other related operating conditions also to be included in the development consent.

The Department's assessment concludes that with the measures referred to above being in place, the impacts of the proposed development on the safety, capacity and efficiency of the surrounding road network are not significant and can be routinely managed through standard conditions of consent.

### **5.3. Air Quality**

The proposed development has the potential to cause health and amenity impacts to nearby residential receivers from air emissions generated by construction activities and the processing of waste on site.

The EIS included a specialist air quality impact assessment (AQIA) which was prepared by Ramboll Environ in accordance with the EPA's *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (the Approved Methods). The AQIA also included a quantitative greenhouse gas assessment in accordance with the *National Greenhouse Accounts Factors Workbook* (NGAF).

The AQIA considered potential air quality, dust and odour impacts at potentially affected receivers in the immediate vicinity of the site and made recommendations for site-specific mitigation and management measures. An assessment was also made of the likely level of greenhouse gas emissions that would be generated by the proposed development.

#### Construction Air Quality Impacts

Construction of the new facility is expected to take place over a period of up to 3 months. During the construction period, the main air emission with the potential to have an adverse impact on surrounding sensitive receivers is dust.



Some earthworks would be involved in constructing the main building and other structures on site. Given the nature of construction activities involved and the relatively small scale of development proposed on the site, the ranking of likely impact that was carried out in the AQIA indicated that dust impacts would be low to negligible.

Given the existing industrial context in which the site is located and the intervening distance from the site to surrounding sensitive receivers, the Department is satisfied that the emission of dust and other pollutants (e.g. diesel fumes from plant and machinery) could be routinely minimised and managed. This would be achieved through the implementation of a series of standard mitigation measures, such as dust suppression, maintaining construction plant and equipment and ensuring all loads are covered to prevent escape of materials during transport.

With these measures in place, the Department is satisfied that dust and other emissions generated during construction would not result in any adverse amenity or health impacts on surrounding receivers.

#### Operational Air Quality Impacts

A number of submissions from within the local community were concerned about the potential for exposure to harmful toxic air pollution including pathogens. However, as the WRTF would only accept inert waste and not hazardous waste, there would be no toxicological risk from the facility. The waste types that the facility would be permitted to receive would be strictly regulated by the development consent and EPL. The Applicant would be required to monitor the quantity, type and source of waste material received on site and handle, store and dispose of any hazardous or prohibited waste in accordance with current NSW legislation with an obligation to produce auditable records to the Department and EPA.

Of the 13 possible emission sources considered, the most significant source of emissions was associated with screening activities in the main shed, truck movements on paved surfaces and diesel combustion emissions. Handling the types of waste materials as proposed on site would inevitably give rise to dust and particulate matter being emitted into the local area. Members of the community were concerned about the potential for these emissions, which if left unchecked, have the potential to cause adverse amenity and potential health impacts for surrounding sensitive receivers.

The AQIA assessed the emission and dispersion of air pollutants that have the potential to be emitted from the site. In this case, the three pollutants that would be generated by the WRTF would be emissions of primary particulate matter (PM), including total suspended particulate matter (TSP), and particulate matter with an equivalent diameter of less than 10 microns (PM<sub>10</sub>) and 2.5 microns (PM<sub>2.5</sub>), which have potential health implications if a significant amount is ingested over a given period of time. Dust deposition was also assessed (as a subset of TSP) for the purposes of determining whether it may cause a nuisance in the area.

Other air pollutants listed in the *Approved Methods and the National Environment Protection (Ambient Air Quality) Measure 2015* (NEPM) have not been considered in the AQIA as they do not have the potential to be emitted from the site in concentrations that could potentially degrade local air quality e.g. sulphur dioxide, heavy metals etc).

The AQIA identified 16 reporting sources of air pollution emissions in the surrounding 10 km of the site. Of these, a number of existing industrial operations were reported to contribute particulate matter emissions to the local environment. In addition, several other local sources that contribute to particulate matter in the vicinity of the site were also identified in the AQIA (e.g. dust entrainment, tyre and brake wear and fuel emissions from vehicles on public roads, household wood burning fires etc).

Meteorological data was gathered from the Bureau of Meteorology Automatic Weather Station at Campbelltown (St Annan) for use in the predicted air model. Ambient air quality data for TSP, PM<sub>10</sub> and PM<sub>2.5</sub> was collected from the NSW OEH Campbelltown West meteorological station and was analysed for the purposes of the assessment. The EPA raised no issues regarding the veracity of the background monitoring data obtained and it is considered representative of ambient air quality conditions in the local air environment.

Fugitive dust sources associated with the operation of the WRTF were primarily quantified through the application of emission estimation techniques. In particular, sources of operational emissions were identified, an emission scenario was developed (focusing on peak recycling operations so as to replicate

a worst-case scenario), emission reduction factors were applied and emissions were calculated by source, taking into account all air quality control measures to be implemented.

