MATERIALS RECYCLING FACILITY 600 WOODSTOCK AVENUE, ROOTY HILL

Response to Submissions - SSDA-29999239

Prepared for
CHARTER HALL
10 August 2022

URBIS

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Report Number	SSD-29999239 RTS – 10.08.2022

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EXECUTIVE SUMMARY

This Submissions Report has been prepared on behalf of Charter Hall (**the Applicant**) to address the matters raised by government agencies, local Council, the community and relevant stakeholder groups during public exhibition of SSDA-29999239 for the proposed development at 600 Woodstock Avenue, Rooty Hill (**the site**).

The State Significant Development Application (**SSDA**) was lodged with the Department of Planning and Environment (**DPE**) in accordance with the *Environmental Planning and Assessment Act 1979* (**EPA& Act**) and *State Environmental Planning Policy (Planning Systems) 2021*.

DPE issued a letter to the Applicant on 14 April 2022 requesting a response to the issues raised during the public exhibition of the application. The following matters were identified by DPE in their Request for Additional Information:

- Waste processing
- Traffic and access
- Water management
- Operating hours

This Submissions Report outlines the proposed refinements and clarifications in response to all concerns raised within submissions.

Overview of Submissions

The SSDA was on public exhibition between 17 March and 13 April 2022. A total of eight submissions were received from NSW government agencies, Blacktown City Council, a utility service provider and local business as listed below:

- Department of Planning and Environment (**DPE**)
- Transport for NSW (**TFNSW**)
- Heritage NSW
- NSW Environmental Protection Authority (**EPA**)
- Fire and Rescue NSW (**FRNSW**)
- Blacktown City Council (**BCC**)
- Endeavour Energy
- General Mills (a local business)

The key issues raised in the submissions can be broadly grouped into the following categories:

- Waste processing
- Traffic and access
- Water management
- Noise
- Air quality
- Stormwater design detail

The project received only a small number of submissions. Of these submissions, only one submission (from BCC) comprised an objection. Each of the matters raised in the BCC submission have been resolved and accordingly, it is anticipated the objection may be withdrawn upon reviewing this Submissions Report.

Since only a small number of submissions were received, this Submissions Report provides a response to each individual submission within **Section 4**. Overall, whilst the above submissions have been received and

identify valid concerns, the minimal interest from public submissions demonstrates this project provides public benefit, albeit that some clarification and minor refinements are required to meet public authority requirements.

Actions Taken Since Exhibition

Since the SSDA was publicly exhibited, the Applicant has undertaken further consultation with the BCC Engineering team and TFNSW to discuss design matters raised within the submissions. The Applicant has also sought clarification on comments from the EPA (refer **Section 4**).

Further assessments and updated technical reports have been prepared to respond to the issues raised within the submissions. These include:

- Revised Architectural Plans (prepared by Nettleton Tribe)
- Revised Civil Plans (prepared by Northrop)
- Revised Traffic (prepared by Traffix)
- Revised Waste Management Plan (prepared by SLR)
- Revised Acoustic report (prepared by Acoustic Works)
- New Groundwater Assessment Report (prepared by WSP)

Response to Submissions

No changes are proposed to the original development description. Minor design refinements and additional information/clarifications have been provided in response to the issues raised in the submissions. The key changes are summarised as follows:

- Civil design refinements in response to BCC Engineering comments.
- Revised design of the at-grade car park fronting Woodstock Avenue to locate the driveway further from the roundabout. The traffic island on Woodstock Avenue is to be extended to create a left-in/left-out turning restriction for the driveway onto Woodstock Avenue. This will mitigate traffic safety risk of visitors entering the site from the roundabout. This is supported by an updated Traffic Impact Assessment report.
- Revised Architectural Plans to be consistent with civil design and car park details as per above. The revised Architectural Plans include an updated Site Plan as requested by DPE.
- The Waste Management Plan has been updated to provide further clarity on waste processing and management procedures.
- A revised Acoustic report has been prepared to respond to EPA queries, supported by a new Construction Noise and Vibration Assessment.
- A new Groundwater Assessment report has been prepared in response to queries from DPE Water.

The Submissions Report also confirms development consent is sought for a MRF with the capacity to process up to 120,000TPA and operate up to 24 hours per day. The WMP considered various operating scenarios of 75,000TPA, 85,000TPA, 95,000TPA, 105,000TPA and 120,000TPA to account for the varying scales of operation during typical shift hours (4:00am to 12:30am). Approval is not sought for a staged maximum capacity but recognises the facility will experience peaks and falls in demand over an annual basis.

- The capacity to achieve up to 120,000TPA would be realised through the operation of the site on a 24 hour basis (ie beyond the typical shift hours), but only when required to accommodate peak demands and unexpected delays to processing. Approval for the maximum capacity and operating hours is sought in this SSDA to facilitate an upfront assessment of the potential impacts and provide a flexible approach to the future site operations without the need to obtain further planning approvals.

Updated Justification and Evaluation

The following provides a review of the project justification provided in the EIS for SSDA-29999239.

Project Design

The proposed design remains generally the same as originally submitted and accordingly, an Amendment Report is not required. Refinements to the design are primarily related to two matters, being:

- Minor stormwater management design refinements prepared in consultation with the BCC Design Engineer.
- Reconfiguration of the at-grade car park fronting Woodstock Avenue to enable relocation of the access driveway to the east, away from the roundabout. An extension of the traffic island on Woodstock Avenue is also proposed to prevent illegal right turns into the site. This design refinement has been prepared in consultation with TFNSW.

The design refinements will improve the water management and traffic safety outcomes and do not create any new environmental impacts that have not been previously assessed.

Strategic Context

As addressed in the EIS, the proposed development is consistent with the strategic directions provided in *A Metropolis of Three Cities, Central City District Plan* and the Blacktown LSPS.

Statutory Context

The refinements and clarifications as part of this response to submissions have been assessed in accordance with the relevant State and local environmental planning instruments as identified in the EIS. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act.
- The updated EIS and supporting documents have been prepared in accordance with the SEARs as required by Schedule 2 of the *Environmental Planning and Assessment Regulation 2021* (**the Regulation**).
- The proposal complies with all of the relevant provisions under *Blacktown Local Environmental Plan 2015* (**BLEP 2015**).
- The proposed development is consistent with the objectives of the IN1 General Industrial zone.
- The proposed development has been assessed in accordance with the relevant State Environmental Planning Policies as identified in the EIS. The proposed development complies with the relevant clauses of these SEPPs.
- The proposal generally accords with the relevant provisions of Blacktown Development Control Plan 2015 (**BDCP 2015**).

Community Views

Community and stakeholder engagement has been undertaken by the Applicant and Urbis in the preparation of the SSDA. This included direct engagement and consultation with:

- Adjoining landowners and occupants
- Government, agency and utility stakeholders listed within the SEARs

In accordance with the Regulation, the EIS was placed on formal public exhibition between 17 March and 13 April 2022. Only one submission was received from a local business in response to the public exhibition. Other submissions were received from NSW government agencies, BCC and a utility services provider in response to referrals from the DPE.

The key issues raised in the submissions are summarised earlier in this executive summary and are addressed in **Section 4** of this Submissions Report.

Likely Impacts of the Proposal

As addressed in the EIS, the proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment:** the proposal addresses the principles of ecologically sustainable development (ESD) in accordance with the requirements of the Regulation). In response to submissions, further assessment has been undertaken in relation to protecting the natural environment, as outlined below:
  - Acoustics **–** the recommended mitigation measures will avoid adverse environmental impacts associated with operation of the facility. Further assessment has been undertaken to identify potential noise and vibration impacts during the construction phase which concludes the proposal will generally comply with relevant standards. A Construction Noise and Vibration Management Plan has been prepared which contains provisions mitigating any impacts.
  - Groundwater – A Groundwater Assessment has been prepared by WSP, which concludes that the proposed construction and operation of the facility will have no interception or impacts on groundwater.
  - Stormwater management – The Applicant has consulted with the BCC Design Engineers to refine the stormwater management system to prevent adverse impacts downstream.
  - Waste processing – The Applicant has updated the Waste Management Plan to clarify measures in relation to waste streams, processing procedures and confirming the facility will not generate any waste pollution due to the type of operation proposed (ie, generally sorting and redistribution). The proposal is for the recycling of waste materials, which will provide an increased value on waste generation and prevent environmental degradation through valuable materials being disposed in landfill.
- **Built Environment:** The proposal has been designed having regard for the site's constraints and to minimise the environmental impact of the proposal. The built form is consistent with the existing industrial development within the precinct. Adequate space is allocated in the design for building clearance, landscaping and infrastructure provision. The site has been designed with sufficient access points to enable the safe manoeuvring of heavy vehicles separated from light vehicles for staff and visitor parking. The proposal will have low visual impact on its surroundings.
- **Social:** The proposal is expected to result in positive social impacts in the locality and the wider Western Sydney area through the provision of additional industrial/warehousing infrastructure.
- **Economic:** Positive economic impacts and contributions to the economic health of Western Sydney and NSW is expected through the provision of jobs and industrial employment in an area of high growth and demand for this infrastructure.

  In addition to supporting additional employment and economic growth, the proposed development will provide a range of other economic benefits for Sydney and New South Wales more broadly, including:
  - Reducing the state's dependency on international markets for the export of waste commodities. By contributing critical recycling infrastructure to the local economy, the facility will help to meet future growth in domestic demand as a result of domestic and international trade policies.
  - Contributing to achieving Australia's recycling target of 80% across all waste streams. By adding 120,000 tonnes of additional annual processing capacity, valuable materials will be diverted from landfill, relieving pressure on Greater Sydney's landfills.

Suitability of the Site

Preliminary investigations were undertaken early in the planning process to identify sites which could be suitable to accommodate the proposed MRF. The site location in the Blacktown LGA is important to meet the contractual and operational requirements by the Applicant and Cleanaway (future operator) to process recyclables collected in the local area by early 2023 and minimise travel distances for the fleet of trucks.

Public interest

As addressed in the EIS, the proposed development is considered in the public interest for the following reasons:

- The proposal is consistent with relevant State and local strategic plans and complies with the relevant State and local planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposal will provide public benefit by delivering a purpose built recycling facility for the local area, meaning capacity for recycling of waste materials is significantly enhanced and will contribute to environmental sustainability outcomes in the local area.
- The site is located close to Cleanaway's existing truck depot in Glendenning, meaning that the truck fleet requires less travel between its storage, pick-up route and distribution to the proposed MRF.
- The proposed facility is located within the area it will be servicing, with sustainability outcomes through the reduction in truck movements over long distances, minimising the supply chain distances and ecological footprint associated with vehicle movements, emissions and noise pollution.
- The proposal will generate significant economic benefits including employment opportunities during construction (103 direct and 143 indirect) and during operation (69 direct jobs through the ongoing operation of the additional facilities on-site and a further 114 indirect jobs from flow-on effects). The project will directly contribute an average of $10.8 million in value added, and indirectly contribute a further $19.5 million in value added, to the NSW economy on an annual ongoing basis.
- The issues identified during the stakeholder engagement have been addressed by design of the project and the assessment of the impacts of the project.

Having considered all relevant matters raised in the submissions, there will be no additional environmental impacts as a result of the minor refinements and clarifications. Additional measures are proposed to mitigate, minimise or manage potential impacts. The proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

1. INTRODUCTION

This Submissions Report relates to a proposed Materials Recycling Facility at 600 Woodstock Avenue, Rooty Hill (**the site**). On behalf of Charter Hall (**the Applicant**), this Submissions Report has been prepared to address the matters raised by public agencies, local Council, the community and other relevant stakeholders throughout the public exhibition period.

The State Significant Development Application (**SSDA**) was lodged with the Department of Planning and Environment (**DPE**) on 27 January 2022 (SSD-29999239). The SSDA was placed on public exhibition for 28 days between 17 March and 13 April 2022.

This Submissions Report has been prepared in accordance with the DPE *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021.*

1.1. EXHIBITED PROJECT

The SSDA seeks consent for:

- Demolition and tree removal
- Site enabling works including cut and fill
- Construction and operation of a purpose-built MRF comprising of a total of 7,572sqm gross floor area, including:
  - Maximum building height of RL 57.83m
  - Warehouse space 6,732sqm
  - Capacity to process up to 120,000TPA
  - Car parking provided on-site: 40 car spaces
- Associated landscaping including on-site tree planting and street tree planting

The proposed development will operate up to 24 hours a day, seven days a week. It will generate 103 direct and 143 indirect jobs during construction and 69 direct jobs through the ongoing operation of the additional facilities on site and a further 114 indirect jobs from flow on effects during the operational phase.

1.2. SUPPORTING DOCUMENTATION

This Submissions Report is supported by the following technical reports and documentation.

Table 1 Supporting Documentation

Appendix	Report	Prepared By
Appendix A	Revised Architecture Plans	Nettleton Tribe
Appendix B	Revised Civil Plans	Northrop
Appendix C	Revised Traffic Impact Assessment	Traffix
Appendix D	Revised Acoustic Report	Acoustic Works
Appendix E	Construction Noise and Vibration Management Plan	Acoustic Works
Appendix F	Revised Waste Management Plan	SLR
Appendix G	Groundwater Assessment	WSP
Appendix H	Volunteer Planning Agreement Letter	The Trust Company (Australia)

2. ANALYSIS OF SUBMISSIONS

This section provides a summary of the submissions received including a breakdown of respondent type, nature/ position and number of submissions received.

2.1. BREAKDOWN OF SUBMISSIONS

The SSDA was publicly exhibited between 17 March and 13 April 2022. There were eight submissions received from public agencies, BCC, Endeavour Energy and one submission received from a nearby business, comprising:

- Department of Planning and Environment (**DPE**)
- Transport for NSW (**TFNSW**)
- Heritage NSW
- NSW Environmental Protection Authority (**EPA**)
- Fire and Rescue NSW (**FRNSW**)
- Blacktown City Council (**BCC**)
- Endeavour Energy
- General Mills (a local business)

All submissions were managed by DPE, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-29999239).

A breakdown of the submissions made by group and issues raised is provided in **Table 2** Breakdown of Submissions Received.

The project received only a small number of submissions. Of these submissions, only one submission (from BCC) comprised an objection. Each of the matters raised in the BCC submission have been resolved and accordingly, it is anticipated the objection may be withdrawn upon reviewing this Submissions Report.

Table 2 Breakdown of Submissions Received

Submitter	**Category of Issues Raised**						
	The Project	Procedural Matters	Impacts			Justification and Evaluation of the Project	Issues Beyond the Scope of the Project
			Economic	Environmental	Social		
Public Authorities (State or Commonwealth Agencies and Council)							
DPE	1	1		1			
EPA	1	1		1			
TfNSW	1						
Heritage NSW							
DPE Water	1			1			
FRNSW	1			1	1		
Local Council Blacktown City Council	1			1			
Stakeholder Groups/Organisations							
General Mills			1	1			
Endeavour Energy	1	1		1			
Individuals – (Local <5km)							
TOTAL	7	3	1	7	1	0	0

2.2. CATEGORISING KEY ISSUES

In accordance with the DPE *State Significant Development Guidelines,* the issues raised in the submissions have been categorised as outlined in **Table 3** Categorising Issues Raised.

Table 3 Categorising Issues Raised

Category of Issue		**Summary of Matters Raised**
The project	The site	N/A
	The project area	N/A
	Physical layout and design	DPE, BCC and EPA requested clarification on the proposed layout and design of the site. TfNSW requested removal of the driveway at Woodstock Avenue, based on its proximity to the roundabout and potential safety issues. BCC requested civil design changes, primarily related to stormwater management. EPA requested an updated site plan to clarify the location of storing materials, and clarification on location of processing and storage on site.
	Key uses and activities	Submissions from EPA, DPE and BCC requested further clarification on waste processing processes and management procedures for the facility. DPE requested clarification on maximum capacity for the facility and the hours of operation.
	Timing	DPE requested clarification on potential staging of capacity/operations of the facility.
Procedural matters	Level or quality of engagement	N/A
	Compliance with the SEARs	N/A
	Identification of relevant statutory requirements	EPA requested clarification in relation to *Protection of the Environment Operations Act 1997* (**POEO Act**)
Economic, Environmental and Social Impacts	Air quality	The EPA provided recommended conditions of consent in relation to air quality. A local business identified concerns of potential air quality impacts on its food manufacturing processes.

