



NSW GOVERNMENT  
**Department of Planning**

***MAJOR PROJECT ASSESSMENT:  
Tipfast Construction Material  
Recycling Facility, Banksmeadow***



Director-General's  
Environmental Assessment Report  
Section 75I of the  
*Environmental Planning and Assessment Act 1979*

February 2007

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## **EXECUTIVE SUMMARY**

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Tipfast currently operates a construction materials recycling facility at St Peters, in the Marrickville Local Government Area (LGA). It proposes to move this facility to a vacant site at 16/19A Baker Street, Banksmeadow, in the Botany Bay LGA.

The proposed facility would receive up to 100,000 tonnes of construction and demolition materials, a year including asphalt, masonry and soil. These materials would be recycled into road base or hard fill, with a small amount (5-10%) of residual waste disposed to a licensed landfill. The proposal includes storage, sorting and processing facilities, as well as an administration building and parking facilities. Tipfast estimates that the proposal has a capital investment value of \$1.7 million and would employ 25 workers during construction and 10 workers during operation.

Nearby landowners raised concerns regarding the dust, noise and traffic impacts of the proposal on their industrial premises. Dust emissions were a particular concern as many nearby landowners operate industries that are sensitive to dust (such as printing and food production facilities). The Department has consulted extensively with these landowners (and their air quality consultant) throughout the assessment process, and has included several conditions in the recommended conditions of approval to specifically address these landowners' concerns.

Subject to the imposition of these conditions, the Department is satisfied that the proposal could be undertaken within acceptable environmental limits. On balance, the Department considers that the proposed site would be suitable for the development and that the proposal would be in the public interest.

# 1. PROPOSED DEVELOPMENT

## 1.1 Project Description

Tipfast currently operates a materials recycling facility at St Peters, in the Marrickville LGA. However, it proposes to transfer this facility to a vacant industrial site at 16/19A Baker Street, Banksmeadow in the Botany Bay LGA (see Figures 1 and 2).