The air quality modelling undertaken predicted TSP, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations and dust deposition rates at surrounding receivers which comprised the adopted baseline concentration plus the contribution from the proposed facility. The maximum predicted 24-hour average concentrations from facility operations were added to the maximum 24-hour average concentrations from the local OEH monitoring station. The Department considers this approach is conservative for assessing maximum cumulative impacts in the surrounding environment.

The Department is satisfied the air modelling undertaken was generally conservative (i.e. may overestimate the air quality impacts at the majority of sensitive receivers) such that the actual air quality impacts would probably be lower than predicted in the assessment. The AQIA that had been carried out was conducted soundly and in accordance with current policies and guidelines (including the Approved Methods) and that the results are commensurate with the magnitude of impact that would be expected of a facility of the nature and scale proposed.

The modelling results were compared against the EPA's applicable air criteria for each of the three primary pollutants that would be emitted from the facility (see **Table 10**). The existing background level for each pollutant is shown for each receiver with the contribution from the WRTF in brackets.

**Table 10: Cumulative Concentration due to Recycling Facility and Background Air Quality**

Receiver ID (Figure 9)	TSP	PM <sub>10</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	PM <sub>2.5</sub>
	Annual Average	Maximum 24-hour	Annual Average	Maximum 24-hour	Annual Average
	µg/m <sup>3</sup> (c)	µg/m <sup>3</sup> (b)(c)	µg/m <sup>3</sup> (c)	µg/m <sup>3</sup> (b)(c)	µg/m <sup>3</sup> (c)
Criteria	90	50	30	25 <sup>(b)</sup>	8 <sup>(b)</sup>
R1	35.2 (0.2)	39.0 (0.8)	16.9 (<0.1)	19.0 (0.5)	6.3 (0.1)
R2	35.2 (0.2)	38.9 (0.7)	16.9 (<0.1)	18.9 (0.4)	6.3 (0.1)
R3	35.2 (0.2)	39.1 (0.9)	16.9 (<0.1)	18.9 (0.4)	6.4 (0.1)
R4	35.2 (0.2)	39.5 (1.3)	16.9 (<0.1)	19.0 (0.5)	6.4 (0.1)
R5	35.2 (0.2)	39.3 (1.1)	16.9 (<0.1)	18.9 (0.4)	6.4 (0.1)
R6	35.2 (0.2)	39.0 (0.8)	16.9 (<0.1)	18.8 (0.3)	6.4 (0.1)
R7	35.2 (0.2)	38.7 (0.5)	16.9 (<0.1)	18.7 (0.2)	6.4 (0.1)
R8	35.2 (0.2)	38.7 (0.5)	16.9 (<0.1)	18.7 (0.2)	6.4 (0.1)
R9	35.2 (0.2)	38.7 (0.5)	16.9 (<0.1)	18.7 (0.2)	6.4 (0.1)
R10	35.2 (0.2)	38.4 (0.2)	16.9 (<0.1)	18.6 (0.1)	6.4 (0.1)
R11	35.2 (0.2)	38.4 (0.2)	16.9 (<0.1)	18.6 (0.1)	6.3 (0.1)
R12	35.2 (0.2)	38.4 (0.2)	16.9 (<0.1)	18.6 (0.1)	6.3 (0.1)
R13	35.1 (0.1)	38.4 (0.2)	16.9 (<0.1)	18.6 (0.1)	6.3 (0.1)
R14	35.1 (0.1)	38.4 (0.2)	16.9 (<0.1)	18.6 (0.1)	6.3 (0.1)
R15	35.1 (0.1)	38.4 (0.2)	16.9 (<0.1)	18.6 (0.1)	6.3 (0.1)
R16	35.1 (<0.1)	38.4 (0.2)	16.8 (<0.1)	18.6 (0.1)	6.3 (0.1)
R17	35.1 (<0.1)	38.4 (0.2)	16.8 (<0.1)	18.6 (0.1)	6.3 (0.1)
R18	35.1 (<0.1)	38.4 (0.2)	16.8 (<0.1)	18.6 (0.1)	6.3 (0.1)
R19	35.1 (<0.1)	38.4 (0.2)	16.8 (<0.1)	18.6 (0.1)	6.3 (0.1)
R20	35.1 (<0.1)	38.4 (0.2)	16.8 (<0.1)	18.6 (0.1)	6.3 (0.1)
R21	35.1 (<0.1)	38.3 (0.1)	16.8 (<0.1)	18.6 (0.1)	6.3 (0.1)
R22	35.0 (<0.1)	38.4 (0.2)	16.8 (<0.1)	18.6 (0.1)	6.3 (0.1)

Notes:

(a) The NEPM Reporting Standards for PM<sub>2.5</sub> are referenced for screening assessment purposes.

(b) The maximum cumulative value is a sum of the maximum combined 24-hour average concentration from the WRTF and the maximum baseline concentration.