Category of Issue		Summary of Matters Raised
	Traffic	TFNSW identified potential traffic safety issues associated with the access driveway on Woodstock Avenue. TFNSW requested additional information in relation to Green Travel Plans. DPE requested clarification on vehicle movements within the site and updated swept paths.
	Water	DPE Water, BCC and EPA requested further information in relation to stormwater management design, water quality impacts and groundwater impacts.
	Noise	The EPA requested further information in relation to noise and vibration impacts, including assessment of impacts during construction and the need for a Construction Noise and Vibration Management Plan (refer to **Table 10**).
	Safety	FRNSW requested further information in relation to fire safety.
	Waste and contamination	EPA requested clarification regarding the classification of waste streams - including but not, limited to sources/amounts of each waste, physical and chemical content, pollution which may result from processing.
Justification and evaluation of the project	Consistency of project with Government plans, policies and guidelines	N/A
Issues beyond the scope of the project or not relevant to the project	N/A	N/A

Since only a small number of submissions were made, a response to each individual submission is included within the Response to Submissions at **Section 4**.

3. ACTIONS TAKEN SINCE EXHIBITION

In response to the key issues raised within the submissions, minor design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the refinements that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions outlined in **Section 2**.

3.1. FURTHER ENGAGEMENT

Since the public exhibition of the SSDA between 17 March and 13 April 2022, the Applicant has undertaken further consultation with BCC, TFNSW and the EPA. This consultation is summarised as follows:

- Northrop consulted with the BCC Design Drainage Engineer in late May to discuss and clarify the design of the proposed drainage system and the preferred size of the gross pollutant trap (**GPT**).
- The Applicant consulted with BCC to enter into a Planning Agreement to provide for the water quality requirements to be met off-site. A signed Letter of Offer to BCC in relation to the Planning Agreement is provided in **Appendix H**.
- The Applicant has consulted with the EPA regarding issues raised in their submission regarding types of pollution and requirement for a wheel washer. The updated Waste Management Plan appended to this report has been issued directly to EPA for comment. No comments have been received at the time of issuing this report. Further justification has been provided for not requiring a wheel washer for the proposed facility. This information is incorporated into Row 87 of Table 10 in this report.
- Traffix consulted with TFNSW on 28 April 2022 to discuss the left-in left-out arrangement for the visitor car park driveway access onto Woodstock Avenue. TFNSW accepted the proposed relocation of the driveway eastwards away from the roundabout and modification to the roundabout splitter island to discourage right turn movements into the development from Woodstock Avenue and ensure that access to the site by visitors will be limited to a left in/left out access arrangement.

3.2. REFINEMENTS TO THE PROJECT

The following table summarises the minor refinements and clarifications proposed since public exhibition and in response to submissions made, and as a result of further engagement with DPE.

Importantly, these refinements are changes that fit within the limits set by the project description. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposal is not required.

Table 4 Design Refinements to Proposed Development

Issue	Refinement/ clarification
Key uses and activities	This Submissions Report confirms approval is sought for capacity up to 120,000TPA. Scenarios have been modelled for various different capacity levels to account for varying scales of operation but it is not intended for there to be a staged maximum capacity. Refer to **Table 5** for further information.
Timing	This Submissions Report clarifies that approval is sought for the site to operate up to 24 hours a day to accommodate peak demands and unexpected delays to processing. This would allow for operation of the MRF outside the typical proposed shift hours (between 12.30am and 4am). Refer to **Table 5** for further information.

Issue	Refinement/ clarification
Air impacts	No further assessment was required to be undertaken to respond to the issues raised. The Applicant will consult directly with General Mills to establish an emergency contact list in the event of a fire, uncontrolled waste discharge or similar. Refer to **Table 12** for further information.
Traffic	An updated Traffic Impact Assessment has been prepared by Traffix. Minor design refinements relate to the at-grade car park fronting Woodstock Avenue and the proposed extension of the traffic island. These design refinements have been undertaken in consultation with TFNSW. **Appendix E** in the updated Traffic Impact Assessment contains updated swept paths to clarify vehicle movements on site will be one-way only.
Water	Minor design refinements to the Civil Plans have been prepared in consultation with BCC. Refer to **Table 7** for further information. A new Groundwater Assessment Report has been prepared to respond to queries raised by DPE - Water and the EPA. Refer to **Table 9** for further information.
Noise	An updated Acoustic Report has been prepared and is accompanied by a new Construction Noise and Vibration Management Plan. Refer to **Table 10** for further information.
Safety	Responses to FRNSW will be prepared during detailed design, prior to the issue of a Construction Certificate (**CC**). Refer to **Table 11** for responses.
Waste	A revised WMP has been prepared in response to comments from EPA including but not, limited to sources/amounts of each waste, physical and chemical content, pollution which may result from processing. Refer to **Table 10** for further information.

3.3. ADDITIONAL IMPACT ASSESSMENT

Additional assessments have been prepared to respond to the issues raised within the submissions. These include:

- Groundwater Assessment Report
- Noise and Vibration Management Plan

The findings and recommendation of the additional assessments are discussed in detail within **Section 4** of this report.

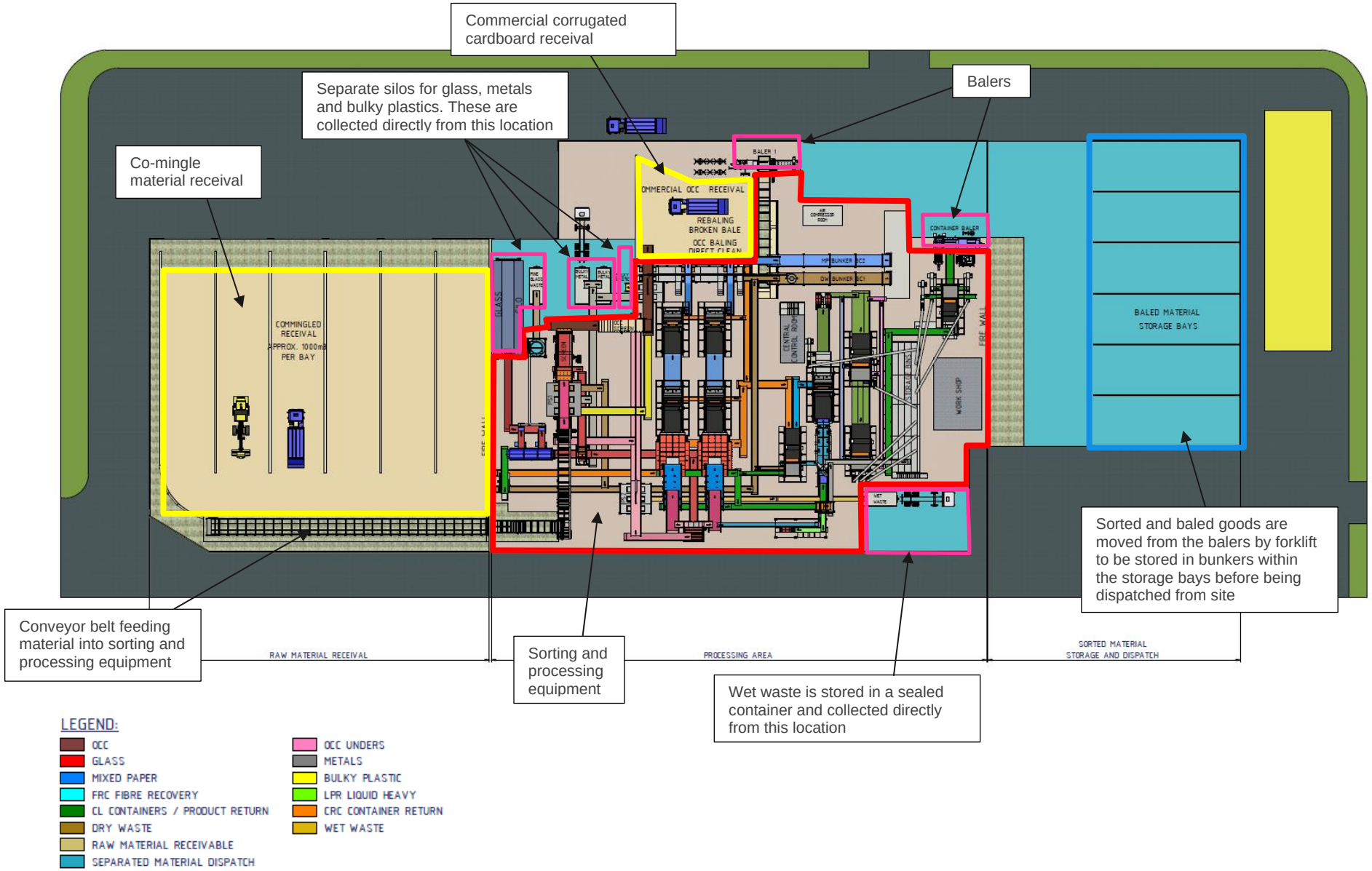
4. RESPONSES TO SUBMISSIONS

This section provides a detailed summary of the Applicant's response to the issues raised in submissions. Since only a small number of submissions were received during the public exhibition process, but are highly detail specific, a response to each individual submission is included in **Table 5** to **Table 12**.

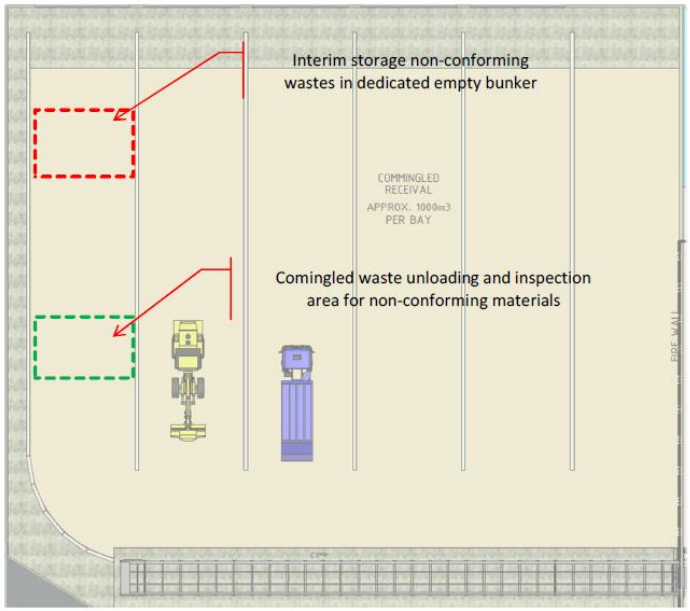
Table 5 Response to Submissions – Department of Planning and Environment

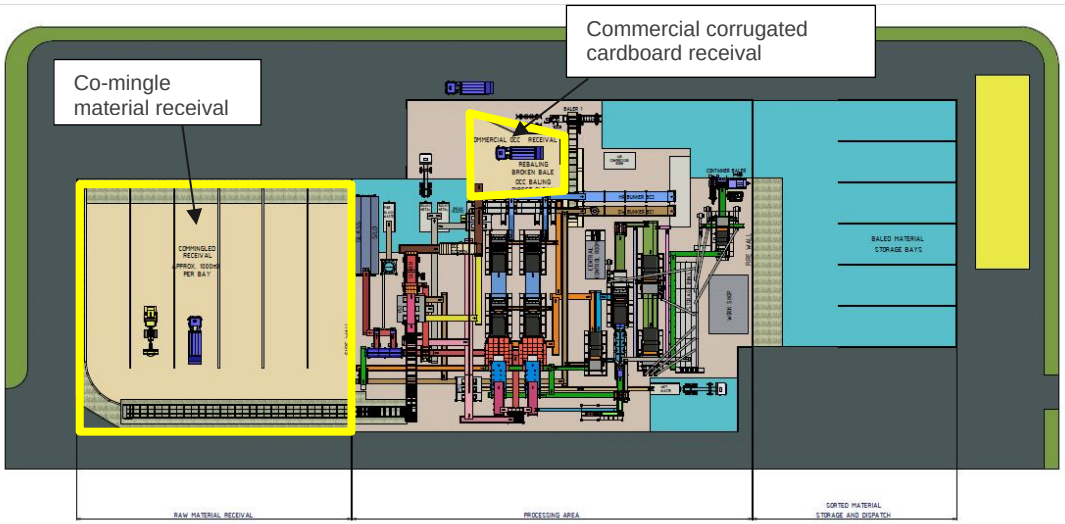
#	Issue Raised	Response	Supporting Document
1	**NSW DEPARTMENT OF PLANNING AND ENVIRONMENT (DPE)**		
2	**Waste Processing**		
3	The EIS states the proposed MRF's maximum processing capacity is 120,000 tpa, whereas section 5.1.2 of the revised Waste Management Plan (WMP) includes four maximum processing capacities being 75,000 tpa, 85,000 tpa, 95,000 tpa, and 105,000 tpa. Please clarify: (a) whether the MRF is proposed to have a staged maximum processing capacity. If so, please advise of the staging plan. (b) the proposed maximum processing capacity (120,000 tpa or 105,000 tpa)	Development consent is sought for a MRF with the capacity to process up to 120,000TPA and operate up to 24 hours per day. The revised WMP considers various operating scenarios of 75,000TPA, 85,000TPA, 95,000TPA, 105,000TPA and 120,000TPA to account for the varying scales of operation during typical shift hours (4:00am to 12:30am). Approval is not sought for a staged maximum capacity but recognises the facility will experience peaks and falls in demand over an annual basis. The 'additional' capacity to achieve up to 120,000TPA would be realised through the operation of the site on a 24 hour basis (ie beyond the typical shift hours), but only when required to accommodate peak demands and unexpected delays to processing. Approval for the maximum capacity and operating hours is sought in this SSDA to facilitate an upfront assessment of the potential impacts and provide a flexible approach to the future site operations without the need to obtain further planning approvals.	**Appendix F**
4	The WMP (especially Section 5.1.2 and Section 5.2.4) contains some acronyms and uncommon terminology. For example, OCC 95/5, OCC 90/10, ONP#6/SRPN, CBS (coated book stock),	Refer to section 5.2.4 of the updated WMP and subsequent subsections. All acronyms and materials are defined in technical terms and described in as clear detail as possible in a format that a member of the public would be able to understand, i.e OCC 90/10 is old	**Appendix F**

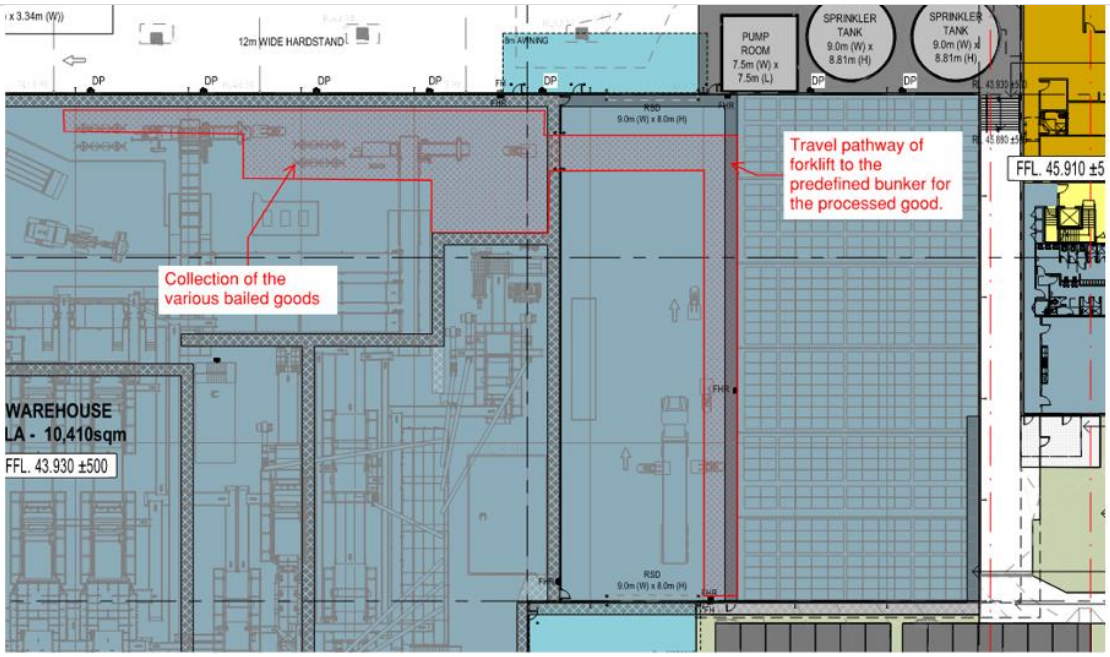
#	Issue Raised	Response	Supporting Document
	PET clear, PET colour, and LDPE. Please clearly describe these acronyms and/or include photos of to visually represent each material.	corrugated cardboard and consists of corrugated cardboard boxes with lines of either test liner or Kraft (section 5.2.4.15). Acronyms and descriptions are also provided for PET bottles (section 5.2.4.5), PET Thermoforms (section 5.2.4.7), LPDE (section 5.2.4.9 and 5.2.4.10) and OCC 95/5 (section 5.2.4.14), OCC 90/10 (section 5.2.4.15), ONP#6/SRPN (section 5.2.4.16). It is not possible to describe or show every form of material that falls into each category due to the broad range of applications that materials such as PET materials and LDPE materials are used for in typical household waste.	
5	Section 8.10 of the Traffic Report states the development comprises six commingled receival bays, one glass receival bay, two OCC receival bays, two wet waste bays, and one finished goods loading bay. However, the general arrangement site plan in Appendix BB (waste processing stream overview) only shows six commingled receival bays and one OCC receival bay. Please clarify locations of all other bays stated in the Traffic Report.	Appendix A of the updated WMP contains the following site plan. The following extracted site plan has been annotated to provide further information and is summarised below: • **(Yellow box annotation)** - The receival bunkers, comprising five bunkers for mixed recyclables and one for a glass silo, are located on the left of the plan. • **(Red box annotation)** - The processing area of the facility contains all sorting and processing equipment fed in from the receival bunkers via the conveyor belt. • **(Blue box annotation)** - The finished goods loading bay is on the right of the plan. This is where sorted and baled goods are stored in bunkers before being dispatched to other recycling facilities for processing. • **(Pink box annotations)** - The sorting equipment will separate certain materials into separate silos, including for glass, metals, bulky plastics and wet waste. The material within these separate silos will be collected by truck from the identified locations.	**Appendix F**


