Recycle Reclaim Re-use

GUNNEDAH RECYCLING & RESOURCE RECOVERY FACILITY SSD-8530563

LOTS 1 & 2 DP 1226992, No. 16 TORRENS ROAD& No. 17-21 ALLGAYER DRIVE, GUNNEDAH NSW

Response to Submissions Report

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Revision A: August 2022

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Revision A dated: August 2022

Foreword

Mackellar Equipment Hire Pty Ltd forms a part of the Mackellar group of companies, a local family-run business that has operated in the Gunnedah area since 1985. It operates a quarry near Gunnedah which has been also approved as a landfill and resource recovery facility, a waste business based in Sydney disposing of material from infrastructure projects, as well as a waste and recycling business in South-East Queensland.

We recognise that waste is one of our most pressing environmental, social and economic challenges. It is a national issue, going well beyond local government boundaries. As a community we need to ensure that instead of going to landfill all waste should either be recycled or recovered wherever possible.

Mackellar Equipment Hire Pty Ltd propose to develop industrial zoned land that it owns at No.16 Torrens Road and No.17-21 Allgayer Drive, Gunnedah, for the purposes of a recycling and resource recovery facility. Once approved, the facility would be required to hold an Environment Protection Licence (EPL), administered by the EPA.

At a time when Australia urgently needs to increase the rate at which waste is recycled, the proposed Gunnedah Recycling & Resource Recovery Facility offers the opportunity to achieve this outcome, assisted in no small measure by its highly accessible location not only to regional waste sources, but also industries in New South Wales or interstate that will ultimately accept any recycled products.

Our company has listened to community concerns, in the main relating to the types of waste proposed to be handled, as well as noise and truck traffic, and has amended the project accordingly, and in particular:

- *The facility is proposed to recycle up to 200,00 tonnes per annum of waste materials, a significant 20% reduction in the scale of operations from that originally proposed.*
- *The reduced scale of waste operations now proposed means that there will be a commensurate 20% reduction in heavy truck traffic generated by the facility travelling on local and regional roads. To further reduce truck traffic volumes, a compactor is to be introduced, to reduce the bulk of material trucked from the recycling operation.*
- *Asbestos waste or lithium batteries will no longer be accepted at the proposed facility, nor will acid sulfate soils be accepted.*
- *All unloading and processing activities associated with the proposed facility will occur within fully enclosed sheds, with an additional acoustic barrier provided along the western boundary, thus reducing potential noise impacts on the adjoining residence owned by Whitehaven Coal.*
- *The crusher originally proposed has now been deleted from the project. This is in response to concerns by the community about noise generated by the crusher and impact on local amenity.*

The project has a capital investment value of $3.9 million and will employ up to 56 people during construction and up to 18 full-time operational staff.

The accompanying response to submissions report confirms the Gunnedah Recycling & Resource Recovery Facility can be developed and operate in a safe and sustainable manner.

Brendon Mackellar

Managing Director Mackellar Equipment Hire Pty Ltd

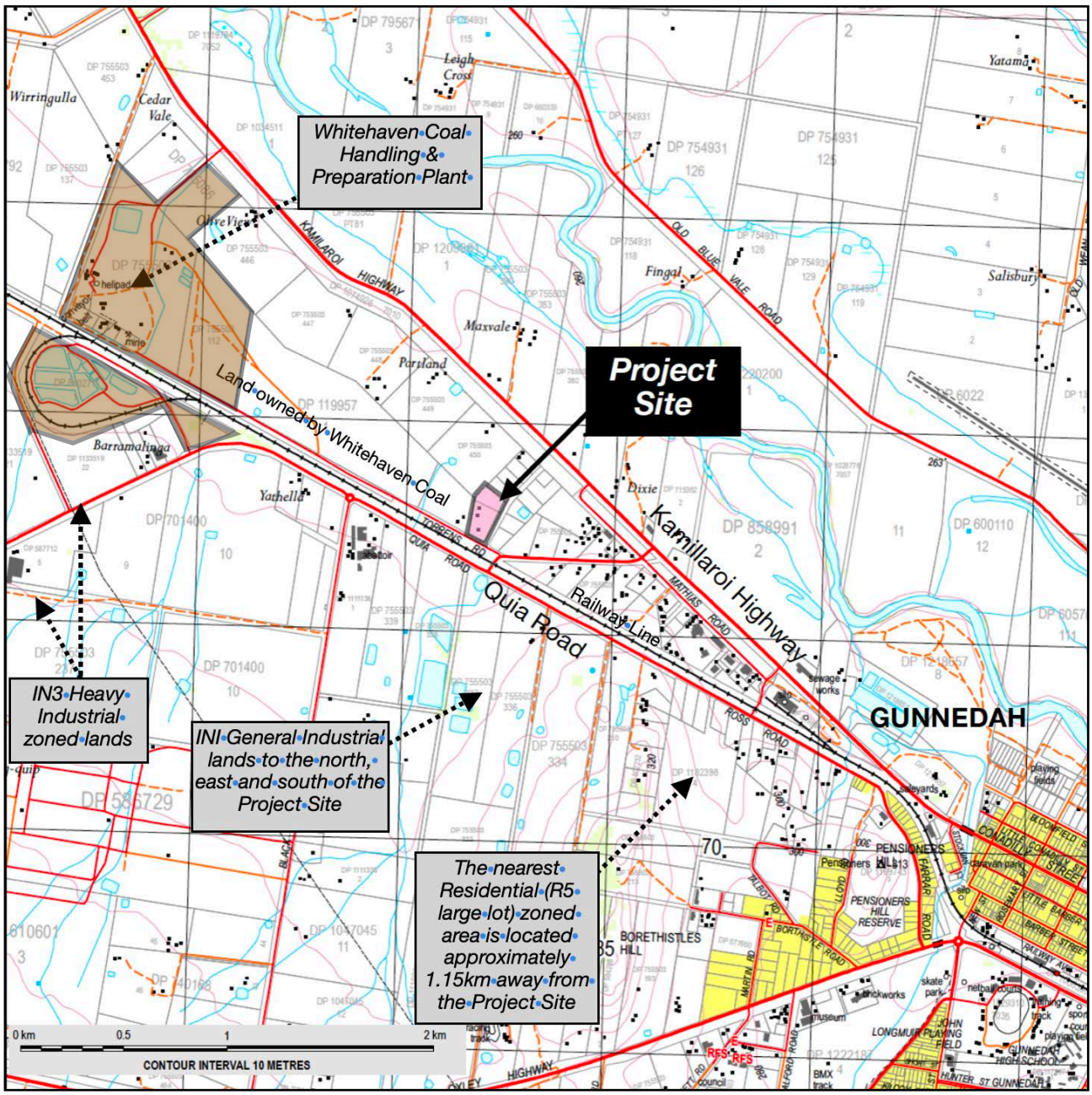


FIGURE 0.1: The Project Site is located in a designated industrial area well removed from and on the western fringes of the township of Gunnedah. The Project Site is proximate to major industrial uses in the Allgayer Drive industrial area and West Gunnedah Industrial Area, as well as being proximate to to heavy industries including the Whitehaven Coal handling and preparation plant (1.1km), Pryde's EasiFeed processing facility (1.3km), Gunnedah Leather Processors (2.0km, Council tip (2.3km) Werris Creek Mungindi Railway line (66 metres) and Kamilaroi Highway (316 metres)

(Source: NSW Spatial Services Emerald Hill 8936-3S 1:25,000 topographic map)

Executive Summary

Mackellar Equipment Hire Pty Ltd (the proponent) proposes to develop land at No.16 Torrens Road and No.17-21 Allgayer Drive, Gunnedah (the project site- refer **Figure 0.1**) for the purposes of a recycling and resource recovery facility. The proposed facility is variously described in this report as the Gunnedah Recycling & Resource Recovery Facility (GRRRF, proposed resource recovery facility), or simply, the Project.

Development for the purpose of "resource recovery or recycling facilities" that handle more than 100,000 tonnes per year of waste is classified as State Significant Development (SSD) under the *Environmental Planning and Assessment Act 1979* (EP&A Act) as it meets the criteria in s. 23(3) of Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021.* The application has been allocated development application reference: SSD-8530563. Once approved, the facility would be operated in accordance with relevant EPA guidelines and an Environment Protection Licence (EPL), administered by the EPA.

Justification for the project

- The Project will enable the future facilitation of further industrial growth, investment and employment opportunities in Gunnedah.
- The project has a capital investment value of $3.9 million and will employ up to 62 people during construction and up to 30 full-time operational staff.
- The project would facilitate the recycling of a wide range of wastes. It promotes recycling as an alternative to landfilling. The project will form a part of a much broader network of waste facilities across New South Wales. This facility, and many others like it in New South Wales, will have the ability to economically process waste from as far away as the greater Sydney region and beyond. At present, the greater Sydney region, in particular, is already facing pressure as waste streams continue to grow in line with construction activity and major infrastructure projects. As these pressures are set to continue, with limited opportunities for new recycling or landfill facilities being established in proximity to growing urban areas, other more distant sites are becoming increasingly attractive to accommodate these uses. This makes it economic for more distant recycling facilities on major transport routes in regional New South Wales, like Gunnedah, to be able to accommodate some of this demand through back-loading of heavy transport vehicles.
- The project is within an existing zoned General Industrial area surrounded by other compatible developments and land uses. The use is permissible in the INI General Industrial zone pursuant to the provisions of *Gunnedah Local Environmental Plan 2012* and *State Environmental Planning Policy (Transport and Infrastructure) 2021*. Refer **Figure 0.2**.
- Following exhibition of the Project, and in response to community concerns, in particular relating to noise, the Project has been amended to address community concerns including:
  - The scale of the Project has now been reduced by 20%, to now handle 200,000 tonnes per annum of non-toxic, non-putrescible waste (previously 250,000 tonnes per annum of waste).
  - There will be a commensurate 20% reduction in heavy truck traffic generated by the facility travelling on local and regional roads.
  - Asbestos waste or lithium batteries will no longer be accepted at the proposed facility.
  - The crusher originally proposed has now been deleted from the proposed facility.
  - All unloading and processing activities associated with the proposed facility will now occur within fully enclosed sheds, with an acoustic barrier provided along the western boundary.

- The project site is adequately separated from sensitive receivers and from zoned residential areas, the closest rural residence located some 230m away from the northern boundary of the project site. The next closest rural dwelling is located approximately 270m away from the northern boundary of the project site. Both of these properties rely on access to the Kamilaroi Highway for their site access. Another three (3) rural dwellings lie within 500m of the project site. The nearest zoned residential (large lot) area is located approximately 1.15km away.
- The project site has no significant constraints development generally, and can be developed for the purposes of the proposed waste facility. The project site is flood-free land.

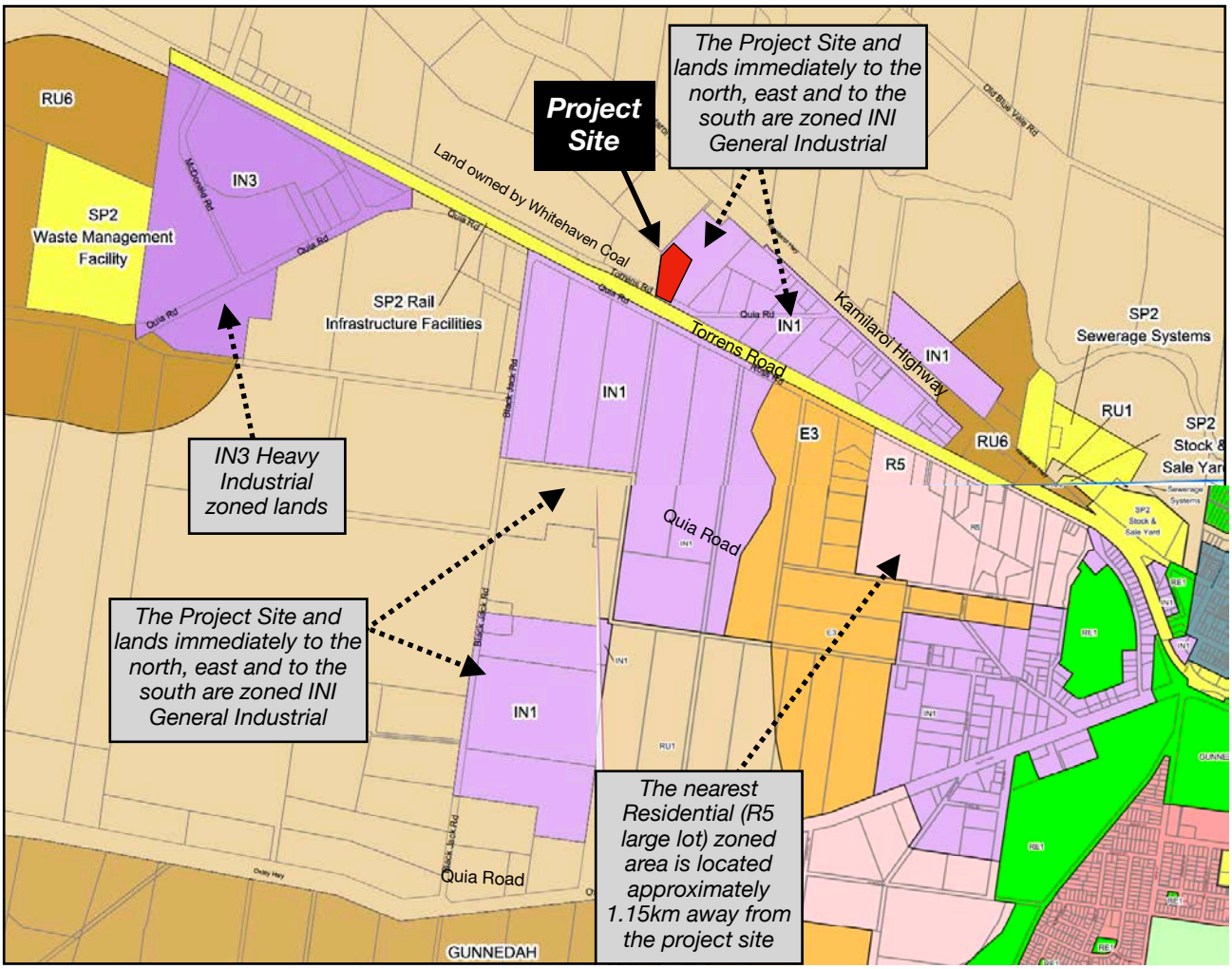


FIGURE 0.2: All of the industrial-zoned land in Gunnedah is located to the west of the CBD. A recycling and resource recovery facility is a permissible use in the IN1 General Industrial zone - the zoning applicable to the Project Site. Industrial uses and/or zoned industrial lands dominate the locality in the near vicinity of the project site

(Source: Gunnedah Local Environmental Plan 2012 compilation of Land Zoning Map-Sheets LZN_005A &5AA)

Public consultation during preparation of Environmental Impact Statement (EIS)

In accordance with the SEARS, a consultation exercise was undertaken with government agencies, the local council, Aboriginal organisations and with the local community in the neighbourhood. It should be noted that COVID restrictions were in place during this time, restricting direct face-to-face interaction. In regard to consultation with residents in the nearby locality, a Fact Sheet was delivered to the following addresses on the 13 and 14 August 2020 by the General Manager of the Mackellar group of companies, Mr Tim Mackellar- refer to accompanying **Figure 1.2**. This was followed up by a meeting held with neighbours to discuss the project, held at the Torrens Road office of the proponent held on 3 February 2021. Other near neighbours were also contacted, as well as the tenant occupying the nearest residence, owned by Whitehaven Coal, as well as the local high school, who use the Whitehaven Coal site for agricultural science projects.

Public exhibition of Environmental Impact Statement (EIS) for the project

In December 2020 the EIS for the project (SSD-8530563) was lodged with the NSW Department of Planning Industry and Environment (the Department) for determination. The EIS was placed on public exhibition from 16 December 2020 to 3 February 2021. During this period, government agencies, Gunnedah Shire Council, key stakeholders, the community and interest groups were invited to provide submissions on the project for consideration by the Department as part of the State Significant Development planning process.

Overview of submissions received during public exhibition of EIS for the project

During the EIS exhibition process the Department of Planning Industry and Environment (the Department) received a total of 95 submissions from government agencies, the local council, non government organisations and community members, comprising:

- Five (5) submissions received from government agencies comprising a submission from the Biodiversity and Conservation division of the Department of Planning Industry and Environment, duplicate submissions from the RMS and Transport for NSW (TfNSW), one from the EPA, and one from Gunnedah Shire Council. A correction has been received from the EPA since then, clarifying the applicable noise limits to apply, if approved.
- Four (4) submissions received from special interest organisations, comprising: Armidale Action on Coal Seam Gas & Mining; North West Protection Advocacy at Coonabarabran; Emerald Hill Progress Association Inc; and the Wando Conservation and Cultural Centre Inc at Maules Creek.
- Eighty Six (86) submissions received from the community.

A summary of the submissions received and submissions register is provided in **Appendix A**.

The most commonly raised issued related to the proposed storage of asbestos and lithium batteries on the project site, despite the fact that no processing of these materials was proposed on the project site. Other issues frequently raised in submissions concerned:

- The potential for contaminated leachate to drain from the project site into local waterways.
- The potential of the site for flooding.
- Adverse noise and dust impacts.
- Adverse impacts associated with truck movements to and from the facility.
- Proximity to residences and to the township of Gunnedah.
- Concerns that the proposed facility was a waste dump.

- Concerns about the EPA's ability to monitor the development, and in particular, the ability of the EPA to monitor the facility processing "toxic" waste from mining developments in the region.
- That the use was inappropriate for a "light industrial" zone.
- Landscape and visual impacts on neighbouring rural residences.
- Lack of community consultation.

Response to Department's request for more community consultation

In advice dated 11 February 2021 the Department requested the proponent to undertake additional community consultation during the preparation of the response to submissions. The requested additional community consultation was undertaken by the proponent during February and March 2021 following discussions with senior Department officers and the proponent at a Teams meeting held on 24 February 2021. This consultation exercise included but was not limited to:

- The holding of six (6) community consultation meetings held 8-10 March 2021.
- Radio interviews and TV news reports.
- Advertisement in the local newspaper as well as various newspaper articles.
- Making the Fact Sheets available at the offices of the local council.
- The distribution of hundreds of project Fact Sheets to a wider community.

Refer **Appendix B**.

In addition to the above, the general Manager, Mr Tim MacKellar, met with and secured a legally binding agreement with the nearest residence to the east, more commonly known as the "Dog House".

The submissions received and the issues raised therein form the subject of this report, titled the Response to Submissions (RTS) Report. Issues raised within the submissions are addressed within this report.

Refinement of project following submissions received and further community consultation

In response to the submissions received and further community consultation, the proponent now proposes the following changes to the project, including but not limited to the following:

- The scale of the Project has now been reduced by 20%, to now handle 200,000 tonnes per annum of non-toxic, non-putrescible waste (previously 250,000 tonnes per annum of waste).
- There will be a commensurate 20% reduction in heavy truck traffic generated by the waste facility.
- No asbestos (special waste) or lithium batteries (hazardous waste) will now be accepted at the project site, including the storage of these wastes on site. Accordingly, the restricted waste shed no also longer forms a part of the project, given that there will be no longer a need to provide for a building specifically dedicated to the storage of such wastes.
- In the interests of reducing the noise impact of the project, the removal of crushing plant from the project description. Following the grant of approval by the Northern Regional Planning Panel on 24 June 2021 the crushing of concrete and similar types of waste will now be undertaken at the Marys Mount Quarry landfill and resource recovery facility.
- The various categories of waste material will be shredded and/or compacted and/or baled, to improve ease of handling and to optimise transported loads of processed waste.

- In the interests of reducing the visual impact of the project when viewed from the north, the erection of further landscaping screening along the northern boundary, coupled with further landscaping proposed elsewhere on the project site, is proposed.
- Treated or untreated ASS or PASS soils will now not be accepted at the facility. The 25,000 tonnes per annum originally dedicated to contaminated soils will be redistributed amongst the other waste categories, such that the facility will handle up to 200,000 tonnes per annum of waste.
- All unloading and processing activities associated with the proposed facility will now occur within fully enclosed sheds, with an acoustic barrier provided along the western boundary.

Further minor revisions are sought to the design of the project, in the main, in response to either community concerns or queries raised by the Department.

At one of the community consultation sessions held 9-10 March 2021 a community consultation committee was proposed by a community member, to enable ongoing dialogue between the community and the operators of the Gunnedah Recycling & Resource Recovery Facility (GRRF).

The proponent now proposes two conditions of consent that will enable the establishment of a community consultation committee and ongoing access to information about the project, if approved. Refer to **Appendix B** for details.

Pursuant to the provisions of clause 55 of *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation 2000- **refer to NOTE 1 below**) an amendment of the development application is proposed, to enable the amendments/refinements sought above having regard for the following:

- The amended application is within the ambit of Clause 55. The amended development, incorporating the changes sought, are essentially the same as that originally proposed. The amendments sought will not result in the conversion of the application into a radically different or new application, and the essence of the development remans the same. Moreover, the site and characterisation of the development remains the same.
- The essential elements of the proposed resource recovery and recycling facility have not been so altered such that they place the development in a different category for the purposes of assessment. Even with the amendments proposed, the essence of the development remains the same, and the fundamental nature is unchanged.
- Importantly, the amended application, incorporating the clause 55 changes, is considered likely to not result in any additional environmental impacts. In fact, the changes proposed are expected to result in significant or demonstrable beneficial impacts , in particular in terms of amenity, noise pollution, and visual impacts, as well as reduced project risks associated with the handling of waste generally.
- The amendments proposed are in response to the issues raised by the community and/or by the Department. As such, the use of the clause 55 power is appropriate given its beneficial (ie. proving for a suitable level of recovery of waste, with reduced risks) and facultative (ie. responsive) purpose.

In short, these changes will result in a better environmental outcome for the project.

Having regard for the above, it is requested that the determining authority in this matter exercise its discretion under clause 55 and that the application be duly approved in the amended manner now sought.

[**NOTE 1: The The 2021 EP&A Regulation commences on 1 March 2022. However, the EP&A Regulation 2000 continues to apply to any development application made but not finally determined before 1 March 2022, including this DA being SSD-8530563 (2021 EP& A Regulation, Sch 6 cl 3)**.]

Contents

1. Introduction

1.1 Overview of Project

Mackellar Equipment Hire Pty Ltd (the proponent) seeks approval to develop land at No.16 Torrens Road and No.17-21 Allgayer Drive, Gunnedah (the project site) for the purposes of a recycling and resource recovery facility handling non-toxic, non-putrescible waste. All unloading and processing activities will occur within enclosed sheds. The proposed facility is variously described in this report as the Gunnedah Recycling & Resource Recovery Facility (GRRRF, proposed resource recovery facility), or simply, the Project.

Project objectives

The objectives of the project include but are not limited to the following:

- The project will significantly contribute to the NSW Government's Policy on Waste Reduction.
- To establish a facility on the site that will handle the types of waste outlined below. This waste material will be sourced from within and outside of the Gunnedah Shire, with recycled product from the facility distributed to local, regional and interstate sources.
- To take advantage of existing industrial infrastructure on the project site, including offices, fire hydrants, urban services, hardstand areas and access to the local road system.
- To provide for a new industry in within an already established, recently constructed fully serviced new industrial estate on the western periphery of Gunnedah township.
- To provide for a new, waste-related industry to the Gunnedah region, providing further diversity in the range of industries offered in the region. Presently the Gunnedah economy is heavily reliant on coal mining, which presently generates significant income and employment.
- The proposed GRRRF would provide a range of environmental and economic benefits for the region by recycling waste, including the provision of additional employment opportunities and investment in infrastructure.
- Manage environmental impacts to the surrounding area to an acceptable degree by implementing various environmental management and mitigation measures, including ongoing community consultation.
- Once development consent has been granted, to obtain an Environment Protection Licence (EPL) from the NSW EPA for the operation Gunnedah Recycling & Resource Recovery Facility.

Description of Development

The following works are proposed to support the proposed project:

- Demolition of existing dwelling, demountable, fences associated with dwelling, and shed. Existing fuel tanks to be relocated offsite.
- Sediment and erosion control works.
- Earthworks.
- Drainage works.
- Fire fighting system and fire water runoff management works.

- Leachate management works.
- Pavement and carpark works.
- Construction of unloading and processing shed, with all processing to occur within an enclosed shed.
- Construction of waste storage bays.
- Installation of incoming and outgoing weigh-bridges.
- Installation of wheel bath and rumble grid.
- Construction of acoustic barriers.
- Further perimeter landscaping.

Waste handling and processing

Some of the more significant waste handling and processing steps proposed at the resource recovery facility are summarised as follows:

- Trucks transporting waste would enter the project site from the Torrens Road entry and make their way to the weigh-bridge for weighing and inspection and classification, prior to unloading. If a load of non-conforming waste is identified prior to unloading, the load would be rejected and the vehicle would be directed to a lawful disposal facility elsewhere.
- The driver will then deliver the waste to the nominated waste unloading or storage area -the tip and spread area- where it will be tipped and further inspected. If a load of non-conforming waste is identified after unloading, the load would be rejected, with the driver of that load required to remove the waste at their expense and directed to a lawful disposal facility elsewhere.
- Delivery trucks would then exit the project site accessing the a proposed new weigh-bridge and wheel-wash facility before exiting the project site. Trucks exiting the site will be re-weighed as they leave the site to determine the mass of the load delivered.
- A range of mobile plant (eg. screen/trommel, shredder, excavator, front-end loader, balers, compactors and presses) and a screening/picking line, will be used to handle and process the waste for each waste type within the enclosed shed, having a floor area of 3,400m^2. These areas are to be serviced by misting sprays, to reduce dust nuisance.
- An on-site surface water management system to be provided, including on-site detention (OSD) system and leachate collection.
- Processed waste will be moved to stockpiles for storage prior to despatch off-site.
- All activities will be undertaken on hardstand areas.
- Further landscaping to be provided around the facility.

Wastes to be accepted at GRRRF (waste inputs)

The wastes proposed to be accepted at the GRRRF comprise the following:

- Excavated natural material and resource recovered material.
- Co-mingled and segregated Construction and Demolition (C&D) waste. [NOTE: No crushing of concrete waste to be undertaken on site. This change made in response to community concerns regarding noise potential from crushing of concrete waste on site- now deleted from the project]
- Commercial and Industrial (C&I) waste, including paper.
- Tyres will be accepted on site. [NOTE: This clarifies a query made. A shredder is now proposed]

[NOTES: 1. The mix of waste above is an estimate only, ultimately dependent on a range of factors including prevailing market conditions, access to the waste streams described above, prevailing government policies, and the like].
2. No other types of hazardous or special waste will be accepted at the site.
3. No garden (green) waste, household waste, liquid waste, chemical waste or putrescible waste will be accepted by the facility. [NOTE: This clarifies a query made]
4. Treated or untreated ASS or PASS soils will now not be accepted at the facility. The 25,000 tonnes per annum originally dedicated to contaminated soils will be redistributed amongst the other waste categories, such that the facility will handle up to 200,000 tonnes per annum of waste [NOTE: These changes made in response to community concerns regarding these waste materials being accepted at the GRRRF]
5. No asbestos (special waste) or lithium batteries (hazardous waste) will now be accepted at the project site, including the storage of these wastes on site [NOTE: These changes made in response to community concerns regarding these waste materials being accepted at the GRRRF]

A shredder will also be utilised, to reduce waste to a manageable size. The low-pressure compaction of processed waste, forming smaller compressed briquettes, will also assist in reducing the size of processed material to be exported from the site. Baling of will also occur, for ease of handling of processed waste. The recycled materials able to be produced will include soils and mulched material suitable for landscaping or rehabilitation and drainage material, or as a gravel substitute. The aim of the recycling process will be to produce end recycled products from materials that might otherwise be disposed to landfill.

Resource recovered products (recycled waste outputs)

The proposed recycling and resource recovery facility will unlock value by transforming the above waste into materials capable of use for a wide range of applications, including but not limited to the following: baled paper, cardboard and plastics; general fill soil (ENM) or topsoil; select fill; drainage medium; or general fill.

Wastes that will not be accepted at the resource recovery facility

The proposed recycling and resource recovery facility will not accept toxic, hazardous or putrescible waste. Wastes accepted by the site are listed in Section 3.1 of the EIS. These wastes will be classified according to the *Waste Classification Guidelines - Part 1: Classification of Waste* (EPA 2014a). Asbestos and lithium batteries, as well as concrete waste and acid sulfate soils, are no longer proposed to be accepted at the GRRRF. No garden (green) waste, household waste or liquid waste, chemical waste or putrescible waste will be accepted by the proposed resource recovery facility.

1.2 Additional Assessments Undertaken

In addition to the work undertaken by Outline Planning Consultants Pty Ltd in preparing the EIS, specialists reports in the fields of traffic, flora/fauna, surveying, landscaping, noise, dust, CIV costings, Aboriginal heritage, contamination, leachate and stormwater management and engineering were provided. In addition to the work undertaken by Outline Planning Consultants Pty Ltd in preparing this RTS report, and the inputs of Mackellar Equipment Hire Pty Ltd (the proponent), further inputs have been sought from the following consultants in addressing the issues raised in submissions received during the public exhibition process- refer **Appendix C**:

- Martens & Associates, consulting engineers, in particular focussing on changes to the design of the project, as well as on-site surface water and leachate management- refer Appendix C6.
- Streetwise traffic consultants, regarding traffic matters- refer Appendix C6.
- Vipac, regarding noise and air quality impacts- refer Appendices C4 and C5.
- East West Enviro, who carried out further contamination investigations over Lot 1- refer Appendix C8.

1.3 Statutory Approval Process for the Project

The project is classified as State Significant Development (SSD) pursuant to the provisions of clause 23(3) of Schedule 1 of the former *State Environmental Planning Policy (State and Regional Development) 2011* (now *State Environmental Planning Policy (Planning Systems) 2021*) and has been allocated the following development application reference: SSD-8530563.

Once approved, the resource recovery facility would be run in accordance with relevant EPA guidelines and will be required to hold an Environment Protection Licence (EPL), administered by the EPA.

A development application, accompanied by an Environmental Impact Statement (EIS) prepared for the project by Outline Planning Consultants Pty Ltd, was lodged with the Department on the NSW Major Projects planning portal in December 2020. The development application sought approval for the project under Part 4, Division 4.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The EIS was prepared to address, and be consistent with, the Secretary's Environmental Assessment Requirements (SEARs) for the project (SSD-8530563), which were issued on 7 August 2020.

In accordance with (then) Clause 82(3) of the *Environmental Planning and Assessment Regulation 2000* the EIS was placed on public exhibition on the NSW Planning Portal from 16 December 2020 to 3 February 2021 (NSW Planning Portal Ref: EXH-12245745). During this public exhibition period, government agencies, Gunnedah Shire Council, key stakeholders, the community and interest groups were invited to provide submissions on the project for consideration by the Department of Planning Industry and Environment as part of the State Significant Development planning process. During the EIS exhibition process the Department of Planning Industry and Environment (the Department) received a total of 95 submissions from government agencies, the local council, non government organisations and community members.

Pursuant to the provisions of Clause 82(2) of the EP&A Regulation, the proponent, Mackellar Equipment Hire Pty Ltd, is now required to respond to the submissions received. This Response to Submissions (RTS) report:

- Provides the applicant/proponent a right of reply to the issues raised in submissions.
- Ensure that the community gets feedback from the applicant/proponent on the issues it raised in submissions.
- Helps the consent authority-in this case the Independent Planning Commission- to evaluate the merits of the project.

The structure and contents of the RTS reflect the draft guideline *Preparing a Submissions Report State Significant Development Guide* (Department of Planning Industry and Environment December 2020).

This RTS report will be considered in the determination of the project under the EP&A Act. As soon as an RTS report is received, the Department must publish the Response to Submissions Report on the Major Projects website and proceed to complete its assessment of the development application. Given that

various refinements and amendments have been made, an Amendment Report will also need to be submitted.

1.4 Public Consultation Process

Public consultation during preparation of Environmental Impact Statement (EIS) for the project

In accordance with the SEARS, a consultation exercise was undertaken with government agencies, the local council, Aboriginal organisations and with the local community in the neighbourhood.

It should be noted that COVID restrictions were in place during this time, restricting direct face-to-face interaction.

In regard to consultation with residents in the locality, a Fact Sheet was delivered to the following addresses on the 13 and 14 August 2020 by the General Manager of the Mackellar group of companies, Mr Tim Mackellar, as illustrated in the accompanying **Figure 1.2**. Refer to Statutory Declaration by Mr Tim Mackellar, General Manager of the Mackellar group of companies, confirming the above.

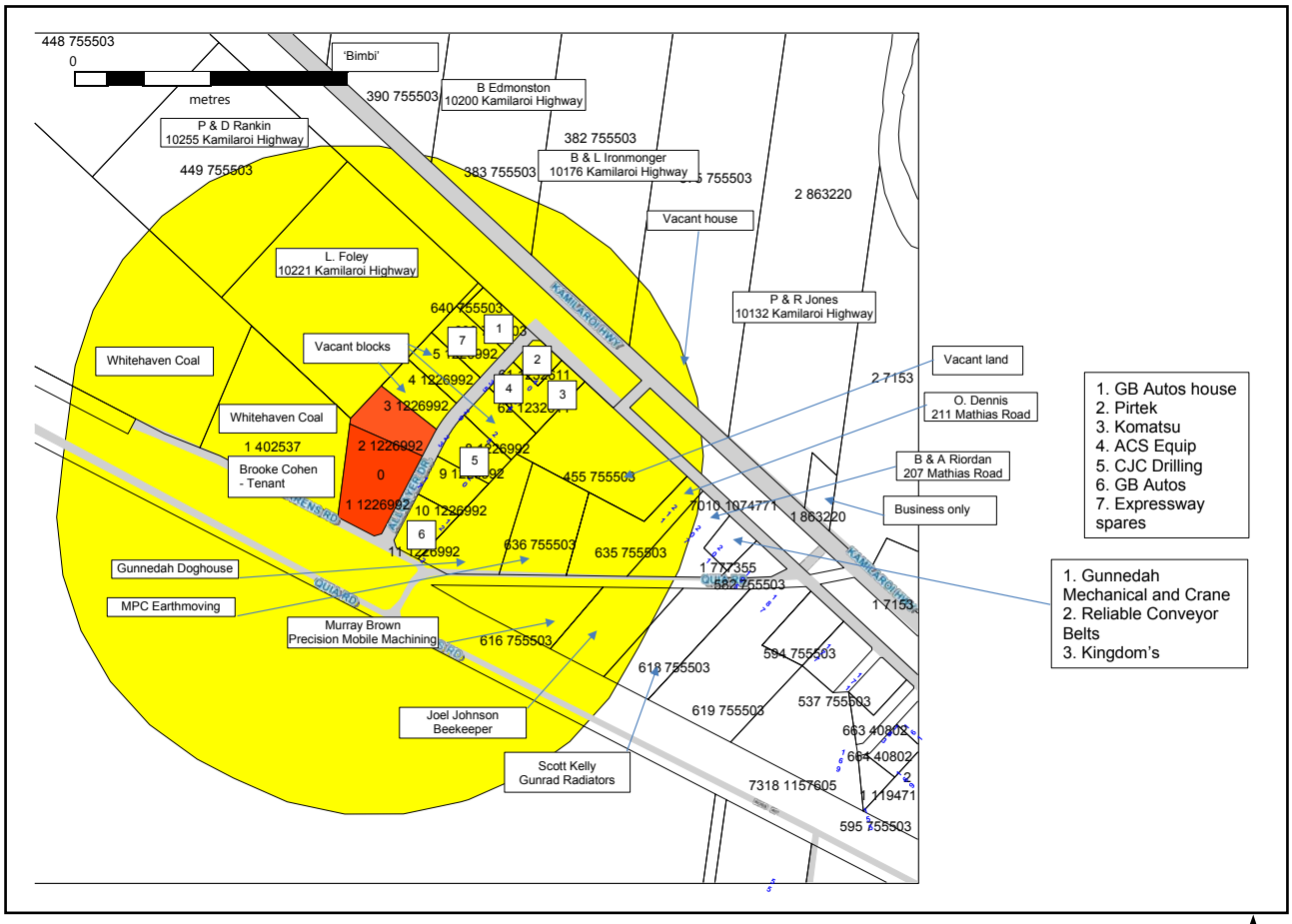


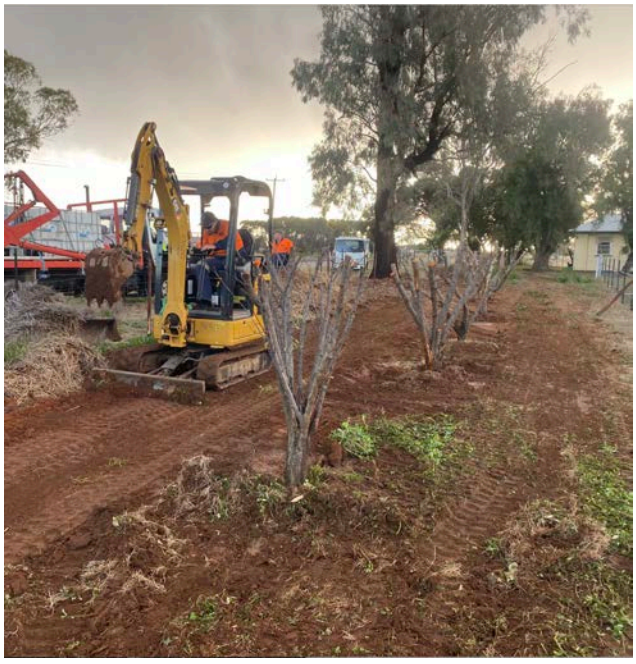
FIGURE 1.1: Location of the addresses where project Fact Sheet was hand-delivered on 13-14 August 2020, during preparation of the EIS

No responses were subsequently received from any of the neighbours provided with the Fact Sheet.