All pollutants and averaging periods are well below the applicable EPA assessment criterion and NEPM reporting goals at all neighboring receivers and therefore the contribution from the WRTF is minimal. As such, there would be no adverse health or amenity impacts at any surrounding receivers from particulate matter that is emitted once the facility becomes operational.

Dust deposition is used to assess nuisance impacts such as dust build up on outside surfaces. There is no data available that is suitable to quantify baseline levels in the area surrounding the facility so the modelling focused only on the incremental contribution from the facility operational emissions only. The

results showed that the WRTF would generate  $<0.1\text{g/m}^2/\text{month}$  of dust at all sensitive receivers which is significantly below the incremental criterion of  $2\text{g/m}^2/\text{month}$ .

The air contours in the AQIA show the  $2\text{g/m}^2/\text{month}$  criterion as extending to the site's south-western boundary with Coles Warehouse and Distribution Centre so there is the possibility of some dust build up in this location. However, the Department is satisfied that a combination of the commitments made by the Applicant, together with the Department's recommended conditions, would negate this issue.

The results of the air modelling were used to determine the magnitude of impact to the existing regional airshed and to inform the scope of air emission controls that would need to be incorporated into the detailed design to minimise air quality impacts. The following management and mitigation measures were integrated into the dispersion modelling process and would be implemented so as to minimise air quality impacts:

- entire site will be hardstand
- all vehicle movements will be restricted to designated routes marked out by appropriate signage and fencing using sealed internal roads
- water sprays will be used at stockpiles and screening plant and during material handling
- a wheel wash in the weighbridge area will be used to clean truck tyres to prevent mud or sediment being carried to and deposited on public roads
- particulate matter generating activities will be conducted within the main building, where possible
- no composting will be undertaken on the site.

These, together with a series of other best practice measures, would be implemented through an Air Quality Management Plan which would be developed in consultation with the EPA and the Department. This Plan would be a subset of a wider Operational Management Plan for the proposed facility that would describe the measures that will be implemented to minimise the potential risks to adverse air quality and how the air quality impacts will be minimised during any adverse meteorological conditions or extraordinary events.

The operational air quality modelling predictions adequately demonstrate that all relevant air quality impact assessment criteria for key pollutants (TSP,  $\text{PM}_{10}$  and  $\text{PM}_{2.5}$ ) concentrations, dust deposition rates and odour would be complied with at all times at all surrounding receivers. Further, the capacity of the existing air shed including other industrial receivers within Smeaton Grange Industrial Estate would not be constrained as a result of the proposed development.

#### Odour

The majority of waste material received at the facility would be inert building waste so the potential for odour is low. Odour generating waste material such as putrescible waste would not be accepted by the site. However, the facility would handle a small volume of glass material and green waste, the latter of which if left under certain conditions, may compost or breakdown, producing odour.

Despite the low potential for offensive odour to be generated, an odour assessment was nonetheless undertaken as part of the AQIA whereby an odour emission rate was adopted for green waste from other comparable waste facilities. Of these, the most conservative (i.e. highest) odour emission rate of  $1.279\text{OU m}^3/\text{s}$  was adopted for the purposes of the assessment. To quantify the level of odour that would be emitted, a green waste stockpile volume of up to  $500\text{ m}^3$  and height of 2 m was assumed in the model.

The results show that odour impacts from the facility would be negligible at less than  $0.1\text{OU m}^3/\text{s}$  at all surrounding receivers and therefore meet the EPA's odour performance criterion in all cases. In addition, whilst all odour generating materials would be stored and processed within the main shed, no control factors were applied to emission calculations so this would further contain the potential for odour emissions.

The Applicant provided a response to the EPA's submission in which it requested further information be provided around the maximum volume of green waste that would be stockpiled on site at any one time, how long it would remain on site before being transferred for disposal or recycling at another waste facility and what contingency measures would be implemented in the event this stockpiled waste began to cause offensive odours.

To address this, the following additional management and mitigation measures were incorporated into the proposal:

- vegetation waste will not be stored on the premises for extended periods and will be dispatched to another licensed facility as soon as there is enough material to fill a truck
- vegetation waste will be monitored daily for any signs that composting is occurring (odour or increased temperature) and if this occurs the stockpile will be broken apart and arrangements made immediately to dispatch the material away in a smaller truck.

With these additional controls in place, the EPA was satisfied that the likelihood of offensive odours being generated by the development would be minimised. The Department is also satisfied that odour is unlikely to pose a problem for surrounding receivers and recommends the scope of the Air Quality Management Plan include the measures that are to be put in place to manage and mitigate odour at the facility and they are implemented prior to the commencement of any odour generating activities taking place on site.

### Greenhouse Gas

Greenhouse gas (GHG) emissions were estimated using the methodologies set out in the NGAF Workbook, using fuel energy contents and Scope 1, 2 and 3 emission factors for diesel, gasoline and electricity generation in NSW. The most significant GHG emission sources were assessed, being direct emissions from fuel combustion by on site plant and equipment and from employees travelling to and from the site by motor vehicle.