Commercial corrugated cardboard receival
Separate silos for glass, metals and bulky plastics. These are collected directly from this location
Balers
Co-mingle material receival
COMMINGLED RECEIVAL
APPROX. 1000m³ PER BAY
COMMERCIAL OCC RECEIVAL
REBALING BROKEN BALE
OCC BALING
BALED MATERIAL STORAGE BAYS
Conveyor belt feeding material into sorting and processing equipment
Sorting and processing equipment
Wet waste is stored in a sealed container and collected directly from this location
Sorted and baled goods are moved from the balers by forklift to be stored in bunkers within the storage bays before being dispatched from site
RAW MATERIAL RECEIVAL
PROCESSING AREA
SORTED MATERIAL STORAGE AND DISPATCH
LEGEND:
OCC
GLASS
MIXED PAPER
FRC FIBRE RECOVERY
CL CONTAINERS / PRODUCT RETURN
DRY WASTE
RAW MATERIAL RECEIVABLE
SEPARATED MATERIAL DISPATCH
OCC UNDERS
METALS
BULKY PLASTIC
LPR LIQUID HEAVY
CRC CONTAINER RETURN
WET WASTE

6	Section 5.2.3.3 of the WMP advises that 'incoming materials will be inspected in the five bays in the main receival hall. Loads suspected to contain hazardous material will be isolated to a single receival bay until they can be inspected and photographed'. Please clarify if the single receival bay is one of the six commingled receival bays. If so, please clarify: (a) what measures are proposed in the event that all receival bays are occupied (b) what measures are proposed to ensure hazardous materials would not contaminate other wastes unloaded in the same bay.	Cleanaway (the future operator) will prepare a detailed Waste Management Operational Plan during the detailed design phase. The Applicant accepts a condition of consent for a detailed Waste Management Operational Plan to be prepared prior to the issue of a CC.	**N/A**
7	Section 5.2.3.3 of the WMP advises that 'inbound commercial cardboard loads will be deposited at the commercial OCC receival area, well away from other cardboard, so the load can be inspected for contamination or signs of a hot load, prior to being pushed onto the baler feed conveyor. Cleanaway's policies for hot loads and contaminated loads will be followed if an incident occurs'. Please clarify and detail the policies for hot loads and contaminated loads.	Section 5.2.3.3 of the updated WMP has been revised to provide greater detail in response to the issues raised by DPE: ▪ If waste is identified that is not allowed on site (eg putrescible waste), the loader driver will immediately contact the weighbridge operator. If possible, the weighbridge operator will stop the vehicle that deposited the load and inform the driver that the load dropped is a material that is not accepted on the site. If the vehicle has already left the site, the vehicle's details will have been recorded in the weighbridge software. ▪ In either case, the weighbridge operator will notify the Operations Manager that the incident has occurred, the Operations Supervisor will then contact the customer. The details of the incident are entered into MyOSH and written notification provided to the customer. The loader driver will segregate any loads not accepted by the site and place	**Appendix F**

		them in the quarantine area. Waste in the quarantine area will be disposed of appropriately within one week. Figure 4 from the updated WMP below shows the waste receipt and storage locations for non-conforming material. The interim storage location for non-conforming wastes may be located in any of the receivals bay and will only be stored in empty bays.  	
8	Section 5.2.2 of the WMP states that 'the contents of the vehicles will be discharged into one of five bunkers on the southern side of the facility. A grab arm will remove any hazardous or undesirable items before a wheeled loader pushes the stockpiles onto a	**Location of the co-mingled waste bunkers** Refer to Row 5 of Table 5 and Appendix A of the updated WMP, which contains the below site plan. The location of the co-mingled receival bunkers, comprising five bunkers for mixed recyclables and one for a glass silo is located on the left of the plan. This is where the grab arm and conveyor belt is located to feed into the sorting area. Waste will be emptied into the bunkers directly from the trucks, which will reverse into the bunkers.	**Appendix F**

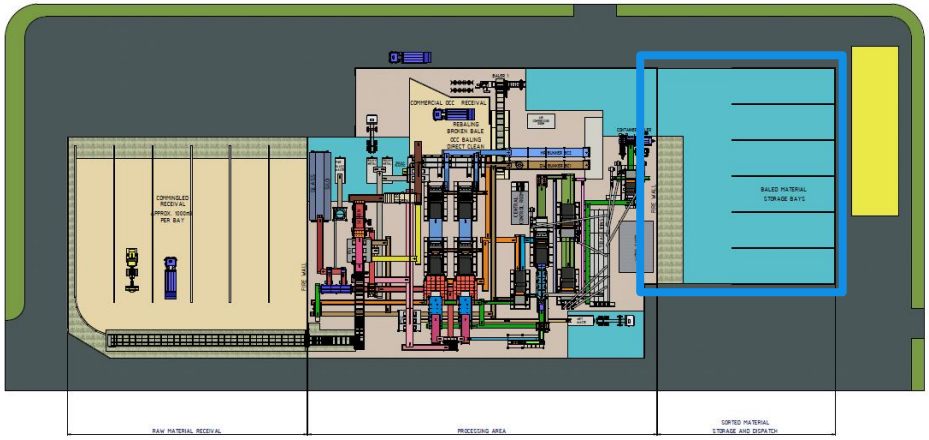
	conveyor that leads into the sorting and processing facility'. Please clarify: (a) locations of the five bunkers and grab arm (b) how co-mingled waste will be moved from trucks to the bunkers (c) where the hazardous or undesirable items will be stored.	 **Movement of co-mingled waste to bunkers** The area highlighted in the below figure shows where the baled materials will be collected and moved to the storage area via forklift trucks. The figure shows clear paths for separation between trucks and forklifts. The storage bays are designed to be multipurpose and will be managed by the operations team to identify what particular sorted materials will be stored in each bay and bunker. Forklifts will be used for all movements of material throughout the facility. All forklift movements for transferring baled materials will occur internally within the facility and with shutter doors closed to mitigate noise impacts from baling equipment and vehicle movements.	



Traffic management procedures and a traffic management system (including CCTV and traffic lights) will be developed as part of an Operational Management Plan to manage the interface between vehicles and staff. The traffic light system will be automated and monitored by the weighbridge office worker. The combination of an automated traffic light system and human monitoring will mitigate any safety risks associated with vehicle movement.

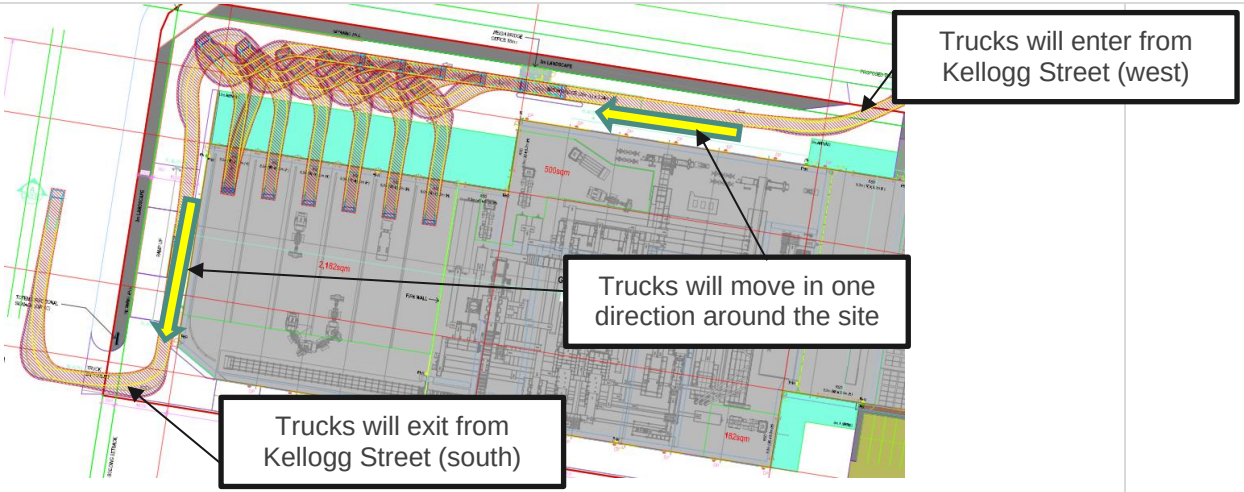
Additional traffic management procedures will require all vehicles and forklifts to be parked before truck drivers prepare the truck for loading. Whilst being loaded, truck drivers will stay in the truck. Once the truck is loaded, the loading forklift will be parked and the truck is closed up and prepared to leave site. Having the truck drivers stay within their vehicles while loading will increase safety and decrease the likelihood of vehicle and pedestrian conflict.

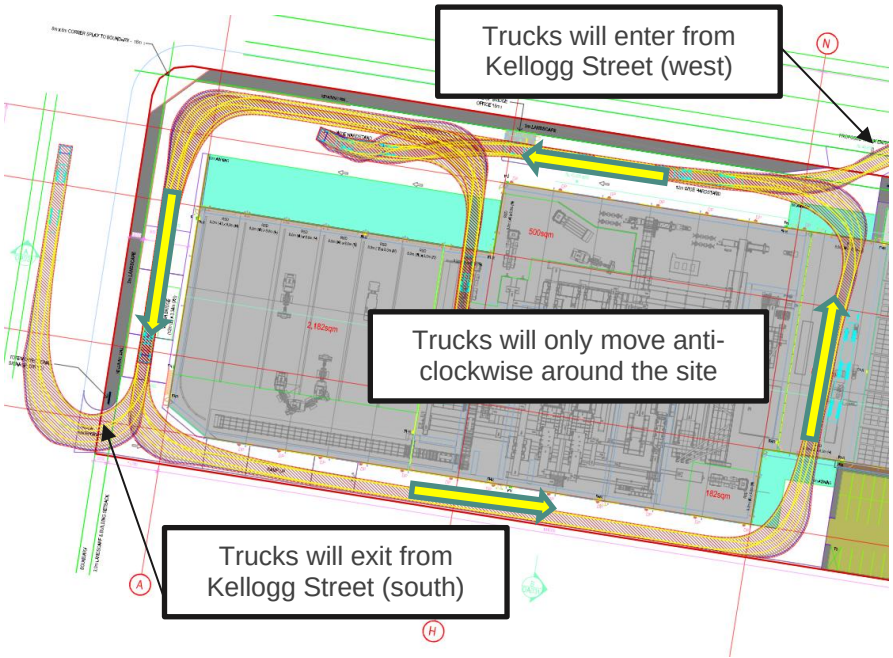
Heavy vehicles will then collect the designated goods for delivery to the appropriate facility for further processing. The loading area for collection is contained within the building minimising

		the impact if noise on surrounding developments as it will be enclosed within the building. The Traffic Management System is detailed further in Row 18. **Hazardous or non-conforming waste** Removal of non-conforming waste is addressed in row 7 (above).	
9	Section 5.2.2 of the WMP states that 'liquid filled containers will be drained into stainless steel tanks'. Please clarify where the tanks are located, how the collected liquid will be disposed of, including disposal destination and frequency.	Cleanaway (the future operator) will be preparing a detailed Waste Management Operational Plan during detailed design phase. The Applicant accepts a condition of consent for a detailed Waste Management Operational Plan to be prepared prior to the issue of a construction certificate.	**Appendix F**
10	Section 5.2.2 of the WMP advises 'baled product will be sent to the storage warehouse from where it will be loaded into articulated heavy vehicles for transport to markets'. Please clarify the location of the storage warehouse, the largest size of the articulated heavy vehicles, and frequency of delivering baled products to markets.	Appendix A of the updated WMP contains the below site plan. The location of the storage warehouse is on the right side of the plan, identified by the blue box.  As identified in the Traffic Impact Assessment report, between 10-50 heavy vehicle movements are expected per day (including delivery and collection of waste), the largest of which is expected to be a 26m B-double vehicle to collect baled products from the storage	**Appendix F**

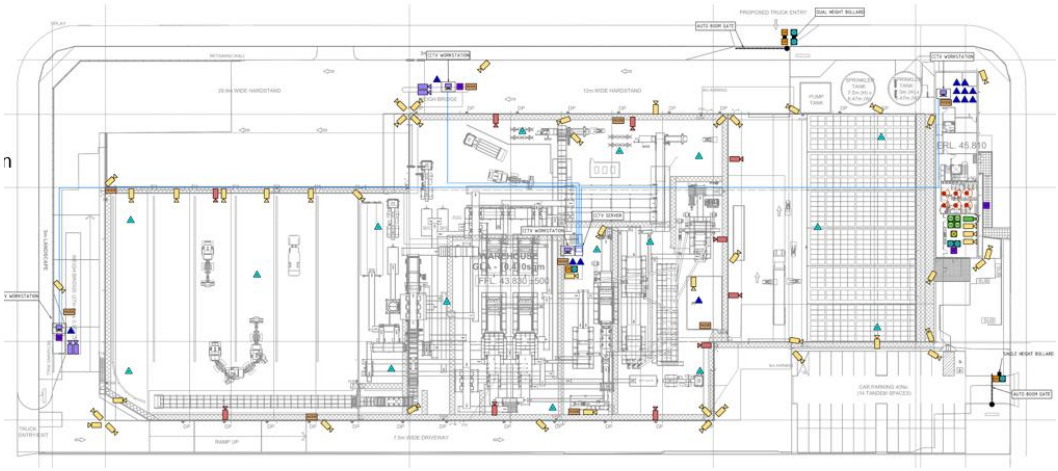
		warehouse. Specific details on the number of trips by 26m B-double vehicles will be confirmed as part of preparing a detailed Waste Management Operational Plan during detailed design. The Applicant accepts a condition of consent for a detailed Waste Management Operational Plan to be prepared prior to the issue of a construction certificate.	
11	Table 18 of the WMP includes discrepancy of feedstock quantities (described as 'plus and minus'). Please provide quantities of each waste stream without discrepancy, shown in both tonnages and percentages.	It is common to provide a range of discrepancy for the proposed development type due to the fluctuation in waste collected from kerbside bins. Refer to Table 19 and Table 20 of the updated WMP.	**Appendix F**
12	Table 20 of the WMP does not include the quantity recovered for each type of material. Please clarify. Also, please clarify whether waste listed in Table 20 means dry and wet waste collectively as described in Section 5.2.7.	'Waste' in Table 20 means dry and wet waste collectively, corresponding to the approximate breakdown in Table 19.	**Appendix F**
13	Please provide figures 1 to 9 as shown in the Blacktown MRF General Arrangement Plan (10840-MRF-01, Rev L).	The General Arrangement Plan (10840-MRF-001, Rev L) is indicative and will be subject to detailed design, prior to the issue of a CC.	**Appendix F**
14	Section 5.2.3.3 of the WMP states that 'dry waste will be held in a bunker conveyor and baled for distribution to the PEF plant. Wet (putrescible) waste will be contained in a sealed 30 m^3 compactor bin for delivery to landfill'. Please clarify:	Dry and wet waste are not the same as recovered materials. Dry waste is unrecoverable non-putrescible material. Wet waste is unrecovered putrescible material. Cleanaway (the future operator) will be preparing a detailed Waste Management Operational Plan during detailed design phase. The Applicant accepts a condition of consent for a detailed Waste Management Operational Plan to be prepared prior to the issue of a CC.	**Appendix F**