In addition to the above consultation process, the General Manager of the Mackellar Group, Mr Tim MacKellar, consulted with the following nearest neighbours by telephone regarding the proposed recycling and resource recovery facility on the subject property:

- Leigh Wilson, Regional Manager, GB Autos. This company owns an industrial property on the opposite side of Allgayer Drive, as well as the rural property and (closest) residence to the north, labelled "6" and "1" respectively on **Figure 1.1** above.
- Tim Muldoon, Whitehaven Coal on 19 March 2019 and follow up discussions with Darren Swain, Whitehaven Coal on 29 September 2020. This property is labelled as "Whitehaven Coal" on the accompanying **Figure 1.1**. A follow up meeting was held with the tenant occupying the Whitehaven Coal residence- a local school teacher- on 24 October 2020 and 4 January 2021.
- As Whitehaven Coal had allowed use of their property by the Agricultural Science department of the local high school a meeting was held with the then headmaster, Shane Kelly and head of the school Agricultural Science, Nicole Dwyer, with the General Manager of the Mackellar Group, Mr Tim MacKellar, on 24 October 2021 to discuss the project.
- On 18 June 2021 Mackellar Equipment Hire Pty Ltd donated and replanted established fruit trees on the Whitehaven site, for use by the local high school. Refer to **Photographs 1.1 and 1.2**.

These nearest neighbours were contacted because each owned the nearest rural dwellings; one to the west , and the other to the north.



PHOTOGRAPHS 1.1 & 1.2: On 18 June 2021 Mackellar Equipment Hire Pty Ltd donated and replanted established fruit trees on the neighbouring Whitehaven site, for use by the local high school

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A meeting was held with neighbours to discuss the project, held at the Torrens Road office of the proponent held on 3 February 2021. The meeting was chaired by Tim MacKellar, General Manager. Refer **Appendix B**.

Outline Planning Consultants contacted Mr Bob Ironmonger, a neighbour to the north of he project site, in his capacity as Gunnedah Shire Council's GIS officer, on 10 February 2020, seeking a plan showing residences

within 500m of the proposed GRRRF. It was explained to Mr Ironmonger that this plan was required for the purposes of distributing Fact Sheet to local residents about a proposed recycling and resource recovery facility on the subject property. A brief description of the proposal was provided to Mr Ironmonger.

In addition to the above, the general Manager, Mr Tim MacKellar, met with and secured a legally binding agreement with the nearest residence to the east, more commonly known as the "Dog House".

Public exhibition of Environmental Impact Statement (EIS) for the project

In December 2020 the EIS for the project (SSD-8530563) was lodged with the NSW Department of Planning Industry and Environment (the Department) for determination.

The EIS was placed on public exhibition from 16 December 2020 to 3 February 2021. During this period, government agencies, Gunnedah Shire Council, key stakeholders, the community and interest groups were invited to provide submissions on the project for consideration by the Department as part of the State Significant Development planning process.

1.5 Purpose of this Report

The purpose of this Response to Submissions Report is to respond to submissions raised by stakeholders during the exhibition of the EIS.

This includes government agencies as well as community organisations ad the community generally.

It also includes a response to matters raised by the Department of Planning Industry and Environment in a letter dated 11 February 2021 to the proponent where the following was requested:

> "*The Department requires that you provide a response to the issues raised in those submissions, in accordance with clause 82(2) of the Environmental Planning and Assessment Regulation 2000. Please provide a response to the issues raised in these submissions and by the Department (Attachment 1) within two months of the date of the issue of this letter.*"
>
> [NOTE: Time extensions have been subsequently granted to this deadline, allowing the proponent to carry out additional assessments and revisions to the project.]

Each of the submissions received during the public exhibition of the EIS has been collated, analysed and addressed (as relevant).

Arising from the submissions received and following further community consultation, further refinements and amendments to the project application have been made. This includes clarification of matters that have been queried in the submissions and by the Department concerning certain aspects of the project.

The refinements mean that the environmental impact of the development have been further reduced.

These matters are dealt with in Section 3.

Included in this section of the report are not only the details of the refinements now proposed, but also the revised drawings and technical reporting undertaken to serve as an addendum to the environmental impact assessment and technical specialist reporting provided within the EIS.

1.6 Structure of this Report

The structure and content of this Response to Submissions Report is as follows:

- **Section 1**: This section includes a short summary of the project and public consultation undertaken during preparation of the EIS, the statutory approval process, purpose of this report as well as report structure.
- **Section 2**: This section analyses the submissions in broad terms, focussing on the groups and people who made submissions and categorising the issues that they raised in submissions. It includes:
  - A general a breakdown of submissions, highlighting the different issues identified by the different types of stakeholders; and
  - A categorisation of the issues raised.
- **Section 3**: This section summarise the actions the applicant has taken since the public exhibition to address the issues raised in submissions, including:
  - A refining or amending the project (undertaken); and
  - Undertaking further engagement with the community (undertaken); and
  - Undertaking further assessment of the impacts of the project (undertaken).

[NOTE: As a result of the proposed refinement/amendment of the project it will be necessary to seek the approval of the Planning Secretary, required under clause 55 of the EP&A Regulation 2000, by way of an amendment to the development application SSD-8530563. Clause 190(2)(a) of the EP&A Regulation 2021 provides that the person preparing an EIS must, in the case of State significant development, have regard for the *State Significant Development Guidelines*. However, clause 7 of Schedule 6 of the EP&A Regulation 2021 provides that:

"*Section 190(2) does not apply to an environmental impact statement submitted to the Planning Secretary on or before 31 March 2022 if the Planning Secretary last gave notice of the environmental assessment requirements before 1 October 2021*.".

In other words, the *State Significant Development Guidelines* do not apply to SSD-8530563 either in terms of the response to submissions format or the amendment of the DA. Moreover, the EP&A Regulation 2000 continues to apply to development applications lodged but not finally determined before 1 March 2022, including SSD-8530563.

The Amendment Report is in addition to the Submissions Report. When this occurs, an applicant must incorporate any relevant findings in the Amendment Report into the response to submissions in the Submissions Report. Refer to accompanying Amendment Report.]

- **Section 4**: This section provides a detailed summary of the applicant's response to the issues raised in submissions by government agencies and the Department.
- **Section 5**: This section provides a detailed summary of the applicant's response to the issues raised in submissions by individuals and community groups.
- **Section 6**:This section provides an updated evaluation of the project as a whole, having regard to any relevant issues raised in submissions and the applicant's response to these issues.

2. Analysis of Submissions

2.1 Overview

Pursuant to s.4.15 of the EP&A Act in determining a development application it is mandatory for any consent authority to have regard for both s.4.15(d) ("any submissions made in accordance with this Act or the regulations") and s.4.15(e) ("the public interest").

The Courts have accepted that the "public interest" (s.4.15(e) of the EP&A Act) includes community submissions regarding a project, per Preston CJ in *Bulga Milbrodale Progress Association Inc v Minister for Planning and Infrastructure and Warkworth Mining Limited* [2013] NSWLEC 48 15 April 2013 at [63].

In *Tegra (NSW) Pty Ltd v Gundagi Shire Council and Anor* [2007] NSWLEC 806 at [53]to [56] Preston CJ identified a number of aspects of the public interest, summarised as follows:

- "*The public interest is multi-faceted*…"
- "*There is the public interest in the proper enforcement of public welfare statutes, such as planning and environment laws.*" The zoning of the land, and uses permissible under that zoning, is but one example of such a planning and environmental law.
- "*There is also the public interest in the reliable and predictable public administration of the law*."
- "*There is the public interest in protecting the environment and components of it, and cultural heritage*."

In a later Land and Environment Court case, *Woolcott Group Pty Ltd v Rostry Pty Ltd* [2015] NSWLEC 46, Preston CJ ruled that only those submissions received during the public exhibition period comprise "*any submissions made in accordance with the Act or the regulations*" for the purposes of s.4.15(d). The upshot of the latter Court decision is that the making of a late submission is not a 'submission made in accordance with this Act or the regulations' (s.4.15(d)), nor has the person making such a submission have any rights under the EP&A Act to commence an objector appeal. As such, any late submission simply has no weight in the assessment of any advertised development application.

More recently, the Court has upheld the guidance of Lloyd J in *New Century Developments Pty Limited v Baulkham Hills Shire Council* (2003) 127 LGERA 303; [2003] NSWLEC 154 to the effect that public submissions may be afforded weight where objective, specific, concrete or observable consequences of the proposed development are set out (relied on in *Guo v Parramatta City Council* [2020] NSWLEC 1311 dated 21 July 2020 at [53] and *Mitribe Holdings Pty Ltd v Canterbury-Bankstown Council* [2021] NSWLEC 1381 dated 8 July 2021 at [49]). A similar test is is to be found in the decision of Preston CJ in *Telstra Corporation Ltd v Hornsby Shire Council* (2006) 67 NSWLR 256; [2006] NSWLEC 133 in relation to testing community perceptions against fact and evidence at [196] and [198]:

> *"196. In this case, the residents perceptions of an adverse effect on the health and safety of residents and on the environment ….are without justification in objective, observable, likely consequences. The claimed effects are unsubstantiated and without reasonable evidentiary foundation….*
>
> *….*
>
> *198. In these circumstances, little, if any weight, can be given to the residents perceptions.…"*

In addition to the above Court rulings regarding the assessment of any development application under s.4.15(d) and s.4.15(e) of the EP&A Act, Pain J in *Gomon Pty Ltd v Council of the City of Sydney* [2019] NSWLEC 116 at [162] provided the following clarification:

> "*A consent authority that has considered submissions pursuant to s 4.15(1)(d) is not obliged under the EPA Act to repeat that exercise by separately taking them into account as an aspect of the public interest*."

In December 2020 the EIS for the project (SSD-8530563) was lodged with the NSW Department of Planning Industry and Environment (the Department) for determination. The EIS was placed on public exhibition from 16 December 2020 to 3 February 2021.

During this period, government agencies, Gunnedah Shire Council, key stakeholders, the community and interest groups were invited to provide submissions on the project for consideration by the Department as part of the State Significant Development planning process. A total of 95 submissions were received.

The submissions received and the issues raised therein form the subject of this report, titled the Response to Submissions (RTS) report. The Department has also raised some issues, also addressed in this RTS report. The proponent, Mackellar Equipment Hire Pty Ltd, is now required to respond to the submissions received. This RTS summarises the submissions and responds to the issues raised.

The structure and contents of the RTS reflect the draft guideline *Preparing a Submissions Report State Significant Development Guide* (Department of Planning Industry and Environment December 2020). This is notwithstanding the fact that these guidelines do not apply to SSD-8530563 as the EP&A Regulation 2000 continues to apply to development applications lodged but not finally determined before 1 March 2022 per clause 7 of Schedule 6 of the EP&A Regulation 2021.

The issues raised in each submission have been carefully considered and a responses made specifically addressing the matter raised in each submission.

During the preparation of the response to the above submissions, representatives of Gunnedah Quarry Products Pty Ltd have engaged further with the community, including those who had already made a submission to the exhibited EIS, in order to gain a fuller appreciation of any concerns that they may have. In response to the concerns raised, and in the interests of minimising perceived environmental impacts, refinements have been made to the proposed development- refer Section 3 for details.

This section analyses the submissions in broad terms, focussing on the groups and people who made submissions and categorising the issues that they raised in submissions. It includes:

- A general a breakdown of submissions, highlighting the different issues identified by the different types of stakeholders.
- A categorisation of the issues raised.

2.2 Breakdown of Submissions

Introduction

The following sub-section provides a breakdown of submissions, highlighting the extent to which different issues may be important to different types of stakeholders. The breakdown includes the total number of submissions made as well as the following:

- An overview of the government agencies, local councils, special interest groups and individuals that made submissions.
- The number of form letters or petitions, including the number of signatories.
- The level of local (<5km from the site), regional (5-100km from the site) and broader community interest (>100km from the site) in the project.
- The number of people who oppose or support the project.

The breakdown of submissions is for informative purposes only and no weighting is applied to the different stakeholder groups, locations or opinions.

Overview of Submissions Made

During the EIS exhibition process a total of 95 submissions from government agencies, the local council, non government organisations and the community were received-refer **Appendix C**-comprising:

- Five (5) submissions received from government agencies comprising: a submission from the Biodiversity and Conservation division of the Department of Planning Industry and Environment; duplicate submissions from the RMS and Transport for NSW (TfNSW): one submission from the EPA: and one submission from Gunnedah Shire Council. A correction has been received from the EPA since then, clarifying the applicable noise limits to apply, once approved. Refer to Section 4 for a response to submissions received from government agencies.
- Four (4) submissions received from special interest organisations, comprising the following: Armidale Action on Coal Seam Gas & Mining; North West Protection Advocacy, based at Coonabarabran; Emerald Hill Progress Association Inc; and the Wando Conservation and Cultural Centre Inc, based at Maules Creek. All submissions took the form of an objection to the project.Refer to Section 5 for a response to submissions received from special interest organisations.
- Eighty six (86) submissions received from the community. Most submissions took the form of an objection to the project. Refer to Section 5 for a response to submissions received from the community.

The most commonly raised issue related to the proposed storage of asbestos and lithium batteries on the project site, despite the fact that no processing of these materials was proposed on the project site. The development application has since been revised, with these materials now no longer to be accepted at the proposed facility.

Other issues frequently raised in submissions concerned the strategic context and need for the project in a regional location; potential for adverse noise impacts; potential for flooding; the management of waste in general; social and health impacts; landscape and visual impacts on neighbouring rural residences: and ongoing community consultation.

Overall Submissions by Community: Location

Of the 90 submissions made by community organisations and individuals, 12 were form letters- equivalent to just over 13% of these submissions. All of the community submissions objected to the project.

By far the most frequently identified issue of concern raised by the community related to the proximity of the proposed resource recovery facility to the Gunnedah township, and in particular to local schools. The next most often-voiced issue of concern was the potential for groundwater contamination arising from the proposed development, followed by noise and then concerns about the facility accepting contaminated or toxic waste- principally asbestos and lithium batteries. Most (63%) of the submissions received were from persons living in Gunnedah (assumed to be <5km from the site) or the Gunnedah local government area (5-100km from the site- a further 10% of submissions), with 27% of submissions coming from the broader community (>100km from the site), including elsewhere in New South Wales (19%) or interstate (8%), the latter including one submission from the USA.

In summary, almost three quarters of all submissions received came from either Gunnedah township or the Gunnedah district. This is summarised in the accompanying pie-chart- refer **Figure 2.1**.

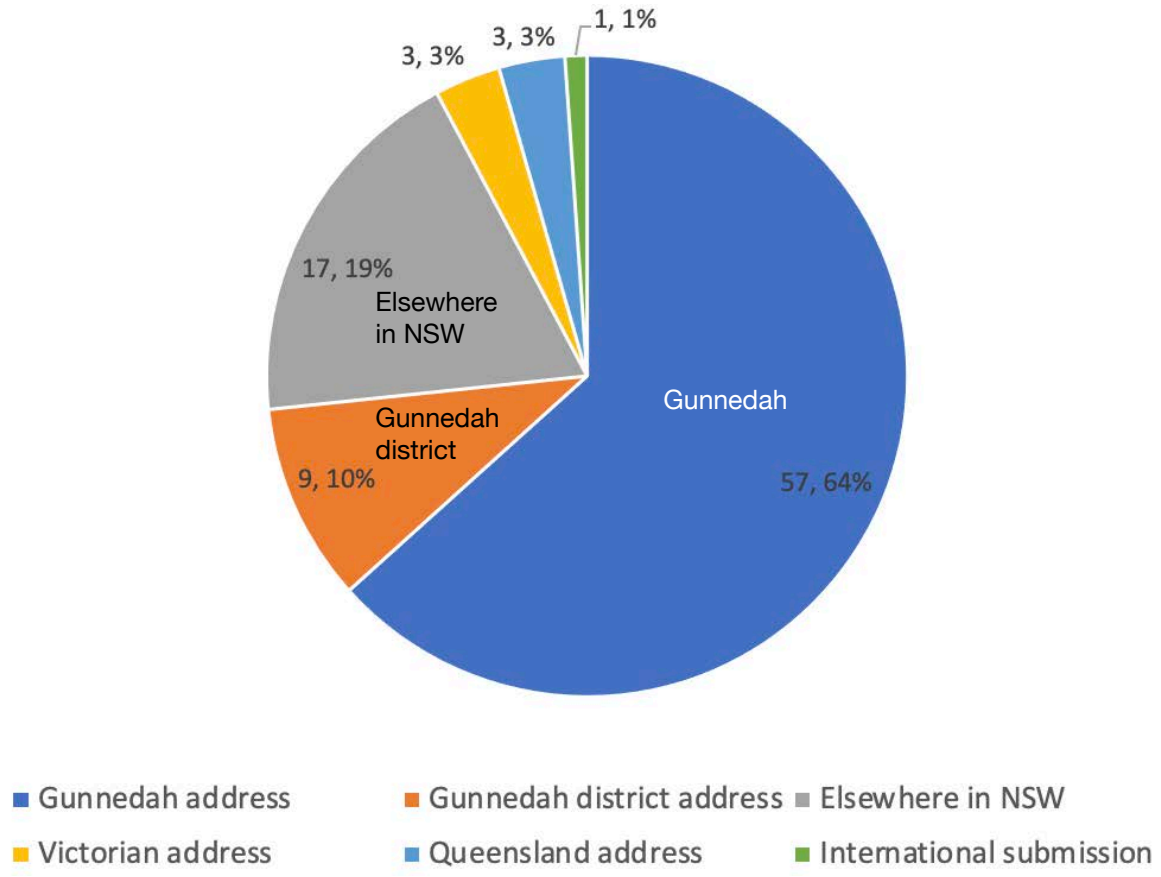


FIGURE 2.1: Sources of the 90 submissions received from local and broader community

2.3 Categorising and Understanding the Issues Raised

The following sub-section provides a categorisation of the issues raised touching on the following:

- The project, including wastes to be handled, design, as well as locational suitability.
- Procedural matters, including ability of government agencies to monitor the project.
- The economic, environmental and social impacts of the project (e.g. amenity, air, noise, visual, transport).
- The evaluation of the project as a whole (e.g. justification for the project).
- Issues that are beyond the scope of the project (e.g. broader policy issues) or not relevant to the project.

Submissions made according to the above categories is summarised in the accompanying Table 2.1.

Several community submissions included comments or accusations relating to the perceived lack of independence, competency or transparency in the EIS assessment process. While technical questions are addressed in this document, accusatory sentiment is not. In a similar vein, some matters raised in

submissions go to broader policy issues (eg. opposition to the mining of coal) that are beyond the scope of this response report. Some submissions made no specific objection to any aspect of the project.

Categorising the Issues

Table 2.1:Categorising issues raised in submissions by government agencies and the community

Submission category	*Number of submissions where these issues are canvassed*
The project (e.g. the site, the project area, the physical layout and design, wastes to be accepted at the facility).	• *Raised in 4 submissions by government agencies.* • *Raised in 54 submissions made by community.*
Procedural matters (e.g. ability of government agencies to monitor the project, once approved).	• *Raised in one submission by a government agency.* • *Raised in 20 submissions made by community.*
The economic, environmental and social impacts of the project (e.g. amenity, air, biodiversity, heritage, pollution, traffic).	• *Raised in all submissions by government agencies.* • *Raised in 87 submissions made by community.*
The justification, suitability and evaluation of the project as a whole.	• *Raised in one submission by a government agency.* • *Raised in 9 submissions made by community.*
Issues that are beyond the scope of the project (e.g. broader policy issues) or not relevant to the project.	• *Raised in no submissions by government agencies.* • *Raised in 10 submissions made by community.*

The NSW Land and Environment Court has ruled that public submissions may be afforded weight where objective, specific, concrete or observable consequences of the proposed development are set out- refer to Section 2.1 above for more details. Similarly, the Court has held that:"*A fear or concern without rational or justified foundation is not a matter which, by itself, can be considered as an amenity or social impact: Telstra v Hornsby Shire Council at [193] and [195]*" per Preston CJ in *Bulga Milbrodale Progress Association Inc v Minister for Planning and Infrastructure and Warkworth Mining Limited* [2013] NSWLEC 48 15 April 2013 at [63].

The most commonly raised issued related to the proposed storage of asbestos and lithium batteries on the project site, despite the fact that no processing of these materials was proposed on the project site.

Other issues frequently raised in submissions concerned:

- The potential for contaminated leachate to drain from the project site into local waterways.
- The potential of the site for flooding.
- Adverse noise and dust impacts.
- Adverse impacts associated with truck movements to and from the facility.
- Proximity to residences and to the township of Gunnedah.
- Concerns that the proposed facility was a waste dump.
- Concerns about the EPA's ability to monitor the development, and in particular, the ability of the EPA to monitor the facility processing "toxic" waste from mining developments in the region.
- That the use was inappropriate for a "light industrial" zone.
- Landscape and visual impacts on neighbouring rural residences.

- Lack of community consultation.

Further Community Consultation Undertaken, Post EIS Exhibition

In regard to the last dot point above, and in advice dated 11 February 2021, the Department requested the proponent to undertake additional community consultation during the preparation of the response to submissions. The requested additional community consultation was undertaken by the proponent during February and March 2021 following discussions with senior Department officers and the proponent at a Teams meeting held on 24 February 2021. This consultation exercise included but was not limited to:

- The holding of six (6) community consultation meetings held 9-10 March 2021.
- Radio interviews and TV news reports.
- Advertisements in the local newspaper as well as various newspaper articles.
- Making the Fact Sheets available at the offices of the local council.
- The distribution of hundreds of project Fact Sheets to a wider community.

Refer **Appendix B**.

Submissions by Community: Sub-Categories by Location

The submissions made by sub-category are summarised in the following tables 2.2 to 2.7.

Pie-charts have been developed showing the source of submissions made by sub-category. Refer to **Figures 2.2-2.7**.

Most submissions made relating to social issues were made by persons residing in the Gunnedah area.

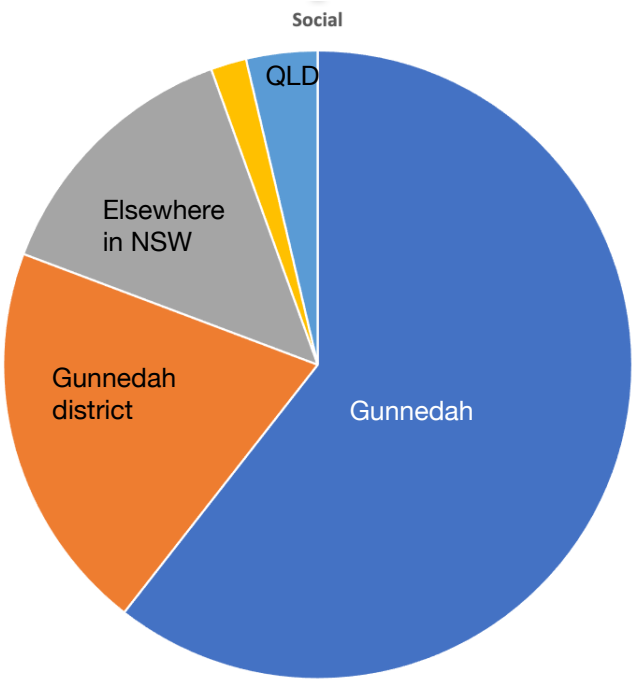


FIGURE 2.2: Sources of community submissions relating to social issues

Submission sub-category: social, site suitability	*Number of submissions where this issue sub-category was raised*
Inappropriate location of the resource recovery facility so close to Gunnedah township.	*Raised in 54 submissions made by community*
Perception that the proposed resource recovery facility is a dump, in most cases, for toxic materials.	*Raised in 19 submissions made by community*
Perceived adverse impacts of the proposed facility on community health and general well being.	*Raised in 21 submissions made by community*

Gunnedah G'dah District NSW - other VIC QLD Multiple International

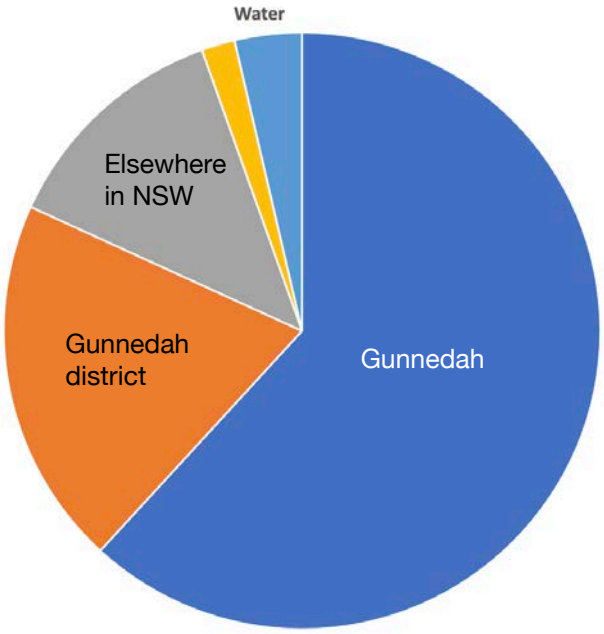


FIGURE 2.3: Sources of community submissions relating to water issues

Table 2.3: Stormwater and groundwater issues raised in submissions by the community

Submission sub-category: stormwater and groundwater	*Number of submissions where this issue sub-category was raised*
Inappropriate location of the resource recovery facility on flooding/ stormwater grounds.	*Raised in 38 submissions made by community*
Concerns about leachate leaving the site, polluting the environment.	*Raised in 6 submissions made by community*
Concerns that the proposed resource recovery facility will result in groundwater contamination.	*Raised in 45 submissions made by community*

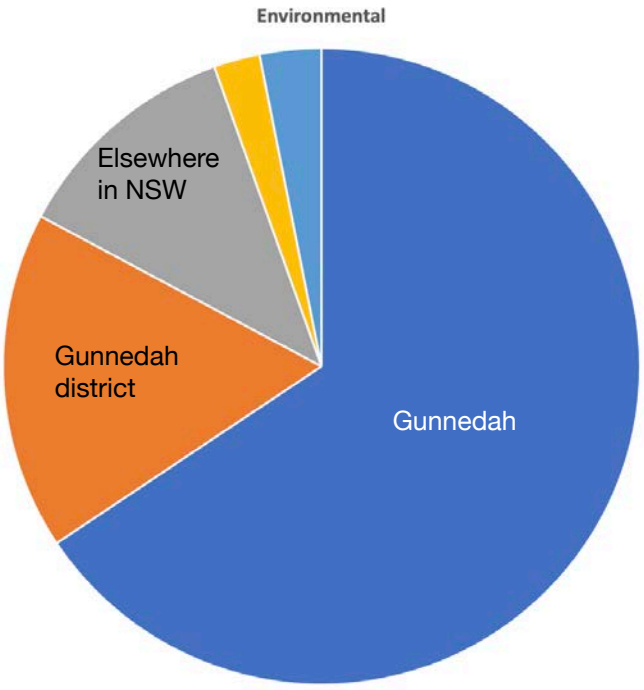


FIGURE 2.4: Sources of community submissions relating to environmental issues

Table 2.4: Environmental issues raised in submissions by the community

Submission sub-category: environmental	*Number of submissions where this issue sub-category was raised*
Concerns about excessive noise being generated by the facility.	*Raised in 43 submissions made by community*
Concerns that the proposed resource recovery facility will result in excessive dust impacts/ airborne particles.	*Raised in 39 submissions made by community*
Concerns that the proposed resource recovery facility will result in toxic fumes and/or air pollution.	*Raised in 31 submissions made by community*

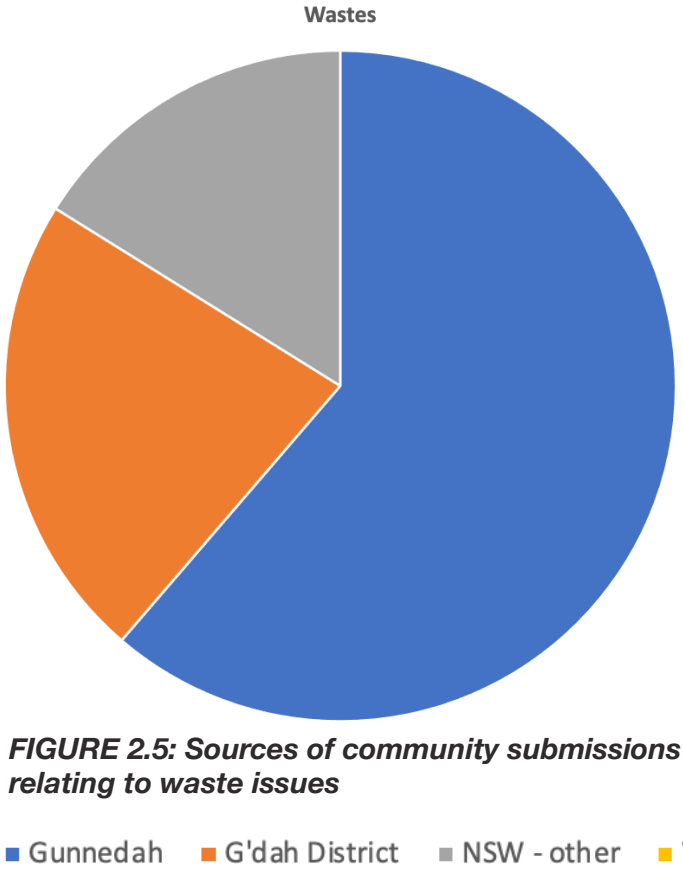


FIGURE 2.5: Sources of community submissions relating to waste issues

Table 2.5: Waste issues raised in submissions by the community

Submission sub-category: waste	*Number of submissions where this issue sub-category was raised*
Concerns about the facility accepting contaminated or toxic waste.	*Raised in 42 submissions made by community*
Concerns that the proposed resource recovery facility will be accepting waste drilling mud from Santos mining sites.	*Raised in 9 submissions made by community*
Concerns that the proposed resource recovery facility will be accepting dangerous wastes.	*Raised in 1 submission made by community*

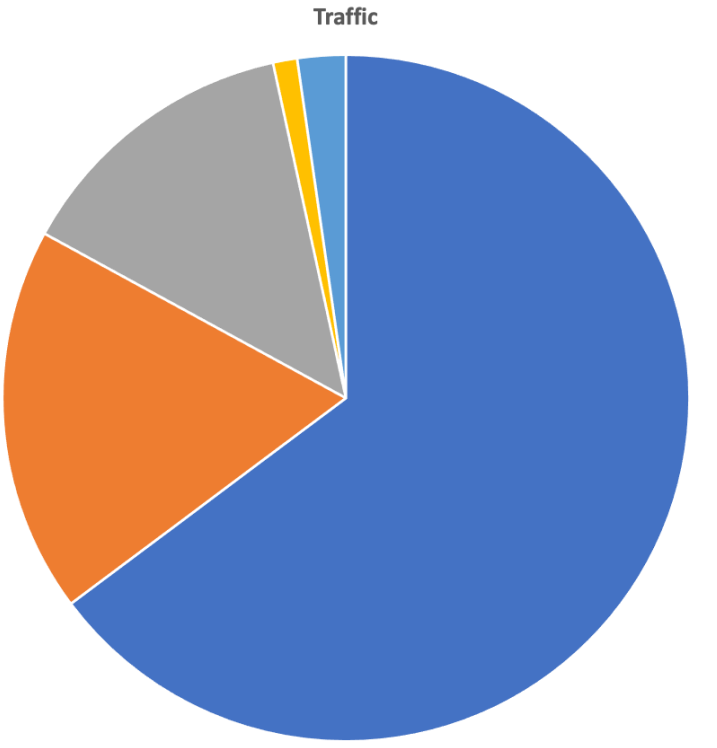


FIGURE 2.6: Sources of community submissions relating to traffic issues

Table 2.6: Traffic issues raised in submissions by the community

Submission sub-category: traffic	*Number of submissions where this issue sub-category was raised*
Concerns about an increase in truck movements on the local road system and near the local school at Gunnedah [NOTE: The latter fronts an existing designated bypass for heavy truck traffic around the Gunnedah township].	*Raised in 40 submissions made by community*
Concerns about movement of waste from other locations outside of the Gunnedah area.	*Raised in 28 submissions made by community*
Concerns about the capacity of the road network to absorb further heavy truck traffic volumes.	*Raised in 7 submissions made by community*

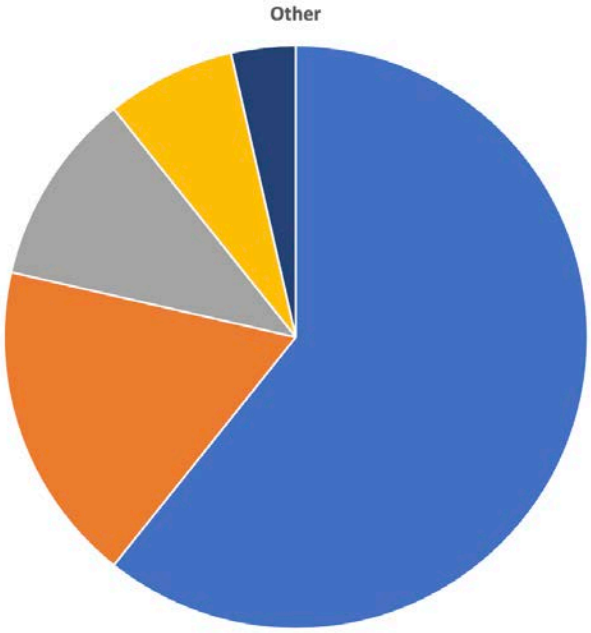


Table 2.7: Other issues raised in submissions by the community

Submission sub-category: other	*Number of submissions where this issue sub-category was raised*
Concerns about monitoring and oversight of the operation.	*Raised in 20 submissions made by community*
Concerns about impacts on koalas.	*Raised in 5 submissions made by community*

FIGURE 2.7: Sources of community submissions relating to other issues

Submissions by Government Agencies: Sub-Categories

The submission from the Biodiversity and Conservation division of the Department of Planning Industry and Environment advised that "*BSC have no specific comments on the exhibited EIS*."

The duplicate submission from the the RMS and Transport for NSW (TfNSW) raised issues relating to traffic:

- Traffic assumptions used in the report appear to be an underestimation of traffic generation.
- Site access from Torrens Road and need for approval to use heavy vehicles on Torrens Road.
- Discrepancies in staff numbers throughout the EIS and TIA.
- Need for road upgrading at Matthias Road.
- Adequacy of intersection of Quia Road and Torrens Road.
- Need for details of truck swept paths for existing truck depot on the site.
- Road safety aspects need to be considered.

The submission from the EPA raised issues relating to the following:

- The proponent to demonstrate that all the requirements of a general resource recovery order ('order') and resource recovery exemption ('exemption') can be met, or, in the alternative, detail how the requirements to obtain an order and exemption specific to their proposal can be met.
- Clarification on any proposed processing of ENM, VENM, ASS and/or PASS at the facility.
- Further information sought on the volumes and management of any contaminated soil received at the facility.
- Additional information sought on the lithium battery and asbestos waste stream and how they will be handled and processed at the facility.
- Further clarification of air quality impacts is sought.
- Further clarification of water management is sought.
- Matters to be addressed with conditions. The EPA has provided recommended conditions of approval.

The submission from Gunnedah Shire Council raised issues relating to the following sub-categories:

- Stormwater management.
- Request for details of boundary fencing proposed.
- Confirmation of the types of waste to be accepted at the facility.
- Compliance with the Gunnedah DCP 2012.
- Noise impacts.
- Dust, odour and air quality management.
- Clarification sought regarding employment generation.
- Notes that development will require payment of Council levy per Council's s94A contribution plan.
- Noting that EPA Waste Levy applies.
- No waste from the facility can be directed to Council's landfill.
- Consolidation of lots should occur.
- Recommended conditions of consent.

Refer to Section 4 for a response to submissions received from government agencies.

The letter received form the Department is also addressed in detail in Section 4.

3. Actions Taken Since Exhibition

3.1 Overview

This section summarises the actions the applicant has taken since the public exhibition of the EIS to address the issues raised in submissions and/or by the Department. This has involved the undertaking of a more extensive community consultation process, as well as a further refinement of the project- the latter in response to community concerns or queries raised by government agencies and the community.

3.2 Further Community Consultation Undertaken

In advice dated 11 February 2021 the Department requested that the proponent undertake additional community consultation during the preparation of the response to submissions. This additional consultation was undertaken by the proponent during February and March 2021. Refer **Appendix B**. The consultation tools employed during this time are summarised in the accompanying Table 3.1.

Table 3.1:Consultation tools employed

Consultation Tools	*Description of activity*
Community Information Sessions	• *Six (6) information sessions for the community provided to enable the proponent to be made aware of community concerns and to respond. Held on 9-10 March 2021.*
Email and telephone	• *Personal email and telephone numbers provided for Brendon Mackellar, director, and Tim MacKellar, general manager, included on all printed material to enable community feedback.*
Brochures/fact sheets	• *A series of Fact Sheets have been provided to the broader community providing further information on the project as well as any project updates.*
Media	• *Two reports on the project by Prime 7 News at the time.* • *Advertisement in the local newspaper, the Gunnedah Times, on 4 March 2021 of planned community consultation meetings to be held on 9-10 March 2021.* • *Half hour radio interview of Tim MacKellar, general manager, on the local radio station on 9 March 2021 regarding the project.* • *Article in the Northern Daily Leader on 2 March 2021 of the decision to not to accept asbestos waste or lithium batteries at the proposed facility.* • *Advertisement in Gunnedah Times 29 April 2021, with contact details provided.*
Information made available at the offices of Gunnedah Shire Council	• *Project Fact Sheets provided in the foyer of Council's Gunnedah Council offices.*
Follow up to queries	• *Response to queries/concerns raised in email dated 9 March 2021 by community group known as Gunnedah District waste Action Group. Response provided on 30 March 2021 by proponent.*
Site inspections, face-to-face meetings	• *Meeting with neighbours on 3 February 2021.*

3.3 Further Refinements to the Project

In response to community concerns and as a result of the community consultation process undertaken, a number of significant changes to the project have been made.

These changes do not change the fundamental nature of the development proposed, however, they are changes that go a substantial way towards meeting-and resolving- some of the substantive community concerns that have been expressed.

With these changes, the amended project will result in overall low environmental and amenity impacts with manageable residual risk.