The estimated annual GHG emissions for each source is presented in **Table 11**. The annual Scope 1 and 3 emissions at full production capacity represent approximately 0.0004% of total GHG emissions for NSW and 0.0001% of total GHG emissions for Australia, based on the National Greenhouse Gas Inventory for 2013.

**Table 11: Summary of Estimated Annual GHG Emissions Per Annum (tonnes CO<sub>2</sub>-e)**

Scope 1		Scope 2		Scope 3	
On-site Diesel	Electricity	On-site Diesel	Electricity	Product Transport (Diesel)	Employee Travel
563	193	43	29	501	412

Note: GHG emissions are reported in tonnes of carbon dioxide equivalents (t CO<sub>2</sub>-e). Non-CO<sub>2</sub> gases are converted to CO<sub>2</sub>-e by multiplying the quantity of the gas by its Global Warming Potential (GWP) in accordance with Table 26 of the NGAF Workbook

Whilst the level of GHG emissions generated during operation of the facility is negligible, the Applicant proposes to implement certain management measures to minimise greenhouse gas emissions including that on-site equipment would be regularly maintained and serviced to maximise fuel efficiency, vehicle kilometres travelled on site would be minimised and energy efficiency would be progressively reviewed and implemented through the life of the facility.

The Department is satisfied with the measures proposed to minimise greenhouse gas emissions are appropriate and that energy saving measures should be incorporated into the Construction and Operational Environmental Management Plans that would be developed for the construction and operational phases.

### Conclusion

The Department's assessment found that the air modelling undertaken was sufficiently conservative and that actual air emissions are likely to be lower than predicted. Nonetheless, the results show that all health and amenity criteria would be met at all sensitive receivers. Greenhouse gas emissions are considered negligible in the State and National context.

Nonetheless, the Department and EPA recommend several conditions to manage air quality emissions, which have been incorporated into the recommended conditions of consent, and require the Applicant to ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act) and prepare and implement an Air Quality Management Plan. Conditions are also included to effectively respond to enquiries and complaints and includes a protocol for identifying and notifying the Department and relevant stakeholders of any such incidents.

The Department concludes that subject to these recommended conditions being in place, together the licence conditions being imposed by the EPA in the EPL for the premises, air quality impacts from the development would be adequately mitigated, minimised and managed to acceptable levels thereby ensuring the amenity and health of surrounding communities would be safeguarded.

#### 5.4. Other Issues

The Department's assessment of other issues is provided in **Table 12**.

**Table 12: Assessment of other issues**

Consideration	Recommendations
<b>Waste Management</b>	
<ul style="list-style-type: none"> <li>• Inadequate management of C&amp;I and C&amp;D waste material entering and leaving the WRTF has the potential to cause adverse impacts in the environment.</li> <li>• A description of the waste types and how it would be received, handed, separated and dispatched is contained in <b>Section 2.3</b>.</li> <li>• Most of the waste received is recycled into useable products including aggregates, shredded timbers, mulches, soils and recyclable metals. The facility may also generate up to 20% of non-recyclable residue which would be dispatched to landfill or another recycling facility for further processing. This exceeds the recycling targets in the WARR Strategy for C&amp;I and C&amp;D waste (see <b>Section 3.1</b>).</li> <li>• The WRTF would accept predominantly C&amp;D and C&amp;I waste as defined in Schedule 1 of the POEO Act, with the Applicant processing up to 140,000 tpa of waste materials. The facility is required to operate in accordance with an EPL that would be issued by the EPA.</li> <li>• Council and the EPA did not raise any concerns with regards waste management although Council recommended that no contaminated material must be accepted at any time.</li> <li>• To ensure waste materials are handled efficiently on site, the Department recommends a condition which requires the Applicant to ensure the processing shed is clear of waste materials and washed down at close of business each day so all waste has been processed and stockpiled in product bays and is not left in its received form overnight.</li> <li>• The Department calculates that based on the maximum processing tonnage and proposed hours of work, the site would accept on average around 450 tonnes (t) of waste a day. The processing shed has a 2,000 t capacity so there is capacity to store about 4 days' worth of unsorted waste if required, which is considered an adequate contingency.</li> <li>• The Department also recommends a condition be included in the consent which requires the dispatch of residual waste to landfill or further processing to take place outside peak traffic hours.</li> <li>• Overall, the Department's assessment concludes the site is suitable for the proposed use and can accommodate the volume of waste that would be processed by the Applicant. In addition to meeting all statutory requirements, specific conditions are recommended to ensure waste is received, handled and dispatched in an appropriate and responsible manner.</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>• comply with a series of statutory requirements relating to waste receipt, storage and handling</li> <li>• follow site specific procedures including the daily emptying and washing down of the main shed and dispatching residual waste outside peak traffic hours</li> <li>• prepare and implement a Waste Monitoring Program.</li> </ul>
<b>Hazards and Risk</b>	
<ul style="list-style-type: none"> <li>• The proposal includes the storage and use of dangerous goods (DG) which, if not handled and stored correctly, could be hazardous to the environment and human health.</li> <li>• These DGs include flammable gas and liquids (Classes 2 and 3), corrosive substances (Class 8) and other hazardous materials such as oils, grease and coolant.</li> <li>• The EIS states that no special liquid, hazardous, restricted solid or putrescible waste would be accepted onto the site with procedures setting out how contaminated waste would be identified and contaminated waste would be rejected and recorded in a register that is available for EPA inspection.</li> <li>• A SEPP 33 analysis was provided in the EIS which concluded that quantities of DG proposed for storage and use do not exceed the</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>• ensure the storage of DGs do not exceed the thresholds outlined in the <i>Hazardous and Offensive Development Application Guidelines: Applying SEPP 33</i></li> <li>• store any DGs in accordance with all relevant Australian Standards.</li> <li>• store all chemicals, fuels and oils used on site in appropriately bunded areas.</li> </ul>