	(a) whether the dry and wet waste are same as the recovered products. (b) which facility will receive the baled dry waste, given that ResourceCo is not licensed to receive and process this type of waste.		
15	The Department notes the EPA's submission regarding waste	Refer to response to EPA comments later in Table 10.	**Appendix F**
16	**Traffic and access**		
17	The Department notes the proposed carpark driveway is in close proximity to Woodstock Avenue/Glendenning Road roundabout. Please review the site access arrangement to address the road safety concerns raised by TfNSW.	The applicant has made design refinements to the proposed access driveway and at grade car park to Woodstock Avenue to address the safety concerns raised by TfNSW. Reference should be made to the revised Architecture Plans in **Appendix A** presented in the updated Traffic Impact Assessment report prepared by Traffix. Refer to Row 24 for further information in response to TFNSW.	**Appendix A, Appendix C**
18	The Department notes it appears the swept path diagrams in the Traffic Impact Assessment show the internal driveway to the east of the processing building would carry two-way traffic, whereas the architectural plan shows the driveway is used for northbound trucks only. Should the driveway carry two-way traffic, it appears there would be movement conflicts between various types of trucks. Please clarify by providing updated swept path diagrams.	The site is designed to operate with vehicles moving in a one-way traffic environment clockwise around the site (aside from vehicles reversing into bays). Appendix E of the revised Traffic Impact Assessment contains updated swept path diagrams. Two main scenarios are extracted and annotated as follows.	**Appendix C**


Trucks will enter from Kellogg Street (west)
Trucks will move in one direction around the site
Trucks will exit from Kellogg Street (south)


Trucks will enter from Kellogg Street (west)
Trucks will only move anti-clockwise around the site
Trucks will exit from Kellogg Street (south)

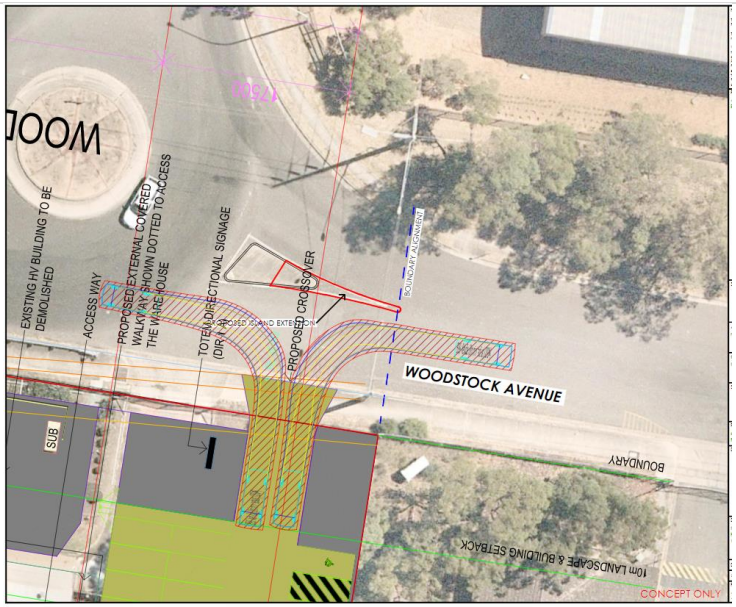
		The typical two scenarios for trucks entering the site will be: ▪ Waste collection trucks will enter the site via Kellogg Road (west) access driveway, move to the western weighbridge, unload in the co-mingle receival area or the commercial cardboard receival area (shown in Row 8), will then move to the southern weighbridge and exit the site via Kellogg Road (south) access driveway. ▪ Dispatch articulated trucks will enter the site via Kellogg Road (west) access driveway, move to the southern weighbridge, circle around the back of the site in a clockwise motion and enter the dispatch and loading area breezeway and will load the baled materials. Loaded trucks will then leave the breezeway and turn south within the site and move to the southern weighbridge again, before leaving the site via Kellogg Road (south) access driveway. ▪ There are other low frequency vehicle movements where trucks will undertake the same entry to the site as above, however, will reverse into loading bays for collecting wet waste on the eastern boundary. These trucks will pass through the loading area breezeway and circle the site, before exiting via Kellogg Road (south) access driveway. On this occasion, this will be coordinated so that there is no loading occurring within the breezeway. There may on very rare occasions be a requirement for vehicles to move in a clockwise direction around the site if there are broken down vehicles or broken equipment. However, this will be managed carefully through operational management procedures, supported by the proposed Traffic Management System that is controlled by the weighbridge operators. **Traffic Management System** An automated traffic management system will be used on the site. The system will be designed in detail prior to issue of a construction certificate for the fit out of the facility. Typically, traffic lights, sensors and line marking will manage traffic on site along with CCTV monitoring by the weighbridge office worker. Having an automated system controlled by the weighbridge office worker will minimise the likelihood of vehicle and pedestrian conflict as vehicles will not be permitted to move around the site without instruction. There will be	

		multiple camera monitoring locations which the weigh bridge office worker will have access to. Refer to the following concept plan for likely camera locations.  A traffic light system for both pedestrian and vehicle movement is a clear way of managing pedestrian and vehicle movements on site and will mitigate potential safety risks associated with vehicle and pedestrian conflicts.	
19	**Water Management**		
20	The Department notes Blacktown City Council's comments on water management. Please address these comments raised by Council in an RtS report.	Refer to response to BCC comments later in this Table.	**N/A**
21	**Operating Hours**		
22	The EIS states the MRF would operate 24 hours, 7 days a week (24/7).	Approval is sought to allow the MRF to operate up to 24 hours, seven days per week to accommodate peak demands and unexpected delays to processing. The typical proposed	**N/A**

	However, section 3.2.6 of the EIS indicates the MRF would not have staff on shift between 12.30 am and 4 am. Please clarify on what grounds 24/7 operation is sought.	shift hours are between 12.30am and 4am, however, extended hours may be required on an occasional and 'as needs' basis to deliver additional capacity. Approval for 24 hour operations are sought in this SSDA to facilitate an upfront assessment of the potential environmental and amenity impacts and provide a flexible approach to the future site operations without the need to obtain further planning approvals.	

Table 6 Response to Submissions – Transport for NSW

23	**TRANSPORT FOR NSW (TFNSW)**		
24	The existing driveway in close proximity to the roundabout should be removed to eliminate dangerous vehicle movements, noting the location of the (existing) driveway encourages vehicles accessing the site in a forward direction across the roundabout, as opposed to a left turn from Woodstock Avenue. TfNSW requests the application be amended to address this concern ensuring safety, and be submitted to TfNSW for review.	Amendments to the access driveway and at-grade car park to Woodstock Avenue are proposed to address the safety concerns raised by TFNSW. Specifically, the at-grade car parking has been reconfigured to relocate the access driveway further east to minimise impacts at the roundabout and as discussed with TFNSW prior to resubmission. The existing roundabout splitter island is to be extended to discourage right turn movements into the development from Woodstock Avenue and ensure that access to the site by visitors will be limited to a left in/left out access arrangement (refer below). The proposed modifications to the access driveway location and the extension of the roundabout splitter island are considered acceptable responses to mitigate traffic safety risks. Based on the modifications being designed in consultation with TFNSW, the proposed is considered acceptable for approval.	**Appendix A, Appendix C**

			
25	TfNSW has requested a Green Travel Plan (GTP) by prepared for the site prior to site occupation. Within the GTP TfNSW asks that a parking management strategy be incorporated with a reduction in the amount of car spaces for the site.	The Applicant acknowledges TFNSW's request for a GTP, including recommendations in relation to parking management, carpooling, bicycle parking/ EoT facilities, shuttle buses and TAGs. The Applicant accepts a condition of consent for a GTP to be prepared prior to the issue of a CC, requiring relevant strategies to be incorporated into the project to provide alternative transport options. In response to TFNSW's request for further information on parking management of the tandem car parking spaces, the Traffic Impact Assessment report has been updated (refer to section 8.7 of **Appendix C**). In Section 8.7 of Appendix C, it specifies that the 40 at-grade parking spaces off Woodstock Avenue for staff and visitors is proposed to include 28 tandem parking spaces to be utilised by staff only. The details of the AM and PM parking arrangements are extracted as follows.	**Appendix C**

		 **AM Shift Parking Arrangement** ▪ 21 MRF spaces (85.3% of AM MRF workforce drive to work). ▪ 10 office staff spaces (85.3% of office workforce drive to work). ▪ 5 visitors spaces based on typical Cleanaway visitor demands. ▪ 4 spaces as float.  PM Shift Parking Arrangement ▪ 17 MRF spaces (85.3% of PM MRF workforce drive to work). ▪ 10 office staff spaces (85.3% of office workforce drive to work). ▪ 5 visitors spaces based on typical Cleanaway visitor demands. ▪ 8 spaces as float. The proposed parking arrangements are intended to be integrated into an operational management plan, to be prepared as a condition of consent. It is considered that the implementation of the parking arrangements is consistent with other parking arrangements for industrial developments and will provide the best approach for managing parking whilst providing efficient use of land, and is considered acceptable for approval.	
26	TfNSW notes that there are no bicycle parking facilities or End of Trip (EoT) facilities. They recommend that these be provided to encourage active transport use. Along with EoT and bicycle parking, a shuttle bus is recommended to take	The Applicant acknowledges TFNSW's request for a GTP, including recommendations in relation to parking management, carpooling, bicycle parking/ End of Trip facilities, shuttle buses and Travel Access Guides (**TAGs**). The Applicant accepts and accepts a condition of consent for a GTP to be prepared prior to the issue of a CC, and will incorporate relevant strategies in consultation with the applicant.	**Appendix C**

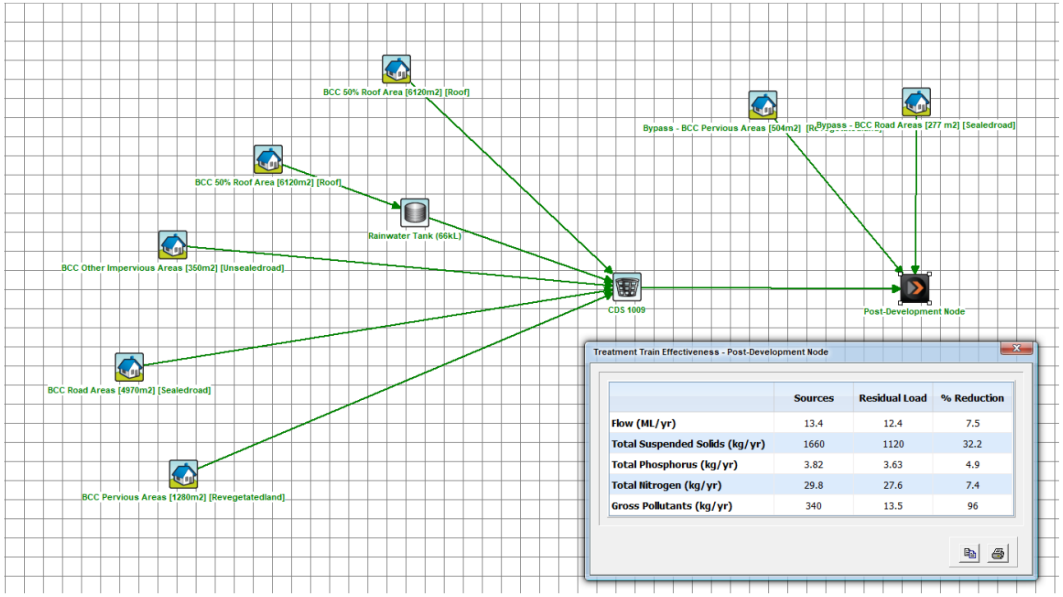
	workers to and from Rooty Hill Train Station.		

Table 7 Response to Submissions – Blacktown City Council

27	**BLACKTOWN CITY COUNCIL**		
28	A minimum splay of 8m x 8m as per Engineering Guide for Development – 2005 is to be included on plans. Splays are not to be used for installation of services or landscape works that may impede sight distance	The requested splay has been incorporated into the updated civil plans.	**Appendix B**
29	The applicant is to submit a letter of offer to enter into a Voluntary Planning Agreement to Catherine.Harris@blacktown.nsw.gov.au. This must be done prior to the determination of the Development Application. Alternatively, should a Voluntary Planning Agreement not be entered into then amendments to the water quality measures shall be provided on-site as per Part J of Councils DCP 2015.	A Letter of Offer to enter into a Planning Agreement was submitted to BCC on 3 June 2022. A copy of the letter is submitted as **Appendix H**.	**Appendix H**
30	If on-lot treatment is the preferred option, a Model for Urban Stormwater Improvement Conceptualisation catchment plan showing which areas drain to the proposed water quality	NA - a Letter of Offer to enter into a Planning Agreement was submitted to BCC on 3 June 2022. A copy of the letter is submitted as **Appendix H**.	**Appendix H**

	system and areas bypassing is required to be submitted.		
31	Due to the cut and/or fill exceeding 1.5 m, a desktop Groundwater Assessment Report is required for the site in accordance with section 4 of Council's Water Sensitive Urban Design developer handbook. Where there is the potential for interaction with groundwater, a Groundwater Management Plan must be prepared by a Geotechnical Engineer registered with the National Engineering Register	A Groundwater Assessment Report (**GAR**) has been prepared by WSP in **Appendix G.** The GAR includes a desktop assessment to characterise the groundwater environment on site, particularly the depth to the water table and expected hydraulic conductivity, prepared in accordance with Blacktown City Council's Water Sensitive Urban Design Developer Handbook. The GAR identifies that the proposal requires limited excavation earthworks. It is noted that site preparation works for the site will be undertaken under a complying development certificate (**CDC**) (requiring less than 1.5m of cutting). The main cutting proposed as part of SSD-29999239 involves up to 4.65m required in the southwestern corner of the site for the installation of proposed OSD and rainwater tanks (**RWTs**). The GAR concludes that the due to the base levels of the excavation being above the groundwater levels encountered, the proposal is not expected to intersect groundwater or require active dewatering. As such, the proposal does not require dewatering for construction and there is no cause for settlement to occur from groundwater extraction or dewatering. Accordingly, the construction of the proposal is considered to have negligible impacts to groundwater levels and sensitive receptors, due to groundwater extraction. WSP has identified that due to there being no requirement for dewatering, a Groundwater Management Plan is not required.	**Appendix G**
32	Provide an on-site detention catchment plan showing the areas draining to the detention tank and clearly show areas of bypass. Note that a 15% maximum site catchment bypass is permitted for the On Site Detention tank.	A catchment plan has been provided on Drawing DAC05.41. 11.5% of the site catchment bypasses the on-site detention (**OSD**) tank.	**Appendix B**

33	Investigation is required for the swale located to the south east of the development. Ascertain if there is any flow coming in to this property from the adjoining property given the current obstructions on the adjoining property. Provide details of the potential impacts to the proposed works and provide appropriate freeboard.	There is an existing kerb along the boundary which obstructs flows towards the subject site. The kerb and levels will be maintained along the boundary, maintaining existing conditions. The below images have been provided to show the existing kerb.  	**Appendix B**
34	Council says that two options have been provided for the proposed roof drainage and connection to the rainwater tank. They want one of the two options nominated for the rainwater tank and size the rainwater tank accordingly. Provide details on the plans and amend the Model for Urban Stormwater Improvement Conceptualisation subsequently.	The Applicant has selected the option that drains half of the roof to the rainwater tank. Civil plans Drawing DAC05.31 has been updated to provide details on this nominated option. Updated MUSIC modelling has been prepared and submitted accordingly.	**Appendix B**

35	The levels in existing street Pit 04/05 are to be confirmed and incorporated into the design	The invert levels of the existing street pit 04/05 have been measured on site and will be surveyed prior to detailed design and issue of a CC.	**Appendix B**
36	The Gross Pollutant Trap labelled CDS 1009 is undersized and the flows in Section 2.4.2.2 “Gross Pollutant Trap” of the civil engineering report are significantly low. Review the flows and calculations and refer to Council’s Engineering Guide for Development 2005 for the rainfall intensities for 1 Year Average Recurrence Interval event. Council also want details of the Gross Pollutant Trap including sections and levels to be provided	Northrop has discussed the sizing of the GPT with the BCC Design Engineer. Northrop has updated DAC05.33 to provide all relevant details and an updated MUSIC model is provided. An extract of the model is provided below.  Please refer to Drawing DAC05.33 for updated details of the Gross Pollutant Trap.	**Appendix B**
37	Pit 04/03 is to be a splitter with a diversion weir to divert the flows. Provide Hydraulic Grade Line details and calculations for the proposed Gross Pollutant Trap and splitter pit system to	A diversion chamber is provided with the Gross Pollutant Trap, please refer to Drawing DAC05.33 for details. The weir level will be set at the top water level for the 1 exceedances per year (**EY**) storm event as part of detailed design, prior to the issue of a CC.	**Appendix B**

	ensure there is sufficient hydraulic head and no obstruction in flows.		
38	The 375 mm diameter outlet pipe from On Site Detention tank is significantly undersized. The outlet pipe must be sized to 1% Annual Exceedance Probability 5-minute storm event. Preliminary calculations suggest the outlet pipe to be minimum 675 mm diameter. Review and amend the pipe sizes (i.e. Increase pipe sizes) from the OSD tank to the existing street pipe discharge.	The Applicant has adopted the requested change to pipe sizes. Please refer to Drawing DAC05.13 and DAC05.14 for updated pipe sizes.	**Appendix B**
39	The 1% Annual Exceedance Probability flows from the site are to be directed to the On Site Detention. Demonstrate how the surface flows in excess of the pipe capacity are directed to the On Site Detention system.	The piped system upstream of the OSD has been designed to cater for the 1% AEP flows.	**N/A**
40	The lids for the On Site Detention tank are to be grated. Remove the sealed lids. Reflect the pit/grate locations correctly and match with drawing DAC05.31 (02).	Northrop has updated Drawings DAC04.01 and DAC05.31 to remove the sealed lids.	**Appendix B**
41	More detail required to show how the roof water gets to the rainwater tank. Provide a separate system for roof water and surface drainage. Pits between the roof lines (i.e. charged pipes) are to be sealed.	The Applicant accepts a condition of consent to incorporate the requested design changes as part of detailed design, prior to the issue of a CC.	**N/A**