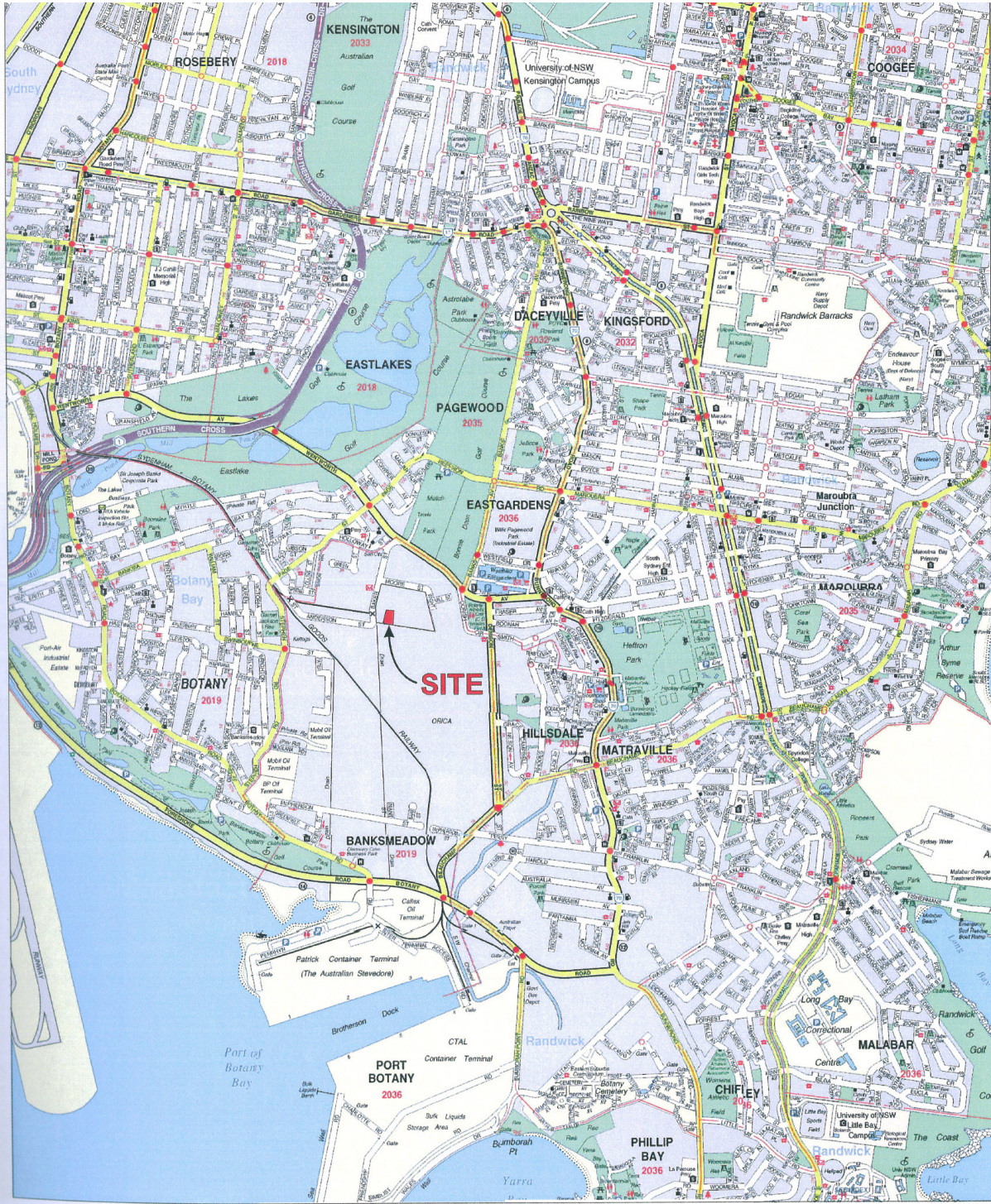


Figure 1: Site Location



**Figure 2: Existing Land Uses**

The major components and layout of the proposed facility are summarised in Table 1 and depicted in Figure 3.

Essentially, the proposed facility would receive up to 100,000 tonnes of construction and demolition materials a year by truck. These materials – which would mainly comprise excavated material, masonry and asphalt – would be sorted, recycled and stockpiled on site. Around 90-95% of the material received at the facility would be recycled for use as road base or hard fill at other sites, while the remaining 5-10% of material would comprise residual waste (such as plastic packaging or insulation) which is unsuitable for recycling and would be trucked to a licensed landfill for disposal. The facility would operate from 6:30am to 5:00pm, Monday to Friday, and from 7:00am to 3:00pm on Saturdays.

The proposal has a capital investment value of \$1.7 million, and would generate 25 jobs during construction and 10 jobs during operation.

Tipfast submitted an environmental assessment of the proposal to the Department on 3 March 2006 (see Appendix E).