The significant changes are summarised below:

- The project components of most concern to residents, namely, the storage of lithium batteries and asbestos, have now been deleted from the project. Accordingly, the restricted waste storage shed, as illustrated in the exhibited EIS, is to be deleted from the revised scheme. Any loads carrying either asbestos and lithium batteries will be rejected.
- Also in response to community concerns, potential acid sulfate soils (PASS) or acid sulfate soils (ASS), treated or untreated, will not be accepted at the facility. They too have been deleted from the project. The 25,000 tonne per annum originally dedicated to contaminated soils will be redistributed amongst the other waste categories.
- Another significant change to the project is the deletion of the crushing plant from the project description. Following the grant of approval of DA2020/054 by the Northern Regional Planning Panel on 24 June 2021 the crushing of concrete waste will now, instead, be undertaken at the Marys Mount Quarry landfill and resource recovery facility, to be operated by the Mackellar Group of companies.
- The scale of the resource recovery facility is proposed to be reduced by 20%, approval now being sought to process for recycling up to 200,00 tonnes per annum of waste materials -the original proposal being to handle up to 250,000 tonnes of waste per annum.
- A commensurate 20% reduction in heavy truck traffic generated by the facility travelling on local and regional roads.
- The roofing all of the stockpile areas, which should reduce significantly the potential for any on-site leachate being generated
- A shredder will be used when the trommel is not in use in the processing shed. The shredder will process a range of materials, including carpets, paper, tyres, textiles, plastics and the like. The introduction of the compaction of processed waste accepted at the facility, forming smaller compressed waste briquettes, will also assist in reducing the size of processed material to be exported from the site. Baling of will also occur, for ease of handling of processed waste.
- At one of the community consultation sessions held 9-10 March 2021 a community consultation committee was proposed by a community member, to enable ongoing dialogue between the community and the operators of the Gunnedah Recycling & Resource Recovery Facility (GRRF). The proponent now proposes two conditions of consent that will enable the establishment of a community consultation committee and ongoing access to information about the project, if approved. Draft conditions of consent have been proposed, as detailed in this Response to Submissions Report.

Further minor revisions are sought to the design of the project, in the main in response to either community concerns or queries raised by the Department. The technical reports and amended design in support of the above refinements and amendments to the project description are contained in **Appendix C**.

The technical reports and amended design drawings prepared comprise the following:

- Updated noise assessment report by Vipac, scientists and engineers-refer **Appendix C4**.
- Updated air quality impact assessment report by Vipac, scientists and engineers-refer **Appendix C5**.
- Updated DA drawings by consulting engineers Martens & Associates -refer **Appendix C6**.
- Updated assessment from traffic consultants Streetwise -refer **Appendix C7**.
- Preliminary footing and slab design for the proposed unloading and processing sheds, prepared by TechSpan dated 29 July 2021. [NOTE: Subject to detailed engineering design at the construction certificate stage, once development consent has ben issued] Refer **Appendix C2**.
- Typical design for wheel wash. [NOTE: Subject to detailed engineering design at the construction certificate stage, once development consent has ben issued] Refer **Appendix C9**.
- Additional contamination report by EastWest Environmental dated 10 November 2021. Refer **Appendix C8**.
- Revised visual assessment by Stewart Surveys- refer **Appendix D**.

Pursuant to the provisions of Clause 55(1) of *Environmental Planning and Assessment Regulation 2000* [refer to **NOTE 1** below] an amendment of the development application is proposed, to enable the amendments/refinements sought above having regard for the following:

- The amended application is within the ambit of Clause 55. The amended development, incorporating the changes sought, are essentially the same as that originally proposed. The amendments sought will not result in the conversion of the application into a radically different or new application, and the essence of the development remans the same. Moreover, the site and characterisation of the development remains the same.
- The essential elements of the proposed resource recovery and recycling facility have not been so altered such that they place the development in a different category for the purposes of assessment. Even with the amendments proposed, the essence of the development remains the same, and the fundamental nature is unchanged.
- Importantly, the amended application, incorporating the clause 55 changes, is considered likely to not result in any additional environmental impacts. In fact, the changes proposed are expected to result in significant or demonstrable beneficial impacts , in particular in terms of amenity, noise pollution, and visual impacts, as well as reduced project risks associated with the handling of waste generally.
- The amendments proposed are in response to the issues raised by the community and/or by the Department. As such, the use of the clause 55 power is appropriate given its beneficial (ie. proving for a suitable level of recovery of waste, with reduced risks) and facultative (ie. responsive) purpose.

In short, these changes will result in a better environmental outcome for the project. Having regard for the above, it is requested that the determining authority in this matter exercise its discretion under clause 55 and that the application be duly approved in the amended manner now sought.

[**NOTE 1: The *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation 2021) commences on 1 March 2022. Clause 37 of EP&A Regulation 2021 relates to the amendment of DAs. However, the 2000 Regulation continues to apply to any development application made but not finally determined before 1 March 2022, including this DA being SSD-8530563 (EP&A Regulation 2021, Schedule 6 clause 3)**.]

3.4 Further Action Taken

On 18 June 2021 Mackellar Equipment Hire Pty Ltd donated and replanted established fruit trees on the Whitehaven site, for use by the local high school. Refer to **Photographs 1.1 and 1.2**.

In May 2021 Mackellar Equipment Hire Pty Ltd commenced planting of the trees proposed in the EIS to be planted in the 6m wide corridor running along the northern boundary of the project site. These plantings are now well established and are flourishing. Refer **Photographs 3.1 and 3.2**.

PHOTOGRAPH 3.1: Trees have already been planted out in the landscaped buffer area in 2021 to run along a 6m wide landscape corridor on the northern boundary of the site.
(Source: Photograph taken 17 May 2021)

As requested by the Department, an additional contamination report was undertaken over the southern portion of the site. [NOTE: The Development Application was lodged under the provisions of *State Environmental Planning Policy No 55 – Remediation of Land* (SEPP 55). On 1 March 2022, SEPP 55 was repealed, and its provisions were transferred to *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP).]

PHOTOGRAPH 3.2: Trees already been planted out in the landscaped buffer area proposed to run along a 6m wide landscape corridor on the northern boundary of the site have become well established since planting more than 1 year ago, now reaching heights of in excess of 2 metres. Photo taken June 2022.

(Source: Photograph taken 21 June 2022)

4. Response to Government Agency Submissions and the Department

4.1 Department of Planning and Environment

In advice dated 11 February 2021 the then Department of Planning Industry and Environment-now Department of Planning and Environment- sought additional information. The following is the applicant's response to the issues raised in that advice. Any proposed changes to the drawings or project arising from the submissions received are highlighted.

Description of development

"*Provide a detailed description of all proposed demolition and construction works, including confirming whether any excavation works are proposed (e.g. footings for buildings, weighbridges and upgrades to stormwater infrastructure).*"

The demolition works proposed are shown in the engineering drawing PS01-B300 Revision G, prepared by Martens & Associates, consulting engineers, accompanying the EIS, and in particular:

- Existing dwelling and demountable near the Torrens Road entry to be relocated elsewhere, and entry widened and covered with asphalt.
- Fencing surrounding the above dwelling and hedge to be removed.
- Existing fuel tanks to be removed.
- In the EIS the existing storage shed was to be relocated to another part of the site and repurposed as a restricted waste storage facility.Given that no restricted wastes are now to be stored on site (ie. asbestos and lithium batteries) this shed will, instead, be relocated off-site.

Earthworks are proposed to regrade the stockpile areas, shed and circulation driveways in order to direct surface flows within the RRF into the appropriate leachate management and stormwater systems. Refer to Martens & Associates drawing C100 and C500 (ref: P1907434PS01-C100 and C500) for grading and cut-fill plans.

Detailed pavement boxing, pipe trenching, excavation, top soil stripping and bulking factors have not been considered at this stage. Approximately additional 1000m^3 excavation will be required for the proposed OSD and leachate storage tanks above the volumes noted within the table on drawing C500. Most of the proposed recovered waste storage bays will require, in the main, some amount of fill.

Excavation to a depth of up to 1.00m or more is required to accommodate the proposed sediment basins.

The proposed on-site stormwater drainage systems is illustrated in the EIS in engineering drawing PS01-A050 Revision G. Minor excavation will be required to accommodate the new drainage lines. Similarly, minimal excavation will be required to accommodate the wheel wash. Refer also to revised engineering drawings by Martens & Associates, in **Appendix C6**.

Given that no restricted waste is be now stored on site, and with the storage shed now proposed to be removed from the site, the drainage line from this shed can now be deleted.

The detailed design of footings and slab for buildings will be addressed at construction certificate stage rather than the DA stage. Refer to **Appendix C1** for an indicative design of the slab and footings likely to be required.

"*Provide a detailed description and a plan of the activities currently undertaken on site by existing operators including the depot, material storage and car parking and confirm whether it is proposed for these activities to continue.*"

Plans of the existing transport depot and buildings used for storage of oils, workshop and administration are clearly shown in the EIS -refer to site survey in Appendix G of the EIS and Figure 4.4 in the EIS document itself. Refer also to the drone photographs of the site in Figures 4.3 and 4.4 of the EIS, which show the relationship of the project site to surrounding land uses.

"*Provide copies of current planning approvals and permits related to the site.*"

The consent for the existing transport depot is included in Development Consent DA 610514 dated 17 December 2012 and the earlier Development Consent DA 547403 dated 17 November 2011, the details of which were included within Appendix B of the EIS.

Justification/need for the development

"*Provide a more detailed justification for the project, including the demand for this type of facility in this location given the distance required to transport waste to the site.*"

Waste is one of our most pressing environmental, social and economic challenges. It is a national issue, going well beyond local government boundaries. As a community we need to ensure that instead of going to landfill all waste should either be recycled or recovered wherever possible.

At a time when Australia urgently needs to increase the rate at which waste is recycled, the proposed Gunnedah Recycling & Resource Recovery Facility (GRRRF) offers the opportunity to achieve this outcome, assisted in no small measure by its highly accessible location not only to regional waste sources, but also industries in New South Wales or interstate that will ultimately accept any recycled products eg. recycled waste paper to Visy Recycling mills in Melbourne and Brisbane and other regional locations.

Unlike local council recycling centres, the proposed Gunnedah Recycling and Resource Recovery Facility (GRRRF) will be a commercial operation, reliant on waste from commercial projects, not on the domestic kerbside waste relied on by the local council.

Presently Gunnedah does not have a recycling facility that handles commercial waste.

Like other industries already established at Gunnedah, reliant on the excellent road network and accessibility to outside markets, the proposed GRRF will aim to serve a much wider catchment, with waste sourced not only from the region but also places wider afield, including Sydney and interstate. The GRRRF is like any other industry; it relies on sources of **inputs** (in this case, waste from commercial operations) and as well as provide recycled product **outputs** (in this case, recycled products) generated by the GRRRF. Similarly, the recycled products generated by the GRRRF will be despatched to recycling and manufacturing operations that are scatted across Australia's Eastern Seaboard eg. Brisbane, Melbourne, including other regional locations. To only focus on sources of inputs is to miss the wider picture.In short, the sources of waste **to** the site (ie. inputs) is but a part of the justification for the project.

A more balanced view needs to also consider the recycled product **outputs** (in this case, recycled products) generated by the GRRRF, as well as the following. All of these considerations, together, provide the justification for the project.

Gunnedah is strategically located at the intersection of two regional highways: the Oxley Highway and the Kamilaroi Highway, and is a short haul distance from the New England Highway. This means that Gunnedah- and the project site- is highly accessible not only to **sources** of waste but also to **end-users of recycled products** likely to be generated by the GRRRF. In this regard the project site is highly accessible to these end-users.

Being near the New England Highway means that waste from Sydney and surrounds, destined for landfill in Queensland, could potentially be diverted to the GRRRF instead- a major saving in freight miles, as well as achieving NSW waste objectives in diverting waste from landfill, the latter satisfying the current NSW Waste Avoidance and Resource Recovery Strategy (WARR). Reducing waste and keeping materials circulating within the economy are priorities for the NSW Government.

The current WARR sets for the following targets for 2021-2022:

- Increasing recycling rates to 70% for commercial and industrial waste.
- Increasing recycling rates to 80% for construction and demolition waste.
- Increasing waste diverted from landfill to 75%.

The proposed GRRF has the potential to divert up to approximately 200,000 tonnes per annum of waste from landfill, therefore contributing to the State's resource recovery performance by reducing rate of landfilled waste. From an economic perspective, the GRRF would also reduce waste disposal costs for both government and industry. Resource recovery orders and resource recovery exemptions allow some wastes to be beneficially and safely re-used independent of the usual NSW laws that control waste.

The GRRF also has the potential to source significant volumes of waste from major infrastructure projects within the region eg. ARTC's Inland Rail project. Waste from such projects could be recycled at the GRRRF. In addition to the above considerations:

- The GRRRF will enable the future facilitation of further industrial growth, investment and employment opportunities in Gunnedah.
- The project has a capital investment value of $3.9 million and will employ up to 62 people during construction and up to 30 full-time operational staff.
- The project would facilitate the recycling of a wide range of wastes with much of this material to be reused elsewhere in New South Wales and Australia. It promotes recycling as an alternative to landfilling. The project will form a part of a much broader network of waste facilities across New South Wales. This facility will have the ability to economically process waste from as far away as the greater Sydney region and beyond. At present, the greater Sydney region, in particular, is already facing pressure as waste streams continue to grow in line with construction activity and major infrastructure projects. As these pressures are set to continue, with limited opportunities for new recycling or landfill facilities being established in proximity to growing urban areas, other more distant sites are becoming increasingly attractive to accommodate these uses. This makes it economic for more distant recycling facilities on major transport routes in regional New South Wales, like Gunnedah, to be able to accommodate some of this demand through backloading of heavy transport vehicles.
- The project is within an existing zoned general industrial area surrounded, adequately separated from sensitive receivers and can be developed for the proposed resource recovery facility. The project site has no significant constraints to development.

"*A number of public submissions raised concerns with the consultation undertaken during preparation of the EIS. Please provide further details and justification for the selection of consultees, the method of consultation, matters raised during consultation and whether changes were made to the development in response to any matters raised.*

The Department considers further community consultation is necessary during the preparation of the response to submissions."

The consultation program undertaken involved public agencies, the local council, Aboriginal groups and local residents in the near vicinity only of the project site. In regard to the latter, the extent of the neighbourhood that was provided with a Fact Sheet in August 2020 was limited to within about 500m radius of the project site. Contact details for the proponent were provided in that Fact Sheet distributed to these near neighbours. No responses were received.

Since exhibition of the EIS, and in following the Department's advice for more extensive community consultation, the proponent engaged in a much more extensive community consultation program, the details of which are provided in Section 3.2 of this RTS report. The further community consultation program undertaken thus satisfies the Department's advice in this regard.

The proponent acknowledges that consultation during preparation of the EIS has not met the expectations of the Department or the local community. Further extensive community consultation has been effected since the exhibition of the EIS, which we believe should satisfy the Department's concerns in this regard.

Following the community consultation undertaken in March 2021 the proponent has distributed a further Fact Sheet, outlining the ways in which channels of communication will be open between the proponent and the community, to demonstrate environmental management performance and accountability and build trust with the local community. These commitments can be translated into appropriate conditions of consent- refer **Appendix B** for suggested wording.

Waste management

"*Clarify the origin of the waste proposed to be received on site. It is noted the EIS mentions Sydney and Newcastle."*

Adequately covered in the EIS. Refer to "Justification for Project" under the heading "Strategic Context" in the Executive Summary of the EIS, as well as section 3.1.2 for details.

"*Confirm the maximum tonnage of waste to be stored at any one time."*

A maximum of approximately 6,436.5 cubic metres of waste to be stored/processed on the project site at any one time, or about 9,654.7 tonnes assuming 1.5 tonnes/cubic metre, as stated in section 3.1.2 of the EIS. This volume allows for flexibility in the allocation of processed waste to the proposed storage bays.

"*Indicate on a plan where all incoming waste and outgoing products and any non-conforming waste will be stored.*"

All non-conforming waste will be rejected and will not be stored on site. All conforming waste will be stored in the 13 storage bays proposed eg. refer to Figure 3.1 of the EIS, after unloading, sorting and processing is completed. Stockpiles will be despatched as quickly as possible, generally within one week of processing. However, with the exception of green waste, longer storage time will not result in any impacts, and as a result, should not be restricted to any fixed time period.

As noted in section 3.1.1 of the EIS, the mix and volumes of wastes to be handled by the proposed recycling and resource recovery facility will vary over time, from load to load, and from waste source to waste source, "*ultimately dependent on a range of factors including prevailing market conditions, access to the waste streams described above, prevailing government policies, and the like*." As a result, no storage bays will be allocated to any particular form of processed waste product, as this is considered to be most impracticable. All bays will be adequately separated from each other by concrete panels.

"*The EIS states material not suited to recycling will be transported to a licensed facility. Please confirm the location and type of facility referred to.*"

Any licensed landfill or other facility authorised to accept the waste involved. The Mackellar group has recently (June 2021) obtained development consent for a proposed landfill and resource recovery operation on land located to the south-west of Gunnedah, at Marys Mount. This landfill would be the principal destination for waste destined for landfill that is allowed to be handled at this facility. Otherwise, any other type of waste not licensed to be accepted at this resource recovery facility will be redirected elsewhere.

"*Confirm and show on a plan the processes to be carried out in the processing shed e.g. shredding, crushing, screening. For excavated and C&D material the EIS states this would be shredded. Please confirm why excavated/C&D waste needs to be shredded.*"

The reference to "shredding" on page 70 of the EIS is a typo. It should read "spread", so that it would read as follows: "*This material would be mechanically sorted and **spread** by front-end loader (or similar) in the unloading shed…*"

The facility will no longer provide a crusher. Any C&D waste requiring crushing will be redirected to the Mackellar Group's approved resource recovery operation at Marys Mount Quarry (once operational).

The facility will, however, have a shredder installed in the main processing shed. It will operate only at times when the trommel is not operating inside the same shed. This arrangement will apply in the interests of ensuring that noise generated by processing activities at the proposed facility will remain compliant with the relevant noise requirements at this location.

C& D waste contains a range of waste materials that may be more suited to shredding rather than processing in a trommel. Industrial shredders for waste products play a key role in waste management and recycling in today's disposal industries. Waste plastics, tyres, wood and similar materials can be immediately reduced to a fraction of their original size and many can be sold or given directly back to the public for distribution as useful products. For example, chipped, shredded or ground bark dust can be resold for landscaping purposes.

"*A front-end loader does not shred material. Please confirm if a shredder will used on site and describe which waste would be shredded e.g. green waste (shown in the flow diagrams) and ensure that descriptions of waste and processing are consistent.*"

The facility will have a shredder installed in the main processing shed. It will operate only at times that the trommel is not operating inside the same shed. Shredders are heavy-duty machines designed for industrial applications and can be configured to efficiently process a wide range of materials, including: paper, cardboard, plastic, tyres, ferrous and non-ferrous metal. Green waste will now be generally avoided except when it represents a smaller fraction of C&D waste. Trommels are different to shredders in that they are used by in the screening and separating process to classify sizes of solid waste received at the resource recovery facility. It consists of a perforated cylindrical drum that is elevated at an angle at the feed end. Physical size separation is achieved as the feed material spirals down the rotating drum, where the undersized material smaller than the screen apertures passes through the screen, while the oversized material exits at the other end of the drum. Shredders, on the other hand, grind and shred waste material to a smaller, more manageable size.

Refer to caption box on preceding page and the Vipac noise report in **Appendix C4** for more details.

"*The EIS states excavated material and C&D waste products would be moved to storage bins. These are not shown on any plan. Please confirm the location of the storage bins and if this is this a reference to storage bays, please indicate which bays.*"

"Bins" refers to the storage bays. The storage bays will be used for a variety of processed waste, not just for one type of processed waste. It will not be practicable to be as inflexible as to designate one end use product for each storage bay, as the the material stored in each bay will be totally dependent on the nature of the waste material being processed at the facility at any one time. Any C&D waste that requires crushing will be redirected to the Mackellar Group's approved resource recovery operation at Marys Mount Quarry (once operational).

"*The EIS states including concrete, bricks and tiles would be crushed on a campaign basis. Please confirm the frequency (per year), intervals between campaigns and the duration of each campaign. Please ensure all technical reports include an assessment of these campaigns.*"

A crusher is no longer proposed on the site. Any waste that requires crushing will now be redirected to the Mackellar Group's approved resource recovery operation at Marys Mount Quarry (once operational).

"*The waste flow diagrams mention handpicking. This is not mentioned in the process description. Please confirm why handpicking is required and where it would occur.*"

Irrespective of the complexity of any resource recovery facility, manual picking lines are typically incorporated at various stages of the waste handling process. The proposed facility is no exception.

Mechanical grabs or similar mobile plant are to be initially employed at the proposed facility to expose items from the mixed waste for hand sorting.

Handpicking is required in order to separate waste for later treatment and for the removal of unwanted material not suited to further processing ie. to remove unwanted or rogue materials. For instance, wastes suitable for the shredder will be separated from waste suitable for processing by the trommel. This activity will be located inside the main processing shed.

"*Explain why acid sulfate soils and potential acid sulfate soils will be co-mingled with other materials and clarify what sorting/picking as outlined in the waste flow diagrams is required.*

The relevant waste flow diagram in the EIS has been misinterpreted. It does not state that acid sulfate soils and potential acid sulfate soils will be co-mingled with other materials. In any case, and by way of clarification, PASS and ASS soils are no longer proposed be accepted at the proposed facility.

"*Confirm the resulting products from the C&I waste and their storage location."*

Commercial and Industrial (C&I) waste includes but not limited to paper/cardboard, plastics, rubber, plasterboard, cement fibre board, ceramics, glass, styrene, and metal.

The proposed resource recovery facility will unlock value by transforming the above waste into materials capable of use for a wide range of applications, including but not limited to the following

- Paper and cardboard would be separated and/or shredded, then baled/briquetted, ready to send off to a paper recycling industrial user like Visy.
- Plastics and rubber would be separated and/or shredded, then baled/briquetted, ready to send off to a plastics/rubber industrial user.
- Plasterboard can be used in recycled road base material, but can also can be blended with other wastes to make select fill or bedding material.
- Glass is separated by size and sent to glass recyclers or road builders.
- Ceramics can be used in the making of select or general fill.
- Metals can be separated and sold off to scrap metal merchants.

Refer to section 3.2.2 of the EIS for further details.

The storage bays will be used for a variety of processed waste, not just for one type of processed waste. It will not be practicable to be as inflexible as to designate one end use product for each storage bay, as the the material stored in each bay will be totally dependent on the nature of the waste material being processed at the facility at any one time.

"*The waste management plan indicates that a trommel will not be used for tyres. Tyres are not identified in the list of waste to be received. Please clarify whether tyres will be accepted and how these would be processed."*

Tyres are proposed to be accepted at the facility, to be shredded prior to disposal off-site.

"*The waste management plan states green waste would not be processed on site but separated and sent to a facility for processing. The description of waste does not include green waste. Please confirm how green waste would be sorted and which facility it would be sent to."*

The range of waste materials to be handled at the proposed resource recovery facility are listed in Section 3 of the EIS. Putrescible waste or waste that readily decays under standard conditions or emits offensive odours will not be accepted at the proposed facility (Section 3.2.1 5th and 8th dot points). Co-mingled and segregated Construction and Demolition (C&D) waste may, however, contain a small fraction of green waste. Provided that the proportion of green waste is below 20% by volume it can be redirected to the Mackellar Group's approved (in June 2021) landfill and resource recovery facility at Marys Mount Quarry, situated to the south-west of Gunnedah.

"*Confirm where non-recyclable waste would be stored and how often the material would be removed from the site.*"

Any non-recyclable waste will be redirected to an approved landfill facility, including but not limited to Mackellar Group's approved (in June 2021) landfill and resource recovery facility at Marys Mount Quarry, situated to the south-west of Gunnedah, on an as-needed basis.

"*Describe how asbestos and lithium batteries will be stored securely.*"

In response to community concerns, the project components of contention, namely, the storage of lithium batteries and asbestos, have now been deleted from the project. Accordingly, the restricted waste storage shed, as illustrated in the exhibited EIS, is to be deleted from the revised scheme. Any loads carrying either asbestos and lithium batteries will be rejected.

"*Describe in detail how material will be removed from the site.*"

In response to community concerns, the proposed development has been amended such that lithium batteries and waste containing asbestos will not be accepted at the facility.

"*The quantity of lithium ion batteries varies between the EIS, waste management plan and technical appendices (described as 0.5 and 1 tonne). Please make sure all documents are consistent.*

In response to community concerns, the acceptance and storage of lithium batteries has now been deleted from the project description.

"*Clarify what is meant by the project treating waste from coal/energy related development in the Gunnedah region.*"

Coal and energy projects in the region generate waste material. Any waste material from coal/energy related development in the Gunnedah region that meets the categories of waste allowed to be handled at the proposed facility could conceivably be accepted at the facility. For example, recycled aggregate from mining access roads that may need to be removed to make way for final rehabilitation works could be accepted at the proposed facility.

"*Please include an assessment of how the development would be consistent with each of the EPA's Standards for managing construction waste in NSW (May 2019)".*

The consistency of the development with each of the EPA's *Standards for managing construction waste in NSW* (May 2019) is summarised below:

Standard 1: Inspection Requirements

Protocols for all inspection points are described in detail in Section 3.2.3 of the EIS in accordance with the requirements of Standards 11.1 and 1.2.

Training requirements for personnel are described in detail in Section 3.2.1 and Section 3.2.3 of the EIS in accordance with Standard 1.3.1.All records of the training undertaken for the purpose of this Standard must be kept at the facility and made available to an authorised officer of the EPA if requested.

The facility will keep and maintain a rejected loads register. Refer to Section 3.2.1 the EIS for details regarding monitoring of all rejected waste loads that come to the site in accordance with the requirements of Standard 1.4.

Standard 2: Sorting Requirements

Following completion of the inspection requirements of Standards 1.1 and 1.2, each load of construction waste received at the proposed resource recovery facility which has not been rejected under these Standards will be sorted and classified into individual listed waste types before being transferred to the waste storage area, as described in the waste stream flow charts in Figures 3.5 to 3.7 and Sections 3.2.3, 3.2.4, 3.2.5, 3.3.2 and 3.3.6 of the EIS. The details provided in the above sections of the EIS thus comply with this Standard.

Standard 3: Mixing of Waste

In accordance with this Standard, construction waste that has been inspected and sorted in accordance with Standards 1 and 2 is not to be mixed with any other construction waste at the resource recovery facility unless the other waste has been inspected and sorted at the waste facility. In fact, C&D waste will be pre-sorted and separated from the general waste stream- refer Section 3.2.4 of the EIS for details.

Standard 4: Waste Storage

Waste will be classified and stored separately, with clear labelling or signposting employed in indicating the individual type of waste being stored in that area, with adequate separation, in accordance wth Standard 4.1. Storage areas (**Inspection Point 3** per *Standards for managing construction waste in NSW*) are to be inspected each day, with any errant waste types moved to the correct area. Records are to be kept of wastes being kept in the wrong area. Records of each inspection carried out by trained personnel will be kept at the Torrens Road resource recovery facility for a period of three years from the date of the inspection. These protocols accord with Standard 4.2. Refer also to Section 3.3.6 of the EIS in this regard.

Standard 5: Transport Requirements

All C&D waste will be inspected, sorted and stored at the proposed facility in accordance with these Standards and the load of waste transported from the resource recovery facility will consist solely of an individual listed waste type or waste that meets the requirements of a resource recovery order or the recovered fines specifications. These protocols accord with Standard 5.

Air quality

"*Provide an assessment of air quality impacts associated with construction of the development.*"

"Provide a worst-case assessment of all emission generating equipment and activities including for screening and shredding of material."

"The assessment should consider the residence 59m to the west of the site as the nearest receiver. Please also assess receivers to the east and south-east of the site."

"The assessment should consider cumulative impacts with other development in the area, including the Whitehaven Coal Handling & Preparation Plant identified in the EIS."

"Please update the mitigation measures to address the exceedances of air quality criteria at nearby sensitive receptors."

Vipac Engineers & Scientists provided an updated air quality assessment report dated 2 September 2021 addressing the above matters- refer to **Appendix C5**.

As summarised in Vipac Table ES-1 (below) the results of the modelling have shown that the cumulative TSP (Total Suspended Particles - Particulate matter with a diameter up to 50 microns), PM10 (Particulate matter less than 10 microns in size), PM2.5 (Particulate matter less than 2.5 microns in size), RCS (Respirable Crystalline Silica) and dust deposition (ie.deposited matter that falls out of the atmosphere) predictions comply with the relevant criteria and averaging periods at all sensitive receptors (refer Vipac Figure 5-2 below) for both the construction and operation of the Project. No exceedances were identified.

It is also relevant to note that maximum measured particulate concentrations and deposition have been adopted for this cumulative impact assessment and that the impacts from the Project emissions are predicted to be much lower than background.

Table ES-1: Summary of Results

Pollutant	Averaging Period	Criteria	Maximum Cumulative Prediction at Any Receptor		Compliant
			Construction	Operation	
TSP	Annual	90 µg/m^3	61.51 µg/m^3	61.73 µg/m^3	✓
PM10	24 Hour	50 µg/m^3	42.41 µg/m^3	48.89 µg/m^3	✓
	Annual	25 µg/m^3	24.95 µg/m^3	24.66 µg/m^3	✓
PM2.5	24 Hour	25 µg/m^3	19.95 µg/m^3	18.82 µg/m^3	✓
	Annual	8 µg/m^3	7.92 µg/m^3	7.76 µg/m^3	✓
Dust Deposition	Monthly Total	4 g/m^2/month	2.90 g/m^2/month	2.98 g/m^2/month	✓
	Monthly Increase	2 g/m^2/month	0.10 g/m^2/month	0.18 g/m^2/month	✓
RCS	Annual	3 µg/m^3	1.02 µg/m^3	0.86 µg/m^3	✓

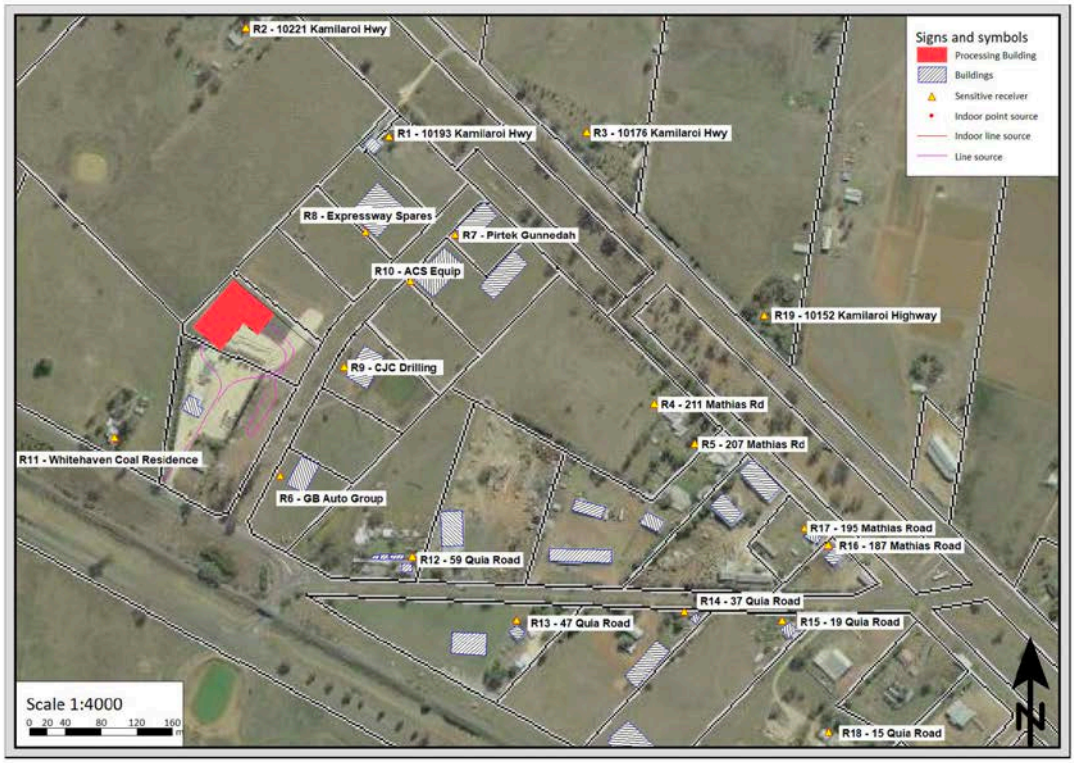


Figure 5-2 - Project Site and Nearest Receptors

Noise

"*Provide an assessment of noise impacts associated with construction of the development.*"

The Vipac noise assessment addressed this issue in detail in the report accompanying the EIS- refer Section 6 of the Vipac report. During construction, noise levels are predicted to exceed the criteria at the receptors. However, the predicted impact is likely to be minor considering the temporary nature of the construction activities and respite periods throughout the construction program.

Potential vibration levels from construction and machinery operations at the resource recovery facility will be minimal and are likely to be less than 1 mm/s PPV (Peak Particle Velocity) for nearby receptors, which is well below all accepted criteria for structural damage and human comfort from ground borne vibration.

Potentially noise affected neighbours would need to be informed about the nature of the construction stages and the duration of noisier activities, along with progress updates- the latter consultation measures proposed to be incorporated into conditions of consent- on the latter, refer **Appendix B** for undertaking to provide for ongoing community consultation, once the project is approved.

"Revise the amenity noise levels in accordance with EPA's Noise Policy for Industry with appropriate classification of the existing land-use zoning of surrounding noise sensitive receivers. The Department does not consider the surrounding land can be classified as 'suburban', given the RU1 zoning."

Satisfied. Refer to the Vipac addendum noise assessment in **Appendix C4**, Table 5-1.

"The assessment should consider the residence 59m to the west of the site as the nearest receiver. Please also assess receivers to the east and south-east of the site."

Requirement satisfied. Refer to the Vipac addendum noise assessment in **Appendix C4**.

Residences attached to existing industrial premises to the east and to the south-east have been included in the revised assessment.

Noise levels from the resource recovery facility during both modelled operational scenarios are predicted to comply with the daytime noise criteria at all receptors with the exception of residential receptor R12 (Gunnedah Dog House Boarding Kennels) where noise levels are predicted to exceed by 2-6dBA. Given the presence of a private agreement between the operator of the proposed facility and the Gunnedah Dog House residence (supplied) this latter exceedance can be excluded from the noise assessment.

"If any negotiated agreement(s) exist, evidence of the agreements should be provided. Please note, the receiver(s) still need to be assessed."

Refer to copy of agreement with Dog House owner appended to the Vipac addendum noise assessment in **Appendix C4**.

"Describe the management and mitigation measures proposed to address exceedances under Scenario 2. Please demonstrate that these management and mitigation measures would be effective in minimising the impacts to sensitive receivers."

Refer to Vipac addendum noise assessment in **Appendix C4** for details. Section 9.1 of the Vipac report describes the mitigation measures, with Section 8.1 and 8.2 showing results with and without mitigation demonstrating the effectiveness of the measures proposed. Refer to accompanying caption box for further details.

Satisfied. Effective noise mitigation measures are proposed in order that the proposed development complies with the daytime noise criteria at all receptors (with the exception of residential receptor R12 (Gunnedah Dog House Boarding Kennels)) during the 'worst case' noise scenario.

Lower levels of noise are likely generated at normal (vs 'worst case') operational times.

A copy of the agreement with the Dog House owner is appended to the Vipac addendum noise assessment.

The proposed noise mitigation measures include but are not limited to the following:

- Unloading and processing sheds to be fully enclosed. Roller doors facing south to be closed during operation of either the Trommel or Shredder. If they are required to be open, operation must cease for the duration they are open for.
- Construction activities to be undertaken during standard day-time hours (7:00am to 5:00pm weekdays, and 8:00am to 1:00pm on Saturdays).
- During construction all equipment is equipped with appropriate noise control (e.g. mufflers, silenced exhausts, acoustic enclosures, flashing lights as an alternative to revising beepers), and equipment is shut down and not left idling when not in use.
- The resource recovery facility machinery to be fitted with manufacturer supplied exhaust mufflers and engine enclosures.
- Implement the use of squawker/quacker reversing alarms on mobile equipment
- Use of electrical powered trommel and shredder, thus resulting in much lower noise emissions, as well as elimination of diesel fumes being generated- a beneficial air quality impact.
- Avoid noisy plant working simultaneously. In this regard the revised Vipac report (Appendix C4) shows likely noise to be generated from operations on site under normal operating conditions as well as 'worst case' noise scenarios.
- Related to the above, machinery items to be only used when required on site, at a location and in a manner that is appropriate to the task. Mobile items should be switched off when not in use, and not employ unnecessary high levels of revving, acceleration, braking etc. Minimise the height from which material is dropped into heavy vehicles when loading waste and other materials into heavy vehicles.
- Installation of an acoustic roller door on the southern façade of the processing shed.
- Installation of a 4.5m high acoustic barrier parallel to the northern boundary of the site, bounding a 6m wide landscaped corridor ie.between this wall and the northern boundary of the site and a 3.2m high acoustic barrier along the western boundary. Trees have already been planted in this landscaped buffer strip, in May 2021. Refer to Photograph 4.1. These plantings will minimise the impact of the proposed development on adjacent land uses.
- If any complaints are received, noise monitoring (at the complainants' property and at the resource recovery facility site) should be conducted to determine the source and level/extent of impact. Further noise mitigation strategies to be considered, if required.

"Clarify how non-steady sounds such as movement alarms and incidental material handling noise have been incorporated in the calculation of time-averaged LAeq,15min noise levels."

Satisfied. Refer to Vipac addendum noise assessment in **Appendix C4**. Section 7-1 of the Vipac report demonstrates that the noise assessment is conservative because the SWL's of the trommel and shredder have been based on peak noise levels, therefore accounting to non-steady, incidental material handling noise. It is also relevant to note that intermittent noise adjustments are only applicable during night time period, not relevant given that the resource recovery facility is only to operate during the day.

"Include records of on-site sound level measurement surveys (incl. photos, measurement methodology, process/activity description, processing/production rate, sound pressure and power level data) undertaken to develop the operational noise model within the noise assessment report."

Satisfied. Refer to the Vipac addendum noise assessment in **Appendix C4** for details.

"Provide evidence of modifying factors for tonal noise, low-frequency noise, intermittent noise and impulsive noise not included in the noise assessment report or include +10 dB adjustment for annoying noise characteristics be added to predicted LAeq,15min noise levels at all sensitive receiver locations."

Satisfied. Refer to Section 7-1 and Section 8-3 in the Vipac addendum noise assessment in **Appendix C4** for details.