42	Charge line cleanout pits are to be provided at the low point of all charge line systems for the rainwater tanks to facilitate cleaning of the system.	Details on the charge line cleanout pits will be provided in the hydraulic engineer's drawings during detailed design. The Applicant accepts a condition of consent to provide the requested design detail, prior to the issue of a CC.	**N/A**
43	The lids for the On Site Detention tank are to be grated trafficable lids.	Northrop has updated Drawings DAC05.31 and DAC05.32 to be grated trafficable lids.	**Appendix B**
44	Council noted that a number of references within Civil Set needed to be updated to reflect correct wording. These include: Rename 100 year Average Recurrence Interval to 1% Annual Exceedance Probability on all notes and plans. Rename 1.5 year Average Recurrence Interval to 50% Annual Exceedance Probability on all notes and plans	Northrop has updated Drawing DAC05.32 to refer to the correct terms.	**Appendix B**
45	Provide 2 x 600 x 1200 mm grates over the 1% Annual Exceedance Probability orifice control pit and overflow pit.	Northrop has updated Drawing DAC05.31 to have two grates over the 1% AEP.	**Appendix B**
46	Provide a 900 mm x 900 mm grate over the 50% Annual Exceedance Probability orifice.	Northrop has updated Drawings DAC05.31 and DAC05.32 to have a grate over the 50% AEP.	**Appendix B**
47	The starting / lowest level in the base of the On Site Detention tank is to be the centreline of the 50% AEP orifice (1.5 year orifice) grading up at 2% from there.	Northrop has updated Drawing DAC05.32 to respond to the BCC requirements.	**Appendix B**

48	Provide separate orifice details for the 50% Annual Exceedance Probability orifice and 1% Annual Exceedance Probability orifice.	The requested detail will be provided during detailed design. The Applicant accepts a condition of consent to provide the requested design detail, prior to the issue of a CC.	**Appendix B**
49	Provide a minimum 2% slope in the On Site Detention storage. For larger tanks this can be in the form of a 2% cross-slope to a central “V” drain with 2% longitudinal slope along the “V” drain. Reassess tank dimensions to achieve the minimum storage volumes.	Northrop has updated Drawing DAC05.32 to reflect the 2% slope	**Appendix B**
50	The orifice within the Discharge Control Pit is to be protected by a suitable screen. Provide Maximesh Rh3030 for orifice diameters 150 mm or less with a minimum area of 50 times the orifice area and Weldlok F40/203 for orifices 150 mm diameter or more with a minimum area of 20 times the orifice area.	Northrop has updated Drawing DAC05.32 to provide detail on trash screen.	**Appendix B**
51	Remove the rainwater tank weir and extend the wall to the soffit of the tank. Provide series of overflow pipes (i.e. 4 x 150 mm diameter) with non-return flaps.	Northrop has updated Drawing DAC05.13 to respond to the BCC requirements.	**Appendix B**
52	The outlet pipe from the On Site Detention tank must be sized to 1% Annual Exceedance Probability 5-minute storm event. Increase the pipe size accordingly.	Northrop has updated Drawings DAC05.13 and DAC05.14 for updated pipe sizes.	**Appendix B**

53	The sealed lid to the rainwater tank pump must have a minimum internal opening of 2 x 600 mm x 1200 mm to facilitate maintenance access to the pumps.	Northrop has updated Drawing DAC05.31 to provide 2 x 600 x 1200 mm access lid.	**Appendix B**
54	The 1% Annual Exceedance Probability flows from the site are to be directed to the On Site Detention tank. Demonstrate how the 1% Annual Exceedance Probability flows will be directed to the On Site Detention tank. There are areas to the east and south east (flows in excess of pit and pipes) which are bypassing the On Site Detention. Clearly show the areas of bypass.	Northrop has updated stormwater long sections on Drawings DAC05.11-14. Drawing DAC05.41 shows the area bypassing the OSD tank.	**Appendix B**
55	Submit On Site Detention Deemed to Comply Tool spreadsheet electronically to Council for review.	Northrop has prepared a OSD Deemed to Comply Tool spreadsheet. This is submitted as part of **Appendix B**.	**Appendix B**
56	Submit all models including the Model for Urban Stormwater Improvement Conceptualisation to Council electronically.	Northrop has prepared updated MUSIC modelling in accordance with the revised Civil Plans.	**Appendix B**
57	All pits deeper than 1.2 m must provide step irons at 300 centres.	Northrop has provided step iron details on Drawing DAC05.32.	**Appendix B**
58	The internal pipe network is to be designed in accordance with the Council's Engineering Guide for Development 2005 to carry the 5% Annual Exceedance Probability (20 year	Northrop has updated stormwater long sections on Drawings DAC05.11-14	**Appendix B**

	Average Recurrence Interval) storm flows.		
59	Review the pit size as 600 * 600 mm pits are limited to 600 mm maximum depth and 600 * 900 mm pits are limited to 900 mm depth. Pits greater than 900 mm depth are all to be minimum 900 * 900 mm. All pits within the proposed development must comply with these requirements.	Northrop confirms the minimum pit size is 900 x 900 mm.	**Appendix B**

Table 8 Response to Submissions – Heritage NSW

60	**HERITAGE NSW**		
61	Heritage NSW concurs with all the recommendations documented in the ACHAR with respect to the management of Aboriginal cultural heritage.	No further actions are required.	**N/A**

Table 9 Response to Submissions – Department of Planning and Environment - Water

62	**DEPARTMENT OF PLANNING AND ENVIRONMENT – WATER**		
63 64	Quantify the maximum annual volume of water take due to aquifer interference activities required for the project and demonstrate sufficient entitlement can be acquired in the relevant water source unless an exemption applies.	As stated in Section 6.1.2 of the Groundwater Assessment Report, groundwater levels in the southwestern corner of the Site, where the deepest cuts (4.65 m depth) are proposed, are below the base of the excavation. Accordingly, the Project is not expected to intersect groundwater or require active dewatering. An assessment of the Project's impacts from the potential changes in groundwater levels and quality on groundwater dependent ecosystems (**GDEs**), beneficial use category, water supply	**Appendix G**

	Insufficient information has been provided to confirm the potential for groundwater take due to aquifer interference associated with construction and operation of the project. Water take volumes and the ability to account for this water take in consideration of all water take at the project site needs to be clearly understood. There is an exemption to requiring a WAL which may relate to the project, Schedule 4 Clause 7 of the Water Management (General) Regulation 2018 which is for the take of water less than 3ML.	works (i.e. registered bores), highly connected surface water source and culturally significant sites is provided in Table 6.1.	

feature	Minimal impact considerations	Response
Water table	Less than or equal to ten per cent cumulative variation in the water table, allowing for typical climatic "post-water sharing plan" variations, 40 m from any: — high priority groundwater dependent ecosystem; or — high priority culturally significant site. — listed in the schedule of the relevant water sharing plan. A maximum of a two-metre decline cumulatively at any water supply work.	No groundwater take is anticipated for the construction or operation of the Project.
	If more than ten percent cumulative variation in the water table, allowing for typical climatic "post-water sharing plan" variations, 40 m from any: — high priority groundwater dependent ecosystem; or — high priority culturally significant site. — listed in the schedule of the relevant water sharing plan then appropriate studies will need to demonstrate to the Minister's satisfaction that the variation will not prevent the long-term viability of the dependent ecosystem or significant site. If more than two metres decline cumulatively at any water supply work then make good provisions would apply.	Refer to above response that indicates this condition is not triggered.
Water pressure	A cumulative pressure head decline of not more than a two-metre decline, at any water supply work.	Pressure heads are not anticipated to be lowered (or raised).
	If the predicted pressure head decline is greater than two metres decline cumulatively at any water supply work, then appropriate studies are required to demonstrate to the Minister's satisfaction that the decline will not prevent the long-term viability of the affected water supply works unless make good provisions apply.	Refer to above response that indicates this condition is not triggered.
Water quality	Any change in the groundwater quality should not lower the beneficial use category of the groundwater source beyond 40 m from the activity.	The Project is not anticipated to result in a change in groundwater quality which would lower the beneficial use category.

		<table><tr><th>feature</th><th>Minimal impact considerations</th><th>Response</th></tr><tr><td></td><td>If the above condition is not met then appropriate studies will need to demonstrate to the Minister's satisfaction that the change in groundwater quality will not prevent the long-term viability of the dependent ecosystem, significant site or affected water supply works.</td><td>Refer to above response that indicates this condition is not triggered.</td></tr></table> The assessment complies with Level 1 acceptance criteria indicating that the proposal is anticipated to have minimal and acceptable impact to the underlying groundwater environment.	

Table 10 Response to Submissions – NSW Environment Protection Authority (EPA)

65	NSW Environment Protection Authority (EPA)		
66	**Environmental Protection Licence** The EPA notes that the construction of the proposed facility will require an Environment Protection Licence (EPL) under section 47 of the Protection of the Environment Operations Act 1997 (POEO Act) for scheduled development work and the operation of the proposed facility will require an environment protection licence under section 48 of the POEO Act for premises based scheduled activities. The EIS does not however specify the scheduled and ancillary activities to be licensed under the POEO Act. The EPA requires the following to be addressed:	The specific licensing requirements for the facility will be identified during detailed design in coordination with Cleanaway (the future operator of the facility). The Applicant will work with Cleanaway to apply for an EPL under section 47 of POEO Act, prior to the fit out of processing equipment. The Applicant accepts a condition of consent to obtain the relevant EPL, prior to the issue of an occupation certificate (**OC**).	**N/A**

	a) The Applicant must identify the activities listed in Schedule 1 of the POEO Act that will be carried out at the Premises for which an EPL is required. b) The Applicant must identify the activities listed in Schedule 1 of the POEO Act that will be carried out at the Premises, for which an EPL is not required due to the scale of the activity.		
67	**Site Plan** The EPA noted that insufficient information has been provided with the EIS in relation to site design and it is unclear from the EIS where each waste type will be stored and the infrastructure associated with waste storage, including the design for any waste storage bays and location of skip bins. The EPA also notes that the EIS describes incoming feedstock to be contained in six separate bunkers however the WMP prepared by SLR, dated February 2022 provided at Appendix L provides descriptions and diagrams indicating five receiving bunkers. a) The Applicant must provide a site plan identifying, at a minimum, the following areas:	Incoming feedstock will be contained in six separate bunkers, including five bunkers for mixed recyclables and one for a glass silo. Bunkers will be divided by 5 metre high masonry walls. No other stockpiles are proposed. The height of the feedstock stockpiles will not exceed 4 metres. Each mixed recyclables bunker will hold approximately 1,000m^3 of feedstock. Section 5.2 provides additional details as requested and Figure 6 shows the storage locations for processed and baled recyclable materials for transport offsite for further processing. **Haulage** Appendix A of the WMP shows how vehicles will move around the site. The plan is extracted below.	**Appendix A, Appendix B, Appendix E, Appendix F**

i. Haulage

ii. Waste receival, processing, storage and loading (for each waste type)

iii. Quarantine

iv. Infrastructure for environmental controls including dust, noise, water and wheel wash

v. Weighbridge/s

vi. Site boundaries

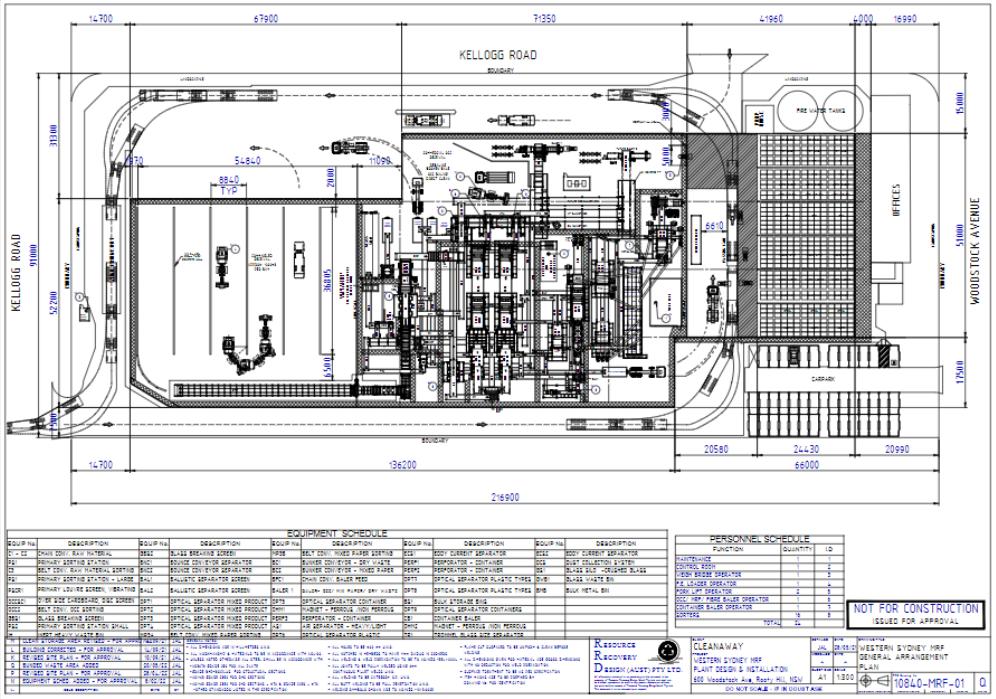
vii. Stormwater drainage areas

viii. Chemical and fuel storage areas

ix. Processing equipment and infrastructure

x. Machinery storage areas.

b) The Applicant must clarify the receiving bay configuration and ensure that all documentation accurately reflects the proposed arrangement.



Waste receival, processing and storage

Section 5.2 of the WMP has been updated to provide further detail on the waste processing system including feedstocks, waste processing operations and systems, resource outputs, storage of recyclables and the waste tracking system. The WMP has been updated accordingly to provide annotated drawings, as summarised below:

Figure 4 – Location of non-confirming loads

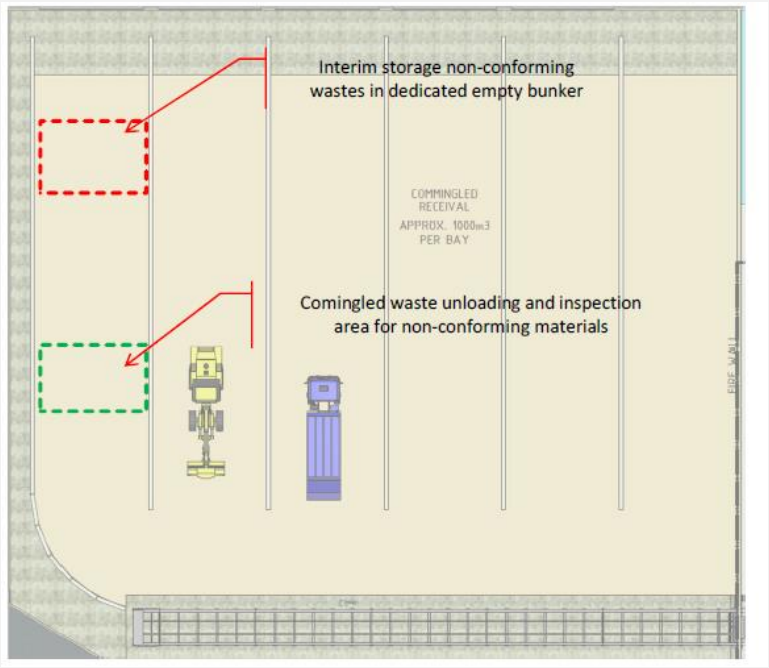
Figure 5 – Kerbside waste receival bays

Figure 6 – Location of bunkers, balers and storage areas

Figure 7 – Storage location of processed and baled recyclable materials.