Consideration	Recommendations
<p>maximum permissible threshold quantities under SEPP 33 and would be stored appropriately.</p> <ul style="list-style-type: none"> <li>The Applicant has adequately addressed the provisions of SEPP 33 and concludes that the proposed development is not considered a potentially hazardous or offensive industry. As such, a Preliminary Hazard Analysis is not required in this case.</li> <li>The Department agrees with the Applicant's conclusions and has recommended standard conditions limiting the storage of dangerous goods below the threshold and that all DGs be stored and managed in accordance with relevant Australian Standards.</li> </ul>	
<b>Stormwater and Drainage</b>	
<ul style="list-style-type: none"> <li>The EIS included a water management report including an erosion and sediment control plan and stormwater concept plan that was prepared by NP Consultants.</li> <li>During construction of the facility, an Erosion and Sediment Control Plan would be developed and implemented to control the extent of sediment in runoff from the site.</li> <li>The site would be sealed with a concrete kerb along the south western, southern and eastern boundaries to collect and direct surface water to a concrete lined sediment and collection basin, which has been sized in accordance with the Blue Book, and would trap runoff and remove sediment.</li> <li>Water within the basin would be reused for dust suppression which would significantly reduce any potential increase in surface runoff and would drain via pipe to the street kerb inlet pit on Anderson Road near the north-eastern corner of the site. The capturing of roof water would provide sufficient water to cover the dust suppression water requirements (the stormwater is shown conceptually in <b>Figure 6</b>).</li> <li>The Department has also required the Applicant to install a leachate management system in the main processing area. All sediment laden water in overland flow would flow away from the leachate management system to prevent cross contamination of clean and sediment or leachate laden water.</li> <li>A small portion of the site near the north-east Anderson Road frontage is subject to flooding and is affected by Council's flood planning level. However, it is not proposed to build on this part of the site. Council has confirmed that the main processing shed is located above Council's Flood Planning Level and that the proposed fence along the boundary of the property is located above the 1% AEP flood level.</li> <li>The drainage channels on the industrial estate have capacity to convey the 100 ARI flood flow with freeboard so flooding would not affect the site.</li> <li>Council's Drainage Engineers are satisfied that flooding of the site would not occur.</li> <li>Overall, the Department's assessment concludes that based that the design of the surface water management system and the associated water balance calculations demonstrate that water can be managed effectively on site without having an adverse effect on the surrounding environment.</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>prepare and implement an Erosion and Sediment Control Plan within the CEMP</li> <li>design and install a stormwater management system in accordance with relevant standards</li> <li>prepare and implement a Water Management Plan that details water use, metering, disposal and management on-site and how wastewater would be managed.</li> </ul>
<b>Fire Safety</b>	
<ul style="list-style-type: none"> <li>FRNSW initially raised concerns around the detailed design of the fire safety system to be installed on site in particular the lack of information provided in relation to fire safety measures (being an adequate supply of water for firefighting purposes and how polluted fire water runoff would be contained during an incident).</li> <li>To resolve the issue, the Department facilitated several meetings between FRNSW and the Applicant during the assessment of the application to find a solution that was amenable to both parties.</li> <li>Agreement was ultimately reached between the two parties on the size and location of stockpiles proposed on the site, details of the fire safety system (including the hydrant system) and contaminated firewater containment capacity required.</li> <li>Following the provision of additional information, the Applicant has designed an on-site fire safety system that is acceptable to FRNSW and is therefore in accordance with Clause E1.10 of the NCC.</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>design and install the fire safety system in accordance with the specifications agreed to with FRNSW</li> <li>design and construct the facility in accordance with PBP.</li> </ul>