Traffic and Transport

[NOTE: The Development Application was lodged when the provisions of *State Environmental Planning Policy (Infrastructure) 2007* (Infrastructure SEPP) applied. On 1 March 2022, this SEPP was repealed, and its provisions were transferred to *State Environmental Planning Policy (Transport and Infrastructure) 2021* (SEPP Transport and Infrastructure).]

"*Confirm the number of construction vehicle movements and provide an assessment of impacts. It is noted construction traffic will enter and exit the site from Allgayer Drive.*

Satisfied. It is proposed that all heavy vehicle movements to and from the site during construction will utilise existing B-double routes, then access the site via Torrens Road. A summary of traffic generation during construction is included on Page 41 of the Amendment Report by Outline Planning Consultants Pty Ltd. The discussion in the Traffic Impact Assessment in regard to construction vehicle volumes and movements was an estimate only. It is assumed that a Construction Traffic Management Plan will be prepared by the construction company prior to commencement of the site works, which will provide a better guide to the vehicle numbers and movements.

"Provide a clear description and diagram of the transport routes. Please confirm the nominated roads are permitted to carry the largest type(s) of vehicles that will be entering and exiting the site."

It is expected that all processed and unprocessed waste will be transported into the site via the Oxley and Kamillaroi Highways, via Black jack Road, Quia Road and Torrens Road, all roads previously approved for heavy transport including B-doubles.

Figure 11.4 of the Streetwise Traffic Impact Assessment indicates the traffic movements in & out of Torrens Road to be generated by the proposed Waste Facility. The diagram shows the distribution of traffic to and from Torrens Road into the local road network, including Quia Road, Kamillaroi Hwy, Oxley Hwy and Black Jack Road, which are all approved B-double routes. Torrens Road is the main access road into an approved industrial precinct, and doesn't include any vehicle weight restrictions. Also, the previous approval for the coal facility (at the western end of Torrens Road) includes an approval from the RTA for up to 125 laden heavy vehicle movements per day, including B-doubles, including the existing intersection of Torrens Road & Quia Road.

"Clarify the proposed number of traffic movements generated by the development. The movements should reflect both a typical day and a worst-case scenario. Please make sure traffic movements make reasonable assumptions about payload and provide justification for any assumptions made."

At the time of preparing the traffic assessment for the original project (as exhibited), it was expected that a range of different vehicle types would be utilised to deliver unprocessed waste to the Torrens Road facility, while the haulage of processed waste from the site would generally be done by truck & dogs, as currently owned by the applicant, and semi-trailers.

At this time, it is unlikely that Tri-tri B-doubles, with a maximum payload of 53.5 tonnes, will be used, and the largest vehicle will be a B-double, with a payload of 43.5 tonnes. However, the majority of trips are likely to be undertaken by truck & dogs. It is also likely that many of the truck & dogs bringing unprocessed waste INTO the facility will also be used to haul processed waste OUT of the site. If this is the case, then heavy vehicle volumes will be reduced significantly. It is also likely that some waste will be transported by 10m tipper trucks to the facility as well as a small number of light vehicles (i.e. utilities and car & trailers).

The precise break-up of future haulage vehicles is unknown at this stage, as this will be dependent on a range of factors, including the type of waste being transported and market demand. However, for the purposes of this assessment, StreetWise have adopted the following:

Unprocessed waste in:

Semi- trailer (15%), Truck & dog (65%), 10m tipper (15%), Utes & trailers (5%)

Therefore, to determine the number of trips required to haul revised 200,000 tonnes of unprocessed waste to the site, the following has been adopted:

200,000 tonnes per annum = 3846 tonnes per week = 700 tonnes per day (10 hrs)

Vehicle	Max payload (tonnes)	% use	Total Tonnes per day	Laden Trips per day	Return Trips per day	Return Trips per hour
Semi trailer	42.5	15	105	3	6	1
Truck & dog	33	65	455	14	28	3
10m tipper	12.5	15	105	8	17	2
Light vehicles	1	5	35	35	70	7
		100	**700**	**60**	**120**	**12**

As can be seen from the preceding table above, the adopted mix of haulage vehicles will generate approximately 25 laden heavy vehicle trips a day, and a total of 120 trips per day.

Processed waste out:

Semi-trailer (15%), Truck & dog (85%)

200,000 tonnes per annum = 3846 tonnes per week = 700 tonnes per day (10 hrs)

Vehicle	Max payload (tonnes)	% use	Total Tonnes per day	Laden Trips per day	Return Trips per day	Return Trips per hour
Semi trailer	42.5	15	105	3	6	0.6
Truck & dog	33	85	595	18	36	3.6
		100	**700**	**21**	**42**	**5**

As can be seen from the preceding table above, the adopted mix of haulage vehicles will generate approximately 42 heavy vehicle trips a day to haul processed waste from the site, and approximately 5 trips per hour.

Total trip generation

The updated trip generation from the proposed Recycling & Resource Recovery Facility in Torrens Road is shown in the table below.

	Daily (7am -6pm)		AM Peak Hr		PM Peak Hr	
	Light	*HV*	*Light*	*HV*	*Light*	*HV*
Staff Commute	80	0	6	0	3	0
Unproccessed Waste In	70	50	7	5	7	5
Processed Waste Out	0	42	0	5	0	5
Sub total	***150***	***92***	***13***	***10***	***10***	***10***
Total	**242**		**23**		**20**	

As can be seen from the preceding table above, the estimated total number of trips per day to be generated by the proposed Recycling & Resource Recovery Facility is 242 trips per day, which includes 92 heavy vehicle movements (of which 46 are laden), 80 staff commuter trips and 70 other light vehicle movements.

From the above table, heavy vehicles account for only 38% of all future traffic movements to be generated. If the same heavy vehicles are utilised to bring waste in and also haul waste out, the total number of heavy vehicle movements will be further reduced.

The number of additional peak hour trips will be approximately 23 in the morning (10 HV) and 20 in the afternoon (10 HV), which is between 43 – 50% of future generated movements, and almost identical to the volumes estimated in the original StreetWise traffic assessment. Therefore, the number of additional trips shown distributed through the local road network in the previous StreetWise report are still valid.

It should be noted that the volumes shown above are a 'worst case' scenario, and the numbers are likely to be significantly lower, given:

- The trip generation rates are based on processing the maximum annual tonnage of waste per year (200,000 tonnes).
- The trip generation rates are based on ALL heavy vehicles entering the site laden with unprocessed waste, and exiting empty; or entering the site empty and hauling away processed waste.
- The applicant owns a fleet of truck & dogs, and plans to utilise these vehicles , as well as other contractor trucks, to haul waste to and from the proposed Recycling & Resource Recovery Facility. It is likely that these trips will be scheduled for maximum efficiency i.e. laden in and laden out, resulting in a significant reduction in the number of heavy vehicle trips to & from the site.
- A maximum of 8 contracted truck drivers utilised on the one day.

The following table compares the estimated number of heavy vehicle haulage movements (semi-trailers and truck & dogs) generated by the original proposal (250,000 tonnes p.a.) and the current proposal (200,000 tonnes p.a.). As can be seen from the table, the proposed 20% reduction waste processed will result in a 20% reduction in HV trips generated. It should be noted that the worst case shown above involves haulage in one direction, with the HV empty for the return trip. The right hand columns are the more likely scenario, with efficient scheduling of truck movements i.e. ensuring at least 50% of heavy vehicle return trips are also used for hauling waste.

	Empty one-way			Empty one-way			50% re-use		
Annual (tonnes)	250,000			200,000			200,000		
	In	*Out*	*Total*	*In*	*Out*	*Total*	*In*	*Out*	*Total*
Semi trailer	8	8	16	6	6	12	4	4	8
Truck & dog	18	18	36	14	14	28	7	7	14
Total			**52**			**40**			**22**

Comparison of estimated daily heavy vehicle movements generated by proposal

"The assessment must consider movements of hazardous and non-conforming waste which would be removed more frequently in smaller loads. If this is reflected in Figure 11.3 please provide an updated description."

The proposed development has been amended so that the facility will not be accepting or processing any restricted, contaminated or toxic waste. If any arrives onsite, it will be rejected and loads turned back.

"The quantity surveyor report states the project will involve 56 construction and 18 operational staff. The traffic assessment considers only 11 staff arriving and departing the site each day. Please update the TIA to reflect the proposed staff numbers."

The proposed development requires a TOTAL of 18 staff per day, but the hours of operation (7am – 5pm) require a number of the activities to be split between morning & afternoon shifts. The actual number of staff required at any time during the day will generally be 11, with 8 operational staff and 3 admin (including 1 environmental officer). Therefore, the estimated staff traffic volumes and movements to be generated by the proposed development, and shown in the StreetWise traffic report are satisfactory.

The future staff at the site will likely comprise:

Weighbridge: 4 staff on split shift. (Each shift: 1 to weigh in/weigh out, 1 to do visual inspections/ paperwork)

Admin: 2 staff (invoicing, reporting, compliance)

Enviro: 1 (Compliance, reporting)

Trommel: 2 staff on split shift (Early start/early finish, late start/late finish)

Loaders: 2

Shed staff: 4 staff on split shirt (Early start/early finish, late start/late finish)

Yard staff: 2

Shed Supervisor: 1

TOTAL 18 staff

As noted above, a number of the future positions will require split shifts (i.e. early shift 7:00 – 1:00pm & late shift 12:00 – 6:00pm), while other roles may be performed by existing staff. A total of 12 additional staff has been adopted for this assessment, plus up to 12 extra truck drivers. The estimated start and finish times (i.e. commute times) of the future Recycling & Resource Recovery Facility staff are likely to be:

7:00am 8 operational staff in + 12 truck drivers in

8:00am 2 admin staff in + 2 operational staff in

12:00pm 4 operational staff in (late shift)

1:00pm 4 operational staff out (early shift)

3:00pm 1 admin staff out

4:00pm 1 admin staff out + 2 operational staff out

5:00pm 4 operational staff + 6 truck drivers out

6:00pm 4 operational staff out + 6 truck drivers out

The estimated number of staff commuter movements above include 28 movements in and 28 movements out, for a total of 56 (generally light vehicle) trips. If we also allow additional staff trips for lunch and other activities, and include trips generated by couriers and other deliveries, the total number of staff movements will be approximately 80 per day, or an average of 8 per hour (4 in and 4 out).

StreetWise on-site manual traffic counts undertaken for the previous traffic assessment indicated peak hour traffic in the local road network occurred at 7:45 – 8:45am and 2:45 – 3:45pm on weekdays. As can be seen from the estimated trips to be generated by the Recycling & Resource Recovery Facility (above), the majority of commuter (light vehicle) trips will not conflict with existing peak hours. Allowing for an average of 1 courier or delivery per hour, the estimated number of staff commuter trips and other 'non-haulage' movements at peak times are:

8:00 – 9:00am 5 in & 1 out

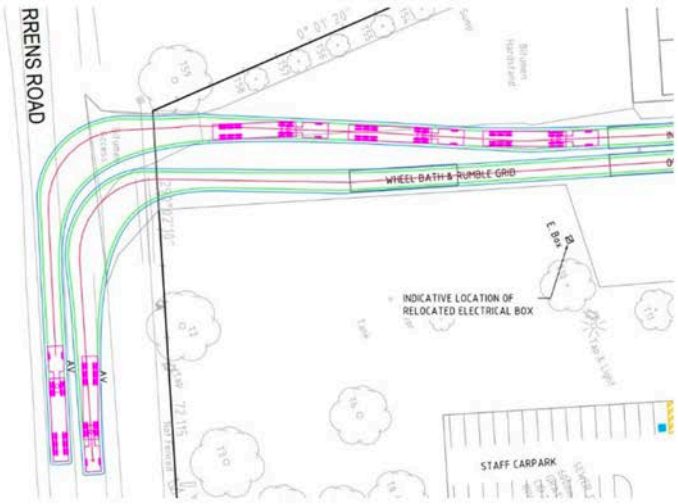
2:45 – 3:45pm 1 in & 2 out

Therefore, the estimated number of staff commuter movements during peak hours to be generated by the proposed Recycling & Resource Recovery Facility are higher than those adopted in the original traffic report, but the am & pm peak hour movements are similar.

"Confirm the largest vehicle expected to enter the site and provide swept paths for this vehicle. Please provide swept path diagrams showing vehicles exiting the site onto Torrens Road."

The proponent expects a mix of vehicles to deliver unprocessed waste to the site. As shown in a table above, the largest amount of waste is expected to be hauled by truck & dog, with semi-trailers/B-doubles and single unit trucks also transporting significant amounts.

The design plans for the future Recycling & Resource Recovery Facility have been updated. The amended plans show details of the upgraded driveway / access from Torrens Road into the site, as well as turnpaths for B-double vehicles. As can be seen from the image below, and the swept-paths provided by Martens & Associates, the widened driveway provides adequate width for all heavy vehicles to turn safely in and out of the site, without the need to cross the Torrens Road centreline.



B-double turnpath assessment – Upgraded Torrens Rd access (Martens & Assoc)

"Describe how site traffic will be managed when a B double or B triple (as shown in swept path diagrams) is turning right to enter the site as other vehicles would not be able to exit simultaneously based on the current width of the driveway."

Refer to swept turn-path by Martens & Associates above and as set down in their engineering drawings.

When the Waste Facility is approved and completed, the operators will prepare a Traffic Management Plan, Vehicle Movement Plan and Driver's Code of Conduct for the site and related activities. This will show the safe access in & out of the site, as well as required movements within the site. The traffic plans & documents will provide directions for safe movements, parking and activities for all drivers, and is likely to include signage, line-marking, scheduling of all heavy vehicle movements and instructions for 2-way radio operations.

"Confirm how waste will be moved from the unloading shed to the processing shed. Assuming a front-end loader is used, please confirm how will you manage these movements and potential conflicts with vehicles which are collecting and dispatching."

As noted above, it is assumed a Vehicle Movement Plan will be prepared to manage vehicle movements on the site when the facility is operational. The plans by Martens & Associates show that there is more than ample room available on site for the queuing of heavy vehicles, either entering or exiting the site.

"Describe contingency measures for equipment and vehicle breakdowns."

A Vehicle Movement Plan will be prepared to manage vehicle movements on the site when the facility is operational. The plans by Martens & Associates show that there is more than ample room available on site for the queuing of heavy vehicles, either entering or exiting the site, including spare space available for vehicles that may have broken down.

"Provide an assessment of stacking spaces available and how the site will avoid vehicles queuing in the public road network."

All internal circulation driveways and parking areas are to be paved, and the existing access via Torrens Road to be upgraded to a concrete vehicular crossing. Pavement details to be provided at detailed design stage of the development. The swept turn-path diagrams indicate the future site will cater for up to 3 B-doubles entering the site at the same time, with 1 on the weigh-bridge and 2 queued within the entry road. At the same time, there will be adequate width to allow heavy vehicles to exit via the same driveway without conflict. Additionally, it is proposed that a Vehicle Movement Plan will be prepared to manage vehicle movements on the site when the facility is operational, including drivers being in radio communication with the site and other drivers.

Details of Torrens Road upgrade along the site frontage are to be provided at detailed design stage of the development.

Refer to Martens & Associates drawing G400 (ref: P1907434PS01-G400) in **Appendix C6** for the pavement plan.

The proposed staff carpark provides 27 parking spaces (including 2 handicap spaces) and is to be accessed via the existing vehicular access from Allgayer Drive. All parking spaces and aisles comply with AS2890.1 and AS2890.6.

Refer to Martens & Associates drawing A300 (ref: P1907434PS01-A300) for details of staff carpark in **Appendix C6**.

"Clarify whether the secondary access to Allgayer drive is only for emergency access during a fire. Please confirm how site traffic be stopped from using this access during daily operations."

All future waste haulage in and out of the site is to be via the upgraded access from Torrens Road. Access will also available from two access points off Allgayer Drive for other vehicles, including access for fire fighting vehicles.

Hazards

"*Clarify if used lithium batteries are considered a dangerous good and provide a Safety Data Sheet (SDS) of this material in accordance with the Work Health and Safety Regulation 2017 in support of this verification."*

"If used lithium batteries are considered a dangerous good, include this material in the Hazardous and Offensive Development (SEPP 33) screening to confirm if the SSD is potentially hazardous, thereby requiring a preliminary hazard analysis."

"Describe the form in which used lithium batteries are received on-site (i.e. type of packaging, how they are sealed and stored, whether the battery poles have been sealed or capped)."

"Provide confirmation of the maximum storage quantity of used lithium batteries."

"Indicate the storage location of used lithium batteries in a site layout plan."

"Verify the storage location of used lithium batteries in the site layout plan requested above can satisfy the requirements in FRNSW's Fire safety in waste facilities guideline."

"Clarify if used lithium batteries will be processed or treated in any way on-site and expand the EIS as necessary."

The handling and storage of lithium batteries has now been deleted from the project. As well, the restricted waste storage shed, as illustrated in the exhibited EIS, is to be deleted from the revised scheme. Given the above, no further assessment or response is required on this issue.

Fire safety

"*Plans show the height of the open storage bays as 4.5m with the indicative stockpile height as 3.5m. However, the EIS describes stockpiles as being less than 4m. To comply with the Fire Safety Guideline the stockpiles must be 1m below the height of the wall."*

Confirming that the maximum stockpile height is 3.5m, in compliance with the *Fire Safety Guideline.*

"*Provide a stockpile management plan including details of the location of all proposed stockpiles, their height and an indication of the type of waste or product to be stored. The plan should include internal and external stockpiles and should clearly show there is suitable access for firefighting equipment."*

The design of the facility, including external stockpiles, was prepared in consultation with the author of the Fire and Rescue NSW *Fire safety in waste facilities* guideline prior to completion of the EIS. When commenting on the draft design prior to the issue of the SEARS Fire and Rescue NSW stated, inter alia, that:"*FRNSW have reviewed the documentation that was provided in support of the development and are conditionally satisfied with the proponents draft fire safety mitigation strategies*." Table 2.9 in the EIS provides details of the compliance of the project with *Fire safety in waste facilities* guideline.

The proposed site fire fighting system is to be designed in accordance with NSW Fire and Rescue (October 2019) *Fire Safety Guideline – Fire safety in waste facilities* and Australian Standard 2419.1 (2017) at detailed design (ie. construction certificate) stage of the development.

The fully dimensioned engineering drawings accompanying the EIS clearly show the arrangements for stockpiles and vehicular access.

The proposed resource recovery facility meets the relevant 'acceptable solution' as described Appendix A of Fire and Rescue NSW *Fire safety in waste facilities* guideline, and in particular:

- Storage and stockpiles are limited in size to reduce fire hazard with the maximum height of any stockpile, loose piled or baled, not to exceed 3.5m, with storage bays separated by walls of at least 1m above the design height of any stockpile (clause 8.2 of guideline).

- Stockpiles of combustible waste material should be rotated to dissipate any generated heat and minimise risk of auto-ignition as required (clause 8.3 of guideline). To show only one type of waste for any stockpile is in contravention of this of Fire and Rescue NSW *Fire safety in waste facilities guideline*. In any case, and in accordance withe the *Fire safety in waste facilities* guideline, storage bays containing different waste are to be separated by concrete walls. Storage bays containing combustible materials (i.e. timber, plastics, and paper/cardboard) shall not be located next to each other at any one time.
- A minimum width of 10 m is required for fire fighting vehicles. The proposed development shows access driveway widths near the stockpiles ranging from 38m or more on the northern side of the site, and 17m between the storage bays nearest Allgayer Drive. External stockpiles are to be maintained so that all required fire brigade vehicle access (e.g. around buildings, between stockpiles and to hardstand areas) is always kept clear and unobstructed (clause 8.4 of guideline).

Martens & Associates have completed a conceptual design for the proposed RRF which complies with the above guidelines and standards and addresses the RFI- refer **Appendix C6** for further details.

"*Provide a plan showing the location of all proposed fire hydrants noting these must be more than 10m from stockpiles and accessible for firefighters entering the site.*"

The EIS provides for an additional two fire hydrants at least 10m clear of any storage bins/stockpiles, in accordance with the Fire and Rescue NSW *Fire safety in waste facilities* guideline-refer to Section 3.6 (Fire Safety) and Tables 2.9 and 4.5 of the EIS.

Moreover, in the ordinary course of events the provision of such detail would be made a condition of consent, with the detail required provided at the construction certificate stage, not the development application stage.

Martens & Associates, consulting engineers, have completed a conceptual design for the proposed RRF which complies with the above guidelines and standards and addresses the RFI- refer **Appendix C6** for further details. Furthermore:

- Site fire fighting system shall be connected to Council potable water supply mains located in the Torrens Road and Allgayer Drive road reserves. Site internal water supply main shall be a ring main configuration to avoid dead ends where feasible.
- Hydrants shall be placed such that they are not closer than 10 m from any stockpiles and shall be accessible from site hardstand areas to allow for a firefighting vehicle to access the hydrant.
- Sizing of the internal firefighting water supply main shall be undertaken at detailed design stage of the development. A conceptual layout showing position of proposed site hydrants is provided in Martens & Associates drawing F300 (ref: P1907434PS01-F300).
- Review of AS 2419.1 (2017) has determined that for each lot 2 hydrants operating simultaneously at 10 L/s shall be required based on yard area of less than 9,000 m_2. This equates to a requirement of 20 L/s (144 kL/hour) for fire hydrants on each lot.

"*Provide details of all sprinkler and hydrant systems including flow rate and capacity and details of the smoke exhaust system.*"

The EIS provides for the installation of sprinklers in the unloading and processing sheds-refer to Section 3.6 (Fire Safety) and Tables 2.9 and 4.5 of the EIS.

Moreover, in the ordinary course of events the provision of such detail would be made a condition of consent, with the detail required provided at the construction certificate stage. Martens & Associates, consulting engineers, have completed a conceptual design for the proposed RRF which complies with the above guidelines and standards and addresses the RFI- refer **Appendix C6** for further details.

In addition to the above:

- The unloading and processing sheds on Lot 2 are required to have a sprinkler system installed to Australian Standard 2118.1 (2017). Review of AS 2118.1 (2017) shows that the proposed RRF would be classified as an 'Ordinary Hazard 3 (OH3)' and therefore requires 18 sprinklers operating simultaneously at 1 L/s/sprinkler (18 L/s total or 64.8 kL/hr).
- Smoke exhaust system for the buildings on Lot 2 shall be required in accordance with Section 7.8 of the Australian Standards and NSW Fire and Rescue (October 2017) guidelines. These shall be designed at detailed design stage of the development.

"*Provide details of the measures to contain fire water run-off noting that in addition to four hydrants there is a requirement for a sprinkler system.*"

The engineering drawings accompanying the EIS made provision for storage of runoff on the site. The EIS also proposes that suitable provisions shall be provided for the retention of contaminated water run-off- refer Section 3.6.2 of the EIS. Martens & Associates, consulting engineers, have completed a conceptual design for the proposed RRF which complies with the above guidelines and standards and addresses the RFI- refer **Appendix C** for further details. Specific measures to contain fire water runoff shall include:

- Automated and manually operated valves on all outlets from site OSD tanks to retain fire water within tanks and prevent offsite movement of fire water to Council's stormwater drainage network.
- Bunds to be provided around yard areas (in the form of trafficable humps). These shall provide an above ground storage volume of the order of 600 kL on Lot 1 and 500 kL on Lot 2 (subject to final site grading and height of bunds). Combined with OSD tank volumes, this shall provide of the order of 1.5 ML of fire water storage on site.
- Bunds shall also be provided within site buildings to contain firewater. The minimum volume to be contained in each building shall be 130 kL (based on 2 hour operation of 18 sprinklers at 1 L/s/sprinkler in accordance with AS 2118.1 (2017)).

The above elements are noted in Martens & Associates drawings E100 and E200 (ref: P1907434PS01-E100 and E200) in **Appendix C6**. Following any fire event at the site, the site operator would be required to transfer fire water and all water used to clean site OSD tanks, stormwater network and surfaces via pump-out tanker to a suitable offsite wastewater treatment facility.

Soil and Water

"*The Preliminary Site Investigation (PSI) stated its objective was to determine the suitability of Lot 2 for the proposed use. A revised PSI is required that provides an assessment of the suitability of the entire site (Lot 1 and Lot 2), supported by soil sampling within Lot 1.*"

Refer to additional contamination report by EastWest, dated 9 November 2021, in compliance with this request. This report forms a part of **Appendix C8** finding, inter alia:

"*Soil sampling of Lot 1 was conducted on October 22nd 2021, where thirty two samples at depths of 0-150mm of natural topsoil were collected using targeted sampling. The thirty two sampling locations were also screened visually by using an auger to drill soil cores to ascertain any obvious signs of fill or contamination to a depth of 1.5m.*

There were no significant readings to indicate contaminants of potential concern have contaminated the topsoil of Lot 1. Contaminants of concern were either below detection limits or well below the NEPM guidelines for the proposed commercial/industrial land use in all topsoil samples.

Considering the assessment contained within this report, there exists very low potential for contamination of Lot 2 from current use in Lot 1 as evidenced by the results of the testing across the targeted topsoil samples in Lot 1. Therefore, on the basis of the investigations undertaken, the site at 16 Torrens Road, Lots 1 and 2 DP 1226992, Gunnedah NSW meets the adopted criteria for commercial/industrial D and is therefore suitable for the proposed use."(Excerpt from Executive Summary)

[NOTE: The Development Application was lodged under the provisions of *State Environmental Planning Policy No 55 – Remediation of Land* (SEPP 55). On 1 March 2022, SEPP 55 was repealed, and its provisions were transferred to *State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP)*.]

"*Describe how the wheel wash would be maintained and confirm whether it is connected to any surface water management system."*

The proposed wheel wash is a free standing structure with a water reservoir under and to the side. It can be regularly de-silted by accessing the side reservoir. It can be regularly supplied with water by hose and pump. It does not form a part of the site d**rainage system. Refer Appendix C** and **Photograph 4.2** for further details in this regard.

"*Confirm whether the leachate management system is separate or draining to the general surface runoff drainage system and this is reflected in the modelling in Appendix C."*

The site leachate management system has been designed in accordance with Section 2 of the NSW EPA (2016) *Environmental Guidelines – Solid Waste Landfills* guideline on the advice of Mr Daniel Stokes of the NSW EPA.

Specifically, the leachate management system is designed to contain:

- Direct rainfall falling onto exposed site stockpile areas.
- Leachate storages include a dedicated volume designed to contain the 1 in 25 year Average Recurrence Interval 24 hour design storm event for Gunnedah.

A summary of the leachate storage requirements based on the monthly water balance is provided in Table 4.1 below.

PHOTOGRAPH 4.2: Typical wheel wash, to be employed the site.
*(Source: Enviro Wheel bath by EnviroConcept.com.au- refer **Appendix C** for preliminary engineering design)*

Table 4.1: Summary of leachate storage tanks proposed

Parameter	*Lot 1*	*Lot 2*
Area of open-aired stockpiles draining to leachate tank (m^2)	*900m^2*	*539m^2*
Maximum monthly volume of leachate generated (kL)	*50.9 kL*	*30.5 kL*
Leachate generated by 1 in 25 year Average Recurrence Interval 24 hour rainfall event (kL)	*100.1 kL*	*60.0 kL*
Total leachate volume required (kL)	*151.0 kL*	*90.5 kL*

The above analysis by consulting engineers Martens & Associates assumes the following.

Specifically, the leachate management system is designed to contain:

- A monthly water balance was used to determine the likely volumes of leachate generated in accordance with NSW EPA (2016) guidelines and advice received.
- Median monthly rainfall for Gunnedah Pool (Bureau of Meteorology station number 055023) was used due to the 144 year record and proximity to the site (approximately 4 km to the south east). Total median yearly rainfall is 616.7 mm and the month with the highest median rainfall is December (60.8 mm).
- It is assumed for the purposes of this analysis that leachate storage tanks are empty at the start of each month – as it is expected that leachate will be periodically transferred to an appropriate offsite wastewater management facility (either by pump-out or as trade waste to local sewer).
- The 2016 Australian Rainfall and Runoff methodology on the Bureau of Meteorology's website (http://www.bom.gov.au/water/designRainfalls/) was used to determine the 1 in 25 year ARI 24 hour rainfall total for Gunnedah. This was calculated to be approximately 119.6 mm.
- The volume of leachate generated by stockpiles and materials sorting processes within site buildings is assumed to be negligible.

From the above analyses, the estimated leachate tank volume required is 151 kL for Lot 1 and 90.5 kL for Lot 2 respectively. Refer to Martens & Associates drawing E100 (ref: P1907434PS01-E100), in **Appendix C6,** for concept leachate management details.

Visual

"*Provide a visual impact assessment which considers the amenity of the surrounding area, including rural residential properties nearby.*"

Views of the project site from nearby rural properties are generally obscured or screened by intervening buildings and/or vegetation, with some residences having views of the proposed new building, framed by existing or proposed new plantings- the latter giving rise to generally Low visual impacts.

Moderate visual impacts will arise when viewed from the residence to the north at No.10221 Kamilaroi Highway, Gunnedah, however, this would be confined to the short-medium term only, with Low visual impacts thereafter. Views from this residence are currently of a well vegetated site with new plantings along the northern boundary already well established and reaching heights of in excess of 2 metres.

The revised visual assessment by Stewart Surveys confirms the findings of the EIS that generally Low to negligible visual impacts will ensue. Refer **Appendix D**.

4.2 RESPONSE TO EPA SUBMISSION

Resource Recovery Framework

"*The EPA recommends that the proponent demonstrate that they meet all the requirements of a general resource recovery order ('order') and resource recovery exemption ('exemption'), or detail how they propose to meet the requirements to obtain an order and exemption specific to their proposal."*

Noted and accepted. Exemptions will be sought on a case by case basis , in the main, by suppliers of waste, who will furnish such exemptions prior to delivery of waste to the waste facility.

Excavated material waste streams

"*Any material brought into the facility as VENM or ENM must be characterised/certified prior to being removed from the source site. The EPA recommends that the:*

· appropriate acceptance criteria be further clarified in the EIS; or

· the definition of the outputs (to be on-sold) is changed to match the lower standard of input material (e.g. recovered fines)."

Noted and accepted. It is accepted that any excavated material processed in this way would need to meet the requirements of the operative recovered fines order and exemptions applying at the time to be lawfully re-used.

Contaminated soils, acid sulphate soils (ASS) and potential acid sulphate soils (PASS)

"*The EIS did not provide any details on the receipt of contaminated soil at the facility. The EPA recommends that further information is provided on the volumes and management of any contaminated soil received at the facility.*

.....The EPA recommends that the proponent prepare an Acid Sulphate Management Plan to address all proposed activities and potential impacts associated with the project. Any proposal to treat ASS/PASS at the facility would require a detailed treatment and management plan. At a minimum this must cover material transport, storage, bunding, treatment methods, treatment validation and characterisation regarding other contaminants.

The EPA recommends the proponent provide further details on ASS/PASS processing and re-use options."

In response to community concerns about contaminated soils generally, the proponent has decided not to accept any treated or untreated ASS or PASS at the resource recovery facility.

Construction and demolition (C&D) and commercial and industrial (C&I) wastes

"*The EIS states that C&D and C&I wastes will together form up to 45% of the total waste received at the proposed facility. Following sorting and processing, the EPA requires that any outputs supplied for re-use meet the conditions a relevant general order and exemption, or else a specific order and exemption must be obtained. This requirement is in addition to any other standards or specification (e.g. RMS road base specifications)."*

Noted and accepted.

Lithium batteries, Asbestos

In response to the submissions received and further community consultation, the proponent now proposes that there will be no asbestos (special waste) or lithium batteries (hazardous waste) accepted on the project site, including the storage of either waste on site.

Waste levy

"*The EPA recommends the proponent provide further details on the management of the waste levy. The transportation of waste from within the levy regulated area to outside the regulated area does not absolve the proponent to pay the waste levy.*

Noted. Details of the management of the waste levy are not a head of consideration under s.4.15 of the EP&A Act. The management of the waste levy will be a matter for the proponent and the EPA, once development consent has been obtained.

Air Quality Impact Assessment

"*The EPA recommends that the proponent should explain how the emission sources described above were derived and justified."*

"It is recommended that the proponent model peak daily operations, including campaign crushing. Peak daily operations should be modelled for 24-hour average pollutants for every day of the year (except Sundays)."

"The EPA recommends that the proponent should confirm that emissions were calculated based on 260 days of operation and clarify how emissions were modelled. If modelling does not assume emissions for every day of the year except Sundays, then the modelling should be revised."

The comments by the EPA are understandably focussed on dust generation, in the main, by proposed crushing activities on site. The application has been amended to delete any crushing activities from the project. This in itself will reduce considerably the amount of dust generated by the project. Refer to revised air quality assessment by Vipac in **Appendix C5** which concludes that the satisfactory air quality impacts will ensue as a result of the (revised) project.

Water management

"*The EPA recommends that the proponent provide the proposed capacity of the leachate tanks and sumps, as well as expected flow rates to the leachate tanks and sumps. Flow rates should be provided for normal conditions as well as wet weather events. The EPA also recommends that the proponent provide additional information on the design of the leachate barrier system.The EPA understands that the site will contain two sediment basins and two on-site detention tanks. It is also understood the sediment basin will overflow to the on-site detention tanks which will then discharge into the council stormwater system. The sediment basins should be designed, constructed, operated and maintained in accordance with Managing Urban Stormwater: Soils and Construction Volume 1, 4th Edition (LANDCOM, 2004)."*

A concept stormwater system proposed for the site has been designed by consulting engineers Martens & Associates in accordance with AS3500.3.

Full details of the proposed stormwater conveyance and retention system and associated stormwater quality improvement devices (SQID) are provided in the Concept Stormwater Management Plan Report and Plans (ref: P1907434JR03V03 and P1907434PS01).

Roofwater will be collected by the proposed rainwater tanks and reused internally for non portable uses such as toilet flushing.

Surface runoff from the site will be conveyed to the proposed on-site sediment basins prior to reuse or discharge from the site to meet the water quality objectives.

In summary, the proposed stormwater system includes:

- Pit and pipe network.
- Overland flow paths.
- Rainwater tanks.
- Sedimentation basins.
- On-site detention basins.
- Gross Pollutant traps (GPTs).
- Oil and grit separators (Humeceptor).

The proposed on-site basins collect runoffs from the site, allowing sediments to settle to the base of the basin.

Sediment collected in the basin will be removed on a regularly basis. This system significantly reduces offsite migration of sediment laden stormwater.

The proposed sediment basins have been designed and sized in accordance with Landcom (2004). Basins are to be constructed, operated and maintained in accordance with Landcom (2004).

Wastewater generated from the wheel wash is collected in the wash out pits before entering the sediment basins. These shall be designed at detailed design (ie. construction certificate) stage of the development.

Matters to be addressed with conditions: Noise

" a. Noise

The EPA has reviewed the Gunnedah Waste Facility Environmental Noise Assessment (NIA) dated 21 October 2020 by Vipac Engineers and Scientists Ltd. The EPA has provided recommended conditions in Appendix A and has provided the following additional comments:

Construction

The NIA does not provide details of the expected duration and phases of construction works. There is also no explanation of the expected number of items of equipment for construction. The EPA notes that standard construction hours are proposed and that predicted noise levels are approximately 10-15 dBA above the criteria at the nearest two residential receivers.

The EPA recommends that the proponent be required to prepare a Construction Noise Management Plan (CNMP) including the noise management strategies in Section 8.6 of the NIA as well as early implementation of operational mitigation measures where possible (e.g. early erection of noise barrier along northern boundary) to help mitigate construction noise levels.

Operation

Whilst the facility is proposed to operate during the daytime hours only, there are predicted noise impacts up to 6 dBA above the Project Noise Trigger Levels during the crushing campaigns. These campaigns are proposed to occur approximately once per month for a duration of 1-2 days. Due to the level of exceedance of the criteria during crushing, the EPA recommends the following measures:

· Separate noise limits that apply during the crushing campaign.

· Respite periods for the crushing activity.

· A restriction to number of times per month/days per crushing campaign that crusher can operate.

· Notification to receivers prior to crushing activity commencing.

The EPA also recommends that the proponent be required to prepare an Operational Noise Management Plan (ONMP) including the noise management strategies in Section 8.6. Road Traffic Noise The EPA recommends that the proponent prepare a Traffic Noise Management Strategy (TNMS).”

Noted and accepted.

[NOTE: The EPA has subsequently issued revised noise guidelines for the nearest residences. These revised noise levels are considered further in the revised Vipac noise assessment report- refer **Appendix C4**]

Minor Matters: Waste Classification Guidelines

“ There is a reliance on the Waste Classification Guidelines (WCG) and a CT1 classification throughout the EIS. The WCG are not relevant to resource recovery matters; rather, the conditions required for resource recovery wastes are given in the orders. Similarly, a load acceptance criteria of CT1 may also be inadequate without greater clarity between the resource recovery operations of the proposed facility and the landfill transfer function.”

Noted and accepted.

4.3 RESPONSE TO GUNNEDAH COUNCIL SUBMISSION

Stormwater Management

"Additional details are required in regard to how the development will prevent the discharge of pollutants from the site. How will spills and particulates transported in stormwater be contained onsite to prevent the discharge to Council's stormwater network or into natural water course?

Stormwater is to be managed within the site with no effluent or polluted water to be permitted to Council's stormwater network or permitted to leave the site. All stormwater works are to comply with the relevant Australia Standards.

A S68 approval under Local Government Act 1993 is required for stormwater discharge, with a condition to this affect being imposed prior to the issue of a Construction Certificate."

A concept stormwater system proposed for the site has been designed by consulting engineers Martens & Associates in accordance with AS3500.3. Full details of the proposed stormwater conveyance and retention system and associated stormwater quality improvement devices (SQID) are provided in the Concept Stormwater Management Plan (ref: P1907434JR03V03 and P1907434PS01). Refer to **Appendix C6**.

Roofwater will be collected by the proposed rainwater tanks and reused internally for non portable uses such as toilet flushing.

Surface runoff from the site will be conveyed to the proposed on-site sediment basins prior to reuse or discharge from the site to meet the water quality objectives.

In summary, the proposed stormwater system includes:

- Pit and pipe network.
- Overland flow paths.
- Rainwater tanks.
- Sedimentation basins.
- On-site detention basins.
- Gross Pollutant traps (GPTs).
- Oil and grit separators (Humeceptor).

The proposed on-site basins collect runoffs from the site, allowing sediments to settle to the base of the basin.

Sediment collected in the basin will be removed on a regularly basis. This system significantly reduces offsite migration of sediment laden stormwater.