Quarantine

Additional information has been provided in Section 5.2.3.3 of the updated WMP in relation to non-conforming waste that is required to be quarantined. The below plan has been extracted from Figure 4 of the updated WMP. Non-conforming waste will be disposed of appropriately within one week.



Infrastructure for environmental controls including dust, noise, water and wheel wash

Dust is controlled by a misting system integrated into the processing equipment.

Noise is mitigated by operating all plant and equipment within the building and keeping doors closed at all times. A noise modelling study has been undertaken by Acoustic Works and incorporates mitigation measures for managing noise and vibration during construction and operation of the facility. Refer to **Appendix E**.

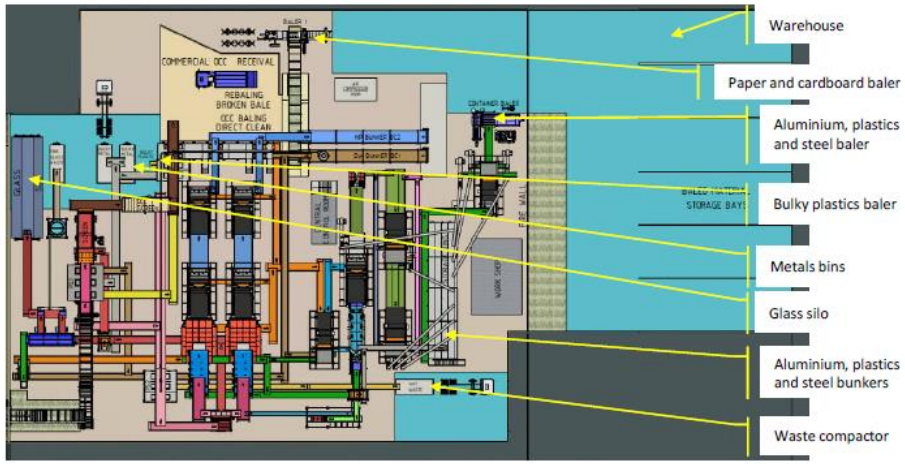
		No wheel wash is proposed for the site. Wheel washes are typically installed at sites with unsealed roads where to dust or mud could be tracked off-site by vehicles. In the case of this MRF, the site roads and surfaces are entirely sealed and dry. Contaminated water is not being conveyed through any on-site systems. A wheel wash is not necessary due to the type of recyclable material being handled and the sealed surfaces. **Weighbridge/s** The updated WMP provides detail on the two weighbridges proposed to be installed: ▪ One to accommodate B-double trucks – long weighbridge ▪ One to accommodate 12m rigid trucks – short weighbridge Weighbridges will include registration plate recognition software, keypad and ticket writer, camera and intercom facilities. All trucks will be required to be weighed on entry to the site and before exiting the site to meet EPA requirements. The procedures for this process are detailed in Section 5.2.8 of the updated WMP. **Site boundaries** The site boundaries are shown on the Site Plan in **Appendix A**. **Stormwater drainage areas** Stormwater drainage areas are shown in the civil plans and Engineering Report prepared by Northrop in **Appendix B**. **Chemical and fuel storage areas** No chemicals or fuel are proposed to be stored on site. **Processing equipment and infrastructure** A description of the processing and separation equipment is provided in Section 5.2.3.1 of the updated WMP. The proposed equipment comprises of: ▪ Five fibre and four plastic optical sorting units	

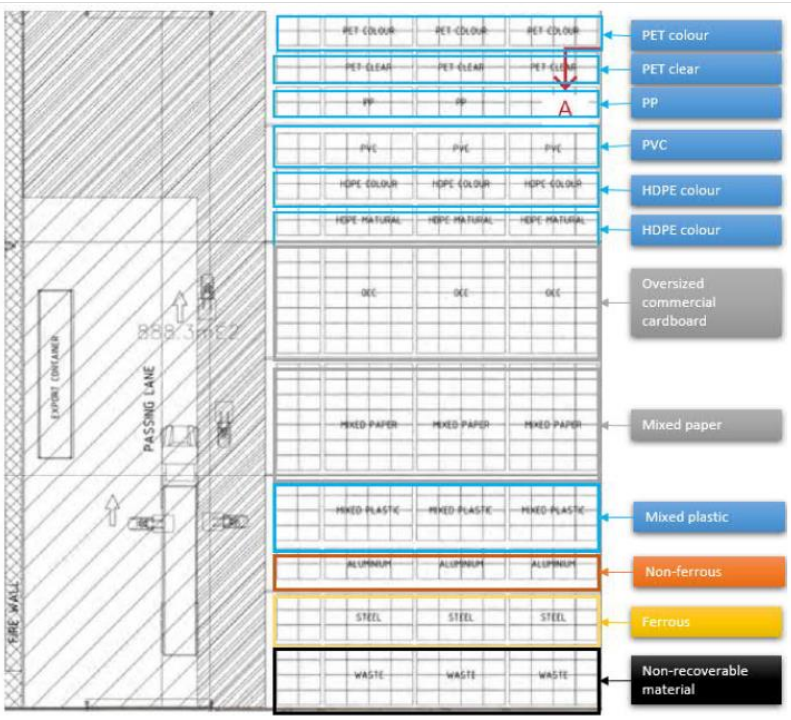
		▪ One ballistic separators ▪ Two air separators ▪ One OCC screen ▪ Two Eddy Current Separators ▪ Three air compressors dryers and receiver ▪ Primary vibratory louver screen ▪ Mega bounce network system ▪ Three-deck glass breaker screens ▪ 3 m glass breaker distribution screen feed to bounce network ▪ Commercial recyclables sorting conveyor system ▪ Plastic film venturi system ▪ SCADA electrical control system. **Machinery storage areas.** No designated area for parking mobile plant has been identified at this phase. It is anticipated that the front-end loader will be parked in one of the feedstock bunkers and the two gas powered forklifts will be parked in the bailed product area. The Applicant accepts a condition of consent to identify a designated area for machinery storage/ mobile plant, prior to the issue of an occupation certificate. The EIS and WMP have been updated according to the above.	

68 69	Insufficient information has been provided regarding the incoming and outgoing waste streams at the Premises. The Applicant must clearly define all waste types in accordance with the Act and ensure they are classified according to the EPA's Waste Classification Guidelines 2014 (as amended from time to time). The EPA notes that Tables 18 and 19 of the Waste Management Plan list a product type as "waste"; this must be clarified as per (a) below. The EPA also notes that Table 21 of the Waste Management Plan identifies "dry" waste and "wet" waste as waste streams. The EPA does not recognise these classifications and requires the Applicant to include these waste streams in the assessment required in (a) below. For each waste type, the EIS must describe the physical and chemical content and types of pollution which may result from the handling, storage and processing of that waste. For each waste type, the EIS must describe the physical and chemical content and types of pollution which may result from the handling, storage and processing of that waste. Detailed information regarding the source and quantity of each of the waste types to be received at the Premises is also lacking	Table 18 has been amended in the updated WMP to show the classification of each waste type according to the 2014 Waste Classification Guidelines and the PoEO Act Schedule 1. The waste and materials types classified in Table 18 align with those in Table 19. References to 'dry' and 'wet' waste have been replaced with 'non-putrescible waste' and 'putrescible waste'. An extract of Table 18 is provided below. **Commodity** | **2014 Waste Classification Guidelines** | **PoEO Act Schedule 1[20]** ONP | General solid waste (non-putrescible) | General solid waste (non-putrescible) Mixed Paper | General solid waste (non-putrescible) | General solid waste (non-putrescible) OCC | General solid waste (non-putrescible) | General solid waste (non-putrescible) HDPE | General solid waste (non-putrescible) | General solid waste (non-putrescible) PET Clear[21] | General solid waste (non-putrescible) | General solid waste (non-putrescible) PET Colour[22] | General solid waste (non-putrescible) | General solid waste (non-putrescible) LDPE | General solid waste (non-putrescible) | General solid waste (non-putrescible) Mixed Plastics | General solid waste (non-putrescible) | General solid waste (non-putrescible) Aluminium | General solid waste (non-putrescible) | General solid waste (non-putrescible) Steel | General solid waste (non-putrescible) | General solid waste (non-putrescible) Glass[23] | General solid waste (non-putrescible) | General solid waste (non-putrescible) Waste | General solid (putrescible) waste | General solid (putrescible) waste Polypropylene | General solid waste (non-putrescible) | General solid waste (non-putrescible) Non-putrescible Waste | General solid waste (non-putrescible) | General solid waste (non-putrescible) Putrescible Waste | General solid (putrescible) waste | General solid (putrescible) waste Batteries | Hazardous waste | Hazardous waste Paint | Hazardous waste | Hazardous waste Oils and solvents | Hazardous waste | Hazardous waste Gas cylinders | Hazardous waste | Hazardous waste Fire extinguishers | Hazardous waste | Hazardous waste Timber | General solid waste (non-putrescible) | General solid waste (non-putrescible) The Applicant has consulted with Elizabeth Watson at EPA, to seek clarification on the matters raised in the EPA submission related to the physical and chemical content and types of pollution which may result from the handling, storage and processing of waste. It is the Applicant's view that the facility will not generate any pollution as materials received and	**Appendix F**

	in the EIS. The Waste Management Plan states that material to be processed at the facility will be collected from kerbside recycling bins with yellow lids in Blacktown Council area. It also states that Cleanaway has the contract to collect and recycle materials collected under the NSW Container Deposit Scheme. No further information is provided as to the source of this material, specific waste classifications, source/s or quantities. Similarly, the Waste Management Plan states that the Premises will be designed to be able to accommodate additional cardboard and recyclables materials from Cleanaway's commercial customers. Again, no further information is provided as to the source of this material, specific waste classifications, source/s or quantities of this material. The EPA requires the following to be addressed: a) The Applicant must identify and classify each waste type with the following information: ▪ Definition as per Schedule 1 of the POEO Act ▪ Specific waste stream	processed by the MRF are simply being sorted ready for more detailed processing at other facilities. Section 5.2.1 of the updated WMP states that the sources of mixed recyclables will be from kerbside bins in Blacktown. Any additional cardboard will be clean packaging sourced from major retailers. No further detail is available until commercial arrangements are finalised by the operator. The updated WMP confirms the facility will not accept CDS materials.	

	▪ Classification of the waste as per the Waste Classification Guidelines ▪ Sources of each waste type ▪ Volumes of each waste type ▪ Physical and chemical content of each waste type ▪ Types of pollution which may result from the handling, storage and processing of that waste		
70	The EIS provides general information on the proposed waste storage arrangements but does not contain enough detail for the EPA to adequately assess the potential environmental impacts relating to waste and materials storage. The Applicant is required to provide details of how waste will be stored, including the maximum daily storage capacity of the site, how waste will be handled on site, and how waste will be transported to and from the site. For example, the EIS states that wet (putrescible) waste will be contained in sealed 30 m3 compactor bin for delivery to landfill but does not provide information as to the expected quantities, timeframes for storage or how and where waste will be transported to landfill.	The updated WMP in **Appendix F** should be reviewed to fully understand the potential environmental impacts of the proposal. Relevant extracts and responses to the issues raised are summarised below. **Waste storage** Section 5.2.5 of the updated WMP provides details in relation to storage. Below is an extract of Table 22 of the updated WMP, which summarises material quantities, dispatch locations and storage details. **Material** / **Quantity Recovered** / **Storage Bin and Bunker Details** (Number; Capacity (m^3)[45]) / **Balers** Bulky plastics — — — Two Bulky metal — Two bins — Each 10 — Waste for landfilling — Two compactors — Each 30 — Steel — One bunker — 138 — One shared Clear PET — One bunker — 345 — Natural HDPE — One bunker — 186 — Coloured HDPE — One bunker — 345 — Mixed plastics — One bunker — 186 — Aluminium — One bunker — 138 — Glass — Silo — 138 — Mixed paper and cardboard — — — 531 — Two shared Old corrugated cardboard — — — 531 —	**Appendix F**

	Insufficient information has also been provided in the EIS regarding contaminated and non-conforming waste, including hazardous materials, received at the premises. The EPA requires that the identification, management, storage and disposal arrangements for these materials are clarified. The EIS does not provide information to indicate that a dedicated quarantine area for the separation and storage of hazardous waste is proposed for this waste, nor that there is a process in place to ensure that all non-conforming waste is removed from the Premises as soon as practicable.	Below is an annotated plan extracted from Figure 6 of the updated WMP. It shows location of materials being dispatched for processing.  The following is an annotated plan extracted from Figure 7 of the updated WMP. It shows location of materials being stored in the northern section of the facility (on the right of the above plan). The sorted materials are baled and stored for transport offsite for further processing.	



Waste transported on and off site

Waste material will be transported on site by trucks that have collected waste from kerbside bins in Blacktown LGA. Waste sorted ready for processing at other facilities will then be transported via truck. As identified in the EIS and the updated WMP, this will be via the following vehicles:

- One 26 m B-double for product storage and MRF glass outbound
- One 19 m articulated vehicle for product storage and MRF glass outbound
- One 12 m rigid vehicle for OCC receival, packer putrescible waste, bulky metal, comingled receival

<table>
<tr><td></td><td></td><td>Quarantine

Refer to row 67 of this table and the updated WMP for further information.</td><td></td></tr>
<tr><td>71</td><td>Insufficient information has been provided regarding the intended fate of the recovered waste, particularly the intended fate of the waste which has been recovered for reuse. The EIS must clearly set out the intended fate for each of the recovered wastes. The Waste Management Plan states some recovered waste will be transported to the ResourceCo PEF plant (ResourceCo). ResourceCo operates under Environment Protection Licence No.20937. The EPA notes outgoing waste must only be transported to a place which is lawfully able to receive that waste. ResourceCo is not lawfully permitted to receive the waste types which will be produced at the proposed facility.</td><td>Section 5.2.7 of the updated WMP identifies the possible destination for processed materials. Extracts of this information is provided below. It is understood that the identified off-site destinations for the identified materials are suitably licenced by the EPA for the identified material (either recycling, non-putrescible waste or putrescible waste).

<table>
<tr><th>Recovered material</th><th>Reprocessing destination</th><th>Recycled raw material</th><th>Reuse product</th></tr>
<tr><td>PET clear</td><td>Circular Plastics Australia, Visy Plastics</td><td>rPET resin pelletisation</td><td>Production of beverage bottles</td></tr>
<tr><td>PET colour</td><td>Australian Recycled Plastics</td><td>rPET resin pelletisation</td><td>Commercial reuse</td></tr>
<tr><td>HDPE natural</td><td>Circular Plastics Australia, Visy Plastics</td><td>rHDPE flake and resin pelletisation</td><td>Production of beverage packaging</td></tr>
<tr><td>HDPE colour</td><td>PCP Global Recycling, Circular Plastics Australia</td><td>rHDPE flake and resin pelletisation</td><td></td></tr>
<tr><td>OCC</td><td>Visy, Opal</td><td>Fibre pulp</td><td>Remanufacture paper and packaging products</td></tr>
<tr><td>Mixed paper</td><td>Visy, Fibrecycle</td><td>Fibre pulp</td><td>Remanufacture paper and commercial fibre products</td></tr>
<tr><td>Mixed plastic</td><td>Advanced Circular Polymers, Cleanaway Chemical Recycling</td><td>Mechanical recycling</td><td>Tacoil and base monomers</td></tr>
<tr><td>Non-ferrous metals</td><td>Pragmatic Metal</td><td></td><td>Remanufactured into automotive parts</td></tr>
<tr><td>Ferrous metals</td><td>Infrabuild</td><td>Blast furnace</td><td>Steel products</td></tr>
</table>

<table>
<tr><th>Stream</th><th>Composition</th><th>Proportion</th><th>On-site Storage</th><th>Off-site Destination</th><th>Approximate Quantity per Day</th></tr>
<tr><td>Non-putrescible waste</td><td>Film, food trays, plastic bags, textiles, lost small recyclable fibre and plastics</td><td>91%</td><td>Baled</td><td>ResourceCo PEF[51] plant where Cleanaway is an invested partner</td><td>20.6 t</td></tr>
</table>