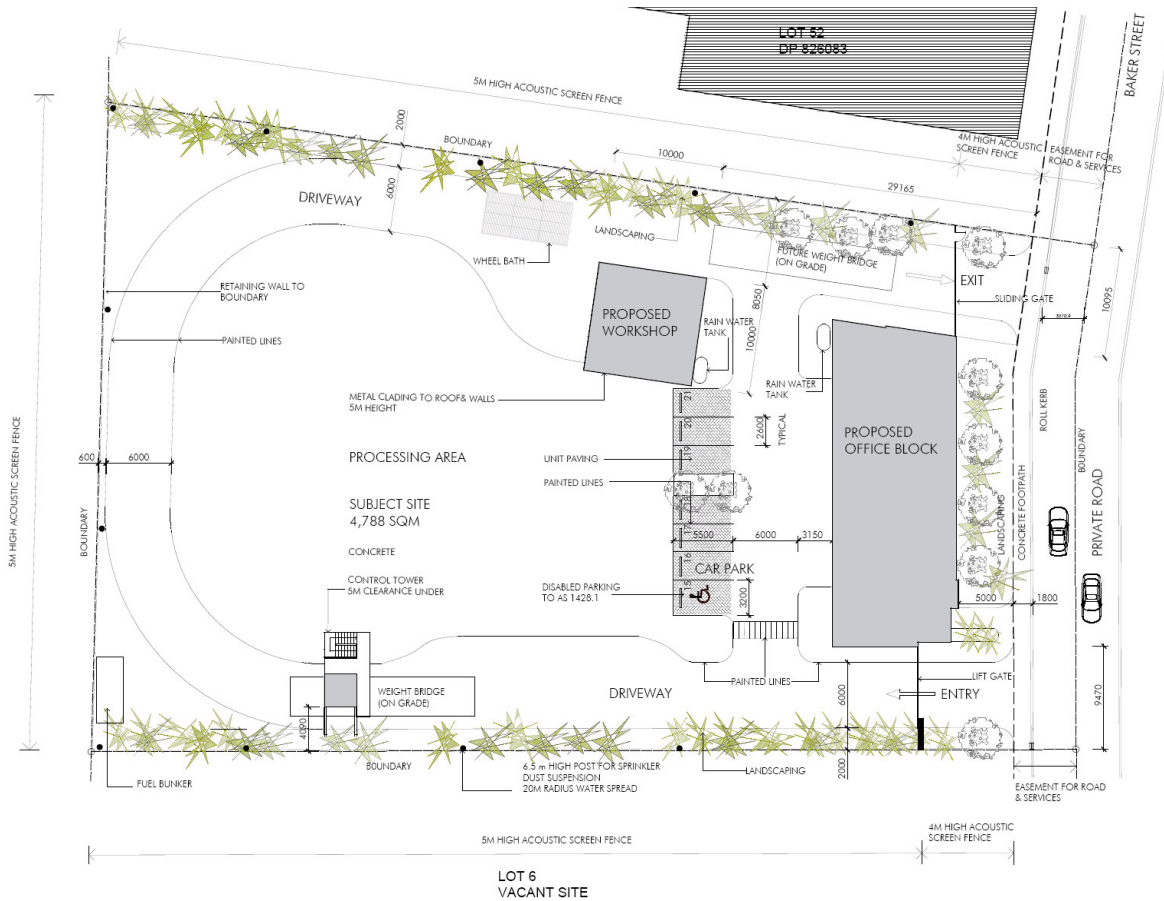


Figure 3: Project Site Layout

Table 1: Major Components of the Proposal

Component	Description
Administration building	Construction of a 12 metre high building with three levels housing offices and administration functions. This administration building would front the private road, with access to the processing area via driveways either side of the building. Finishes would be concrete block, glass and galvanised steel.
Employee and visitor parking	At-grade parking for fourteen staff would be provided within an undercroft of the administration building. Seven visitor open air parking spaces would be provided at the rear of the administration building.
Workshop	Construction of a general workshop to the rear of the administration building. This workshop would be finished in colorbond steel and would be 4 metres in height and 100m <sup>2</sup> in area.
Control tower and weighbridge	Construction of a 7.9 metre high two storey control tower to monitor transport and processing activities at the site. The control tower would be located on the eastern portion of the site. An at-grade weighbridge would be located at the foot of the control tower to monitor truck loads entering and leaving the site.
Storage areas and wheelwash facility	The rear of the site would be paved to accommodate separate open air storage areas for materials to be processed and materials that have been processed. A wheelwash facility would remove process dust from trucks leaving the site.
Stormwater system	Run-off from the site and buildings would be collected, stored and treated in an on-site treatment system. Treated water would be reused on the site for processing and dust suppression activities.
Landscaping	Landscaping within the front road reserve, setback and perimeter of site.
Acoustic barriers	Construction of 5-10.5 metre high acoustic barriers around the side and rear boundaries.

## 2. STATUTORY CONTEXT

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### 2.1 Major Project

The proposal is classified as a major project under Part 3A of the *Environmental Planning and Assessment Act 1979* (the Act) as it meets the criteria in Schedule 1 of the *State Environmental Planning Policy (Major Projects) 2005*, being development for the purpose of a resource recovery or recycling facility that would handle more than 75,000 tonnes per year of waste. Consequently, the Minister is the approval authority for the project.

### 2.2 Permissibility

Under Section 75J of the EP&A Act, the Minister cannot approve the carrying out of a project that would be wholly prohibited under an environmental planning instrument.

The site is zoned 4(a) Industrial under the *Botany Local Environmental Plan 1995* (BLEP), and development for the purpose of a 'materials recycling yard' is permissible with development consent in this zone.

Council argued the proposal should be characterised as a 'waste transfer station', and is therefore wholly prohibited within the zone. However, given that between 90 and 95% of the materials received at the site would be recycled for use as road base or hard fill at other sites, and only 5-10% of the materials received would need to be disposed to landfill, the Department is satisfied that the proposal should be characterised as development for the purpose of a 'materials recycling yard'.

Consequently, the Department is satisfied that the proposal is permissible with development consent in the zone, and that the Minister may therefore approve the carrying out of the project.

### 2.3 Exhibition

The environmental assessment of the proposal was exhibited from 22 March 2006 until 5 May 2006, which satisfies the requirements for public consultation in Section 75H of the EP&A Act.

### 2.5 Environmental Planning Instruments

Under Section 75I of the EP&A Act, the Director-General's report on this project is required to include a copy of or reference to the provisions of any State Environmental Planning Policy (SEPP) that substantially governs the carrying out of the project.

The Department has considered the project against the relevant provisions of several SEPPs (including SEPPs 11, 33, & 55), and is satisfied that none of these SEPPs substantially govern the carrying out of this project.