Consideration	Recommendations
<ul style="list-style-type: none"> <li>The proposed development also has the potential to be a bushfire hazard so a Bushfire Hazard Assessment (BHA) was prepared by EMM, which considered the risk bushfire risk associated with the proposal and described the mitigation measures to be followed based on the NSW RFS's <i>Planning for Bush Fire Protection 2006_Guideline</i> (PBP Guideline).</li> <li>The RFS reviewed the BHA and advised that since the proposed facility would store and handle potential fuel sources that may be difficult to control during a bushfire event, a series of bushfire protection measures should be incorporated into the detailed design of the facility by a specialist consultant in accordance with the PBP Guideline.</li> <li>The Applicant accepts this recommendation and a condition is recommended by the Department accordingly.</li> </ul>	
<b>Visual</b>	
<ul style="list-style-type: none"> <li>The Applicant included a Visual Impact Statement (VIA) to identify the potential visual impacts as a result of the development.</li> <li>The facility would be located in an established industrial area close and viewed in the context of other industrial premises. There would be limited opportunity for views into the site due to the presence of other large-scale industrial buildings and from Currans Hill, a vegetated mound to the south east and a vegetated corridor along Kenny Creek to the north east of the site.</li> <li>Metal fencing is proposed around the perimeter of the site, varying in height between 2.1 m and 10 m to serve as a visual barrier. In relation to the front boundary fence, the Applicant has committed to building a combination decorative metal and masonry fence in accordance with Council's DCP in response to Council's request. The front setback is proposed to be landscaped on either side of the driveway the details of which would be agreed with Council.</li> <li>Currans Hill is the closest residential area to the site, located approximately 120 metres to the east and south-east. A vegetated mound to the south east obstructs views of the development from and nearby residential receivers (refer to <b>Section 5.1</b> and see <b>Figures 8 and 9</b>).</li> <li>The VIA concluded that the development is unlikely to have a significant visual impact given that it is located within an existing industrial estate and is consistent with the visual character of the area.</li> <li>The Department agrees with the findings of the VIA and considers the development as not being visually intrusive. Overall, the Department's assessment concludes the development would have minimal impact on the visual amenity of the nearby residential area.</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>design the front fence in accordance with Council's DCP requirements prior to the issue of a Construction Certificate</li> <li>submit a final Landscape Management Plan to Council and maintain landscaping and vegetation on site for the life of the development</li> <li>ensure lighting from the development complies with relevant Australian Standards and does not create nuisance.</li> </ul>
<b>Site Contamination</b>	
<ul style="list-style-type: none"> <li>The site was historically used for agricultural purposes and has been rezoned and redeveloped as an industrial estate. On 28 October 2004, Camden Council granted development consent DA 1127/2003 for the creation of 52 Industrial lots at 73 Anderson Road, Smeaton Grange.</li> <li>The contamination assessment of the site and possible remediation was undertaken and validated prior to the issue of the Construction Certificate for subdivision under DA 1127/2003.</li> <li>The Department's assessment concludes the site is not contaminated and is suitable for its intended purpose. Nevertheless, to ensure that any unexpected discoveries of contamination are managed adequately, the Department requires the preparation of a protocol for unexpected finds as part of the Construction Environmental Management Plan.</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>prepare a protocol for unexpected finds to ensure any material identified as contaminated is disposed of appropriately.</li> </ul>
<b>Biodiversity</b>	
<ul style="list-style-type: none"> <li>The site is located within an industrial estate and has been cleared of any vegetation. Kenny Creek adjoins the site to the north.</li> <li>OEH advised that the application does not contain biodiversity issues that require a formal OEH response and the EIS considers the risk of significant impact to local flora and fauna to be low.</li> <li>The Department concurs with the Applicant's conclusions that the site does not contain any biodiversity values due to the highly-disturbed nature of the site within the Smeaton Grange Industrial Estate.</li> </ul>	<ul style="list-style-type: none"> <li>None applicable.</li> </ul>

Consideration	Recommendations
<ul style="list-style-type: none"> <li>The Department is also satisfied that with the water management measures in place any waste water generated during operation of the facility is able to be managed within the confines of the site and would not flow into the adjacent Kenny Creek riparian corridor.</li> </ul>	
<b>Parking</b>	
<ul style="list-style-type: none"> <li>The proposed development would result in staff and delivery trucks requiring on-site parking.</li> <li>The Camden DCP 2011 allows the proposed used to be assessed on its merits taking into consideration staffing, servicing and local requirements.</li> <li>The TIA states that a total of 12 car parking spaces would be provided, however the site plan identified a total of 7 car parking spaces.</li> <li>Council's submission stated that 17 car parking spaces are required and that the location of car parking spaces in the front landscaped area is not supported.</li> <li>The RTS clarified the number of car parking spaces provided in the TIA was incorrect and that parking is proposed for a maximum of 8 employees and 2 visitors on the site at any one time (10 car parking spaces) based on actual shift patterns. No parking within the front landscaped setback is proposed.</li> <li>The Department has reviewed the proposed car parking provision and considered the Applicant's justification for the number of car parking spaces proposed. The Department accepts the Applicant's justification and considers the number of car parking spaces to be adequate taking into account likely future staff and visitor numbers.</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>design and construct all car parking and internal road surfaces in accordance with the relevant Australian Standards.</li> </ul>

### 5.5. Consideration of key issues raised in public submissions

Table 13 presents the key issues raised in the public submissions (as summarised in Section 4.2.2), and a summary of how the Department has considered each issue. The majority of issues raised by members of the public are also considered in more detail in Section 5.