<table>
<tr><th>Stream</th><th>Composition</th><th>Proportion</th><th>On-site Storage</th><th>Off-site Destination</th><th>Approximate Quantity per Day</th></tr>
<tr><td>Putrescible waste</td><td>Nappies, organics and bags garbage</td><td>9%</td><td>Stored in compactors</td><td>Disposed of to landfill</td><td>2.1 t</td></tr>
</table></td><td>Appendix F</td></tr>
<tr><td>72</td><td>The EPA notes putrescible waste is mentioned in the Waste Management Plan. The applicant should be aware the EPA will not permit the facility to receive</td><td>Incoming materials will be inspected in the five bays in the main receival hall. Loads suspected to contain hazardous material will be isolated to a single receival bay until they can be inspected and photographed. The inbound kerbside delivery and inspection process for non-conforming waste is described below.</td><td>Appendix F</td></tr>
</table>

	putrescible waste as it would not be appropriate for this type of waste facility. The Applicant must provide detailed information regarding how any incidental putrescible waste will be managed. The EPA expects any incidental putrescible waste to be removed from the Premises as soon as practicable but within 48 hours at the latest as is provided within the recommended air quality conditions in Attachment A.	All trucks delivering kerbside material to the main receival hall will be directed to unload at the front of the main pile of a specific bay no closer than 4 metres. The loader driver will inspect the load once the truck has departed. The loader driver will look for the following: 1. Smoke or flames indicating a hot load. If smoke or flames are observed, Cleanaway fire procedures will be followed to isolate and contain the hot load. 2. Excessive contamination. If excessive contamination is observed Cleanaway's procedure for contaminated loads will be followed. The MRF Manager will be informed, photos taken, and the occurrence documented. The load will be removed from the main receival hall and disposed of appropriately. In bound commercial cardboard loads will be deposited at the commercial OCC receival area, well away from other cardboard, so the load can be inspected for contamination or signs of a hot load, prior to being pushed onto the baler feed conveyor. Cleanaway's policies for hot loads and contaminated loads will be followed if an incident occurs. Non-putrescible waste will be held in a bunker conveyor and baled for distribution to the PEF42 Plant. Putrescible waste will be contained in sealed 30m^3 compactor bin for delivery to landfill.	
73	The EPA requires the following to be addressed: a) The Applicant must provide details on the transportation, assessment and handling of each waste type arriving and generated at the site b) The Applicant must provide details of any stockpiling of each waste type and each of the materials proposed to be recovered at the site including, but not limited to, sizes (dimensions and heights)	a) All loads entering the site will be processed as described in the updated WMP, as per Section 5.2.8.2 for 12m Rigid trucks, and Section 5.2.8.3 for B-double trucks. This generally involves: ▪ Trucks entering the site from Kellogg Road (west) and proceed to the allocated weighbridge. ▪ Data on the vehicle collected on the weighbridge, including ID and weight. ▪ Weighbridge operator instruct the vehicle to drive to allocated location on site. ▪ Vehicle loaded/unloaded. ▪ All loads will be assessed and handled as described in Section 5.2.3.3 of the updated WMP, in relation to quality control.	

	and locations (capacity of storage area, dimensions of bays etc) c) The Applicant must provide details of the maximum volume of waste to be stored for each individual waste type as well as at any one time overall d) The Applicant must provide details of the maximum annual throughput of waste overall for each individual waste type e) The Applicant must provide a description of waste processing procedures for each waste type f) The Applicant must provide details on the proposed reuse, recycling, reprocessing or treatment of each waste type g) The Applicant must provide details of the intended fate of each waste type, including but not limited to, the specific licensed facility that each waste stream will be disposed of. h) The Applicant must provide details of all materials produced under a Resource Recovery Order, and the controls in place for meeting the conditions of that order: i) The Applicant must clearly describe the process for management of	▪ Vehicle return to weighbridge before exiting the site via Kellogg Road (south). ▪ All vehicles enter and exit the site in a forwards motion. b) Refer to response in row 67 and 70 and additional detail in WMP. c) The below table extracted from Section 5.1.3 of the updated WMP identifies the maximum volumes of waste to be stored at any one time. | Product Types	Bale Weight (kg)	Number of Bales	Total Weight (t)
Steel	450	108	48
Aluminium	250	96	24
OCC (oversize commercial cardboard)	1100	252	277
MXD Paper	1100	252	277
PET Clear	350	96	33
PET Colour	350	96	33
PVC	350	96	33
HDPE Natural	350	96	33
HDPE Colour	350	96	33
PP	350	96	33
Glass		Silo	150
Waste	1000	144	144
Total		**1428**	**1122.6**	 d) Section 5.1.2 of the updated WMP provides calculations on the maximum annual throughput of waste overall. This is as follows, assuming 260 operating days per year: ▪ 288 t over 13.1 hours per day for a total of 75,000 t per year ▪ 327 t over 14.9 hours per day for a total of 85,000 t per year ▪ 365 t over 16.6 hours per day for a total of 95,000 t per year ▪ 404 t over 18.4 hours per day for a total of 105,000 t per year. The updated WMP contains Table 19, which breaks down the throughput of waste per annum for each individual waste type. e) Section 5.2 of the updated WMP describes the waste processing system, including feedstock sources, waste processing operations, technology used, outputs, quality	

	contaminated and non-conforming waste, including, at a minimum, the following information: i. detailed information regarding the waste types and likely quantities of hazardous materials that may be received at the Premises ii. Methods for detection and removal of contaminated and non-conforming iii. Locations and configurations of storage for contaminated and non-conforming waste, including demonstration that any proposed hazardous materials storage areas are in compliance with the Australian Standard AS 1940 – the storage and handling of flammable and combustible liquids. iv. Methods for and locations of disposal of contaminated and non-conforming waste.	control separation equipment, vehicles and mobile plant used, quality control resource outputs, storage of recyclables and the waste tracking system. Flow charts for the MRF processes are included in the WMP. f) Refer to row 71 and section 5.2.7 of the WMP. g) Refer to row 71 and section 5.2.7 of the WMP. h) No materials listed by the EPA under resource recovery orders are likely to be produced from this facility. i) No hazardous materials will be received at the premises. All loads will be assessed and handled as described in Section 5.2.3.3 of the updated WMP. i. Procedures for detecting and removing contaminated and non-conforming loads are described in Section 5.2.3.3 of the updated WMP. ii. Refer to row 67 and section 5.2.3.3 of the WMP. iii. Refer to row 67 and section 5.2.3.3 of the WMP.	
74	**Weighing of vehicles and record keeping requirements** The Protection of the Environment Operations (Waste) Regulation 2014 (the Regulation) and Waste Levy Guidelines require that an occupier of a scheduled waste facility to measure the quantity of	Appropriate data on waste quantities will be recorded as required. See Section 5.2.8 of the updated WMP. Refer to Row 73. No vehicles will be leaving the site without passing over a weighbridge as stated in Section 5.2.8.2 12 and Section 5.2.8.3 of the updated WMP.	**Appendix F**

	waste that is transported into or out of the facility. Information including, but not limited to, the sources, types, volumes of waste must be identified and recorded, as outlined in Division 1 of the Regulation. The Waste Management Plan states that approved vehicles will be free to leave the site without crossing the weighbridge again. The EPA reiterates that all vehicles entering and leaving the site must be weighed, regardless of the load status of the vehicle. The Applicant must review and clearly document the process for weighing vehicles to ensure compliance with the Regulation and Waste Levy Guidelines.		
75	**Noise and Vibration Impacts** The Applicant has not provided an assessment of construction noise impacts, including construction traffic noise, from the proposal as required by the SEARs. Table 1 of the Acoustic Report (AR) prepared by Acoustic Works, dated 10 February 2022 and provided in Appendix M.1 states that 'construction work noise is assessed in a separate report and is typically assessed at a later stage in the development when construction methods are finalised.' The EIS for the proposal does not contain any	A Construction Noise and Vibration Management Plan (**CNVMP**) has been developed by Acoustic Works. The CNVMP has considered noise and vibration during construction of the proposed development, including traffic noise and noise and vibration from excavation activities. It concludes: ▪ Demolition noise levels are predicted to potentially be above the noise affected level of 48dBA at the nearest residential receivers but are predicted to comply with the highly affected noise limit of 75dBA LAeq 15 min at each of the receiver locations, and the internal noise management levels at distant non-residential receivers. ▪ Construction noise levels are predicted to comply with the noise affected and highly noise affected limits of 52dBA and 75dBA LAeq 15 min at each of the receiver locations. ▪ Potential vibration impacts during construction have been assessed and the surrounding residential receivers locating in proximity to the site are separated from roads and the M7 motorway.	**Appendix E**

	further assessment of construction noise impacts, and it is unclear where this information has been provided. Construction noise impacts are routinely provided as part of the environmental assessment process and enable the consent authority to gauge the potential for impacts on the surrounding community, and what measures will be implemented to address any such impacts.	It is anticipated that a condition of consent will require the implementation of recommended mitigation measures in the CNVMP.	
76	Section 5.3 of the AR states the background noise monitoring was carried out between 5 and 13 October 2021, however data is only presented for a seven-day period between 6 and 12 October 2021 in Table 3. Furthermore, Table 2 shows that significant rainfall was recorded on Monday 11 October, and Table 3 shows that extraneous noise was present on Thursday 7 October. It is likely that the total duration of valid background noise data falls short of the minimum one week of valid data specified in Table A1 of the Noise Policy for Industry (NPfI). Furthermore, the meteorological data in Table 2 shows only spot wind readings at 9am and 3pm, and no information to confirm the validity of readings at other times of each day is available.	Monitoring was conducted between 5-13 October. The daytime period for 5 October was not used as only 2 hours of data were included at the start of the recording. The data for 13 October was not used as the monitor was collected before a full day period could be recorded. Average windspeeds exceeding 5m/s were recorded throughout the day and evening periods on 7 October. These were only found to affect the RBL (lowest 10th percentile noise levels) during the evening period when the highest wind speed was reached and other extraneous noise was recorded. The affected time period was removed from the data. To ensure a minimum of 7 days, the evening period from 5 October was included in the data. Rainfall recorded on 11 October occurred in scattered showers of less than 2mm throughout the day, with most of the rain falling on 10 October during the afternoon and night period. Where rainfall was recorded during the expected quieter times of each assessment period (see Fact Sheet B1.3 of the Noise Policy for Industry) the data was omitted, otherwise the rainfall was not found to affect the lowest 10th percentile background noise level. To ensure a minimum of 7 days, the night period from 5 October was included in the data.	**Appendix E**

		Table 3: Measured RBL noise levels – Noise Monitor A In addition, the cumulative amenity criteria is lower than the lowest recorded RBLs for the daytime period, and lower than the minimum intrusiveness criteria for the evening and night time periods, therefore the outcome of the assessment will not change based on changes to the data.	
77	The Applicant must provide wind speed and rainfall data, ideally overlaid as traces on the daily noise logger charts, to confirm the validity or otherwise of each 15-minute data point in the background noise monitoring data. Any 15-minute periods affected by excessive rain or wind should be removed from the data set as per Fact Sheet A and Fact Sheet B of the NPfI. A minimum of 7 days' valid background noise monitoring data must be provided in the assessment	The updated report includes half-hourly weather data presented in the appendices. Measurement affected by wind speeds exceeding 5m/s (18km/h) or rainfall were reviewed to determine if the weather affected the overall RBL. As stated in the previous section, if it was found to affect the recorded data, it was omitted prior to determining the results from unattended noise monitoring.	**Appendix E**

Day	Date	RBL dB(A)		
		Day	Evening	Night
Tuesday	05/10/21	x	40	39
Wednesday	06/10/21	47	44	40
Thursday	07/10/21	47	*46	38
Friday	08/10/21	49	43	37
Saturday	09/10/21	42	40	36
Sunday	10/10/21	42	43	40*
Monday	11/10/21	50	44	41
Tuesday	12/10/21	50	44	39
RBL		47	44	39

78	The EPA requires the following to be addressed: a) The Applicant must review the LAeq(15minute) amenity noise levels for surrounding industrial receivers in Table 8 to ensure that these levels are in compliance with the recommended amenity noise level minus 5 dB(A) plus 3 dB(A) in accordance with Sections 2.2 and 2.4 of the NPfI. b) The Applicant must amend the 'project-specific criteria' in Table 10 so that the minimum applicable levels are 40 dB(A) during the daytime period, and 35 dB(A) during the evening and night-time periods. c) The Applicant must clarify how the cumulative amenity criteria in Table 12 have been derived. d) The Applicant must clarify the time period applicable to the source noise levels in Table 15. Section 8.1 states that a +3dB correction was applied to all results to convert them to LAeq(15minute) values. This suggests that the source noise levels in Table 15 have been set as LAeq(period) levels. The use of a 'per metre' sound power level for reversing alarms must also be explained in the text, as it suggests a	As stated in section 2.1 of the policy, only the amenity noise levels in Table 2.2 apply to non-residential receivers, with no corrections or reductions required. The only time corrections are applied is for residential receivers. This is typical for assessment of non-residential receivers in NSW and is clearly supported on previous SSD which have been reviewed by SEARs noise expert and independent acoustic review from other acoustic consultants. Based on a review of historical imagery of the surrounding area, most surrounding developments have been operational for longer than 15 years and are therefore part of the existing acoustic environment. The number of proposed or new developments likely to contribute to the cumulative noise impact of the area has been reduced to five (based on review of new/approved applications) in the updated report, with the cumulative criteria changing accordingly. Therefore, the above point is no longer relevant based on the new calculated criteria. The cumulative criteria has been determined in accordance with Section 2.4.2 of the Noise Policy for Industry, with the methodology outlined in Section 7.3.4. The updated report includes all relevant details pertaining to the calculation method. The source noise levels referenced in Table 15 are sound power levels, which are applied for the duration of each event for point sources. For line sources the duration of the event varies according to the length of the line source and the speed of the vehicle. As SoundPLAN does not directly calculate LAeq,15min noise levels, the overall LAeq,period was calculated for each period, with a +3dB correction added to this result in accordance with Section 2.2 of the Noise Policy for Industry. For 'per metre' sound power levels, the overall sound power level of a line source was calculated by: LW/m + 10log(d) Where: LW/m is the sound power level per metre and; d is the total length of the line source in metres (that is, the distance travelled by the vehicle in question)	**Appendix E**

	reversing path being used by Rigid/B-double vehicles in the modelling.		
79	The AR states in Section 11.1.2 that mechanical plant has not been finalised at the time of preparation of the AR. The EPA requires the following to be addressed: a) The Applicant must include the details of the preliminary assessment carried out to indicate that plant at similar developments would comply with the criteria nominated in the AR. b) The Applicant must ensure that any mechanical plant is designed such that the overall premises noise emissions comply with the criteria set out in the AR.	Mechanical plant details have become available since the previous revision of the report. The updated report now includes the plant specified in the preliminary mechanical drawings provided by Grosvenor Engineering Group and the corresponding mechanical specification.	**Appendix F**
80	**Water Quality Impacts** The EPA considers that the Proponent has not addressed the potential for the pollution of waters within the information provided for the Proposal. The EIS must identify all sources of potential contamination that may impact water quality on site and consider mitigation measures to minimise the environmental risk from these contaminants. These may include, but not be limited to, spillages from any chemicals and liquid waste	The proposed facility will only be accepting kerbside waste and will not accept hazardous or contaminated materials. All loads will be assessed and handled as described in Section 5.2.3.3 of the updated WMP. If contaminated materials are identified, the MRF Manager will be informed, photos taken, and the occurrence documented. The load will be removed from the main receival hall and disposed of appropriately. The proposed facility has been designed to minimise the use of water on site that could create flow of materials off site. The stormwater and firewater management design for the site has also been prepared by Northrop to prevent contamination of downstream waters. This is achieved by designing the stormwater pit and pipe network and OSD tank to capture all flows. In relation to risk of materials escaping the site due to vehicle movement, wind and rain, Cleanaway has procedures to minimise the risk of this occurring through frequent cleaning. It	**Appendix F**

	stored on site, waste and contamination tracked on to external surfaces through vehicle movement, loose waste items transported on site due to wind and rain and spillages from chemical or fuel deliveries.	is noted that as materials are unloaded from vehicles, the materials are immediately being sorted and moved into the processing equipment, and then baled for transporting offsite.	
81	In addition, the EIS must contain information detailing any chemicals that are stored and used at the Premises, for example for the purposes of cleaning or maintaining equipment. The EPA expects that any chemical or hazardous liquids being stored on the Premises are clearly identified in the EIS and measures put in place to minimise any potential environmental impacts. Measures may include, but are not limited to, the installation of bunding or use of self-bunded tanks, strip drains and spill capture pits and procedures for delivery of chemicals and hazardous liquids that mitigate the risk to water quality from human error and mechanical failure.	No chemicals or fuel are proposed to be stored on site.	**Appendix F**
82	The EIS states that in the event of a fire, the stormwater pit, pipe network and on-site detention (OSD) tank will be used as a storage for fire water. The EIS also describes that the last pit prior to discharge to Council's network and the OSD tank will be fitted with a penstock valve that will automatically close when a	The Applicant accepts the requested design change to manually operate the penstock valve can be incorporated during detailed design, as a condition of consent to be satisfied prior to the issue of a CC.	**N/A**