The proposed sediment basins have been designed and sized in accordance with Landcom (2004). Basins are to be constructed, operated and maintained in accordance with Landcom (2004).

Wastewater generated from the wheel wash is collected in the wash out pits before entering the sediment basins. These shall be designed at detailed design (ie. construction certificate) stage of the development.

Provision of development plans

"*Provide development plans which indicated the location and type of all fencing to be constructed as part of the development. Elevation plans are required for each fence type to identify potential visual impact and design.*

Provide development plans for storage bays including specific elevation and design of each structure. The development should address the visual impact from a 4.5 metre high concrete structure on the adjoining lots and the potential for overshadowing of the site and adjoining allotments."

Security fencing to be provided in compliance with GSC DCP 2012, details to be provided at detailed design stage of the development.

All open storage bays to be fenced by 4.5m high concrete tilt panel wall with Colorbond cladding.

Confirmation of Waste accepted at resource recovery facility

"*Confirmation is required regarding whether the developer intends to accept waste tyres at the facility. Comments within the executive summary (ppll) and Sections 3.1.1 and 3.2.1 (pp63, 66) of the exhibited EIS identify that no waste tyres will be accepted at the facility. However, issue 3 of Table 0.2 (pp19) notes tyres to be separately processed/shredded. These comments should be clarified prior to assessment of the development."*

Tyres are proposed to be accepted at the facility. They will be processed by a tyre shredder in the fully enclosed processing shed.

Compliance with the Gunnedah Development Control Plan 2012

"*The exhibited EIS does not address each of the requirements of the Gunnedah Development Control Plan, Section 4 for Industrial land uses, with regards to:*

- *o The development does not identify the use of non-reflective roof material for buildings with a roof slope greater than 17°.*
- *o The EIS does not address how the development will be compatible on both visual and operational grounds with regards to non-industrial land uses located nearby and the requirement to the be visually compatible with the surrounding nonindustrial land use located to the West and North-West of the site.*
- *o Frontage along Torrens Road is to be constructed with kerb and gutter and road shoulder for the full frontage of the development site.*
- *o Provision of onsite stormwater detention tanks for capture with roofwater and reuse on landscaping;*
- *o The development has not adequately addressed onsite parking demand for the lands proposed additional land use. Parking for this development should be in addition to existing parking requirements. Council requests that a detailed parking layout, complying with AS2890.1 be prepared and submitted as part of this development, accommodating the minimum number of spaces required onsite.*
- *o The Gunnedah Development Control Plan 2012 requires that a minimum of 3 metres of landscaping be conducted along each lot boundary where presenting to a public road or rail corridor. The development does not address the landscaping requirements within the industrial area. Parts of the frontage to Allgayer Drive do not contain any landscaping, which does not meet the character and streetscape that Council is attempting to create within its industrial precincts. The development in its current layout is inconsistent with adjoining developments.*

o Security fencing not addressed on development plans. Fencing is to be of a decorative nature from the lot frontages to the building line.

o Internal driveways are to be sealed and extended to ensure that all vehicles can manoeuvre within the site, especially B-Doubles. The current swept path analysis plan for B double vehicles by Martens & Associates Pty Ltd, indicates manoeuvring is unable to be achieved within the indicated internal driveway.

o Existing access to Torrens Road is to be upgraded to a concrete vehicle access in accordance with Council's Urban Design standard."

As Council would no doubt be aware, as the project is for State Significant Development (SSD) **the provisions of any development control plan do not apply**. This is by virtue of clause 2.10(a) of *State Environmental Planning Policy (Planning Systems) 20s1* which states, inter alia, that: "*Development control plans…do not apply to- (a) State significant development…*".

Notwithstanding the above, an assessment of the compliance of the Project with the relevant provisions of the Gunnedah Development Control Plan 2012 was undertaken. It finds that the Project generally complies with the applicable provisions of the DCP, and in particular in terms of:

- Side and rear building boundary setbacks will comply with the BCA (clause 4.1 of the DCP).
- The 7.5m primary and secondary road building setbacks are complied with(clause 4.1 of the DCP)
- In terms of clause 4.2 of DCP 2012, the buildings proposed reflect the intended industrial use ie. a resource recovery facility, with landscaping employed- including well established stands of trees on the site-to improve views from nearby public roads.
- *"Industrial development proposed in close proximity to non-industrial uses must be compatible on both visual and operational grounds"* (clause 4.2 of DCP 2012). In this regard the project complies with these requirements, with building heights similar to those of adjoining industrial buildings with landscaping provided well in excess of that provided anywhere else in the industrial estate.
- *"Applications must demonstrate adequate provision for storage and handling of solid wastes."* (clause 4.3 of DCP 2012). In this regard the project complies with these requirements.
- A traffic assessment has been undertaken to demonstrate the adequacy of roads, pavement impacts, site access, loading/unloading, as well as on-site manoeuvring of the largest design vehicle (clause 4.4 of DCP 2012).
- Adequate parking has been provided (clause 4.5 of DCP 2012).
- Landscaping is proposed in satisfaction of clause 4.6 of DCP 2012, however, the landscape strip fronting Allgayer Drive is not as wide as that required under the DCP. This is more than compensated by the extensive tree plantings already established on the project site, as well as wide landscaped buffer strips proposed on the northern and western flanks of the project site. Not only do these plantings provide for landscaping well in excess of that provided by Council's DCP, they also achieve much higher levels of visual amenity contemplated by the DCP.
- Security fencing is proposed (clause 4.7 of DCP 2012).
- Adequate loading and unloading facilities are to be provided on site (clause 4.8 of DCP 2012).
- Outdoor lighting to comply with *AS 4282 Control of Obtrusive Effects of Outdoor Lighting* (clause 4.9 of DCP 2012).
- Windows, doors and other wall openings are to be arranged to minimise noise impacts on residences where proposed within 400m of a residential zone. (clause 4.11 of DCP 2012). In this regard the project site is located 1.119km from the nearest Residential (R5) zone.

Notwithstanding overall compliance with the above provisions of the DCP, Council in its submission has pointed to the need to address additional provisions of the DCP or raised additional concerns not necessarily identified in the DCP. The provisions of DCP do not apply to SSD development.

In response to the matters raised by Council under the "DCP" heading:

- *"The development does not identify the use of non-reflective roof material for buildings with a roof slope greater than 17°."* The unloading and loading shed has a roof slope of 4.33,° well below the 17° trigger referred to by Council. The steeper pitched restricted waste shed no longer forms a part of the project, given that the proponent has decided to not accept asbestos or lithium batteries at the proposed facility (and hence the need for storage of these wastes).
- *"The EIS does not address how the development will be compatible on both visual and operational grounds with regards to non-industrial land uses located nearby and the requirement to the be visually compatible with the surrounding nonindustrial land use located to the West and North-West of the site."* The proposed resource recovery facility seeks tree plantings along the key boundaries facing neighbouring rural properties. western boundary of the site as one measure that assists in screening views of the development from the residence owned by Whitehaven Coal, located 59m to the west of the site. Properties to the north-west of the site already have views of industrial buildings in Allgayer Drive- some as close as Similarly, further plantings along the western and northern boundaries of Lot 2 will assist in screening views of the proposed development to a satisfactory degree.
    - Firstly, In terms of overall compatibility, the Land and Environment Court has established the planning principle of compatibility in urban environment in *Project Venture Developments Pty Ltd v Pittwater Council* (2005) [2005] NSWLEC 1919 (*Project Venture*). Senior Commissioner Roseth concluded that being compatible is different from being identical and the Court has accepted that developments can exist together in harmony without having the same density, scale or appearance.
    - The desired future character of the local area is guided and defined by the industrial zoning of the project site and surrounding land. The proposal is considered to be consistent with the desired character of the Allgayer Drive industrial estate and provide an intensity of development that is commensurate with the existing and planned form of the Allgayer Drive industrial estate and locality generally. The proposed buildings will be of a similar height to that of existing industrial buildings nearby. The proposal provides for an appropriate bulk, height and scale commensurate with the designation of the project site specifically for the purpose of industry.
    - Thirdly, and to put matters in perspective, the rural dwellings located to the north-west have similar sized existing industrial buildings in much closer proximity than the proposed development. Further industrial development will infill the currently vacant allotments located between the subject nearby residences and the site. Due to intervening vegetation, all of the subject rural residences to the north-west have filtered views only of the site.
    - Fourthly, the project site currently has more well established landscaping provided than any other industrial development in the Allgayer Drive industrial estate. Moreover, almost all existing landscaping will be retained on the site as a part of the proposed development.
    - Fifthly, the proposed development is to be more than adequately landscaped with additional perimeter landscaped screening applied, wherever possible, in order to further ameliorate the visual impact of industrial uses and buildings from neighbouring residences. In this regard, satisfactory landscaping has been provided.

Regarding Council's requirement for:"*Frontage along Torrens Road is to be constructed with kerb and gutter and road shoulder for the full frontage of the development site"* the proponent accepts these requirements, which can be included as a condition of consent, with details to be more appropriately addressed at the construction certificate stage of the project.

Regarding Council's requirement for:"*Provision of onsite stormwater detention tanks for capture with roofwater and reuse on landscaping"* roofwater is proposed to be collected by the rainwater tanks. A concept stormwater system proposed for the site has been designed by consulting engineers Martens & Associates in accordance with AS3500.3 providing fro roofwater capture. . Refer Martens & Associates drawings P1907434JR03V03 and P1907434PS01) in **Appendix C6**.

Regarding Council's requirement for:"*a detailed parking layout, complying with AS2890.1"* please refer to the revised engineering drawings by Martens & Associates, which shows car parking proposed on site in compliance with AS2890.1.

Regarding Council's comments on landscaping and claimed inconsistency with other industrial development please refer, in the first instance, to the response provided on the preceding page. Moreover, the proposed development achieves a higher visual amenity compared to surrounding industrial uses by virtue of the established tree plantings, further landscaping and wide landscaped buffers to be provided. Tall trees have been retained in that section of the project site at the corner of Torrens Road and Allgayer Drive, providing a good level of visual amenity addressing both roads in this location.

Regarding Council's requirement for security fencing the proponent will be providing suitable fencing around the operational areas of the site, can be addressed in more detail at the construction certificate stage of the project and applied as a condition of consent.

The swept path plans provided by consulting engineers Martens & Associates show that manoeuvring by B double vehicles can be achieved within the indicated internal driveway.

Regarding Council's requirement for *Existing access to Torrens Road is to be upgraded to a concrete vehicle access in accordance with Council's Urban Design standard'* can be addressed in more detail at the construction certificate stage of the project and applied as a condition of consent.

4.4 RESPONSE TO TfNSW SUBMISSION

Clarification of heavy truck numbers

"*It is requested that the proponent confirm traffic generation numbers, addressing the matters raised and as based on the submitted information. This will lead to an assumption of 20 incoming heavy vehicle trips per day. If the majority of traffic is via rigid trucks, the number of trips would be significantly higher. It is suggested that once numbers are confirmed, weekly and hourly HV generation rates be referenced in any approval granted to meet the requirements to obtain an order and exemption specific to their proposal."*

Noted and accepted. Addressed in the revised traffic assessment by traffic consultants Streetwise- refer **Appendix C7.**

B-double routes

"*Access from Torrens Road (the main site access) only allows general access vehicles. TfNSW's road access team identifies that Torrens Road is not on either the PBS 2A or the 25/26 m RAV B-double network. In order for the proponent to legally operate the larger vehicles, a permit from the Heavy Vehicle Regulator (NHVR) will be required. The proponent will need to work and consult with Gunnedah Shire Council to provide their consent for heavy vehicle access on this road*."

Noted and accepted. Satisfactorily addressed in the revised traffic assessment by traffic consultants Streetwise- refer **Appendix C7.** It should also be noted that by way of Ministerial approval in respect of the Sunnyside Coal project MP 06_0308, dated November 2008, allowed the use of the local road system from the mine to the coal handling facility via Torrens Road and Quia Road for use by B-doubles, with the proponent required to upgrade the intersection of Quia Road and Torrens Road (development consent condition 35)- a requirement of the then Roads and Traffic Authority (Ref: Major Project Assessment Sunnyside Coal project MP 06_0308 Director-General's Environmental Assessment Report Section 75I of the Environmental Planning and Assessment Act 1979 dated September 2008). This consent is yet to lapse.

Clarification of staff numbers

"*There are discrepancies in regards to staff numbers throughout EIS and TIA. This anomaly should be addressed."*

The waste facility would directly employ 62 people during construction of the facility, and up to 18 on site staff onsite during the day-to-day operation of the facility, not including 12 truck drivers employed by the company to transport waste ie. up to 30 operational employees.

Access from Torrens Road

"*Allgayer Dr (industrial area) also has a connection to the Kamilaroi Hwy at Matthias Rd. There appear to be no separate left and right-turn lanes. The intersection would need upgrading if it is to be used by the development (possibly to a BAR). If it is not proposed for access, HVs should be restricted from using this route."*

Noted. It has been made quite clear in the EIS that this route is not proposed to be utilised by the project. The proponent is content for the imposition of a with a condition of consent that enforces this requirement.

Intersection of Quia and Torrens Road

"*The TIA claims that a through vehicle can pass a right-turning vehicle at the intersection of Quia and Torrens Rd. The widths are not quantified and it appears that a BAR does not exist. It might be the case for 2 light vehicles (LV) but not for articulated heavy vehicles (HV) with greater swept paths. The existing guardrail would not comply with BAL requirements. This should be further investigated and addressed by provision of swept paths to demonstrate the safety impacts for increased turning traffic.*"

Noted and accepted. Satisfactorily addressed in the revised traffic assessment by traffic consultants Streetwise- refer **Appendix C7.**

Swept paths and site access

"*MEX Depot access details were not quantified in the TIA and therefore it is no possible to check if they meet AS2890 requirements. Swept paths appear to indicate that a B-Double cannot exit onto the correct side of the road. This should be reviewed.*"

Noted. Satisfactorily addressed in the revised traffic assessment by traffic consultants Streetwise- refer **Appendix C7** and Martens & Associates engineering drawings- refer **Appendix C6.**

Road safety

"*The consent authority needs to be satisfied that the safety impacts of the development have been considered at all relevant intersections, not just the capacity issues. Any mitigation measures should be clearly identified and specified in the conditions of any consent issued.*"

Noted. Satisfactorily addressed in the revised traffic assessment by traffic consultants Streetwise- refer **Appendix C7.**

4.5 Response to Late Submission NSW Fire + Rescue

A late submission, dated 20 April 2022 was received from NSW Fire + Rescue. The submission made four recommendations, as follows:

> *"1. That a comprehensive ERP is developed for the site. That two copies of the ERP are stored in a prominent 'Emergency Information Cabinet' which is located in a position directly adjacent to the site's main entry point/s.*
>
> *2. An Emergency Services Information Package is to be developed as detailed in FRNSW guideline - Emergency Services Information Package and Tactical Fire Plans for use by responding firefighters. It is to be stored along with the ERP in an 'Emergency Information Cabinet' which is located in a position directly adjacent to the site's main entry point/s.*

3. Please revisit the FRNSW fire safety guideline for Fire Safety in Waste Facilities that includes legislated requirements and development considerations.

4. The waste facility is to provide safe, efficient and effective access for emergency vehicles as detailed in FRNSW guideline - Access for fire brigade vehicles and firefighters."

Noted and agreed.

5. Response to Community Submissions

5.1 Overview

This Section provides responses to the matters raised in the community submissions and submissions by organisations during the EIS exhibition process. In total, 90 submissions were received from non government organisations and the community-refer **Appendix A**-comprising:

- Four (4) submissions received from special interest organisations, comprising the Armidale Action on Coal Seam Gas & Mining; North West Protection Advocacy, based at Coonabarabran; Emerald Hill Progress Association Inc; and the Wando Conservation and Cultural Centre Inc.
- Eighty six (86) submissions received from the community.

The most commonly raised issue related to the proposed storage of asbestos and lithium batteries on the project site. The development application has since been revised, with these materials now no longer to be accepted at the proposed facility. Other issues frequently raised in submissions concerned the strategic context and need for the project in a regional location; potential for adverse noise impacts; potential for flooding; the management of waste in general; social and health impacts; landscape and visual impacts on neighbouring rural residences: and ongoing community consultation.

The following summarises the proponent's response to submissions received from the above.

5.2 Site Suitability, Social Issues

The principal concerns raised here related to the following:

- Inappropriate location of the resource recovery facility so close to Gunnedah township.
- Perception that the proposed resource recovery facility is a dump, in most cases, for toxic materials.
- Perceived adverse impacts of the proposed facility on community health and general well being.

In response:

- The proposed resource recovery facility is well removed from Gunnedah township, being approximately 2.89km from the western periphery of the township and 1.15km away from the nearest residential (in this case R5 Large Lot) zoned area. Importantly, no change to the character of the near locality is proposed as the project is to be undertaken on land specifically zoned for this type of industrial use. There is, as a result, a reasonable expectation that the site can be developed for industrial uses, subject to satisfactory environmental impacts. The project site is within a fully serviced industrial area with multiple access points to sealed local roads with drainage facilities, landscaping and fire hydrants already in place.
- The proposed resource recovery facility has been confused as a dump. This is clearly not the case. It is a facility proposed to recycle non-toxic waste, with no asbestos or lithium batteries or other toxic waste to be accepted.
- The potential impacts of the project to health and general well being, particularly as a result of changes to air quality, noise and traffic are considered in detail in the EIS and this Response to Submissions Report. The project achieves a balance between localised impacts-which are considered to be satisfactory- and the broader benefits of the project to the local and the wider community, for example, through economic opportunities and increased recycling of waste.

In addition to the above, and in terms of the suitability of the site for industrial development and amenity impacts on neighbouring uses:

- Much of the surrounding industrial estate has been developed for warehouse and industrial uses. In terms of cumulative impact, namely, the impact of similar developments to the one proposed and the accumulation of such development and successive developments of a similar type on the community or locality: *Gales Holdings Pty Limited v Tweed Shire Council* [2006] NSWLEC 85 at [43], the surrounding industrial estate is likely to continue to be developed for similar uses, generating similar levels of noise as well as visual impacts associated with large, shed-like industrial structures. This includes the future development of industrial lots located immediately to the north of the Project Site which, once developed, should effectively shield most, if not all, views of the proposed development from rural residences to the north.
- In the meantime, the Project will ameliorate visual impacts to the north through provision of a 6m wide landscaped zone along the northern boundary, supplemented by further perimeter plantings along the north-western boundary of the Project Site.
- The nearest receptors are principally within the surrounding zoned industrial area ie. GB Autos (243m away); Gunnedah Dog House (agreement in place- 281m away); McElroy & Peterson (730m away); with other industrial receptors including those at 660m, 626m and 439m away. The residence to the west is on land owned by Whitehaven Coal. Satisfactory measures are proposed to mitigate against the impacts of the proposed development, in particular in regard to noise and visual impacts.
- The character of the area is strongly influenced by surrounding industrial development. there are currently multiple industrial activities conducted in close proximity to the residences nominated in this document. These include the Whitehaven Coal's coal handling and preparation plant (CHPP), Gunnedah Waste Management Facility, Gunnedah Leather Processors, north-west railway line, derelict abattoir and Pryde's stock feeds, all of which cause amenity impacts, for example, in terms of either noise (trains, associated road traffic), or dust (trains Council tip, CHPP or airborne contaminants (old abattoirs). The project, on the other hand, proposes effective mitigation measures such as noise and dust suppression systems, sealed trafficable areas, rumble grid/wheel wash, site speed limits, hours of operation limits and methods of construction to minimise and mitigate impacts on neighbourhood amenity.
- The rural residential receptor located 604m away is in direct line of sight of the abandoned abattoir and 830m away from and in direct line of sight of Whitehaven Coal's coal handling and preparation plant (CHPP). Similarly, the rural residential receptor located 706m away is only 700m from the CHPP, 680m from the abandoned abattoir. Views to the south from the receptor located 446m away to the NE of the site are dominated by intervening tree stands and large industrial buildings within the Allgayer Drive industrial area.

5.3 Stormwater and Groundwater Issues

The principal concerns raised here related to the following:

- Inappropriate location of the resource recovery facility on land subject to flooding and stormwater flows.
- Concerns that leachate will leave the site, if developed for the proposed resource recovery facility, polluting the environment.
- Concerns that the proposed resource recovery facility will result in groundwater contamination.

In response:

- The project site is not mapped or identified as comprising flood-prone land. No part of the project site, proposed to accommodate the resource recovery facility, is identified as "Flood planning area" on the Flood Planning Map (source: Gunnedah Local Environmental Plan 2012 Flood Planning Map Sheet FLD_ 002). [NOTE: Not raised as an issue, or constraint, by Gunnedah Shire Council in their submission to the exhibited EIS]
- Given the nature of the waste to be accepted and project mitigation measures proposed there should be minimal potential for polluted stormwater runoff leaving the site. Moreover:
  - Almost all of the site is currently sealed/hardstand area.
  - Surface water controls are to be used to prevent the uncontrolled release of waters from the project site.
  - The wheel wash would be a closed systems that would have no contact with the proposed stormwater management system.
  - The use of surface water management, as well as sediment and erosion controls, is proposed.
  - Discharges of polluted water offsite are not predicted.
  - The resource recovery facility will not impact flood behaviour.
  - The resource recovery facility will not take nor impact on any groundwater.
  - Any spills are to be contained on site.
  - Waste is to be stored in the storage areas identified.
  - Separate leachate and stormwater collection devices are proposed.
- Excavation work associated with the proposed development is most unlikely to intersect with any groundwater. The nearest groundwater bores, located about 500m or more away from the project site, indicate depths to groundwater of between 8.8m (GW025597) to 9.14m (GW 019878) below natural ground level. Refer to **Figure 5.1**. The project works are located well above these known groundwater levels and are sufficiently separated from these nearby water bores in the locality. The vertical and horizontal separation to sensitive groundwater receivers provides an acceptable, manageable degree of mitigation to risks posed by the proposed resource recovery facility.

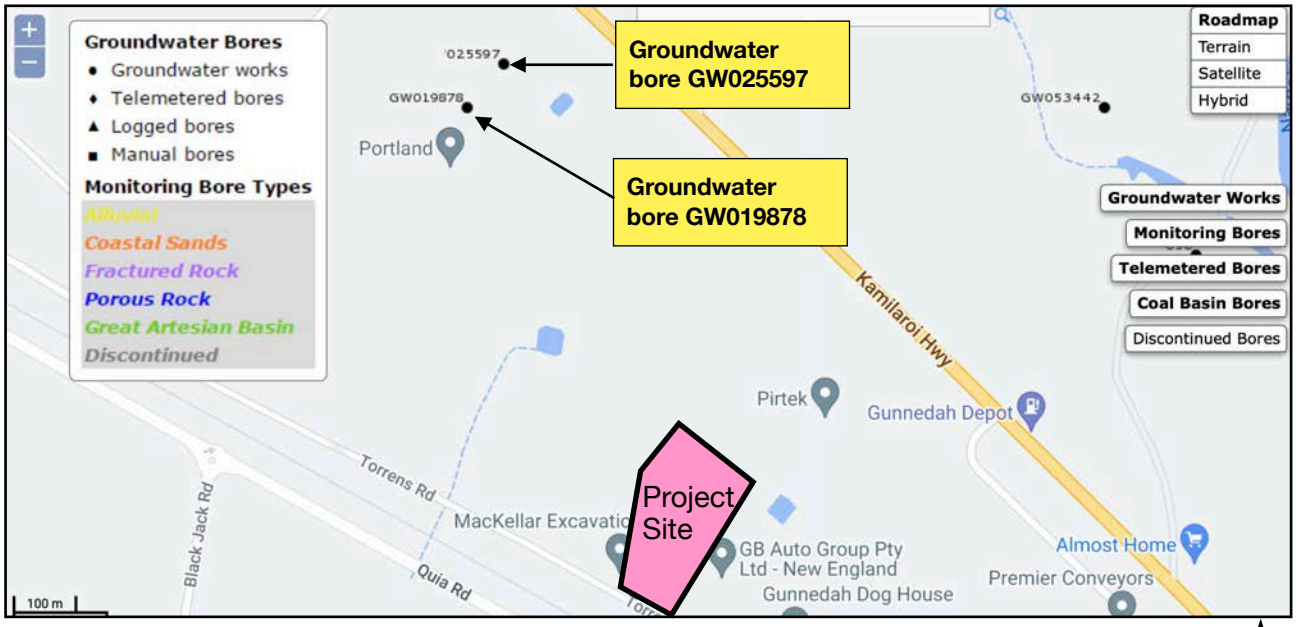


FIGURE 5.1: Groundwater bores location & Project Site (approx.)
(Source: Water NSW All Groundwater Map website June 2022)

5.4 Noise and Air Pollution Issues

The principal concerns raised here related to the following:

- Concerns about the potential for excessive noise to be generated by the proposed resource recovery facility.
- Concerns about the potential for excessive dust or airborne particles generated by the proposed resource recovery facility.
- Concerns that the proposed resource recovery facility will result in toxic fumes and/or air pollution.

- The impact of the proposed resource recovery facility in terms of noise and air pollution were assessed by Vipac Engineers and Scientists Ltd (Vipac), the results of which are contained in the original EIS and in the supplementary reports appended to and accompanying this Response to Submissions report- refer to **Appendix C** for details.
- Potentially noise affected neighbours will be informed about the nature of the construction stages and the duration of noisier activities, along with progress updates.
- In the interests of neighbourhood amenity, the hours of operation of the resource recovery facility proposed are to be limited to:
  - 7.00 am and 6.00 pm Monday to Saturday. No waste facility operations are to be undertaken on Sundays or public holidays.
  - Operation of heavy machinery is only able to occur between 7.00am-5.00pm Monday to Friday.
  - Construction hours would be 7.00am to 5.00pm Monday to Friday and 8.00am to 1.00pm Saturdays.
- Most of the potential dust generating activities including unloading, sorting, partial storage and mechanical processing of waste, are proposed in an enclosed unloading and processing shed which will be fitted with dust suppression sprinklers thereby minimising dust and noise emissions.
- Noise exceedances were predicted, however, at the neighbouring rental property owned by Whitehaven Coal (Whitehaven Coal residence) and at the residence attached to the "Dog House", to the east. Since then the proponent has introduced the following in response:
  - Entered into a noise agreement with the owner/occupant of the "Dog House".
  - Proposed an acoustic wall along the western side of the project site and the Whitehaven Coal residence in order to reduce noise to a compliant level.
  - The crusher originally proposed has now been deleted from the proposed facility. This is in response to concerns by the community about noise generated by the facility.
  - The scale of the Project has now been reduced by 20%, to 200,000 tonnes per annum of non-toxic, non-putrescible waste (previously 250,000 tonnes per annum of waste). This proposed measure will result in less air and noise generation potential.
  - There will be a commensurate 20% reduction in heavy truck traffic generated by the facility travelling on local and regional roads, which will result in less air and noise generation potential. It is a legal requirement for trucks operating on public roads in NSW to have their loads covered, thereby mitigating the potential for fugitive dust emissions from truck loads.
  - All unloading and processing activities associated with the proposed facility will now occur within fully enclosed sheds, with an acoustic barrier provided along the western boundary. This proposed measure will result in less air and noise generation potential.
  - Separate leachate and stormwater collection devices are proposed.
- Based on the above, there will be no adverse air quality or noise impacts on sensitive receivers as a result of the project.

5.5 Waste Issues

The principal concerns raised here related to the following:

- Concerns about the proposed waste facility accepting contaminated or toxic waste.
- Concerns about the potential for accepting waste drilling mud from Santos mining sites.
- Concerns that the proposed resource recovery facility will be accepting dangerous wastes.

In response:

- The proposed resource recovery facility will not accept hazardous or toxic waste.
- The protection of workers at the proposed resource recovery facility from exposure to asbestos is a paramount concern to the proponent. Accordingly, a range of measures will be implemented to ensure that waste that contains asbestos or that could potentially contain asbestos is not accepted at the facility, to form a part of an Incoming Waste Quality Plan- refer to Section 3.2.1 of the EIS for further details in this regard. The measures to protect of onsite workers will also protect anyone in the neighbouring industrial and residential areas from the potential dangers of asbestos. Similarly, lithium batteries will also not be accepted at the facility. Refer to Section 1.1 of this Response to Submissions report for further details.
- Following community concerns, treated or untreated acid sulfate (ASS or PASS) soils will now not be accepted at the resource recovery facility. The 25,000 tonnes per annum originally dedicated to contaminated soils will be redistributed amongst the other waste categories, such that the facility will handle up to 200,000 tonnes per annum of waste.
- Excavated natural material and resource recovered material that meet the CT1 thresholds as per the guidelines will be accepted at the resource recovery facility, as will co-mingled construction and demolition (C&D) waste, as well as commercial and industrial (C&I) waste. No other types of hazardous or special waste or dangerous wastes will be accepted at the site. No garden (green) waste, household waste or timber/wood waste, liquid waste, chemical waste or putrescible waste will be accepted by the facility. Treated drilling mud is one waste material subject to current resource recovery orders and resource recovery exemptions in force in NSW. So too is plasterboard, slag, cement fibre board and . Some of the wastes subject to a resource recovery order or exemption that will not be accepted at the waste facility, for example, by reason of potential for odour (putrescible waste), include processed animal waste, manure or effluent. The waste facility will only accept non-putrescible waste that will not readily decay under standard conditions; emit offensive odours; or attract vermin or other vectors (including flies, birds and rodents). Accordingly, the waste facility is not considered a potentially offensive or hazardous development.
- Vehicles carrying waste would be pre-screened at the entry weigh-bridge to determine whether the load is compliant for acceptance. Any load deemed non-compliant would be rejected and made to exit the site via the exit weigh-bridge and the wheel wash.
- The contamination investigations undertaken over Lots 1 and 2, supported by onsite soil investigations, did not identify significant contamination issues that would preclude the site being used for an industrial facility.
- Odorous waste will not be accepted at the proposed waste facility.
- With the implementation of the mitigation measures and revised project now proposed, impacts on residents will be acceptable.

5.6 Traffic Issues

The principal concerns raised here related to the following:

- Concerns about the increase in truck movements on the local road system and near the local school at Bloomfield Street, Gunnedah [NOTE: The latter fronts an existing designated bypass for heavy truck traffic around the Gunnedah township]proposed waste facility accepting contaminated or toxic waste.]
- Concerns about the movement of waste from other locations outside of the Gunnedah area.
- Concerns about the capacity of the road network to absorb further heavy truck traffic volumes.

In response:

- In November 2020 the Government of New South Wales (NSW) in Australia has announced the completion of the Gunnedah heavy vehicle bypass project.The project upgraded a 1.8km stretch of Bloomfield Street, which runs past the local school, to support B-doubles and other higher mass limit vehicles. Completion of the project was aimed at facilitating safer and smooth journeys for the freight industry while taking trucks out of town centres. The Minister for Transport Regional Transport and Roads Paul Toole said at the time that: "*The upgraded Bloomfield Street is a vital link in the strategic freight plan for the region. Providing road freight with a clear route around town is a big win for the community and the agricultural, resources and manufacturing sectors that power the economy.*""*Projects like this that improve freight efficiency, productivity and safety outcomes have never been more important with the regional freight task in NSW growing so fast.*"Gunnedah Shire Council Director of Infrastructure Services, Jeremy Bartlett, said:"*Completion of the Bloomfield Street project has resulted in significant gains for not only our community, but anyone who uses the State road network*," said Bartlett. In 2021 Council undertook further strengthening and sealing of Bloomfield Street as a part of the NSW Government's *Heavy Vehicles Safety and Productivity Program Round Six.* at a cost of $4 million.
- From the above, it is clear that the Gunnedah heavy vehicle bypass is an important component of the transport system of Gunnedah, aimed at taking heavy truck transport out of the Gunnedah CBD and delivering safer, more efficient journeys for the freight industry. It was upgraded to support B-doubles and other higher mass limit vehicles, similar to those proposed to service the proposed waste facility.
- Under the project originally proposed in the EIS, heavy traffic generated by the proposed waste facility would have made up a small proportion of heavy truck traffic utilising the Bloomfield Road bypass. Allowing for the 20% reduction in the scale of the waste facility now proposed, it is likely that heavy truck traffic generated by the waste facility would be commensurately even less.
- The recycling of waste is a national issue. As was explained in the EIS, the proposed waste facility at Torrens Road will form a part of a much broader network of waste facilities across New South Wales. This waste facility, and many others like it in New South Wales, will have the ability to economically process waste from as far away as the greater Sydney region and beyond. With the pressure to provide waste facilities in NSW set to continue, with limited opportunities for new recycling or landfill facilities being established in proximity to growing urban areas, other more distant sites are becoming increasingly attractive to accommodate these uses. The transport of waste interstate and intrastate is already a common occurrence.
- The traffic impact assessment by Streetwise in the EIS and the addendum report (**Appendix C7**) finds that there is more than sufficient capacity of the local road network to absorb further heavy truck traffic volumes.

5.7 Other Issues

Other concerns raised related to the following:

- Concerns about monitoring and oversight of the waste operation.
- Concerns about impacts on koalas.
- Concerns lack of community consultation.

In response:

- The proposed resource recovery facility, if approved, will be developed as part of an integrated waste management system, consistent with all statutory planning, environmental and occupational health and safety requirements. The granting of development consent under the *Environmental Planning and Assessment Act 1979* to develop a resource recovery facility does not exhaust the approvals process necessary for the commencement of that operation. The scheme of approvals/ consents for resource recovery facilities envisages roles for both the EPA and a consent authority in ongoing management of development of any resource recovery facility that triggers the need for a licence.
  - The *Environmental Planning and Assessment Act 1997* sets out the framework for land use, planning and development in NSW, including the oversight of developments, once approved, to ensure compliance with conditions of consent.
  - The *Protection of the Environment Operations Act, 1997* and *Protection of the Environment (Waste) Regulation* are the principal tools for the NSW Government to regulate the way waste operations are monitored and managed, once development consent is obtained. This Act and Regulation are administered by the NSW EPA.
- The *Protection of the Environment (Waste) Regulation* Regulation contains details relating to:
  - The waste and environment levy. The NSW EPA, largely through the implementation of the Landfill Levy, looks to divert waste from Landfill and encourage recycling of resources – allowing materials to enter back into further use as part of a circular economy
  - Waste tracking.
  - Waste classification, defined in clause 49 of Schedule 1 of the *Protection of the Environment Operations Act 1997*. The proposed waste facility will not be accepting a broad range of wastes, including special waste, liquid, putrescible waste or hazardous waste. The waste classification guidelines acknowledge that the pre-classification of waste (Step 4) does not classify all types of general solid waste (non-putrescible). Additional wastes may be classified as general solid waste (non-putrescible) by the EPA from time to time by a notice published in the NSW Government Gazette and can be thus added to the list above. All currently gazetted general solid wastes (non-putrescible) are listed on EPA's website
  - Management requirements for certain waste types.
  - Classification of material subject to a Resource Recovery Order.
  - Payment schemes for local councils.
  - Consumer packaging recycling and other miscellaneous provisions

- Once approved, the EPL would cover the waste materials that can be lawfully processed and stored, incident management, as well as environment protection licence reporting conditions including but not limited to the following:
  - What the licence authorises and regulates- in this case for a resource recovery facility handling up to 200,000 tonnes per annum of specified waste.
  - The premises from which the facility is to operate.
  - Location of monitoring/discharge points and areas, including noise monitoring points.
  - Noise limits- Noise generated at the premises that is measured at each noise monitoring point established under the licence.
  - Maintenance of plant and equipment.
  - Other administrative conditions eg. waste must not be permitted to be received at the premises until the Development Works set down in the development consent are completed to the satisfaction of the EPA and the EPA has given the licensee written approval to commence receiving waste. Licensees must provide the EPA with a Construction Certificate from Council or an Accredited Certifier before the EPA will consider permitting waste to be received at any premises.
  - Control of dust eg. Ensure that water sprinklers and/or misting sprays in the enclosed building must be utilised at all times when plant is operational.
  - Air Quality controls.
  - The licensee will be required to prepare, maintain and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises.
  - Controls on stockpiles.
  - Monitoring and recording conditions eg. the results of any monitoring required to be conducted by the licence or a load calculation protocol must be recorded and retained as a condition of the EPL.
  - Recording of pollution complaints. Records must be produced to any authorised officer of the EPA who asks to see them.
  - The licensee to complete and supply to the EPA an Annual Return in the approved form including a Statement of Compliance and a Monitoring and Complaints Summary.
  - Notification of environmental incidents/events.The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.
- From the above, , it is clear that the operation of the resource recovery facility, once operating, will be closely monitored by both the determining authority and by the EPA.

In terms of potential impacts on Koalas, the SEPP 44 assessment accompanying the EIS found that the site is not considered to be Potential or Core Koala habitat as defined by SEPP 44.Only two (2) Koala feed tree species listed under SEPP 44 was observed at the site, on Lot 1 near the Torrens Road/Allgayer Drive intersection. These were the *Eucalyptus populnea*, Bimble Box tree and *Eucalyptus albens*, White Box. There were no SEPP 44 feed trees species observed on Lot 2.

In terms of perceived lack of community consultation refer toSections 1.4 and 2.3 of this Response to Submissions report for further details regarding community consultation undertaken.

6. Updated Project Justification

6.1 Overview

This section provides a justification and evaluation of the amended project as a whole, having regard to the economic, environmental and social impacts of the amended project and the principles of ecologically sustainable development.

The proposed recycling and resource recovery facility, as amended, is justified in that it addresses the substantive concerns raised by objectors during and following the public exhibition process, and in particular:

- In response to the concerns about potential impacts on human health, acid sulfate soils, lithium batteries and asbestos will no longer be accepted at the proposed facility.
- The scale of the proposed facility has been reduced by 20%, to 200,00 tonnes per annum of waste materials, a significant reduction in the scale of operations from that originally proposed.
- In response to concerns raised by objectors to heavy truck traffic generated by the proposed facility, the reduced scale of waste operations now proposed means that there will be a commensurate 20% reduction in heavy truck traffic generated by the facility travelling on local and regional roads. To further reduce truck traffic volumes, the proponent is also introducing a compactor within the processing shed, to reduce the bulk of material trucked from the recycling operation.
- All unloading and processing activities associated with the proposed facility will now occur within fully enclosed sheds, with an additional acoustic barrier provided along the western boundary, thus reducing potential noise impacts on the adjoining residence owned by Whitehaven Coal.
- The crusher originally proposed has now been deleted from the project. This is in response to concerns by the community about noise generated by a crusher and impact on local amenity.
- The various categories of waste material will be shredded and/or compacted and/or baled, to improve ease of handling and to optimise transported loads of processed waste, further reducing volumes of heavy truck traffic required to service the proposed development.