Table 13: Department's response to issues raised in submissions from the general public

Issue raised	Department's response
Noise	<p><i>Loss of amenity and sleep disturbance due to increased industrial noise levels</i></p> <ul style="list-style-type: none"> <li>The Department has required the Applicant to cover the processing area and product bays to reduce noise emissions</li> <li>The Applicant has changed the hours of work so the site will be shut from 10 pm to 6 am and between 6 am and 7 am only allow waste deliveries (i.e. no other site operations).</li> <li>The Applicant must demonstrate through noise monitoring and verification that the noise criteria is met during this early morning period.</li> <li>Based on background monitoring, the Department and EPA have established intrusive noise criteria for the development which would be met at all surrounding receivers, which means there should be no loss of amenity or sleep disturbance</li> <li>A range of stringent conditions are in place to ensure residential amenity is not adversely impacted by the proposed development (see Section 5.1).</li> </ul>
Transport	<p><i>Additional traffic impacts that could occur from proposed road traffic and heavy vehicle movements on local roads including Hartley Road</i></p> <ul style="list-style-type: none"> <li>The increase in road traffic and heavy vehicle movements is low and unlikely to be noticeable in the context of existing background traffic volumes on roads surrounding the industrial estate, including Hartley Road</li> <li>The traffic generated by the development can be accommodated with only a negligible effect on the efficiency of the local road network and infrastructure (e.g. intersections).</li> <li>There would now be no traffic movements associated with the facility between 10 pm and 6 am (see Section 5.2).</li> </ul>
Air quality	<p><i>Human health impacts from hazardous materials and harmful air pollutants, increased dust emissions and odour including from green waste</i></p> <ul style="list-style-type: none"> <li>Hazardous materials would not be accepted at the site so harmful toxic pollutants would not be emitted from the facility</li> <li>The levels of particulate matter and dust that would be emitted from the facility would be minimal and when added to existing background levels would remain well below applicable health and amenity criteria</li> </ul>



	<ul style="list-style-type: none"> <li>As the site would accept only non-putrescible waste, there would be negligible odour emissions from the site</li> <li>There is the potential for some low levels of odour to be emitted if green waste is allowed to compost but this is unlikely given the small volumes involved and taking into account the management measures the Applicant would implement which have been agreed to by the EPA (see <b>Section 5.3</b>).</li> </ul>
Visual	<p><i>Visual encroachment getting closer to residents and possible night lighting impacts (including glare from floodlighting and mobile equipment)</i></p> <ul style="list-style-type: none"> <li>From Currans Hill, views into the site are limited however there may be some views into the site from certain vantage points</li> <li>The site is located on a large, fairly well established industrial estate so the facility would be viewed in this context.</li> <li>The site would not be operating at night so lighting impacts would not occur.</li> <li>The Applicant would be required to comply with relevant Australian Standards to minimise lighting impacts (see <b>Section 5.4</b>).</li> </ul>
Biodiversity	<p><i>Potential impacts to biodiversity values in Kenny Creek and associated catchment from water pollution, toxic air pollutants and seed distribution from noxious weeds and plants and green waste</i></p> <ul style="list-style-type: none"> <li>There would be no toxic air pollutants emitted that could harm vegetation</li> <li>Controls would be in place to effectively manage pests, vermin and noxious weeds on site</li> <li>OEH advised that there are no biodiversity issues in respect of this application that require a formal response.</li> </ul>
Hazards and risks	<p><i>Transportation of hazardous waste through residential areas and risk of accidents from unsecured loads and bushfire</i></p> <ul style="list-style-type: none"> <li>The facility would not accept hazardous waste and no vehicles would be travelling through any residential areas</li> <li>All vehicles are required by law to have their loads secured with all drivers possessing the necessary licences to drive heavy vehicles safely</li> <li>To address bushfire risk, the Applicant would be required to implement all relevant fire protection measures in the NSW RFS's <i>Planning for Bush Fire Protection 2006 Guideline</i> (see <b>Section 5.4</b>).</li> </ul>
Local community	<p><i>Social costs and impacts on property values</i></p> <ul style="list-style-type: none"> <li>The Department's assessment has found that the facility is able to comply with all relevant amenity criteria subject to environmental controls being put in place.</li> <li>The proposal would have socio-economic value in the form of 25 local jobs and increased business turnover from significant capital investment.</li> <li>Property values are not a material planning consideration that are taken into account in the assessment of development applications.</li> </ul>
Site suitability	<p><i>An alternative location should be selected as it is too close to non-compatible uses</i></p> <ul style="list-style-type: none"> <li>The facility is a compatible use as the site is located within a major industrial estate and the land has been zoned for industrial purposes</li> <li>An environmental buffer exists between the industrial and residential land uses to mitigate noise and visual impacts</li> <li>The Department's assessment has found that all applicable health and amenity criteria would be met at all surrounding receivers</li> <li>Other receivers within the industrial estate (e.g. the childcare centre, recreation centres, cafes etc) were not assessed in detail as they would not be affected by the proposal given their distance from the site.</li> </ul>
Insufficient assessment and information provided	<p><i>Especially relating to the effect of the proposal on other businesses within the wider industrial estate, the veracity and accurateness of certain aspects of the air and noise modelling, impacts to biodiversity values in Kenny Creek and effectiveness of management and mitigation measures committed to</i></p> <ul style="list-style-type: none"> <li>The Department and other relevant NSW Government agencies are satisfied that the various technical studies in the EIS have been undertaken in accordance with guidelines and standards that are applicable in NSW</li> <li>The Department and the EPA are satisfied the noise and air modelling is robust and provides a sound basis for the characterisation and consideration of impacts associated with the development</li> <li>The modelling is also sufficiently conservative to ensure the actual noise impacts that occur will not be higher than those predicted in the two studies</li> <li>There would be no impact to biodiversity impacts on Kenny Creek</li> <li>The management and mitigation measures to be implemented on site would be effective and represent current best practice in the waste industry</li> <li>Imposing the recommended conditions of consent would strengthen the environmental controls to be put in place at the facility.</li> </ul>