	fire event occurs. The EPA supports the proactive design of a fire water containment system; however, the stop valve must also be able to be utilised manually in the event of a spill or other such pollution incident that may affect water quality on the Premises.		
83	The EIS states that the development will incorporate stormwater quality system items including a Gross Pollutant Trap, rainwater tank and filtration cartridges. It is unclear from the description in the EIS how the components of the stormwater system are incorporated into the stormwater management system, in particular to manage water quality. In addition, the Applicant must consider the installation of a first flush system to remove contaminated stormwater from the site.	The design of the GPT and stormwater management system has been amended in consultation with BCC. Refer to updated plans as per **Appendix B**.	**Appendix B**
84	The EIS states that the applicant intends to enter into a VPA with Blacktown City Council to offset water quality requirements off-site, however the EIS does not contain information regarding the water quality impacts that the VPA is designed to offset.	The design of the stormwater management system has been amended in consultation with BCC.	**Appendix B**
85	The Applicant must advise how all leachate will be contained within the facility and how leachate will be	The design of the stormwater management system has been amended in consultation with BCC.	**Appendix B**

	managed including how leachate generated from the receival of waste will be contained and managed. The EPA expects at minimum for internal surfaces to be graded inwards to ensure all leachate is captured and measures to be in place to ensure appropriate management of the generated leachate.		
86	The EPA requires the following to be addressed: a) The Applicant must identify and estimate the quality and quantity of all pollutants that may impact water quality at the Premises by source and discharge point. b) The Applicant must consider mitigation measures to minimise the impact of contaminants on water quality at the Premises, including, but not limited to, the installation of wheel wash structures as required to minimise tracking of contaminants. c) The Applicant must detail any chemicals that are stored at the Premises and identify mitigation measures that will be put in place minimise the risk to water quality in the event of a pollution incident.	The proposed facility will not accept contaminated materials or pollutant materials on site. The site will also not contain storage of any hazardous or pollutant materials. The proposed facility is generally for the sorting and redistribution of waste materials for reprocessing off site. As such, it is not expected that the facility will generate any pollutants. Note – comments (d) and (e) are repeat of comments addressed in row 80 to 82.	**Appendix F**

	d) The Applicant must install an emergency stop valve within the stormwater system that can be utilised in the event of a pollution event on site. e) The Applicant must consider the installation of a first flush system for the removal of contaminated stormwater, and if not required, provide justification to support this conclusion. f) The Applicant must provide a description of the water quality impacts that are being offset by the VPA.		
87	**Wheelwash** Best practice waste facilities utilise a wheelwash to reduce the risk of contaminants being tracked out onto public roads and into local stormwater drains and networks. The EPA notes the Proposal does not include the installation of a wheelwash. The EPA requires the Proposal include consideration of the installation of a wheelwash at the exit point of the Premises to ensure contaminants are not tracked onto public roads, and provide evidence-based justification where installation is not proposed.	No wheel wash is proposed for the site and is not considered necessary due to the type of recyclable material and processes being handled on the site and that the entire facility comprises of sealed surfaces. The following justification has been provided to the EPA: • The future operator Cleanaway is experienced in operating MRFs and based on their experience a wheel wash has not been required to meet EPA requirements. • A wheel wash is typically installed at the exit of unsealed work site such as landfill for the purpose of removing sediment/mud within the boundary to minimise tracking contaminants onto the road/receiving environment. • The proposed Materials Recycling Facility on Woodstock Ave Rooty Hill is an entirely sealed hardstand facility with all operations occurring on sealed or in enclosed areas with no sediment sources. • All waste is deposited within the enclosed facility. Truck drivers and operational staff are trained to inspect vehicles and the external hard stand for loose waste (typically light weight plastic / paper).	**N/A**

		• The site is constrained in terms of space for safely including a wheel wash area and its inclusion would require the Applicant to identify an alternative site. • During operation of the facility, routine environmental inspections are undertaken that include compliance with environmental aspects (air, land, water) including litter management as will be detailed in the detailed Waste Management Operational Plan to be prepared as a condition of consent. • Inspection and corrective actions are recorded in Cleanaway internal online environmental management system. • During construction there will be environmental management controls and procedures in place under the approved Construction Environmental Management Plan (CEMP). In summary, it is considered unnecessary that a wheel wash is required to facilitate the operation of the proposed facility to manage tracking of materials off-site as identified as a concern by EPA. The facility has been designed to not require a wheel wash and other mitigation measures have been proposed to mitigate risk of materials being tracked off site. The future operator is experienced in operating the type of proposed facility and complying with EPA requirements through the proposed mitigation measures. Based on the above justifications, it is considered acceptable for the DPE to approve the development with conditions of consent that require a detailed Operational Waste Management Plan and compliance with relevant EPA requirements. The above information has been issued to EPA for comment. However, at the time of preparing this submission, a response has not been provided.	

Table 11 Response to Submissions – Fire and Rescue NSW

88	**FIRE AND RESCUE NEW SOUTH WALES**		
89	FRNSW raised concern around the level of fire safety at the site due to waste facilities posing special problems which require additional fire safety management. Therefore, they require a comprehensive Fire Safety Study (FSS) to be developed. The FSS is to be developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No.2 and is to meet the requirements of FRNSW. They also require that the development of the FSS considers the operational capability of local fire agencies and the need for the facility to achieve an adequate level of on-site fire and life safety independence.	A comprehensive FSS will be prepared during detailed design. The Applicant accepts a condition of consent to develop a Fire Safety Study, prior to the issue of a CC.	**N/A**
90	FRNSW raised that they want fire safety guideline for Fire Safety in Waste Facilities that includes legislated requirements and development considerations (planning) is continued to be utilised and consulted. Also, that the FRNSW fire safety guideline for Access for Fire Brigade	The Applicant accepts a condition of consent to satisfy this requirement, prior to the issue of a CC.	**N/A**

	Vehicles and Firefighters is continued to be utilised and consulted.		
91	A comprehensive Emergency Response Plan is developed for the site in accordance with HIPAP No.1	The Applicant accepts a condition of consent to develop an Emergency Response Plan, prior to the issue of a CC.	**N/A**
92	The last request that FRNSW requested as part of their submission is that an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency Services Information Package and Tactical Fire Plans.	The Applicant accepts a condition of consent to develop a Emergency Services Information Package, prior to the issue of a CC.	**N/A**

Table 12 Response to Submissions – Utility Provider

94	**Endeavour Energy** As an adjoining or nearby owners and occupiers, Endeavour Energy's Rooty Hill Zone Substation being a non-habitable building / site is comparatively less impacted. Endeavour Energy's Glendenning Field Service Centre and Glendenning Central Logistic Facility are essentially industrial uses, albeit the Field Service Centre has a comparatively higher office component than 'typical' industrial buildings.	The Applicant will consult with Endeavour Energy during the detailed design phase. A Customer Application (EE Ref. UIL6295) has already been submitted. The Applicant accepts a condition of consent requiring further detail and consultation with Endeavour Energy to address design matters regarding the interface of existing electrical substations and the transmission easement, prior to the issue of a CC.	**N/A**

	Whilst Endeavour Energy is not necessarily opposed to the Development Application, it will leave the determination in regards to the environmental impact and the appropriate development controls to the Department.		

Table 13 Response to Submissions – Individual Submitter

95	**General Mills** General Mills are a food manufacturing facility on a nearby lot. They raised concern surrounding air quality and pollution affecting their ability to produce food in a hygienic manner. This could lead to stopping of production lines and financial losses. Their recommendations/requirements are that they are immediately notified if an incident happens which may affect their production and proactive measures taken as a matter of priority, nature of risk, extent of failure, what are they doing to control and by when it will be resolved for giving us the opportunity to also put control / containment of the risk if possible or a stop of our facility depending on the risk we are exposed.	SSDA-29999239 has been submitted with a range of environmental assessment reports which have assessed the potential risk of air quality and pollution. Mitigation measures have been proposed to mitigate risk of air quality and pollution, that have been directly incorporated into the design. This is supported by a range of procedures in the event of an emergency or uncontrolled waste discharge. The Applicant will consult directly with General Mills to respond to their concerns and provide an emergency contact list in the event of a fire, uncontrolled waste discharge or similar.	**N/A**

5. UPDATED PROJECT JUSTIFICATION

The following provides a review of the project justification provided in the EIS for SSDA-29999239.

5.1. PROJECT DESIGN

The site of the proposed development has been carefully selected in an existing industrial precinct, close to the M7 Motorway. The site is also located close to industrial/warehouse precincts similar to the development proposed. The site is located well away from sensitive residential land uses.

The proposed development will comprise of two elements, being the existing commercial office and the purpose built warehouse for waste recycling to maximise fire safety. The proposal has been designed so heavy vehicles can enter, manoeuvre and exit the site in a forward motion. Loading docks are located internally within the site to maintain a consistent street frontage and minimise acoustic and visual impacts.

The design has incorporated specific design solutions to minimise noise and air quality impacts, including rapid roller doors at all vehicle entries to ensure operations occur within a sealed building to prevent fugitive dust emissions. The proposed MRF also incorporates a range of ESD initiatives to increase efficiency and minimise the impacts on the environment.

Overall, the proposed design remains the same as originally submitted. Refinements to the design are primarily related to detailed changes in relation to two matters, being:

- Minor stormwater management design refinements prepared in consultation with the BCC Design Engineer.
- Reconfiguration of the at-grade car park fronting Woodstock Avenue to enable relocation of the access driveway to the east, away from the roundabout. An extension of the traffic island on Woodstock Avenue is also proposed to prevent illegal right turns into the site. This design refinement has been prepared in consultation with TFNSW.

The design refinements will improve the water management and traffic safety outcomes and do not create any new environmental impacts that have not been previously assessed.

5.2. STRATEGIC CONTEXT

As addressed in the EIS, the proposed development is consistent with the strategic directions provided in *A Metropolis of Three Cities, Central City District Plan* and the Blacktown LSPS.

The site is identified as being within an industrial land precinct. The site is adjacent to the M7 Motorway and close to the Greater Penrith to Eastern Creek Growth Area. It is well-placed to generate jobs and services, including advanced manufacturing as indicated in Planning Priority C11. The proposed Cleanaway facility would contribute to the management of waste as provided in Planning Priority C19.

Industrial land is identified as an important employment generating land use and is protected under the 'retain and manage' policy. The 'retain and manage' policy is currently being reviewed by the GSC to inform future updates to the District Plan. However, this review is not expected to be completed until 2023. Notwithstanding, the site is located within an industrial precinct in a strategic location with good access to regional roads and so it is logical to consider the current land use is unlikely to change in the near term.

5.3. STATUTORY CONTEXT

The refinements and clarifications have been assessed in accordance with the relevant State and local environmental planning instruments as identified in the EIS. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act.
- The updated EIS and supporting documents have been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulations.
- The proposal complies with all relevant provisions under the BLEP 2015.
- The proposed development is consistent with the objectives of the IN1 General Industrial zone.

- The proposed development has been assessed in accordance with the relevant State Environmental Planning Policies as identified in the EIS. The proposed development complies with the relevant clauses of these SEPPs.
- The proposal generally accords with the relevant provisions of the BDCP 2015.

5.4. COMMUNITY VIEWS

Community and stakeholder engagement has been undertaken by the Applicant and Urbis in the preparation of the SSDA. This included direct engagement and consultation with:

- Adjoining landowners and occupants
- Government, agency and utility stakeholders listed within the SEARs

In accordance with the Regulation, the EIS was placed on formal public exhibition between 17 March and 13 April 2022. Only one submission was received from a local business in response to the public exhibition. Other submissions were received from NSW government agencies, BCC and a utility services provider in response to referrals from the DPE.

The key issues raised in the submissions can be broadly grouped into the following categories:

- Waste processing
- Traffic and access
- Water Management
- Noise
- Air quality
- Civil design detail

Each of the key issues raised in the have been responded to in detail in **Section 4** of this Submissions Report. Where relevant, additional measures are proposed to mitigate, minimise or manage potential impacts.

5.5. LIKELY IMPACTS OF THE PROPOSAL

As addressed in the EIS, the proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment:** the proposal addresses the principles of ecologically sustainable development (ESD) in accordance with the requirements of the Regulation. In response to submissions, further assessment has been undertaken in relation to protecting the natural environment, as outlined below:
  - Acoustics **–**the recommended mitigation measures will avoid adverse environmental impacts associated with operation of the facility Further assessment has been undertaken to identify potential noise and vibration impacts during the construction phase which concludes the proposal will generally comply with relevant standards. A Construction Noise and Vibration Management Plan has been which contains provisions for monitoring and measures to mitigate any potential impacts on sensitive receivers.
  - Groundwater – A Groundwater Assessment has been prepared by WSP, which concludes that the proposed construction and operation of the facility will have no interception or impacts on groundwater.
  - Stormwater management – The Applicant has consulted with the BCC Design Engineers to refine the stormwater management system to prevent adverse impacts downstream.
  - Waste processing – The Applicant has updated the WMP to clarify measures in relation to waste streams, processing procedures and confirming the facility will not generate any waste pollution due to the type of operation proposed (ie, generally sorting and redistribution).

  The proposal is for the recycling of waste materials, which will provide an increased value on waste generation and prevent environmental degradation through valuable materials being disposed in landfill.

- **Built Environment:** The proposal has been designed having regard for the site's constraints and to minimise the environmental impact of the proposal. The built form is consistent with the existing industrial development within the precinct. Adequate space is allocated in the design for building clearance, landscaping and infrastructure provision. The site has been designed with sufficient access points to enable the safe manoeuvring of heavy vehicles separated from light vehicles for staff and visitor parking. The proposal will have low visual impact on its surroundings.
- **Social:** The proposal is expected to result in positive social impacts in the locality and the wider Western Sydney area through the provision of additional industrial/warehousing infrastructure.
- **Economic:** Positive economic impacts and contributions to the economic health of Western Sydney and NSW is expected through the provision of jobs and industrial employment in an area of high growth and demand for this infrastructure.

  In addition to supporting additional employment and economic growth, the proposed development will provide a range of other economic benefits for Sydney and New South Wales more broadly, including:

  – Reducing the state's dependency on international markets for the export of waste commodities. By contributing critical recycling infrastructure to the local economy, the facility will help to meet future growth in domestic demand as a result of domestic and international trade policies.

  – Contributing to achieving Australia's recycling target of 80% across all waste streams. By adding 120,000 tonnes of additional annual processing capacity, valuable materials will be diverted from landfill, relieving pressure on Greater Sydney's landfills.

5.6. SUITABILITY OF THE SITE

Preliminary investigations were undertaken early in the planning process to identify sites which could be suitable to accommodate the proposed MRF. The site location in the Blacktown LGA is important to meet the contractual and operational requirements by the Applicant and Cleanaway (future operator) to process recyclables collected in the local area by early 2023 and minimise travel distances for the fleet of trucks.

5.7. PUBLIC INTEREST

As addressed in the EIS, the proposed development is considered in the public interest for the following reasons:

- The proposal is consistent with relevant State and local strategic plans and complies with the relevant State and local planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposal will provide public benefit by delivering a purpose built recycling facility for the local area, meaning capacity for recycling of waste materials is significantly enhanced and will contribute to environmental sustainability outcomes in the local area.
- The site is located close to Cleanaway's existing truck depot in Glendenning, meaning that the truck fleet requires less travel between its storage, pick-up route and distribution to the proposed MRF.
- The proposed facility is located within the area it will be servicing, with sustainability outcomes through the reduction in truck movements over long distances, minimising the supply chain distances and ecological footprint associated with vehicle movements, emissions and noise pollution.
- The proposal will generate significant economic benefits including employment opportunities during construction (103 direct and 143 indirect) and during operation (69 direct jobs through the ongoing operation of the additional facilities on-site and a further 114 indirect jobs from flow-on effects). The project will directly contribute an average of $10.8 million in value added, and indirectly contribute a further $19.5 million in value added, to the NSW economy on an annual ongoing basis.
- The issues identified during the stakeholder engagement have been addressed by design of the project and the assessment of the impacts of the project.

Having considered all relevant matters raised in the submissions, there will be no additional environmental impacts as a result of the minor refinements and clarifications. Additional measures are proposed to mitigate, minimise or manage potential impacts The proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

6. DISCLAIMER

This report is dated 2 August 2022 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Charter Hall **(Instructing Party)** for the purpose of Response to submissions **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A REVISED ARCHITECTURAL PLANS

APPENDIX B REVISED CIVIL PLANS

APPENDIX C REVISED TRAFFIC IMPACT ASSESSMENT

APPENDIX D REVISED ACOUSTIC REPORT

APPENDIX E CONSTRUCTION NOISE AND VIBRATION MANAGEMENT PLAN

APPENDIX F REVISED WASTE MANAGEMENT PLAN

APPENDIX G GROUNDWATER ASSESSMENT

APPENDIX H VOLUNTARY PLANNING AGREEMENT LETTER OF OFFER

URBIS