6.2 Justification for the Project, as Amended

In addition to the justification cited in 7.1 above, the project can also be justified for a number of reasons, including:

Strategic Context

- The proposed recycling and resource recovery facility at Torrens Road will form a part of a much broader network of waste facilities across New South Wales. This waste facility, and many others like it in New South Wales, will have the ability to economically process waste from as far away as the greater Sydney region and beyond.
- At present, the greater Sydney region, in particular, is already facing pressure as non-putrescible waste streams continue to grow in line with construction activity and major infrastructure projects. While in the longer term these levels of waste may be proportionately reduced with better recycling methods, the pressures of continued population growth, urban development and infrastructure programs will continue to create large ongoing waste streams.

- With these pressures are set to continue, with limited opportunities for new recycling facilities being established in proximity to growing urban areas, other more distant sites are becoming increasingly attractive to accommodate these uses.
- This makes it economic for more distant recycling facilities in regional New South Wales, like Gunnedah, to be able to accommodate some of this demand through back-loading of heavy transport vehicles. Combined with the introduction of the Queensland waste levy, which acts as a disincentive to relying on interstate landfill and recycling facilities, there will be an increased need for recycling facilities being established in NSW. The proposed recycling and resource recovery facility is consistent with the NSW Government's direction in achieving waste reduction targets by the *NSW Waste and Sustainable Materials Strategy 2041 Stage 1 2021-2027*, in particular to enable recovery and recycling infrastructure to keep pace with demand. The latter strategy also identifies the need for new stand-alone facilities in regional areas, like Gunnedah, for the recycling of paper and cardboard.
- The project, as amended, will assist in achieving the waste reduction and recycling outcomes sought by the *National Waste Policy*, in particular in terms of managing waste as a resource and improving resource recovery, as well as protecting human health and the environment.

Statutory Planning

- The proposed recycling and resource recovery facility at Torrens Road complies with relevant planning objectives, controls and guidelines including but not limited to the following:
  - The use is permissible in the INI General Industrial zone pursuant to the provisions of *Gunnedah Local Environmental Plan 2012* and Division 23 of *State Environmental Planning Policy (Transport and Infrastructure) 2021*. The project complies with the applicable aims, zone objectives and land use controls contained both environmental planning instruments. Given the above, there is a reasonable expectation that the site be developed for the industrial purposes now proposed per Robson J in *Omid Mohebati-Arani v Ku-ring-gai Council* [2017] NSWLEC 143.
  - The site is not contaminated, nor is the proposed development either potentially hazardous or a potentially offensive development under the provisions of clause 4.6 and Chapter 3 of *State Environmental Planning Policy (Resilience and Hazards) 2021*, respectively.
  - The site is not considered to be either Potential or Core Koala habitat for the purposes of Chapter 3 of *State Environmental Planning Policy (Biodiversity and Conservation) 2021*.
  - The project incorporates appropriate environmentally sustainable development measures both during the construction and operational phases.
- The project, as amended, will comply with the provisions of Fire and Rescue NSW (FRNSW) *Fire safety in waste facilities* guideline as well as with the requirements of the *National Construction Code* (NCC/BCA) and Fire+Rescue NSW guideline *Access for fire brigade vehicles and firefighters*.
- The project, as amended, will comply with the provisions of the EPA's *Noise Policy for Industry*.

Suitability of the Site

The project site is well suited to accommodating the proposed recycling and resource recovery facility, and in particular:

- The project site is within an existing industrial area surrounded by other compatible developments and land uses. Moreover, with the mitigation measures proposed, it can be adequately buffered from sensitive receivers.

- The site is not subject to contamination, flooding, groundwater vulnerability, terrestrial biodiversity, heritage, scenic or geotechnical constraints.
- The site is readily accessible to major transport links, and in particular the Kamilaroi Highway.
- The site has sufficient area to allow external manoeuvring of vehicles and also the handling, storage and processing of waste materials within enclosed buildings.

Social, Economic

- The project would facilitate the recycling of a wide range of wastes with much of this material to be re-used elsewhere in New South Wales and Australia. It promotes recycling as an alternative to landfilling.
- The design of the proposed recycling and resource recovery facility will result in satisfactory operational and amenity outcomes.
- The Project will support future industrial development in the Gunnedah region, without significant adverse environmental impacts.
- The project has a Capital Investment Value of $3.9 million and will employ up to 62 people during construction and up to 30 full-time operational staff. The economic impacts of the proposal will be positive.

For the reasons cited above, the project, as amended, has merit and should be approved, subject to the imposition of appropriate conditions of consent.

7. References

EastWest Online (November 2021) *Mackellar Excavations Pty Ltd Detailed Contaminated Site Investigation Lot 1 DP 1226992 16 Torrens Road, Gunnedah, NSW*.

Environment Protection Authority (NSW EPA) (2014), *NSW Waste Avoidance and Resource Recovery Strategy 2014-21*, NSW EPA, Goulburn Street,NSW.

Environment Protection Authority (NSW EPA) (2014b), *Waste Classification Guidelines*, NSW EPA, Goulburn Street, NSW.

Environment Protection Authority (NSW EPA) (2016), *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*, NSW EPA, Goulburn Street, NSW.

Environment Protection Authority (NSW EPA) (2017), *Noise Policy for industry*, NSW EPA, Goulburn Street, NSW.

Environment Protection Authority (NSW EPA) (2019), *Standards for managing construction waste in NSW*, NSW EPA, Goulburn Street, NSW.

Landcom (2004) *Managing Urban Stormwater: Soils and Construction Volume 1*.

Martens & Associates Pty Ltd (May 2021) NSW EPA and DPIE *Request for Additional Information– Proposed Resource Recovery Facility (RRF), 16 Torrens Road Gunnedah*

NSW Department of Planning (September 2008) *Major Project Assessment: Sunnyside Coal Project MP 06_0308* Director-General's Environmental Assessment Report.

NSW DECCW (2011) *Road Noise Policy*.

NSW DECCW (2009) *Interim Construction Noise Guideline*.

NSW Planning & Environment (2017) *New England North West Regional Plan 2036*.

NSW Fire + Rescue (2019) *Fire safety in waste facilities* guideline.

Outline Planning Consultants Pty Ltd (December 2020) *Environmental Impact Statement Proposed Waste Facility Lots 1 & 2 DP 1226992 No. 16 Torrens Road & No. 17-21 Allgayer Drive, Gunnedah NSW*. On behalf of MacKellar Equipment Hire Pty Ltd.

Vipac Engineers and Scientists (September 2021) *Gunnedah Waste Facility Environmental Noise Assessment*.

Vipac Engineers and Scientists (September 2021) *Gunnedah Waste Facility Air Quality & Greenhouse Gas Assessment*.

Appendices

Appendix A:

Appendix A1: Submissions Register

SUBMISSIONS REGISTER		
Group	**Submission ID/Name**	**Section where issues addressed in this Response to Submissions Report**
Public authorities	Department of Planning Industry & Environment (now Dept. Planning and Environment)	Section 4.1
	EPA	Section 4.2
	TfNSW (two duplicate submissions)	Section 4.4
	NSW Fire + Rescue	Section 4.5
Councils	Gunnedah Shire Council	Section 4.3
Special interest groups, individuals	Refer to summary of submissions received by issue raised	Section 5

Response To Submissions Received : Gunnedah Resource Recovery Facility

Overview of Concerns or Objections

				Environmental			Traffic			Wastes			Other		Water				Social			
Submission Id	Suburb	State	P'code	Dust/Airborne particles	Toxic Fumes &/or air Pollution	Noise	Increase in truck movements	Movement of waste from other blocations	Road system capacity	SANTOS waste	Contaminated or toxic waste	Dangerous products	Monitoring	Koala habitat Wildlife	Impacts to rainwater tanks	Leachate	Ground water contamination	Storm water & flood water	Perception it is a dump	Proximity to town/residences	Impacts to community helth & well being	Generic letter submission
Gunnedah Submissions																						
SE-13304032	GUNNEDAH	NSW	2380	✓	✓	✓	✓	✓		✓			✓									
SE-13832209	Gunnedah	NSW	2380																			
SE-13832781	GUNNEDAH	NSW	2380	✓												✓				✓		
SE-13856809	Gunnedah	NSW	2380								✓								✓			
SE-13861719	Gunnedah	NSW	2380	✓	✓	✓	✓	✓			✓		✓				✓	✓		✓		✓
SE-13861721	Gunnedah	NSW	2380	✓	✓	✓	✓	✓			✓		✓				✓	✓		✓		✓
SE-13861723	GUNNEDAH	NSW	2380	✓	✓	✓	✓	✓			✓		✓				✓	✓		✓		✓
SE-13861725	GUNNEDAH	NSW	2380	✓		✓	✓				✓							✓			✓	
SE-13861727	Gunnedah	NSW	2380	✓	✓	✓	✓	✓			✓		✓				✓	✓		✓		✓
SE-13861963	Gunnedah	NSW	2380	✓	✓	✓	✓	✓			✓		✓				✓	✓		✓		✓
SE-13861968	Gunnedah	NSW	2380	✓	✓	✓	✓	✓			✓		✓				✓	✓		✓		✓
SE-13861971	Gunnedah	NSW	2327	✓	✓	✓	✓	✓			✓		✓				✓	✓		✓		✓
SE-13861973	Gunnedah	NSW	2380		✓		✓	✓			✓				✓							
SE-13865031	GUNNEDAH	NSW	2380	✓	✓	✓	✓	✓			✓		✓					✓		✓		
SE-13886053	Gunnedah	NSW	2380	✓	✓	✓	✓				✓				✓		✓	✓			✓	
SE-13888467	GUNNEDAH	NSW	2380	✓		✓					✓							✓	✓			
SE-13888474	GUNNEDAH	NSW	2380	✓	✓	✓		✓			✓		✓				✓	✓	✓			
SE-13888743	GUNNEDAH	NSW	2380	✓	✓	✓	✓	✓					✓				✓	✓	✓	✓		
SE-13889009	Gunnedah	NSW	2380	✓	✓	✓		✓			✓		✓				✓	✓	✓			Same submission as SE - 13888474
SE-13890957	Gunnedah	NSW	2380																	✓		
SE-13899904	GUNNEDAH	NSW	2380	✓		✓	✓								✓	✓	✓	✓				
SE-13925616	GUNNEDAH	NSW	2380		✓												✓	✓		✓		
SE-13925695	GUNNEDAH	NSW	2380								✓									✓		
SE-13925938	GUNNEDAH	NSW	2380																	✓		
SE-13926008	GUNNEDAH	NSW	2380														✓			✓		
SE-13926812	GUNNEDAH	NSW	2380	✓		✓	✓										✓	✓		✓		
SE-13926866	GUNNEDAH	NSW	2380																	✓		
SE-13927428	GUNNEDAH	NSW	2380														✓					
SE-13927666	GUNNEDAH	NSW	2380	✓		✓	✓	✓			✓				✓			✓		✓	✓	
SE-13950015	GUNNEDAH	NSW	2380				✓				✓						✓			✓		
SE-13955740	GUNNEDAH	NSW	2380	✓														✓		✓		
SE-13957537	Gunnedah	NSW	2380	✓		✓		✓	✓		✓				✓		✓	✓		✓	✓	
SE-13972230	Gunnedah	NSW	2380		✓	✓	✓				✓									✓		
SE-13972457	Gunnedah	NSW	2380							✓	✓									✓		
SE-13972723	GUNNEDAH	NSW	2380	✓			✓													✓		
SE-13973209	Gunnedah	NSW	2380	✓	✓		✓				✓						✓			✓	✓	
SE-13973274	Gunnedah	NSW	2380					✓									✓			✓		
SE-13974041	Gunnedah	NSW	2380	✓	✓						✓								✓			
SE-13974090	Gunnedah	NSW	2380																		✓	
SE-13974099	GUNNEDAH	NSW	2380	✓		✓		✓			✓		✓					✓		✓		✓
SE-13975272	Gunnedah	NSW	2380	✓		✓	✓				✓						✓	✓			✓	
SE-13975303	Gunnedah	NSW	2380								✓						✓	✓	✓	✓		
SE-13975311	Gunnedah	NSW	2380																✓	✓	✓	
SE-13975508	Gunnedah	NSW	2380	✓		✓	✓	✓	✓		✓						✓	✓			✓	✓
SE-13975544	Gunnedah	NSW	2380	✓		✓	✓	✓	✓		✓				✓		✓	✓			✓	✓
SE-13978881	Gunnedah	NSW	2380	✓		✓		✓			✓		✓					✓		✓		✓
SE-13981292	Gunnedah	NSW	2380																✓			
SE-13981364	Gunnedah	NSW	2380				✓	✓		✓	✓								✓			
SE-13981878	GUNNEDAH	NSW	2380	✓				✓			✓						✓	✓	✓	✓	✓	
SE-13985735	Gunnedah	NSW	2380								✓					✓				✓	✓	
SE-13985739	Gunnedah	NSW	2380																	✓		
SE-13994611	GUNNEDAH	NSW	2380	✓																✓	✓	
SE-13959255	Gunnedah	NSW	2380	Nothing identified as a specific objection																		
SE-13931256	GUNNEDAH	NSW	2380	Nothing identified as a specific objection																✓		
SE-13862224	GUNNEDAH	NSW	2380	✓	✓	✓	✓	✓			✓		✓	✓		✓		✓	✓		✓	
SE-14104219	Gunnedah	NSW	2380	✓		✓	✓	✓	✓		✓				✓		✓	✓			✓	✓
SE-13954712	GUNNEDAH	NSW	2380	Comments were generally of a personal nature																	✓	
Total				33	19	27	26	24	4	3	34		15	1	7	4	26	29	12	35	16	12
Gunnedah Distrct Submissions																						
SE-13922680	CURLEWIS	NSW	2381	✓		✓	✓								✓		✓	✓		✓		
SE-13925562	EMERALD HILL	NSW	2380																	✓		
SE-13926006	CURLEWIS	NSW	2381	✓							✓						✓	✓	✓	✓	✓	
SE-13956176	BREEZA	NSW	2381						✓	✓												
SE-13888986	Emerald Hill	NSW	2380			✓	✓				✓						✓			✓		
SE-13980624	MULLALEY	NSW	2379		✓						✓		✓				✓		✓	✓		
SE-13984281	KELVIN	NSW	2380	✓		✓							✓				✓			✓		
SE-13883789	MARYS MOUNT	NSW	2380	✓	✓	✓	✓	✓			✓		✓			✓	✓			✓		
SE-14091655	GHOOLENDAADI	NSW	2380	Organisation	✓	✓	✓										✓					
Total				4	3	5	4	1	1	1	4		3		1	1	7	2	2	7	1	

Response To Submissions Received : Gunnedah Resource Recovery Facility

Overview of Concerns or Objections

				Environmental			Traffic			Wastes			Other		Water				Social			
				Dust/Airborne particles	Toxic Fumes &/or air Pollution	Noise	Increase in truck movements	Movement of waste from other blocations	Road system capacity	SANTOS waste	Contaminated or toxic waste	Dangerous products	Monitoring	Koala habitat Wildlife	Impacts to rainwater tanks	Leachate	Ground water contamination	Storm water & flood water	Perception it is a dump	Proximity to town/residences	Impacts to community helth & well being	Generic letter submission
Elsewhere in NSW																						
SE-13919052	Armidale	NSW	2350	Organisaton		✓	✓			✓							✓	✓				
SE-13981880	Armidale	NSW	2350	Organisation	✓	✓	✓	✓	✓	✓								✓				
SE-14016707	Coonabarabran	NSW	2357	Organisation	✓	✓	✓		✓	✓	✓									✓		
SE-13942059	WESTDALE	NSW	2340	✓		✓	✓				✓											
SE-13990095	BOGGABRI	NSW	2382					✓		✓			✓				✓					
SE-13903735	ARMIDALE	NSW	2350			✓	✓										✓	✓				
SE-13862226	BLACK HEAD	NSW	2430									✓								✓		
SE-13922603	COONABARABRAN	NSW	2357		✓												✓					
SE-13983106	Qurindi	NSW	2343								✓					✓	✓		✓		✓	
SE-13981834	MAROUBRA	NSW	2035		✓	✓	✓							✓								
SE-13976298	GLEN INNES	NSW	2370					✓		✓									✓	✓		
SE-13961091	BOGGABRI	NSW	2382																✓		✓	
SE-13966848	CHARLESTOWN	NSW	2290														✓	✓				
SE-13969957	COOKS HILL	NSW	2300														✓			✓	✓	
SE-13931021	BREWARRINA	NSW	2839		✓	✓	✓										✓	✓		✓		
SE-13931216	Brewarrina	NSW	2839		✓	✓					✓		✓							✓	✓	
SE-13931248	WESTDALE	NSW	2340																✓	✓		
Total				1	6	8	7	3	2	5	4	1	2	1		1	8	5	4	7	4	
Victoria																						
SE-13861766	MOUNT ELIZA	VIC	3930											✓								
SE-13925803	ST KILDA EAST	VIC	3183														✓			✓		
SE-13926015	ST KILDA EAST	VIC	3183	✓	✓	✓	✓							✓			✓			✓		
Total				1	1	1	1							2			2			2		
Queensland																						
SE-13931038	THE RANGE	QLD	4700		✓	✓	✓										✓	✓		✓		
SE-13931073	QUILPIE	QLD	4480		✓	✓	✓										✓			✓		
SE-13926878	UPPER COOMERA	QLD	4209															✓	✓	✓		
					2	2	2										2	2	1	3		
International																						
SE-13905738	New York	USA	10128											✓								
90 submissions																						
		Totals		39	31	43	40	28	7	9	42	1	20	5	8	6	45	38	19	54	21	12

Public Submissions					
SE-13991972	Gunnedah	NSW	2380	Public Authority	GSC
SE-12631227	Sydney	NSW		Public authority	State Planning
SE-13686576	Grafton	NSW	2460	Public authority	TfNSW
SE-13687272	Haymarket	NSW	2000	Public authority	TfNSW
SE-14212847	Armidale	NSW	2350	Public authority	EPA

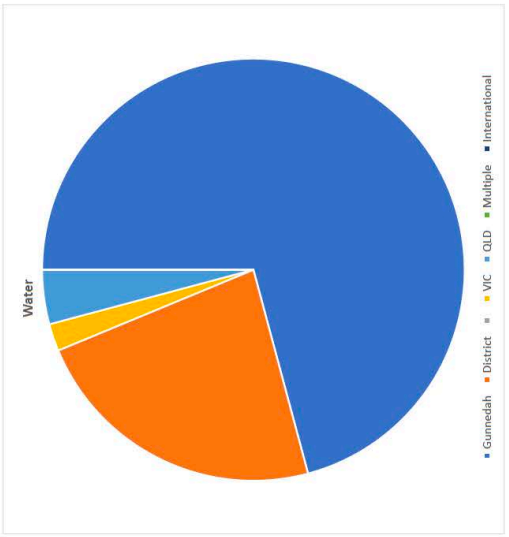
Colour Codes for Areas of Submission		
	Gunnedah address	57
	Gunnedah district address	9
	Elsewhere in NSW	17
	Victorian address	3
	Queensland address	3
	International submission	1
		90

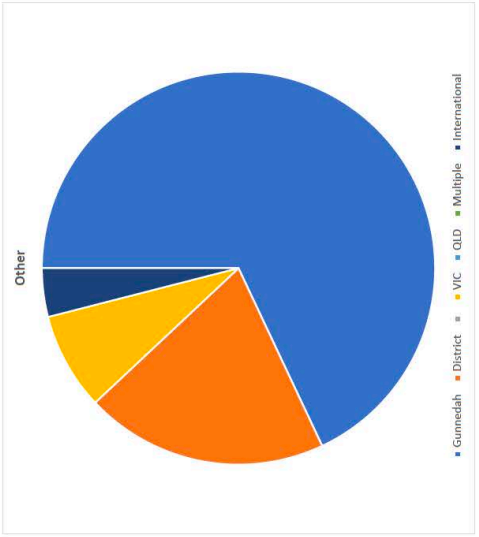
Includes multiple

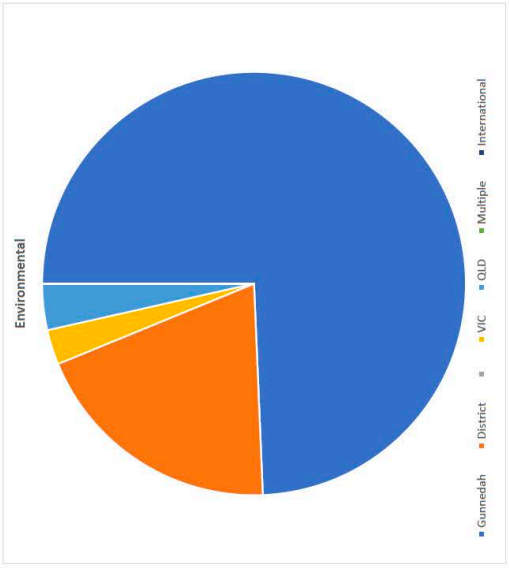
4 x organisation

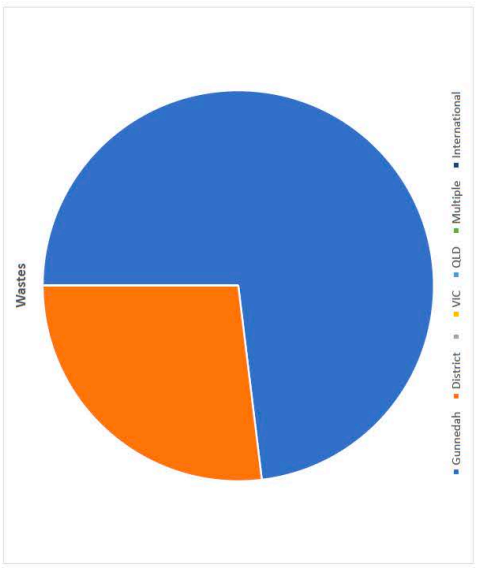
Social		Environmental		Water		Traffic		Wastes		Other	
Proximity to town/residences	54	Dust/Airborne particles	39	Storm water & flood water	38	Increase in truck movements	40	Contaminated or toxic waste	42	Monitoring	20
Perception it is a dump	19	Toxic Fumes &/or air Pollution	31	Leachate	6	Movement of waste from other blocations	28	SANTOS waste	9	Koala habitat Wildlife	5
Impacts to community helth & well being	21	Noise	43	Ground water contamination	45	Road system capacity	7	Dangerous products	1		
	94		113	Impacts to rainwater tanks	8		75		52		25
					97						

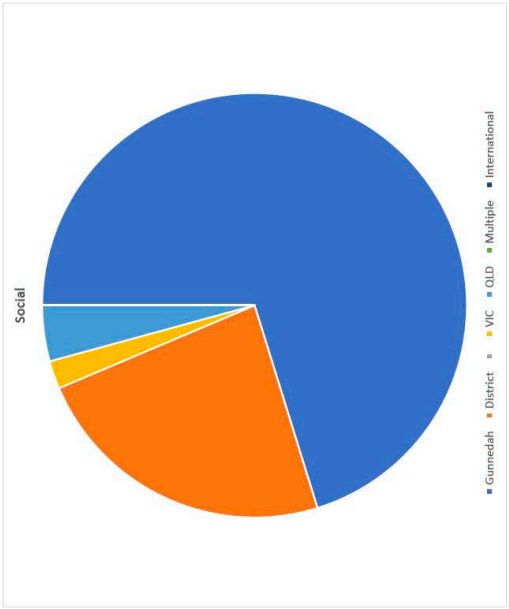
		Social	Environmental	Water	Traffic	Wastes	Other	
	Gunnedah address	66	84	68	57	38	17	Gunnedah
	Gunnedah district address	22	22	22	16	14	5	District
	Elsewhere in NSW							
	Victorian address	2	3	2	1	0	2	VIC
	Queensland address	4	4	4	2	0	0	QLD
	Multiple submissions							Multiple
	International submission	0	0	0	0	0	1	International
		94	113	96	76	52	25	

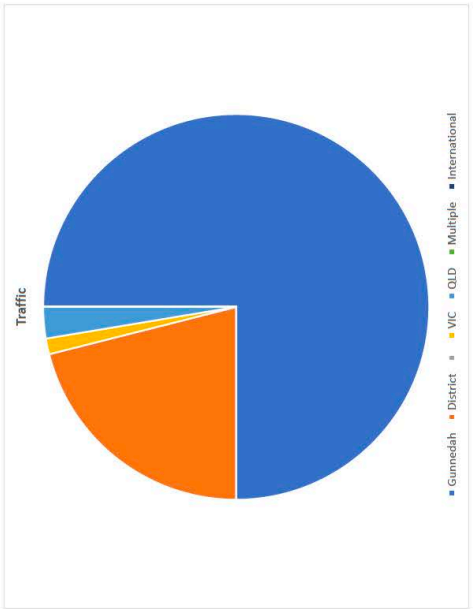

Water
Gunnedah
District
VIC
QLD
Multiple
International


Other
Gunnedah
District
VIC
QLD
Multiple
International


Environmental
Gunnedah
District
VIC
QLD
Multiple
International


Wastes
Gunnedah
District
VIC
QLD
Multiple
International


Social
Gunnedah
District
VIC
QLD
Multiple
International


Traffic
Gunnedah
District
VIC
QLD
Multiple
International

Appendix A2: Further Community Consultation

Meeting with neighbours in relation to the proposed Gunnedah Resource Recovery Facility

3.2.2021

In attendance and location: As per attached attendance sheet

Opening Comments by Tim

1. Tim stated his position on the company and broadly what he was responsible for.
2. Tim stated that he was happy to attend this meeting today to answer any questions regarding the development that people may want to ask. If he didn't know the answer, he would seek clarification and revert back to the person asking the question.
3. Tim stated that MEX had engaged consultants, subject matter experts, engineers and relevant professionals to develop the EIS and guide us through the process. He had an overarching understanding of the proposal but not all of the finer detail.

Discussion points

Consultation

4. Tim was asked about consultation in relation to the stated letter box drop. Tim stated that he delivered the newsletter himself personally to the letterboxes nominated in the EIS based on guidance from our consultant and that this was intended to initiate consultation by giving a brief overview of the development and giving contact details for either Tim or Brendon (landline or email) for further information and/or discussion
5. No public forum was held at the time of newsletter distribution due to the considerations of public gatherings at the time of a pandemic.
6. The full submission, EIS and accompanying 25 associated files, were all available on the Major Projects site from mid December.
7. Department of Planning had also notified of all people they deemed to be impacted by the development in writing with the web address for all files associated with the proposed development. MEX had received a notification from State Planning by mail in mid December.
8. Tim had to challenge Dianne Rankin in relation to swearing at him and he stated that he would leave the meeting if this was to be the standard of interaction. Tim stated that he would afford Dianne the respect she was entitled to and that he had an expectation of the same.

Acid Sulphate Soils

1. Tim was asked about acid sulphate soils. Tim stated that there were two classes being proposed to be accepted onto site; ASS and PASS. His understanding of these soils is that generally they are treated with the addition of lime to bring the pH back to a more neutral level and that once done, they can be reclassified. Tim was asked where the lime for treating the soils would be stored and he answered that, to the best of his knowledge, it would be stored in the main processing shed.

Flood Zone

1. Brian Edmonston and Bob Ironmonger both commented that the proposed site was in a flood prone area. Tim stated that the EIS did not show the development site as being flood prone and that this information came from Councils flood maps.
2. Bob Ironmanger said his property had been flooded by water in March of 2019 that ran down a watercourse adjacent the industrial subdivision MEX had developed. This watercourse had been built as part of the subdivision development. Tim noted that this water had come from land had surrounding the old abattoirs site that that site was being developed by another developer. The MEX subdivision had been built to Council approved development plans.
3. Several attendees asked what was to become of stormwater from the development site. Tim stated that a full water management plan had been developed that included onsite detention tanks to deal with surface water and any leachate.
4. Concerns were raised with regard to contaminants reaching the water table or Namoi River. Tim stated that the waste stream MEX were proposing to deal with would not contain any chemical, toxic or biological waste so the potential for any groundwater or waterway to be contaminated would be negligible. The water management plan considered leachate and necessary controls such as OSD tanks.
5. Tim stated that there were probably more reasons to be concerned about what was in any floodwater running past/over their places that had come from other places as opposed to what may come from the proposed development site that had proper controls in place.

Water

1. Tim was asked where the water for the facility would come from. Tim answered that it would come from the town water system that supplies the other businesses in the estate. Tim was asked if this was a legitimate use of water given that we had just come out of one of the worse droughts in history. Tim answered that this business was as relevant and entitled to use the water supply as other businesses in the estate and that we would be paying the same as all other commercial users. It's relevant to note that the defunct abattoir that would have previously used hundreds of thousands of litres of water every month was never considered as an excessive user.
2. Tim was asked if there would be surface water monitoring on the site (volumes discharged). Tim stated that he was unaware if this was proposed and that if it did occur, it would most probably be as a condition of an EPA license if the development got the go ahead.

Hours of Operation

1. Tim was asked if the facility was proposed to operate 24 hours/7 days per week. Tim stated that this was not a part of the proposal and if it was proposed in the future it would be subject to a modification of DA.
2. Tim was asked if the facility would operate on Saturdays. Tim answered that it was proposed to run on Saturdays however the EIS states that heavy plant will not be used on Saturdays.

Asbestos

1. Tim was asked if we were going to be processing asbestos. Tim stated that we had no intention of processing any asbestos related materials. The only asbestos related activities we would be doing is to act as a transfer facility for encapsulated asbestos that had come from an licensed asbestos remover. Encapsulated asbestos is twice plastic wrapped asbestos.
2. Tim stated that the encapsulated asbestos would be stored in a separate secure storage facility. It would be moved in loads of approximately 30 tonnes to a facility licensed to receive and dispose of asbestos waste. There would be an upper limit of 1,000 tonnes per annum
3. Tim was asked how we would ensure that no asbestos fibres became airborne. Tim stated that as it was encapsulated asbestos from a licensed asbestos remover, the likelihood of fibres escaping would be negligible.
4. Tim was asked if he had seen someone die from cancer. Tim stated he failed to see the relevance of the question but did acknowledged that he had witnessed his grandmother die from cancer.
5. Tim was asked what happens if a load turns up that has asbestos in it. Tim explained that business that transport waste have to have an EPA license to do so. He further stated that all commercial waste loads have to be accompanied by appropriate documentation that identifies what the waste is. Part of the EIS contains protocols for what will happen if there are unexpected finds of asbestos.
6. Tim was asked how we would guarantee that no free asbestos comes onto site. Tim explained that no absolute guarantees can be given and that is why we have to have protocols in place for such a circumstance. All trucks would be inspected on arrival at the weighbridge where an aerial viewing platform would be utilized to inspect the load. Any load detected with asbestos would be denied entry to site and sent back to its dispatch point. All relevant details would be retained, and the incident reported to the necessary authorities if required
7. A further inspection of the load would take place as it was being unloaded in the unloading shed. If asbestos was detected, it would be immediately quarantined, necessary reports generated and as soon as practically possible, the contaminated material would be dispatched to a facility licensed to receive and dispose of the asbestos.
8. Tim stated that there will be an extensive, zone specific water misting dust control system installed in the unloading shed to further mitigate and control any chance of dust and/or airborne particles impacting the locality.
9. Tim was asked if facility staff will be trained to identify asbestos. Tim stated that an extensive training programme will be undertaken to have facility staff fully aware of all procedures, waste categories, potential hazards and risks. This training programme would be an ongoing programme and would also be a basis of our quality assurance.

Noise.

1. Tim was asked how are we going to control noise. Tim stated that all unloading activities will occur in the unloading shed. The shed is predominantly constructed of 250mm thick x 4 metre high concrete panels. This will have a substantial impact on any noise generated at the facility. In

addition to that, Tim was of the understanding that insulation will be used on the colorbond section of the walls which would add further noise mitigation.

2. Tim was asked if there would be any noise monitors onsite. Tim stated that if there was to be noise monitoring then this would probably be as a condition of the EPA license. Noise modelling had been done by expert consultants in that field that indicated that the facility would have minimal impact from a noise perspective.

Vehicle movements.

1. Tim was asked what the number of vehicle movements were. Tim stated that this was covered in the EIS and anything that is a part of the EIS would form the basis of the Conditions of Consent. Tim stated that from his calculations, to move the maximum volume of material to site would be an average 1.5 to 2.5 trucks per hour for the hours of operation. He did state that this was an average and that some periods may see high activity and some periods may see no activity.
2. Tim stated that access to and from the site would be via Torrens Road.

Assorted miscellaneous discussion points.

1. Tim was asked how the site would be fenced. Tim stated that a security fence of similar style to those around other businesses would be erected
2. Tim was asked why MEX had not maintained the vegetation screen on the western side of the vacant blocks to the north of them. Tim stated that these blocks had been purchased by a Hunter Valley based business who had not established a facility on them. Due to the fact that they are owned by another party, MEX are not responsible for their maintenance. Trees on our proposed development block had been replanted several times in recent years however due to prolonged periods of drought they had struggled to survive. The most recent planting are, however, starting to thrive albeit that they are still smallish.
3. Tim was asked if we plan to extend the site. Tim explained that as we only owned the block that our current facility sits on and the one immediately to the north, then our capacity to extend is nonexistent without acquisition of additional land. Currently no additional land is available.
4. Tim was asked why MEX were proposing to deal with waste from outside the area. Tim stated that the EPA have a focus of having these facilities develop where there is adequate space for them, good transport access and low population density. There is also a focus to reduce the volume of re-usable material going to landfill unnecessarily.
5. Tim stated that the focus of the facility was to recover as much of reusable and recyclable resources as possible and for a minimum amount to go to landfill.

Meeting Attendance Record

Meeting Details			
Meeting Name:	Meeting with MacKellar Excavations Neighbours		
Meeting Date:	3.2.2021	Meeting Time:	4.00pm
Location:	Civic Meeting Room, Gunnedah		
Meeting Facilitator:	Paul Rankin (Neighbour), Tim MacKellar (MEX)		

Attendees

	NAME	Contact	COMPANY	SIGNATURE
1.	Tim MacKellar	(Personal contact details have been removed on privacy grounds)	MEX	
2.	Paul Rankin		10255 Kamilaroi Hwy	
3.	Janice Squire		10279 Kamilaroi Highway	
4.	BRIAN [illegible]		10200 Kamilaroi Hwy	
5.	Luke Finlay		10221 Kamilaroi Hwy	
6.	Bob [illegible]		10176 Kamilaroi Hwy	
7.	Liz [illegible]		10176 Kamilaroi Hwy	
8.				

FACT SHEET DISTRIBUTED TO COMMUNITY IN MARCH 2021

Recycle Reclaim Re-use

FACT SHEET

GUNNEDAH RECYCLING & RESOURCE RECOVERY FACILITY

Benefits

The Gunnedah Recycling & Resource Recovery Facility (**GRRF**) would reclaim a wide range of recoverable resources from waste so that it can be either recycled or re-used. Much of this reclaimed material can be used locally and elsewhere in New South Wales and Australia.

The **GRRF** will support future industrial development in the Gunnedah region, with significant environmental benefits through redirecting waste from landfill sites to recycling or re-using these waste streams. Significantly, it has the potential to create a whole new employment stream for Gunnedah that does not rely on mining and will effectively create jobs and attract workers from the city to the bush.

Changes Proposed Following Recent Community Input

In response to concerns raised by locals, residents and others, the following significant amendments have been made to the proposed development.

- **NO ASBESTOS will be received, processed, or stored for transfer, at the site.**
- **NO LITHIUM will be received, processed, or stored for transfer,**

Suitability of the site

The site is suited to the proposed resource recovery facility for several reasons, including:

- The project site forms part of land that has been specifically developed to accommodate industrial uses such as this Project.
- The project is within an existing general industrial area surrounded by other compatible developments and land uses, adequately separated from sensitive receivers.
- The project site has no significant development constraints and can be developed for the purposes of the proposed waste facility.
- The Site is readily accessible to major transport links, including the Oxley Highway, New England Highway, Newall Highway and the Kamillaroi Highway.

The proposed waste facility complies with relevant planning objectives, controls and guidelines. The use is permissible in the INI General Industrial zone under Gunnedah Local Environmental Plan 2012.

The Proposed Facility

- The development is a Recycling & Resource Recovery Facility that will receive no toxic or hazardous waste. An example of waste that will be handled at the facility is Construction & Demolition waste (C & D waste). The waste will be processed through a trommel screen to separate out dirt (the main component), timber, brick/concrete/tile and plastic.
- An EPA licence will confirm what can be accepted at the facility.
- **ALL** unloading and separating activities will occur indoors in a purpose built shed that comprises a combination of 4-metre-high x 250mm thick concrete panels at the base of the walls for noise minimisation and Colourbond above those panels.

Recycle Reclaim Re-use

- A comprehensive, zone sensitive, water misting dust suppression be a part of the processing shed
- There are protocols in place for the receiving of any waste to the facility which are part of the submission to State Planning. The key goal of these protocols are to prevent unlicenced waste coming onto site.
- All waste coming onto site will go through a two-step inspection process. First at the weighbridge via a viewing gantry and secondly in the unloading shed as unloading is occurring. Any load detected with non-conforming material at the weighbridge will be denied entry and sent back to their dispatch point. Any load detected with non-conforming material whilst unloading, will be immediately reloaded and sent back to their dispatch point.
- All waste coming onto, and going out of, the site must be accounted for. Two weighbridges will be part of that monitoring process.
- In most circumstances, the dirt recovered from the separating process can be re-used for top dressing, engineering purposes, fill or rehabilitation works.