Cumulative impacts	<p><i>The proposal should be assessed in conjunction with a Hot Dip Galvanising Plant proposed on an adjacent site</i></p> <ul style="list-style-type: none"> <li>• It is understood that the development application for this proposed development on Lot 4331 DP 1194022 at 42A Bluett Drive, Smeaton Grange (Council Ref. DA/2015/1122/1) was withdrawn on 26 May 2017</li> <li>• As such, there is no development application currently before Council on this site that should be assessed in conjunction with the application for the proposed WRTF.</li> </ul>
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## 6. CONCLUSION

The Department's assessment of the application has fully considered all relevant matters under Section 79C of the EP&A Act, the objects of the EP&A Act and the principles of ecologically sustainable development.

The proposed development would focus on the conversion of waste into reusable products via recycling. It would also assist in diverting C&D and C&I material from landfill and as a result would help to extend the life of existing landfill facilities and minimise their environmental impacts. In economic terms, recycling also reduces waste disposal costs for both government and industry.

Through its assessment of the application and in response to issues raised by the public, the Department has required the Applicant to make changes to the proposal. The Department has also worked closely with the Environment Protection Authority (EPA) and the Applicant to ensure residential amenity is maintained during operations.

In response to community concern, the Applicant reduced the site's operating hours to include a night time respite period. The Department has developed appropriate noise criteria in conjunction with the EPA for the one hour shoulder period between 6 am and 7 am during which time the Applicant needs to have the ability to receive waste deliveries. Whether the site is permitted to operate during this period in the future would depend on the outcome of a monitoring and verification program that the Department has required the Applicant to carry out. The program requires the Applicant to demonstrate the criteria is able to be met during this period.

The Department has also insisted the stockpiles and product bays be covered (which would assist in mitigating noise and dust emissions at source) and the acoustic fencing be erected prior to construction, rather than operation of the development as was proposed by the Applicant, to help mitigate noise emissions during both the construction and operational phases.

A stringent set of conditions have been developed and are recommended which the Department is confident would ensure the level of noise experienced by the surrounding community would not have an adverse impact on existing amenity.

The key issues associated with the development relate to noise, transport and air quality. The Department's assessment concluded that the impacts of the development can be mitigated and/or managed to ensure an acceptable level of environmental performance, subject to the recommended conditions of consent. In summary, the development:

- would positively contribute to the State's *Waste Avoidance and Resource Recovery Strategy* performance for both C&I and C&D waste
- would meet the relevant air quality and noise criteria at sensitive receivers
- would generate traffic which could be accommodated on the local and regional road network without any significant impacts on its safety, capacity or efficiency
- would provide a range of environmental and economic benefits for the region, through resource recovery and the provision of 25 new jobs.

Nonetheless, the Department has recommended stringent conditions to manage any potential impacts as a result of the proposed development.

The Department concludes the impacts of the development can be appropriately managed through implementation of the recommended conditions of consent. Consequently, the Department considers the development is in the public interest and should be approved, subject to conditions.

Following on from its assessment of the development, the Department considers the development is approvable, subject to any conditions of consent. This assessment report is hereby presented to the Planning Assessment Commission for determination.

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13/11/17.

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