- Timber waste can be shredded and utilised in furnaces
- Brick/concrete/tile materials will be crushed and re-purposed as road base
- The other items recovered are sent onto facilities licenced to deal with these type of materials. E.g paper and metals.
- The 14 open bays noted within the design are for the storage of recovered resources such as timber, metals (ferrous/nonferrous), ceramics, baled plastics etc
- Paper will be baled and stored internally until dispatched to a paper recycling facility
- That portion that cannot be reclaimed (approx. 25%) will go to landfill and is predominantly small pieces of plastic. This will be baled to consolidate it before it goes to landfill for potential re-use at a later date as there are emerging technologies in Europe that utilise plastics in furnaces
- All road surfaces at the facility will either be two coat sealed or asphalted to control wheel generated dust. All trucks exiting the site will go through a wheel wash/rumble grid combo to prevent mud and or dirt being dragged onto the local road network.
- The stormwater design will accommodate any stormwater runoff from the site and manage this in accordance with the relevant Guidelines;
- There is a leachate control system within the design plan to manage any leachable materials at the site.
- The entire site will have a vegetative screen established and a 1.8 metre high security fence around the perimeter. The fence will be screened with printed shade cloth to further minimise any visual impacts.
- The EIS has been collated using the expertise of consultants from many disciplines of town planning, engineering, traffic management and is comprehensive by nature.
- The potential for any odours or dust is minimal given the waste stream we are dealing with and the strategies being taken to minimise dust within the processing shed and from vehicle movements.
- It has the potential to create a whole new employment stream for Gunnedah that does not rely on mining and will effectively create jobs and attract workers from the city to the bush
- Income earned from the facility will be predominantly from the materials we recycle.

Recycle Reclaim Re-use

What will be accepted at the recycling facility?

1. About **50%** of the intended waste is excavated natural materials (ENM) that meet the lowest contaminated thresholds (CT1 thresholds) for soils.
Only soils and excavated natural material that meet the CT1 thresholds as per the EPA's guidelines will be accepted at the proposed recycling facility. This material would be mechanically sorted by front-end loader in the unloading shed prior to screening with a trommel in the processing shed.
2. About **25-30%** of the waste stream will be Construction and Demolition (C&D) waste, with about **15%** being Commercial and Industrial (C&I) waste.
The C & D waste includes bricks, concrete, tiles, suitable slags and concrete batching waste, asphalt, rail ballast spoils, and any other material meeting the definition of Construction and Demolition waste as defined in the EPA Waste Classification Guidelines Part 1: Classifying Waste.
C & I waste includes paper/cardboard, plastics, rubber, plasterboard, cement fibre board, ceramics, glass, styrene, and metals. This material would be mechanically sorted by front-end loader in the unloading shed prior screening in the enclosed processing shed in accordance with the EPA guidelines and stockpiled. It can then be offered for resale as a recycled product, or, if not suited to recycling, then removed to a licensed facility.
3. About **10%** of the intended waste is acid sulphate soils or potential acid sulphate soils (ASS & PASS). Acid sulphate soils (ASS) would be blended with lime on site to restore it back to a normal pH. Once treated, these soils can potentially be used for other beneficial purposes; not just sent to landfill.

Some of the recycled materials will be: -

1. **Road base (crushed concrete)**: Suitable for use on roads where traditional quarried products would be applied.
2. **Road base (crushed concrete/brick/tile/asphalt/cement fibre board)**: Suitable for use on roads either a base course or sub-base.
3. **Recovered railway ballast**.
4. **General fill soil (Excavated Natural Material - ENM) or topsoil**.
5. **Select Fill** This material is placed directly on the sub-grade to improve sub-grade performance.
6. **Bedding Material** (crushed concrete/brick/cement fibre board/screened gravelly soil): Screened material with about a 7mm maximum particle size used as a support for paving blocks, pipe bedding, concrete under slab fill, retaining walls, block infill, cycleways or on lightly trafficked access-ways.
7. **Drainage medium** (crushed concrete/brick): Backfilling material for stormwater pipes, sewer pipes or subsurface drainage lines.
8. **General fill** – Hardstand material: Recycled materials that have been crushed and screened to a sizing requirement for specific applications can be utilised as a general or engineered fill in road making applications.

Hours of operation

- The proposed recycling facility will normally operate and accept deliveries between 7.00 am and 6.00 pm Monday to Saturday, excluding public holidays.
The operation of heavy machinery is only able to occur between 7.00am-5.00pm Monday to Friday.
No recycling facility operations to be undertaken on Sundays or public holidays.
Construction hours would be 7.00am to 5.00pm Monday to Friday and 8.00am to 1.00pm Saturdays.
- The maximum number of truck movements required per day to move the maximum volume, should approval be given, is 12 hour per hour; 6 in & 6 out. This is based on a six-day operating week and operating between the hours of 7.00am and 6.00pm.
- At the time of the 2017 Motor Vehicle Census (MVC) traffic volumes along the Kamillaroi Highway were noted as high as 2,100 vehicles per day or 87.5 per hour so any truck movements from our site will have minimal additional impact.

Recycle Reclaim Re-use

MacKellar Equipment Hire will more broadly advertise the changes now proposed following the recent community input. Further community input is to be sought prior to submitting the final response to State Planning for determination of the application.

An aluminium can that is discarded will still be there 500 years from now. An aluminium can – can be recycled, filled and back on a grocery store shelf as a brand-new can in just 60 days.

Fact 3 - Reducing Our Plastic Consumption Is Critical to Reducing Plastic Pollution

Australians throw away 3.5 million tonnes of plastic each year, but currently, only about 9.4 percent makes its way to a recycling facility.

Fact 4 - Glass Bottles Can Take 4000 to One Million Years to Decompose

Aussies consume 1.36 million tonnes of glass packaging per year. It can take up to 4000 to one million years for that glass to completely disintegrate. Glass is 100 percent recyclable and can be recycled and reprocessed an infinite number of times.

Fact 5 - Bottled Water Production Generates More Than 60,000 Tonnes of Greenhouse Gas Emissions

Australia's annual use of bottled water generates more than 60,000 tonnes of greenhouse gas emissions.

Australia recycles only 36% of the 582.9 million plastic bottles we consume each year. Recycling just one tonne of plastic bottles saves the equivalent electricity use of a two-person household for one year.

Fact 6 - Cardboard Can Be Recycled Up to Eight Times

Cardboard recycling is a simple yet effective way to make a difference to our environment.

Making cardboard from recycled material, rather than brand new fibre, saves not only trees, but also large amounts of water (up to 99% less) and energy (up to 50% less). One tonne of recycled cardboard saves almost 175 litres of oil and up to 250 cubic feet of landfill space.

Fact 7 - E-Waste Is Responsible For 70% of The Toxic Chemicals Found in Landfill

E-waste is responsible for 70% of the toxic chemicals, including lead, cadmium and mercury, that ends up in landfill.

Fact 8 – 8.2 Million Tonnes of Australia's Food Waste Ends Up in Landfill

The sad news is 8.2 million tonnes is food waste that ends up as landfill, enough to fill more than 10,000 Olympic swimming pools. Only about 5% of our household food waste is diverted from landfill.

Who to Talk to or Email for More Information?

Brendon MacKellar 0412 272 770 Director
brendon@mackexc.com.au
Tim MacKellar 0438 614 856 General Manager
tim@mackexc.com.au

16 Torrens Road, Gunnedah. NSW. 2380

MEX
MACKELLAR EXCAVATIONS

ARTICLE IN LOCAL NEWSPAPER 2 MARCH 2021 ADVISING THAT ASBESTOS & LITHIUM BATTERIES TO BE SCRAPPED FROM PROJECT

4 NORTHERN DAILY LEADER Tuesday March 02, 2021 northerndailyleader.com.au

NEWS

Goodbye asbestos, lithium

BY JESSICA WORBOYS

ASBESTOS and lithium will not be stored at the proposed Gunnedah Waste Facility on Torrens Road, if it is approved.

Proponent MacKellar Excavations made the decision to cut the two out of its plan for the resource recovery site, after locals raised numerous concerns about the potentially harmful nature of the materials.

Locals were informed of the change at a meeting at Emerald Hill Hall on Saturday, where the project and the Marys Mount Quarry Expansion were both discussed.

MacKellar Excavations general manager Tim MacKellar said descriptions of the project, such as "toxic waste dump", were far from accurate.

"It's not a dump ... its prime focus is to reclaim, reuse and recycle," Mr MacKellar said.

"The majority of this stuff goes to landfill. What we're proposing is very beneficial to the environment, which is taking these resources and putting them back into recirculation."

He said while locals were concerned about asbestos and lithium being processed at the facility, they were simply going to be held there before being transferred to a licensed facility after the limit was reached.

"That was encapsulated asbestos, it comes from a licensed remover, and is twice wrapped in plastic and sealed. We could receive 1000 tonnes maximum," he told the *Leader*.

"Lithium batteries was 500kg, or half a tonne maximum.

"The thing that surprised me with the commentary about lithium batteries is most people who posted things to social media would've been done on a personal device powered by lithium batteries.

"If there's such a concern, why do they have phones and tablets?"

Meeting attendees told the *Leader* they were disappointed Mr MacKellar didn't attend Saturday's meeting, but he said they hadn't been invited.

He said they would be planning community consultation sessions in the near future, so they could meet with concerned residents.

"We acknowledge the community's concerns and we're going to be proactive in putting sessions in place," Mr MacKellar said.

"We'll do our best to allay the fears they were perceiving that this development poses to them.

"The reality is, the population is growing, more waste is going to get generated and the upside is, we're much better processing and claiming out of it than sending it to landfill."

Locals meantime, said they plan to continue meeting to discuss the projects. Bob Ironmonger said they would be willing to hear from MacKellar Excavations.

"We're not close minded to what he has to say."

Big bands bringing beats to city park

TAMWORTH will be put on the musical map in May when a brand new festival sets up at the park, starring popular headline acts Spacey Jane and Ocean Alley.

Next Exit Festival will be held at Bicentennial Park on Friday, May 21, and Aussie bands are set to play live and light up the night.

Psych-rock outfit Ocean Alley and triple j Hottest 100 success story Spacey Jane and regional towns, after a tough run for the arts and for tourism amid the COVID-19 pandemic and before that, devastating bushfires.

"We pass so many 'Next Exit' signs on the highway and often drive past with only our destination in sight," MJR Presents head of touring Scott Mesiti said.

"We have designed a safe festival that ... will employ many people from our in-

NOTICE OF COMMUNITY MEETINGS MARCH 2021

RECYCLE, RECLAIM AND REUSE

RECYCLING FOR A CLEANER, GREENER ENVIRONMENT

A new, safe development for Gunnedah

This is what the proposed recycling centre is about. The proposal is based on being able to RECYCLE, RECLAIM AND REUSE as much material as possible.

Why do we need a recycling and resource recovery facility?
We need the facility because currently there is thousands of tonnes of recoverable resources going into landfill. These resources includes recoverable soils that can be used for rehabilitation works, top dressing and engineering purposes, ferrous and non ferrous metals that can be reused over and over again, paper and cardboard that can be recycled over and over again, timber that can be shredded and used as furnace fuel, brick, tile and concrete rubble that can be crushed and used for building pads and roads.

Reclaim, recycle and reuse
The world has finite resources and we need to reuse them as much as we can as it is a great outcome for the environment and creates employment opportunities for our community. Our development will not impact native wildlife habitat. It will enhance it through the planting of 36 Australian Eucalypt trees around the facility as a vegetation screen.

What changes have been made to the proposal? The biggest change to the proposal is that asbestos and lithium batteries are being removed from the applications. These wastes will not be accepted, stored for transfer, or processed at the resource recovery facility.

So, what are the potential benefits of this development?
A development such as this has potential positive impacts for the environment by reusing and preserving resources and expanding regional employment opportunities.

Be on the look-out For our fact sheet that is being distributed throughout the community. It will give you all the facts about what is and what is not happening in relation to the proposed recycling and resource recovery facility at Gunnedah.

If you are keen to learn more, take a look at the ABC's episode of Australian Story that aired recently, The Tipping Point | Veena Sahajwalla. Here's the link https://www.abc.net.au/austory/the-tipping-point/13164736

What if I have more questions? We welcome any further enquiries you may have in relation to our project and encourage you to contact us directly via phone or email, to learn more about the facts.

We also have community consultation meetings next Tuesday and Wednesday, March 9-10 at the Gunnedah Civic Centre and we invite interested people to register to attend. Due to COVID safe considerations, meetings are limited to 30 people. To register email office@mackexe.com.au with preferred day and time.

Meeting times:
Tuesday: 1pm, 3pm and 6.30pm
Wednesday: 7.30am, 1pm and 6pm

We are a long established local business committed to Gunnedah community

Phone 02 6742 4222 | MEX MACKELLAR EXCAVATIONS | www.mackexc.com.au

NEWSPAPER NOTICE 4 MARCH 2021: COMMUNITY MEETINGS

THURSDAY, MARCH 4, 2021 GUNNEDAH TIMES

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MEX MACKELLAR EXCAVATIONS

www.mackexc.com.au

ATTENDANCE SHEETS COMMUNITY MEETINGS HELD 9-10 MARCH 2021

Meeting Attendance Record

TUESDAY

Meeting Details

Meeting Name:	**Community Consultation Meeting – Resource Recovery Facility**		
Meeting Date:	**9.3.2021**	**Meeting Time:**	**1.00pm**
Location:	**Studio Room, Gunnedah Civic Centre**		
Meeting Facilitator:	**Brendon MacKellar**		

Attendees

	NAME	Contact	Company/Address	SIGNATURE
1.	Ian Dunnet	(Personal contact details have been removed on privacy grounds)	Gunnedah Times	
2.	Steve Benham			
3.	CATH DRIES			
4.	RICHARD SLIP			
5.	LIZ HIGHAM			
6.				
7.				5
8.				

30.	Lynne MacKellar	0412029588		
31.	Brendon MacKellar	0421 272 770	MEX	Brendon MacKellar
32.	Tim MacKellar	0438 614 856	MEX	Tim MacKellar
33.	Gary Peacock	0418 242 762	Outline Planning	Gary Peacock
34.	Peter Long (Moderator)	0429 024 428	Rural Law	Peter Long (Moderator)

Meeting Attendance Record

TUESDAY

Meeting Details			
Meeting Name:	Community Consultation Meeting – Resource Recovery Facility		
Meeting Date:	9.3.2021	Meeting Time:	3.00pm
Location:	Studio Room, Gunnedah Civic Centre		
Meeting Facilitator:	Brendon MacKellar		

Attendees				
	NAME	Contact	Company/Address	SIGNATURE
1.				
2.				
3.				
4.				
5.				
6.				
7.				

(No community attendees at this session)

31.	Brendon MacKellar	0421 272 770	MEX	Brendon MacKellar
32.	Tim MacKellar	0438 614 856	MEX	Tim MacKellar
33.	Gary Peacock	0418 242 762	Outline Planning	Gary Peacock
34.	Peter Long (Moderator)	0429 024 428	Rural Law	Peter Long (Moderator)

Meeting Attendance Record

TUESDAY

Meeting Details

Meeting Name:	Community Consultation Meeting – Resource Recovery Facility		
Meeting Date:	9.3.2021	Meeting Time:	6.30pm
Location:	Studio Room, Gunnedah Civic Centre		
Meeting Facilitator:	Brendon MacKellar		

Attendees

	NAME	Contact	Company/Address	SIGNATURE
1.	JULES BAILEY	(Personal contact details have been removed on privacy grounds)		
2.	BOB IRONMONGER			
3.	LIZ IRONMONGER			
4.	BRIAN EDMONDSTON			
5.	PARTNER Gwen Hi			
6.	NELLIE LINCOLN			
7.				
8.				
9.				

31.	Brendon MacKellar	0421 272 770	MEX	Brendon MacKellar
32.	Tim MacKellar	0438 614 856	MEX	Tim MacKellar
33.	Gary Peacock	0418 242 762	Outline Planning	Gary Peacock
34.	Peter Long (Moderator)	0429 024 428	Rural Law	Peter Long (Moderator)

Meeting Attendance Record

WEDNESDAY

Meeting Details

Meeting Name:	Community Consultation Meeting – Resource Recovery Facility		
Meeting Date:	10.3.2021	Meeting Time:	7.30am
Location:	Studio Room, Gunnedah Civic Centre		
Meeting Facilitator:	Brendon MacKellar		

Attendees

	NAME	Contact	Company/Address	SIGNATURE
1.	CATH DRIES	(Personal contact details have been removed on privacy grounds)		
2.	ANDREW BENHAM			
3.	RENEE BENHAM			
4.	PAM BURNS			
5.	ANDY M'GOWAN			
6.				
7.				5
8.				

31.	Brendon MacKellar	0421 272 770	MEX	Brendon MacKellar
32.	Tim MacKellar	0438 614 856	MEX	Tim MacKellar
33.	Gary Peacock	0418 242 762	Outline Planning	Gary Peacock
34.	Peter Long (Moderator)	0429 024 428	Rural Law	Peter Long (Moderator)

Meeting Attendance Record

WEDNESDAY

Meeting Details

Meeting Name:	Community Consultation Meeting – Resource Recovery Facility		
Meeting Date:	10.3.2021	Meeting Time:	1.00pm
Location:	Studio Room, Gunnedah Civic Centre		
Meeting Facilitator:	Brendon MacKellar		

Attendees

	NAME	Contact	Company/Address	SIGNATURE
1.	JULIE HEILER	(Personal contact details have been removed on privacy grounds)		
2.	PENNY CRAWFORD			
3.	ROSS URQUART			
4.				
5.	P. MURRAY			
6.	S. WILSON			
7.	R URQUHART			
8.	M. Moon			
9.	Julie Heiler			
10.				
11.				
31.	Brendon MacKellar	0421 272 770	MEX	Brendon MacKellar
32.	Tim MacKellar	0438 614 856	MEX	Tim MacKellar
33.	Gary Peacock	0418 242 762	Outline Planning	Gary Peacock
34.	Peter Long (Moderator)	0429 024 428	Rural Law	Peter Long (Moderator)

Meeting Attendance Record

WEDNESDAY

Meeting Details			
Meeting Name:	Community Consultation Meeting – Resource Recovery Facility		
Meeting Date:	10.3.2021	Meeting Time:	6.00pm
Location:	Studio Room, Gunnedah Civic Centre		
Meeting Facilitator:	Brendon MacKellar		

Attendees

	NAME	Contact	Company/Address	SIGNATURE
1.	DEEANNE RANKIN	(Personal contact details have been removed on privacy grounds)		
2.	" "			Peter Wills (12)
3.	" "			Jo Tibbs (11)
4.	ANNA CHRISTIE			Inability rec'd by email
5.	AL KEARSLEY			
6.	Mary "			
7.	Bob ~~Anna~~ Wilks			
8.	Paul Rankin			
9.	Kate Trend			
10.	Andrew Trend			
11.	Jo Tibbs			J. Tibbs
12.	Peter Wills			
13.	Anna Wilks			
31.	Brendon MacKellar	0421 272 770	MEX	Brendon MacKellar
32.	Tim MacKellar	0438 614 856	MEX	Tim MacKellar
33.	Gary Peacock	0418 242 762	Outline Planning	Gary Peacock
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FACT SHEET ISSUED AFTER COMMUNITY CONSULTATION, 10 MARCH 2021 PROPOSING ONGOING COMMUNITY CONSULTATION

Recycle · · · Reclaim · · · Re-use

FACT SHEET

GUNNEDAH RECYCLING & RESOURCE RECOVERY FACILITY

As a result of requests for meaningful ongoing community consultation the following initiatives are now proposed:

Initiative 1: Proposed Community Consultation Committee

At one of the consultation sessions held 9-10 March 2021 a community consultation committee was proposed by a community member, to enable ongoing dialogue between the community and the operators of the Gunnedah Recycling & Resource Recovery Facility (GRRF).

The following draft condition of consent is proposed:

"*COMMUNITY CONSULTATION COMMITTEE*

The applicant must establish a community consultation committee, comprising members of the community and the applicant, that will meet once every 3 months. Discussion at the meetings must include implementation of the development consent and other statutory approvals, and provide adequate time for the community to raise matters of concern associated with the ongoing management, monitoring and effectiveness of mitigation measures associated with the approved development."

Initiative 2: Proposed Ongoing Access to Project Website

Access by the community to information regarding the ongoing management of the proposed recycling facility will be critical.

It is recommended that a web page be set up by the operators of the Gunnedah Recycling & Resource Recovery Facility, enabling access by the community, as well as the Planning Secretary of the Department of Planning Industry & Enviornment, to the latest information posted relating to such matters as ongoing environmental performance, monitoring, plans, audit reports and the like, as well as updates on the results of the proposed Community Consultation Committee.

In addition to Initiative 1 above, this measure will enable effective monitoring of the project by the community.

The following draft consent condition is proposed:

"*ACCESS TO INFORMATION*

At least 48 hours before the commencement of construction and for the life of the development, the Applicant must:

- *(a) make the following information and documents (as they are obtained or approved) publicly available on its website:*
  - *(i) the documents referred to in condition A2 of this consent and the final layout plans for the development;*

Fact Sheet Version dated 10 March 2021

Recycle · · · Reclaim · · · Re-use

- *(ii) all current statutory approvals for the development;*
- *(iii) all approved strategies, plans and programs required under the conditions of this consent;*
- *(iv) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent;*
- *(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;*
- *(vi) a summary of the current stage and progress of the development;*
- *(vii) contact details to enquire about the development or to make a complaint;*
- *(viii) a complaints register, updated monthly;*
- *(ix) the Compliance Reporting of the development;*
- *(x) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report;*
- *(xi) Minutes of meetings and follow up actions arising from each community consultation committee meeting;*
- *(xii) any other matter required by the Planning Secretary; and*

- *(b) keep such information up to date, to the satisfaction of the Planning Secretary."*

Fact Sheet Version dated 10 March 2021

Appendix B:

Updated mitigation measures table

[NOTE: New/amended mitigation measures are shown in ***bold italics***]

Table C1: Summary of Mitigation Measures: Construction Stage

Environmental Issue Construction Stage	***Mitigation measures during construction***
Pre-construction investigations, establishment	▸ *Existing condition and dilapidation survey of roads, light poles, and other government infrastructure. The Dilapidation Report will include a photographic survey of existing public roads, kerbs, footpaths, drainage structures, street trees and any other existing public infrastructure within the immediate area of the project site.* ▸ *Prior to start of construction on-site, licenses and approvals and worker training are required. Prior to commencing construction activities, all of the Head Contractor's employees shall attend a project induction workshop carried out by the Head Contractor. This shall be documented and all participants are to sign an attendance sheet.* ▸ *Notice shall be given to Gunnedah Council at least two (2) days prior to works commencing in accordance with Clause 104 of the EP&A Regulation 2000.* ▸ *Site development compound established and fenced off. Exclusion zones, including fenced exclusion zones, will be set up. Appropriate signage will be placed on areas at the entrance to the work zone, indicating the works area and restricted access to the site.*
Waste management	▸ *Waste mitigation strategies during construction would include the requirement for construction waste generated on site will be removed by a licensed waste contractor and sorted for recycling off-site.* ▸ *Use of pre-fabricated materials reduces the potential for generation of on-site construction waste.* ▸ *Use of existing toilet facilities provided on site.*
Hazards and risk, including fire	▸ *Existing hazards and risks associated with the operation of the existing depot are managed through the existing Mackellar Group management system which includes workplace health and safety management, and pollution incident response and emergency management eg. for fires, fuel spills and accidents.* ▸ *Mobile plant and vehicles will be fitted with fire extinguishers.* ▸ *Accesses to be managed to accommodate the turning path of all construction and any other heavy vehicles requiring access to the site eg. fire fighting vehicle. Use of existing lawful access points to the site, from Torrens Road and from Allgayer Drive.* ▸ ***Covering of outdoor storage bays**.*
Compliance reporting	*A Compliance Monitoring and Reporting Program to be prepared in accordance with the required Compliance Reporting Post Approval Requirements (Department Planning & Environment 2018) must be submitted to the Department and the Certifier.*
Signage	*A sign is to be erected and maintained in a prominent position on the site in accordance with Clause 98A(2) of the Environmental Planning and Assessment Regulation 2000 indicating all of the following:* ▸ *The name of the principal contractor (if any) for the building work and a telephone number on which that person may be contacted outside working hours,* ▸ *The name and address and telephone number of the Principal Certifying Authority (PCA) for the work (if relevant).* ▸ *Stating that unauthorised entry to the construction site is prohibited.*

Environmental Issue Construction Stage	Mitigation measures/risk treatment during construction cont.
Soil and water	▸ *Minimal site excavation proposed eg. weigh-bridge, services, building foundations, and leachate and stormwater management devices.Stockpiles of topsoil, sand, aggregate, soil or other material will not be located on any drainage line or easement, natural watercourse, footpath or roadway and will be protected with adequate sediment controls.* ▸ *Minor additional fill material to be applied to the site, to enable proper site drainage. All imported fill to be free of any contamination. Prior to the importation and/or placement of any fill material on the project site, a validation report and sampling location plan for such material must be provided to and approved by the PCA, confirming that it is free from contaminants and provides no risk to human health and the environment.* ▸ *Areas of fill to be regularly watered, for dust suppression. Reliance on existing town water supply and existing hose connection points on site, as well as water trucks (if required) for dust suppression.* ▸ *A sediment and erosion control plan to be prepared as part of any overall site environmental management plan dealing with the construction stage of the project. Sediment and erosion controls are to be effectively maintained at all times during construction and are not to be removed until works are completed. All such works are to accord with the requirements of the relevant guidelines, including Managing Urban Stormwater Soils and Construction, Volume 1 Landcom (the so-called 'Blue Book') and Gunnedah Council requirements, as set down in the Martens & Associates amended plans and drawings.* ▸ *The site environmental management plan will include an unexpected finds protocol to ensure that any contamination encountered during excavation can be appropriately managed.* ▸ *All excavated material will be tested for petroleum hydrocarbons at a laboratory, and if results exceed the applicable guideline limits, the material will be disposed of at a licensed landfill facility.* ▸ *Use of sediment controls/traps/fences on site, and diverting clean runoff around the site. Sediment will be removed immediately following rainfall events when the operating capacity of the devices is impaired.* ▸ *The proposed fill area will be bunded so that any fuel spilled during plant refuelling will be captured and will drain to an interceptor trap. A diesel spill kit will be stored within the workshop and/or main storage shed.* ▸ *On-site erosion and sediment controls will be regularly monitored for their effectiveness. Sediment and erosion control must remain in place throughout the entire construction process.* ▸ *Refuelling activities will be undertaken in the existing refuelling area, removed from site works.* ▸ *Cleaning of drainage system before and during works.* ▸ *Truck shaker grids will be installed at the entry gates to ensure that there is minimal tracking of dirt onto the local road system roads. Any tracked dirt will be cleaned daily.* ▸ *Any complaint related to the water quality or erosion and sediment control measures is to be investigated and reported, with remedial action taken.*
Emergency and evacuation management	*An emergency and evacuation plan will be prepared as a part of the site EMP. To include notification of neighbours in the event of a potential emergency.*

Environmental Issue Construction Stage	Mitigation measures/risk treatment during construction cont.
Air quality	▸ *Mains town water to be used, as well as water trucks (if required), for dust suppression.* ▸ *Most of the site is already hardstand.* ▸ *Construction hours to be strictly controlled ie. 7.00am to 5.00pm Monday to Saturday, with no work on Sundays or public holidays.* ▸ *Construction activities to be undertaken such that dust emissions from exposed soil areas comply with the requirements of the 'Blue Book' eg. use of wet suppression techniques on all potential dust sources, where practicable, where additional fill is required.* ▸ *Contractors and staff to be trained to implement dust minimisation measures.* ▸ *Site speed limit of 20km/hour to be imposed.* ▸ *Covering of all truck loads.* ▸ *Public roads used by these trucks are to be kept clean.* ▸ *Any dust complaints to be recorded, identifying cause(s) and remedial measures put into place in a timely manner.*
Traffic and transport	*A traffic management plan to be prepared as part of any overall site environmental management plan, aimed at ensuring the safety of employees, contractors, and the general public.* ▸ *The Torrens Road and Allgayer Drive roadway is to be kept free of obstruction by work materials and/or plant. All trucks and associated plant are to be kept wholly within the project site, with no queuing allowed on public roads.* ▸ *Internal roads, driveways and parking associated with the development are to be constructed and maintained in accordance with the latest version of AS 2890.1:2004 Parking facilities Off-street car parking (Standards Australia, 2004) and AS 2890.2:2002 Parking facilities Off-street commercial vehicle facilities (Standards Australia, 2002)* ▸ *All trucks entering or leaving the site with loads to have their loads covered to avoid tracking of dirt onto public roads.* ▸ *Adequate swept paths provided for all heavy trucks on site, to be kept clear of obstacles.* ▸ ***All loading and unloading of construction machinery, excavation and building materials is to be confined to within the site boundaries, in compliance with relevant WorkCover and other regulations**.* ▸ *Cleaning of drainage system before and during works. Council's road systems will be maintained during the construction works period. Any damage to Gunnedah Council's infrastructure within the road reserve by construction operations will be repaired and/or reinstated.*
Noise and vibration	▸ *Operational hours to be strictly controlled ie. 7.00am to 5.00pm Monday to Saturday. No work to be carried out on Sundays or public holidays.* ▸ *Potentially noise affected neighbours will be informed about the construction stages and duration of noisier activities, along with progress updates. Particularly noisy activities to be conducted for short durations, that is, allowing for intra-day respite periods, where practical.* ▸ *Noise monitoring by site management.* ▸ ***Acoustic treatment to the processing shed external wall and ceiling construction to achieve specific acoustic performance ratings, as well as acoustic barriers along western and northern boundaries. Installation of an acoustic roller door on the southern façade of the processing shed*** ▸ *Noise complaints to be registered, investigated and responded to in a timely manner.*

Environmental Issue Construction Stage	***Mitigation measures/risk treatment during construction cont.***
Community	► ***The proponent to establish a community consultation committee, comprising members of the community and the applicant, that will meet once every 3 months. Discussion at the meetings must include implementation of the development consent and other statutory approvals, and provide adequate time for the community to raise matters of concern associated with the ongoing management, monitoring and effectiveness of mitigation measures associated with the approved development.*** ► ***At least 48 hours before the commencement of construction and for the life of the development, the Applicant must:*** • ***(a) make the following information and documents (as they are obtained or approved) publicly available on its website:*** • ***(i) the documents referred to in condition A2 of this consent and the final layout plans for the development;*** • ***(ii) all current statutory approvals for the development;*** • ***(iii) all approved strategies, plans and programs required under the conditions of this consent;*** • ***(iv) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent;*** • ***(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;*** • ***(vi) a summary of the current stage and progress of the development;*** • ***(vii) contact details to enquire about the development or to make a complaint;*** • ***(viii) a complaints register, updated monthly;*** • ***(ix) the Compliance Reporting of the development;*** • ***(x) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report;*** • ***(xi) Minutes of meetings and follow up actions arising from each community consultation committee meeting:*** • ***(xii) any other matter required by the Planning Secretary; and*** • ***(b) keep such information up to date, to the satisfaction of the Planning Secretary."***
Biodiversity, landscaping	► *Limited impacts. No clearing of koala habitat. Clearing of trees is proposed on Lot 2, with northern plantings retained. Limited tree clearing on Lot 1 to make way for truck movement pathways to Lot 2.* ► *Communication with building contractors and basic tree protection measures to reduce potential for incidental/accidental damage to the trunk, canopy and shallow roots of all retained trees throughout the construction process.* ► *Canopy pruning should be undertaken by an AQF Level 2 (minimum) Arborist in accordance with AS4373-2007-Pruning of Amenity Trees, Section 7.2.4 (Selective Pruning).* ► ***Landscaping earmarked for retention to be regularly maintained, including established landscaping along the northern boundary of the site**.*

Environmental Issue Construction Stage	Mitigation measures/risk treatment during construction cont.
Visual	▸ *Extensive site works involved over Lot 2, and to a lesser extent Lot 1, with minimal clearing of trees proposed. Extensive trees stands are already well established on the site.* ▸ *The site will have the appearance of a work site during construction phase.* ▸ *Maintenance of established boundary plantings existing on northern boundary.*
Traffic and transport	*A traffic management plan to be prepared as part of any overall site environmental management plan, aimed at ensuring the safety of employees, contractors, and the general public.* ▸ *The Torrens Road and Allgayer Drive roadway is to be kept free of obstruction by work materials and/or plant. All trucks and associated plant are to be kept wholly within the project site, with no queuing allowed on public roads.* ▸ *Internal roads, driveways and parking associated with the development are to be constructed and maintained in accordance with the latest version of AS 2890.1:2004 Parking facilities Off-street car parking (Standards Australia, 2004) and AS 2890.2:2002 Parking facilities Off-street commercial vehicle facilities (Standards Australia, 2002)* ▸ *All trucks entering or leaving the site with loads to have their loads covered to avoid tracking of dirt onto public roads.* ▸ *Adequate swept paths provided for all heavy trucks on site, to be kept clear of obstacles.* ▸ *All loading and unloading of excavation and construction machinery, excavation and building materials is to be confined to within the site boundaries. All loading and unloading operations are to comply with relevant WorkCover and other statutory regulations.* ▸ *Cleaning of drainage system before and during works. Council's road systems will be maintained during the construction works period. Any damage to Gunnedah Council's infrastructure within the road reserve by construction operations will be repaired and/or reinstated.*
Heritage	*Minimal excavation works proposed. Minimal potential for disturbing any archaeological site. If any Aboriginal objects are identified during construction or operation of the facility, the operator would cease work in the immediate area of the find and fence off the area. The find would be reported to Heritage NSW and management measures would be implemented based on the significance of the item. An unexpected finds protocol will be developed and included in the site management plan.*
External lighting	*In order to minimise the impact of external lighting arising from construction-related activities on local amenity, all external lighting is to be in compliance with AS4282:1997 Control of the obtrusive effects of outdoor lighting.*

Table C2: Summary of Mitigation Measures: Operation of Facility

Environmental Issue Operation of Facility	***Mitigation measures during operation of facility***
Waste management	▸ *A Waste Management Plan (WMP) will be incorporated into the overall site environmental management plan (EMP), which will include procedures relating to identification of waste streams accepted at the facility, screening of incoming loads, weighing of incoming and outgoing vehicles, procedures for dealing with unexpected finds* ***and rejected loads****.* ▸ ***The vehicle details of all incoming vehicles are to be recorded, including registration number, type of material and quantity of materia****l.* ▸ *Each load presented at the facility is to be inspected at the weigh-bridge and accepted/rejected.* ***Material that does not meet the sign posted acceptance criteria to be rejected. The driver will be advised of the closest suitable facility. Rejected loads will be recorded and a rejected loads register will be maintained.*** ▸ ***Visual inspections are to occur at the tip and spread unloading shed****.* ▸ *Processing of waste to occur in the enclosed processing shed, to minimise dust and noise and reduce the potential for wastewater runoff.* ▸ ***Any other load containing other unwanted waste including hazardous or restricted waste, any load carrying asbestos or lithium batteries or acid sulfate soils (ASS and PASS), will be rejected and diverted to the appropriate waste facility.*** ▸ *All waste is to be sorted, treated and recycled with unwanted waste disposed of to a licensed landfill.* ▸ ***CT1 soil will be blended in the processing shed****, with final mixing in stockpile/storage bay. This waste type has a very low hazard or fire risk.* ▸ *The unloading, sorting and recycling of waste will occur within covered sheds to minimise dust and noise and reduce the potential for wastewater runoff.* ▸ ***Compactor/briquette machine to be added, to process any of the waste materials accepted at the facility. In compacting waste the volumes of materials exported from the site can be reduced****.* ▸ *Covering of loads to minimise the potential for waste spreading to surrounding locations during transport. Unloading of vehicles and processing will occur in covered sheds, minimising the spread of waste.* ▸ ***Tyres to be separately processed and shredded in the enclosed processing shed****.* ▸ *Regular litter removal on the site.* ▸ ***Waste to be stockpiled in accordance with the listed waste types set out in the EPA's Standards for Managing Construction Waste in NSW and stored in separate storage areas****.* ▸ ***Limit of 200,000 tonnes per annum of waste to be handled at the facility****.*
Visual, landscaping, lighting	*Further boundary plantings proposed:* ▸ *Along the Allgayer Drive street frontage.* ▸ *Along the western boundary of Lot 2.* ▸ *A 6m wide landscaped area to be established on the northern boundary of Lot 2.[****NOTE: Planted in May 2021, already well-established****]* ▸ *The visual appearance of the site entrance on Torrens Road, as well as Allgayer Drive, will be landscaped and kept tidy.* ▸ *Lighting design for the Site will be such that the criteria prescribed in Table 2.1 of Australian Standard - AS 4282-1997, "Control of Obtrusive Effects of Outdoor Lighting" for commercial areas will be achieved at the site boundary.*

Environmental Issue in SEARS cont.	Mitigation measures during operation of waste facility cont.
Hazards and risk, including fire	▸ *Existing hazards and risks on site are managed through the existing Mackellar Group management system which includes workplace health and safety management, and pollution incident response and emergency management. To be incorporated into an overall site environmental management plan (EMP).* ▸ *Construction will be undertaken in accordance with the Work Health and Safety (WHS) Act 2011.* ▸ *Waste to be managed in accordance with Fire and Rescue NSW Fire safety in waste facilities guideline. [NOTE: The facility is not expected to be handling any significant volume of combustible waste- refer Section 3.1 of EIS for details].* ▸ *Mobile plant and vehicles will be fitted with fire extinguishers.* ▸ *Emergency Response Plan to be prepared as part of proposed management plan for the waste facility, to include fire response procedure in accordance with Appendix A, Fire and Smoke Emergencies, of the AS 3745: 2010 standard. Safe operational access and egress for emergency service personnel and workers will be provided at all times.* ▸ *Fire hose reels and portable fire extinguishers to be located throughout the site. An additional two (2) fire hydrant connection points are to be located on the Allgayer Drive street frontage, able to service the sheds and waste storage bays.* ▸ *A fire detection and alarm system is installed to Australian Standard AS 1670.1.* ▸ *Fire brigade vehicle access is capable of being provided between external storage bins/bays/stockpiles.* ▸ *The external areas of the site should be level, clear of all rubbish and combustible materials, and enclosed by fences or walls constructed of non-combustible construction.* ▸ *Site security measures to include fencing of site and securing of the site at the end of each day.* ▸ *Each internal stockpile is well below the minimum of 1,000 m2 specified in the 'acceptable solutions' set down in Appendix A of the Fire and Rescue NSW Fire safety in waste facilities guideline. Internal stockpiles will maintain a minimum of 6m unobstructed access on each accessible side.* ▸ *Individual storage bays that contain the different waste product (as identified above) shall be separated.* ▸ *Retention of contaminated water run-off from any fire event.* ▸ *Emergency lighting and exit signs throughout the sheds in accordance with the relevant provisions of BCA Part E4 and AS 2293.1-2005.* ▸ *Automatic smoke exhaust system to be provided.* ▸ *An operations plan is to be documented and implemented for stockpile management.* ▸ *Auditable procedures to be in place to handle and dispose of hazardous waste materials that have been received on site.* ▸ *Regular cleaning of litter on site.* ▸ *Plant and equipment to be well maintained, to reduce the risk of sparks.* ▸ *Fire fighting equipment to be well maintained.* ▸ *An Incident Response Plan (IRP) will be developed for operation of the Site. The plan will specify the procedure to be followed in the event of a spill, including the notification requirements and use of absorbent material to contain the spill. A spill kit will be provided onsite at all times.*

Environmental Issue in SEARS cont.	Mitigation measures during operation of waste facility cont.
Air quality	▸ *Contractors staff to be trained to implement dust minimisation measures.* ▸ *Site speed limit of 20km/hour to be imposed.* ▸ *Covering of all truck loads, with public roads used by these trucks to be kept clean.* ▸ *Any dust complaints to be recorded, identifying cause(s) and remedial measures put into place in a timely manner.* ▸ *Surfaces within unloading, processing and stockpiles to be either concrete or asphalt surfaces.* ▸ *Waste storage and processing areas are to be regularly cleaned, watered and any residual waste removed.* ▸ *Wheel-wash to be used for outgoing haulage vehicles.* ▸ *Water sprays to be used in unloading and processing areas, or any other area with the potential to create dust.* ▸ *Stockpile heights to be restricted - refer EIS Section 3 for details.* ▸ *Stockpiles to be regularly wetted down to minimise the potential for wind erosion and dust impacts.* ▸ *Air quality levels are predicted to be below applicable amenity criteria at nearest sensitive receptors.* ▸ *Possible odour sources are to be monitored and control activities implemented as required.*
Noise and vibration	▸ *Operational hours to be strictly controlled ie. 7.00am to 6.00pm Monday to Saturday. No work to be carried out on Sundays or public holidays.* ▸ ***Trommel and Shredder are to operate at separate times, in order to reduce noise to an acceptable level**.* ▸ ***Acoustic barriers to be in place prior to operation ie. 4.5m barrier running along the northern boundary, forming part of the open storage bay walls, and a 3.2m high acoustic barrier along the western boundary**.* ▸ *The noise generated by the waste facility similar to that generated by other industrial uses.* ▸ ***Acoustic treatment to the processing shed external wall and ceiling construction to be in place prior to operation, in order to achieve specific acoustic performance ratings**.* ▸ ***Roller doors facing south to be closed during operation of the Trommel and Shredder.*** ▸ *Noise generating plant and equipment to be shielded by sheds.* ▸ *Plant and equipment will be regularly maintained and serviced, to minimise the potential for excessive noise impacts.* ▸ *Plant and equipment to be switched off when not in use.* ▸ *A register of (noise) complaints shall be maintained. If noise complaints occur, they will be registered, investigated and responded to in a timely manner to ensure issues are not repeated.*
Visual, landscaping, lighting	*Further boundary plantings proposed **to be in place and maintained**:* ▸ *Along the Allgayer Drive street frontage.* ▸ *Along the western boundary of Lot 2.* ▸ *A 6m wide landscaped area to be established on the northern boundary of Lot 2.[**NOTE: Planted in May 2021 and already well-established**]* ▸ *The visual appearance of the site entrance on Torrens Road, as well as Allgayer Drive, will be landscaped and kept tidy.* ▸ *Lighting design for the Site will be such that the criteria prescribed in Table 2.1 of Australian Standard - AS 4282-1997, "Control of Obtrusive Effects of Outdoor Lighting" for commercial areas will be achieved at the site boundary.*

Environmental Issue in SEARS cont.	Mitigation measures during operation of waste facility cont.
Soil and water	▸ *Surface water controls are to be used to prevent the uncontrolled release of waters from the project site. All waste transfer and sorting will occur in sheds.* ▸ *Waste water will be managed in the facility by ensuring that the wastewater management system is monitored and maintained.* ▸ *The leachate management system will be designed to maintain separation between rainfall run-off and leachate at all times. The design provides for collection of leachate in a stand-alone leachate storage facility All excess leachate from the Site will be disposed of in accordance with legislative requirements, through either a trade waste agreement or pumped out and disposed of at an appropriately licensed facility.* ▸ *No water will be used in the transfer or sorting of waste except for dust control or unexpected finds asbestos dust control.* ▸ *Bunding to be employed. (Existing diesel tanks are self-bunded.)* ▸ *On-site detention (OSD) to be employed in the north-east corner of the project site* ▸ *Use of surface water management, as well as sediment and erosion controls.* ▸ *Discharges of polluted water offsite are not predicted.* ▸ ***Self-bunded wheel-wash to be used on site**.* ▸ *Any spills are to be contained on site.*
Traffic and transport	▸ *Traffic management plan to be prepared, aimed at ensuring the safety of employees, contractors, and the general public in and around the project site. A Construction Traffic Management Plan (CTMP) will be developed for the construction phase of the Project. The CTMP will form a sub-plan to the overall site environmental management plan and will prescribe locations for private worker vehicle parking during construction works, access routes to the Site and notification requirements during construction of the Project infrastructure.* ▸ *In the interests of traffic and pedestrian safety, a low (20km/hour) speed limit to be applied to waste haulage vehicles on site.* ▸ *Control, monitoring, management and recording of all incoming and outgoing waste.* ▸ *Vehicle inspection and clearance is undertaken at the weigh bridge complex on all waste transport vehicles entering the project site.* ▸ *Traffic movements into and out of the site are to be in a forward direction.* ▸ ***All unloading and processing activities associated with the facility to occur within fully enclosed sheds**. No vehicle queuing on local roads.* ▸ *All waste vehicle movements within the project site will be restricted to designated routes marked out by appropriate signage on site.* ▸ *Staff and visitor parking to be located in the southern section of the project site, on Lot 1, in the vicinity of the existing staff car park.* ▸ *Appropriate directional signage will be provided at the site entrances to direct vehicles and pedestrians safely around the site.* ▸ *Signs will be erected at the facility regarding drivers' legal obligation to ensure that waste is covered during transport.* ▸ *Vehicles dispatching products or residue will be covered prior to leaving the site.*
Biodiversity	*Limited impacts. No impacts on koala habitat. The waste facility will not affect any groundwater dependent ecosystems. Extensive trees stands are already well established on the site. Minimal clearing, with extensive remedial landscaped plantings proposed.*

Environmental Issue in SEARS cont.	Mitigation measures during operation of waste facility cont.
Heritage	*The procedure for the management of unexpected archaeological finds will be documented within the site environmental management plan. For example, if any Aboriginal objects are identified during construction or operation of the facility, the operator would cease work in the immediate area of the find and fence off the area. The find would be reported to Heritage NSW and management measures would be implemented based on the significance of the item. An unexpected finds protocol will be developed and included in the site management plan. In the event that suspected human skeletal remains are discovered, all works will cease and the NSW Police and the NSW Coroner's office will be contacted. If the burial is identified as being of Aboriginal origin a heritage professional and Heritage NSW will be contacted to determine the subsequent course of action.*
Emergency and evacuation management	*An emergency and evacuation plan will be prepared as a part of the site EMP. To include notification of neighbours in the event of a potential emergency.*

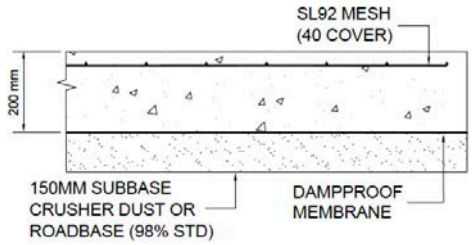
Appendix C:

Supporting Information & Amended DA Drawings

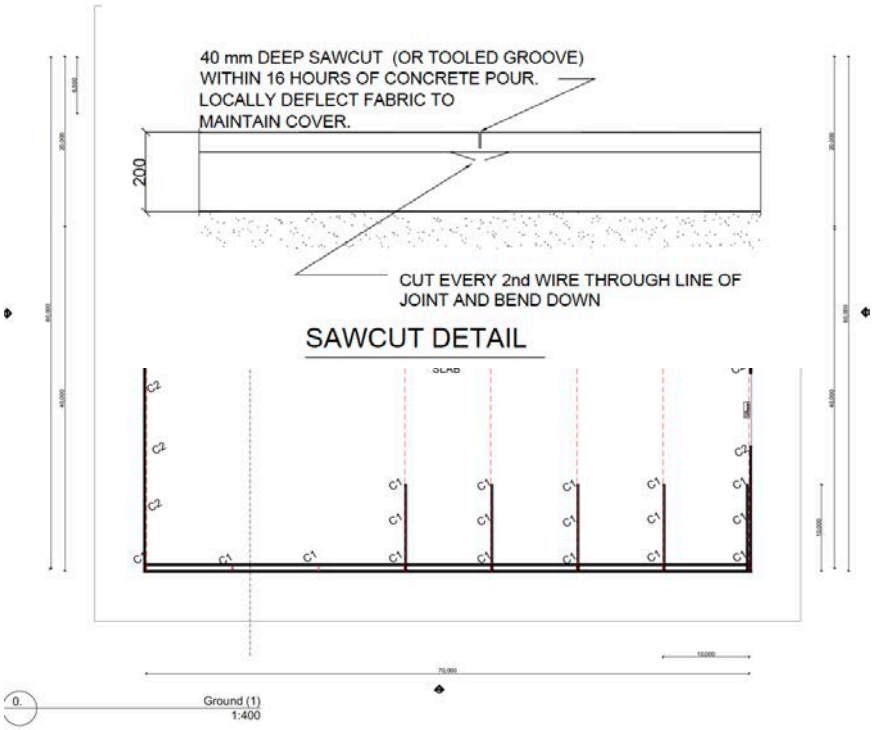
Appendix C1:

Preliminary Footing and Slab Design for Sheds

(Subject to detailed engineering design at the cc stage)



SLAB SECTION



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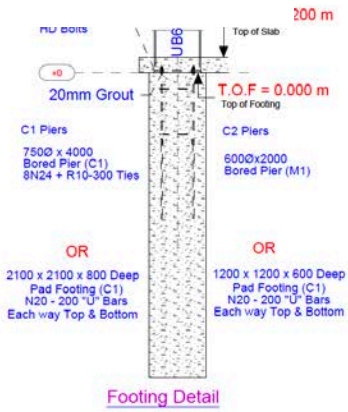

Footing Detail

TECHSPAN
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W| techspanbuilding.com.au
A| 87 Seaton St Armidale NSW 2350

PROJECT DETAILS

CLIENT:	MEX
PROJECT NAME:	MEX SHED
BUILDING DISCRIPTION:	WORKSHOP

DEVELOPMENT DETAILS

ADDRESS:	#Site Full Address
LOT/DP:--/---	N/A
LOT SIZE: -----m2	N/A
LOCAL AUTHORITY:	#Project Custom
WIND REGION:	N/A
TERRAIN CAT:	N/A
IMPORTANCE:	TBC
BUILDING CLASS:	TBC
BUILDING TYPE:	TBC

CONSULTANTS

STRUCTURAL:	#Structural Engineer
CIVIL:	#Civil Engineer
HYDRAULIC:	#Hydraulic Engineer
MECHANICAL:	#Mechanical Engineer
ELECTRICAL:	#Services Consultant
LANDSCAPE:	#Landscape Consultant
ACOUSTIC:	#Acoustic Consultant
FIRE:	# Safety Engineer

REV.	DISCRIPTION	DATE
	PRELIMINARY	8/02/2021

SHEET TITLE: FOOTING PLAN

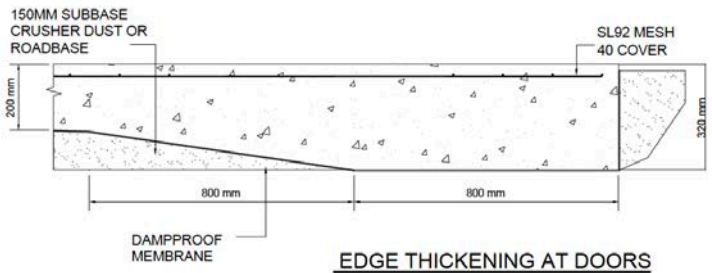
DWG NUMBER	REVISION
MEX - 000A1	

SHEET	SCALE	SIZE
1	1:400	297 x 420 ISO A3

DRAWN BY: GO
CHECKED BY:

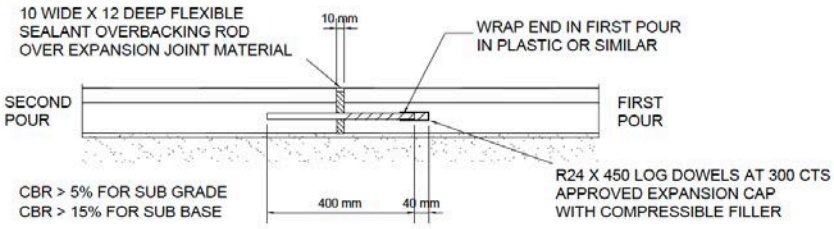
NORTH

PRINT DATE: 29/07/2021



EDGE THICKENING AT DOORS

NOT FOR CONSTRUCTION



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W| techspanbuilding.com.au
A| 87 Seaton St Armidale NSW 2350

PROJECT DETAILS

CLIENT:	MEX
PROJECT NAME:	MEX SHED
BUILDING DISCRIPTION:	WORKSHOP

DEVELOPMENT DETAILS

ADDRESS:	#Site Full Address
LOT/DP:--/---	N/A
LOT SIZE: -----m2	N/A
LOCAL AUTHORITY:	#Project Custom
WIND REGION:	N/A
TERRAIN CAT:	N/A
IMPORTANCE:	TBC
BUILDING CLASS:	TBC
BUILDING TYPE:	TBC

CONSULTANTS

STRUCTURAL:	#Structural Engineer
CIVIL:	#Civil Engineer
HYDRAULIC:	#Hydraulic Engineer
MECHANICAL:	#Mechanical Engineer
ELECTRICAL:	#Services Consultant
LANDSCAPE:	#Landscape Consultant
ACOUSTIC:	#Acoustic Consultant
FIRE:	# Safety Engineer

REV.	DISCRIPTION	DATE
	PRELIMINARY	8/02/2021

SHEET TITLE: SLAB SECTIONS

DWG NUMBER: MEX - 000A4

REVISION:

SHEET	SCALE	SIZE
4	1:250	297 x 420 ISO A3

DRAWN BY: GO
CHECKED BY:

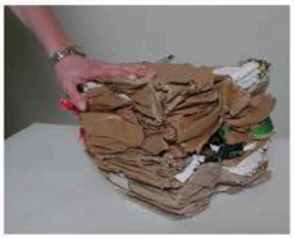
NORTH

PRINT DATE: 29/07/2021

Appendix C2:

Typical shredder and compactor/briquette machines

BRICKMAN 900K



BRICKMAN 900K IS OPTIMIZED FOR:

CARDBOARD
+ Corrugated cardboard

CAPACITY
up to 750 kg/h

PLASTIC
+ PET bottles

CAPACITY
up to 600 kg/h

CONVENIENT AND EFFICIENT
Brickman offers time-saving and comfortable waste handling. The press can be fed while running, there is no lid or door to open when loading the material and the ready briquettes require no binding. Furthermore, optional photocells can automize the start function. The material infeed and briquette outfeed are easy to integrate in system solutions.

GREAT LOGISTICS
Thanks to Brickman's compact dimensions and low sound emission, it can be placed indoors close to the waste disposal station.

DESIGNED FOR HEAVY DUTY
Thanks to the following features, the robust briquette press Brickman 900K is especially designed for compaction of large volumes of cardboard and empty PET bottles:
+ Extension on press cylinder
+ Automatic greasing of the press plate
+ Reinforced material in press chamber, press plate, cutting blades, guide piston and press loop

OPTIONAL ACCESSORIES
Brickman 900K can be ordered with a number of accessories; different chute options, start systems, sound absorbation plates as well as heating and cooling devices.

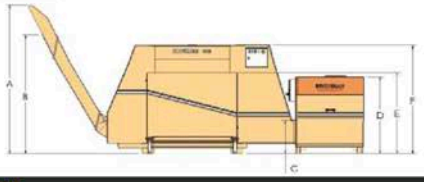
DIMENSIONS & SPECIFICATIONS

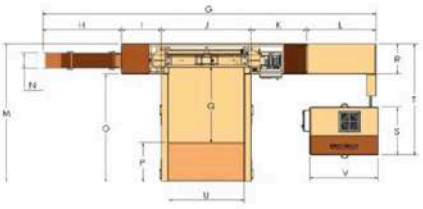
DIMENSIONS (MM)

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
2470	2010	585	1350	1420	1870	5710	1355	685	1545	945	1180	2430	265	1900	690	1350	535

DIMENSIONS (MM)

S	T	U	V
840	1960	1300	1155





TECHNICAL SPECIFICATIONS

MACHINE WEIGHT	PRESS FORCE	PRESSURE	HOPPER	BRIQUETTE SIZE	DENSITY*	NOISE LEVEL	OPERATING POWER
3700 kg	25 ton, 250 kN	Up to 62 kg/cm²	2 m²	200x200x100-300 mm	Up to 400 kg/m³	68 db (A)	400 V, 3-phase, 50 Hz** Fuse: 25 A (slow) Engine: 7.5 kW Voltage: 24 V Protec. class: IP 55

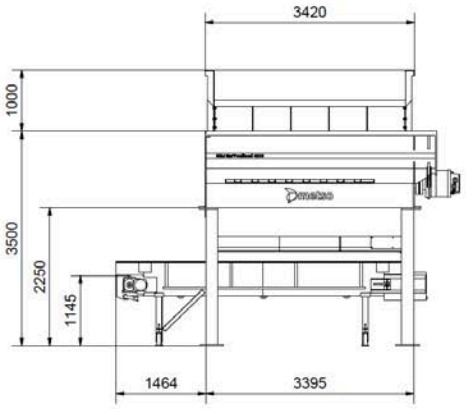
We reserve the right to make changes to specifications without prior notice. * Density varies with type of material. ** Other voltages are available

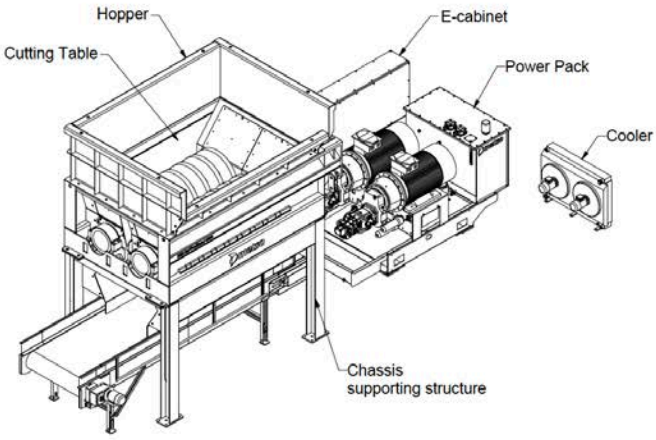
Orwak AB
Svetsaregatan 4
S-576 33 Sävsjö
SWEDEN
Tel: +46-(0)382-157 00
info@orwak.com, www.orwak.com

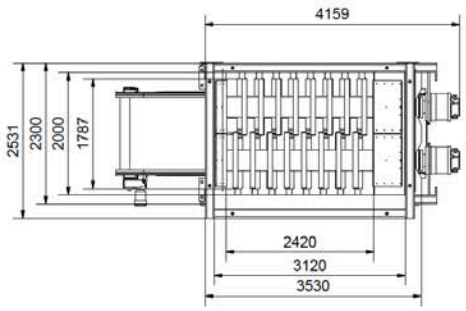
ORWAK PART OF SULO GROUP

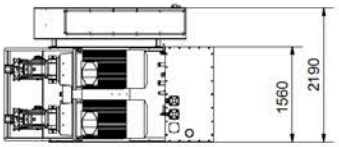
Compactor

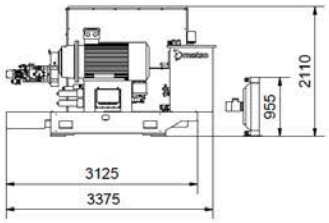
M&J Eta®PreShred 4000 Stationary











Shredder

Appendix C3:

Groundwater bore information

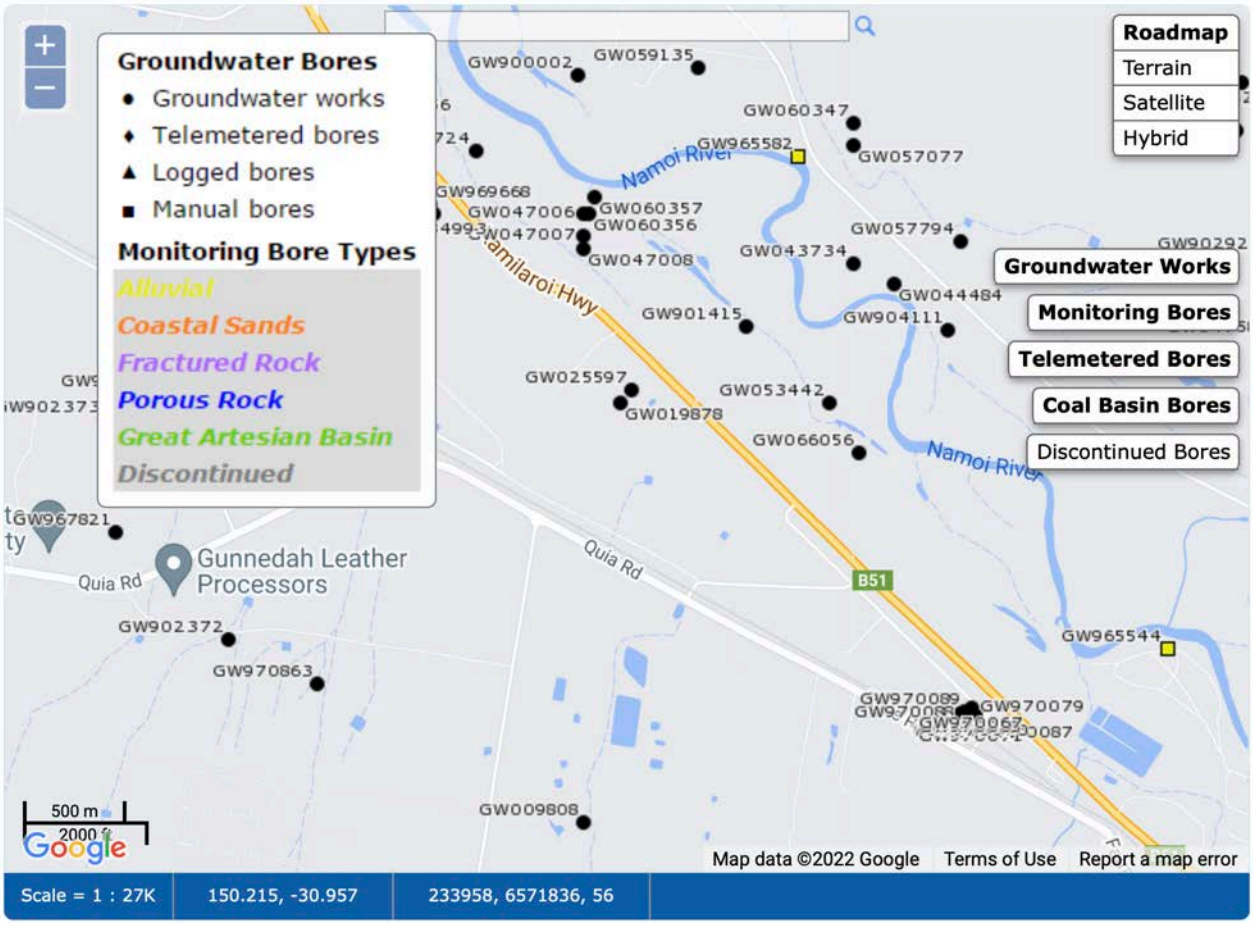
All Groundwater Site Details

ALL GROUNDWATER MAP

bookmark this page

All data times are Eastern Standard Time

Map | Info



28/6/2022, 11:00 am

WaterNSW
Work Summary

GW025597

Licence: 90WA820824 **Licence Status:** CURRENT

Authorised Purpose(s): STOCK,DOMESTIC
Intended Purpose(s): IRRIGATION

Work Type: Bore
Work Status:
Construct.Method: Cable Tool
Owner Type: Private

Commenced Date:
Completion Date: 01/12/1965

Final Depth: 30.50 m
Drilled Depth: 30.50 m

Contractor Name: (None)
Driller:
Assistant Driller:

Property: PORTLAND NSW
GWMA: 604 - GUNNEDAH BASIN
GW Zone: -

Standing Water Level (m):
Salinity Description: Very Good
Yield (L/s):

Site Details

Site Chosen By:

	County	Parish	Cadastre
Form A:	POTTINGER	GUNNEDAH	449
Licensed:	POTTINGER	GUNNEDAH	Whole Lot //

Region: 90 - Barwon
River Basin: 419 - NAMOI RIVER
Area/District:

CMA Map: 8936-3S
Grid Zone:
Scale:

Elevation: 0.00 m (A.H.D.)
Elevation Source: (Unknown)

Northing: 6572206.000
Easting: 234137.000

Latitude: 30°57'13.3"S
Longitude: 150°13'01.1"E

GS Map: -
MGA Zone: 56
Coordinate Source:

Construction

Negative depths indicate Above Ground Level; C-Cemented; SL-Slot Length; A-Aperture; GS-Grain Size; Q-Quantity; PL-Placement of Gravel Pack; PC-Pressure Cemented; S-Sump; CE-Centralisers

Hole	Pipe	Component	Type	From (m)	To (m)	Outside Diameter (mm)	Inside Diameter (mm)	Interval	Details
1	1	Casing	Threaded Steel	-0.50	15.30	152			Suspended in Clamps
1	1	Opening	Slots	8.80	14.90	127		1	

Water Bearing Zones

From (m)	To (m)	Thickness (m)	WBZ Type	S.W.L. (m)	D.D.L. (m)	Yield (L/s)	Hole Depth (m)	Duration (hr)	Salinity (mg/L)
9.10	10.60	1.50	Unconsolidated	8.80		5.68			

28/6/2022, 11:05 am

WaterNSW
Work Summary

GW019878

Licence: **Licence Status:**

Authorised Purpose(s):
Intended Purpose(s): NOT KNOWN

Work Type: Bore
Work Status: Test Hole
Construct.Method:
Owner Type: Private

Commenced Date:
Completion Date: 01/01/1963

Final Depth:
Drilled Depth: 45.70 m

Contractor Name: (None)
Driller:
Assistant Driller:

Property:
GWMA:
GW Zone:

Standing Water Level (m):
Salinity Description: Good Stock
Yield (L/s):

Site Details

Site Chosen By:

	County	Parish	Cadastre
Form A:	POTTINGER	GUNNEDAH	449
Licensed:			

Region: 90 - Barwon
River Basin: 419 - NAMOI RIVER
Area/District:

CMA Map: 8936-3S
Grid Zone:
Scale:

Elevation: 0.00 m (A.H.D.)
Elevation Source: (Unknown)

Northing: 6572143.000
Easting: 234086.000

Latitude: 30°57'15.3"S
Longitude: 150°12'59.1"E

GS Map: -
MGA Zone: 56
Coordinate Source:

Construction

Negative depths indicate Above Ground Level; C-Cemented; SL-Slot Length; A-Aperture; GS-Grain Size; Q-Quantity; PL-Placement of Gravel Pack; PC-Pressure Cemented; S-Sump; CE-Centralisers

Hole	Pipe	Component	Type	From (m)	To (m)	Outside Diameter (mm)	Inside Diameter (mm)	Interval	Details
1		Backfill	Backfill	0.00	45.70				

Water Bearing Zones

From (m)	To (m)	Thickness (m)	WBZ Type	S.W.L. (m)	D.D.L. (m)	Yield (L/s)	Hole Depth (m)	Duration (hr)	Salinity (mg/L)
9.10	12.10	3.00	Unconsolidated						
18.30	18.90	0.60	Unconsolidated						

Appendix C4:

Vipac noise report

Appendix C5:

Vipac air quality assessment report

Appendix C6:

Revised DA drawings

Appendix C7:

Streetwise revised traffic report

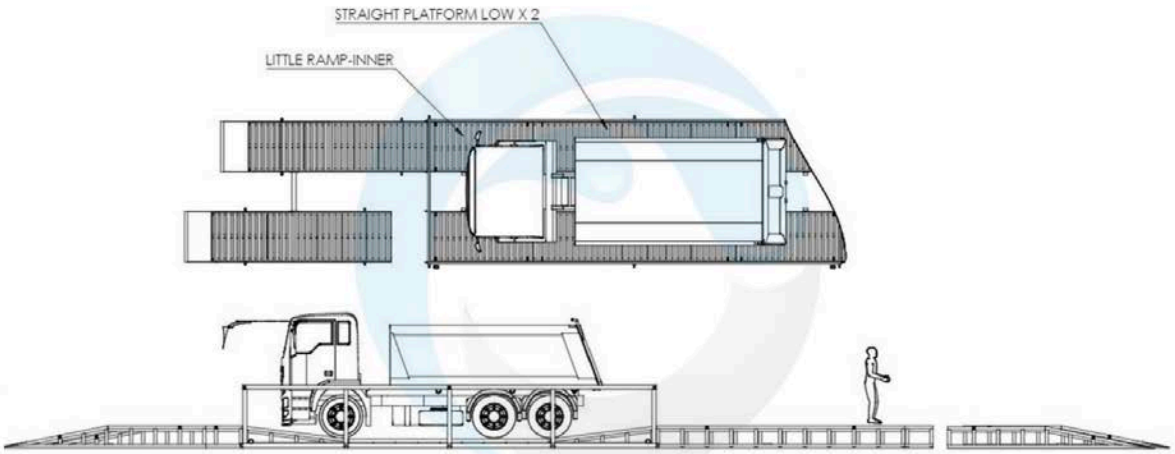
Appendix C8:

Additional contamination report

Appendix C9:

Typical Wheel Wash Design

(Subject to detailed engineering design at the cc stage)



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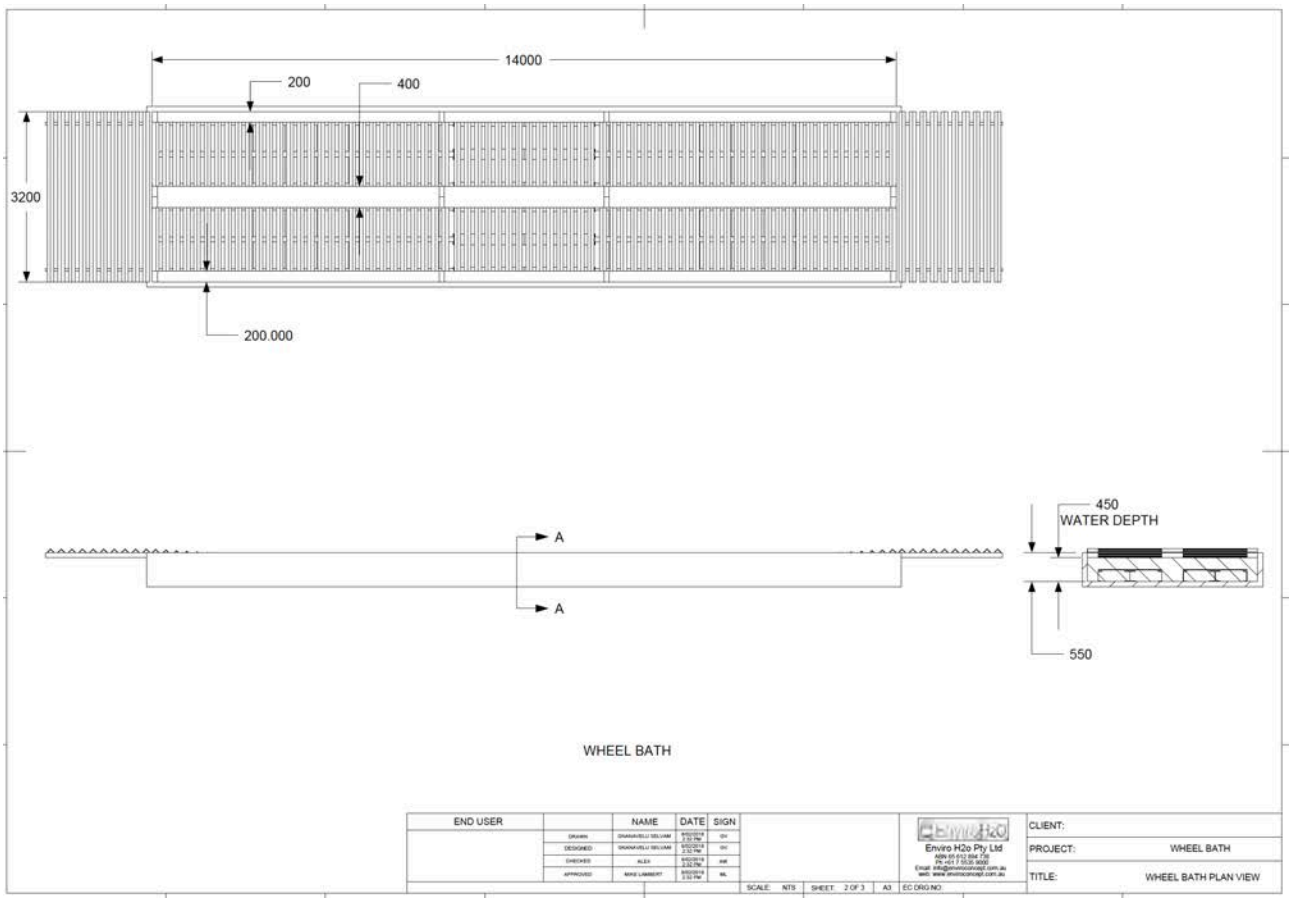

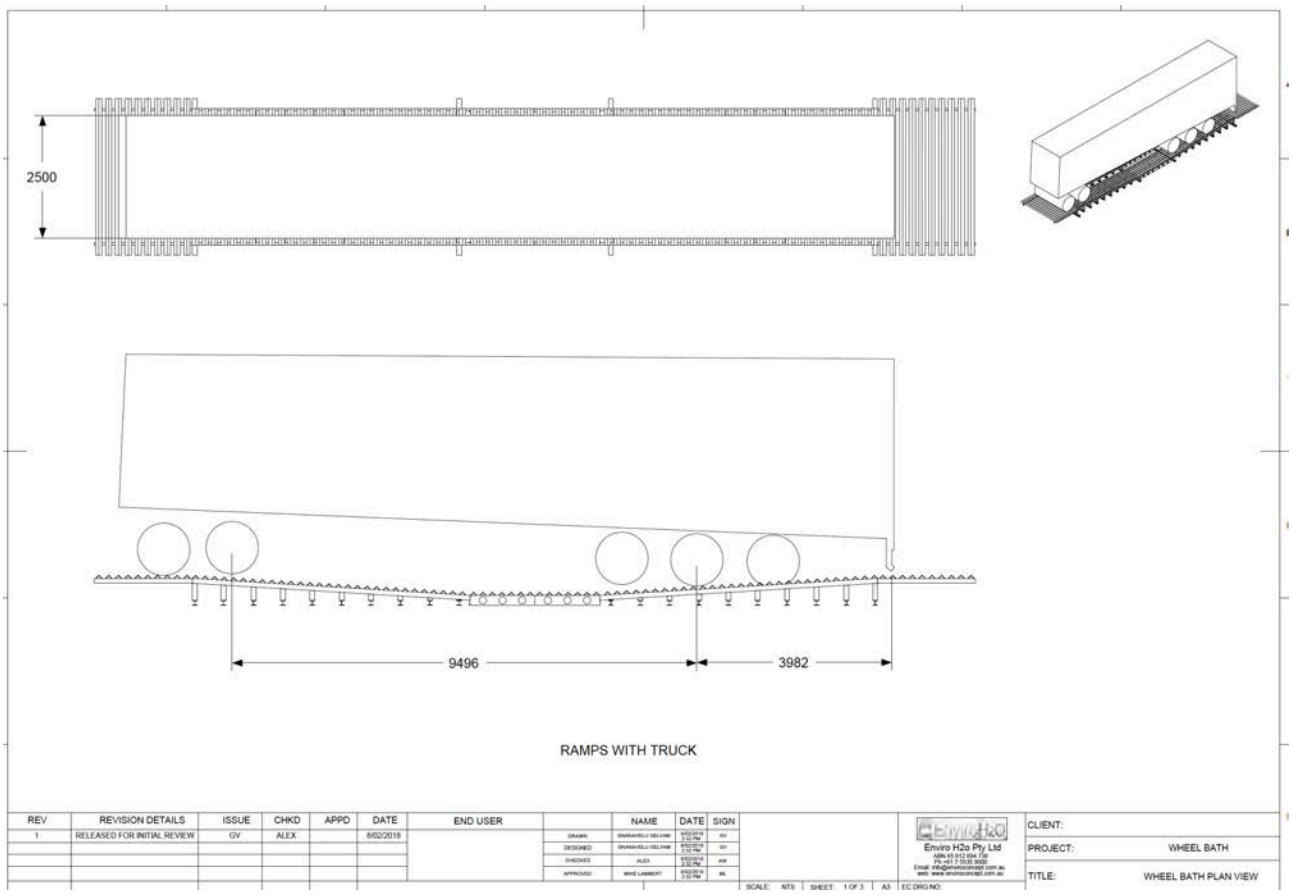
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9496
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RAMPS WITH TRUCK
REV
REVISION DETAILS
ISSUE
CHKD
APPD
DATE
END USER
1
RELEASED FOR INITIAL REVIEW
GV
ALEX
6/02/2018
NAME
DATE
SIGN
DRAWN
DESIGNED
CHECKED
APPROVED
Enviro H2o Pty Ltd
CLIENT:
PROJECT:
WHEEL BATH
TITLE:
WHEEL BATH PLAN VIEW
SCALE: NTS | SHEET: 1 OF 3 | A3 | EC DRG NO:


ENVIRO WHEEL BATH
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