### 2.6 Statement of Compliance

Under Section 75I of the EP&A Act, the Director-General's report is required to include a statement relating to compliance with the environmental assessment requirements with respect to the project. The Department is satisfied that the environmental assessment requirements have been complied with.

## 3. ISSUES RAISED DURING CONSULTATION

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During the exhibition period, the Department received 16 submissions on the proposal (see Appendix D), including:

- 2 submissions from public authorities (Department of Environment and Conservation and City of Botany Bay Council);
- 2 submissions from special interest groups (Botany Environmental Watch and Australian Workers' Union); and
- 12 submissions from the general public.

The DEC raised no objections to the proposal, and has provided its recommended conditions of approval.

However, all the other submissions, including the submission from Council either objected to or raised concerns about the proposal. These submissions were primarily concerned about the following impacts of the proposal, and suggested that the proposal would be inconsistent with Council's strategic planning aims for the area:

- air quality impacts, particularly dust impacts on sensitive nearby industries such as food production and offset printing;
- noise impacts, particularly from the crushing and grinding of materials on the site and the effect on users of the adjacent industrial units; and
- traffic impacts, including the impact on local traffic flows and parking.

Tipfast has prepared a Preferred Project Report and a response to the issues raised in these submissions, which is attached as Appendix B.

## 4. ASSESSMENT OF ENVIRONMENTAL IMPACTS

### 4.1 Air Quality

#### *Construction*

The construction of the proposal would involve minor excavation works, which could generate dust emissions. The Department is satisfied that these emissions would not be significant due to the low level of site disturbance involved and the short duration of the construction period. Nevertheless, the recommended conditions of approval require Tipfast to minimise dust generation during construction.

#### *Operation*

The proposal would sort, screen, crush and store up to 100,000 tpa of construction materials and this process has the potential to generate dust emissions from the site. Tipfast has proposed a number of mitigating measures to address dust emissions. All processing activities would operate within a surrounding 5m high perimeter wall to prevent dust emissions and water sprinklers would be installed at the top of this wall to further reduce the amount of dust emitted from the site. Tipfast also committed to a regular site cleaning program to prevent the emission of dust from the site and all trucks entering and leaving the site would be covered at all times. With these measures in place, the emissions associated with the proposal are predicted to comply with the relevant DEC criteria for air quality. A comparison of the relevant DEC criteria and the predicted air emissions from the project is provided in Table 2 below.

**Table 2: Predicted Air Quality Impacts**

Pollutant	Averaging Period	Existing	Predicted	DEC Criteria
PM10 ( $\mu\text{m}^3$ )	24 hours	39	50	50
	Annual	14	20	30
Deposited Dust ( $\text{g}/\text{m}^2/\text{month}$ )	Annual	2-3	4	4
TSP ( $\mu\text{m}^3$ )	Annual	35	54	90

Notwithstanding this assessment, significant concerns remained among nearby property owners regarding air quality. Many of the property owners operate businesses which they consider to be sensitive to dust impacts, such as printing, food production and general warehousing. These owners commissioned air quality and noise consultants to support their objections. The Department also provided them with additional time to prepare detailed submissions, beyond the end of the exhibition period, and met with them to discuss their concerns.

On 8 November 2006, officers from the Department and the DEC attended an additional meeting with Tipfast and the air quality consultant representing the nearby property owners to discuss the air quality impacts of the proposal. In response to this meeting, Tipfast undertook to prepare a detailed air quality management and monitoring plan (AQMP) for the project, in consultation with nearby property owners and the DEC, which would specify commitments to on-site management of dust and a monitoring program to ensure air quality criteria is met. A draft of this AQMP was provided to the

Department on 2 February 2007, which specified the location of monitoring stations, the operational parameters for water sprinklers on the site, and the management protocols for stockpiles. Both the DEC and the objectors' representative have expressed general satisfaction with its content. The recommended conditions of approval require that this plan be finalised to the Director-General's satisfaction prior to the commencement of operations.

The DEC also recommended ten conditions relating to the management and monitoring of air emissions at the site. These conditions have been incorporated into the recommended conditions of approval and require Tipfast to install dust suppression measures at the site and prevent Tipfast from accepting potentially hazardous construction materials, like asbestos, for processing. Tipfast also agreed to the imposition of a condition that would require the processing areas of the facility to be enclosed if the monitoring program indicates non-compliance with DEC noise and air quality criteria.

The Department has provided objectors to the proposal with several opportunities to submit their concerns, and understands their view on the proposal. The Department believes that the recommended conditions provide a comprehensive regime to ensure the air quality concerns of objectors are addressed. The conditions would ensure that the facility is adequately managed by maintaining moisture levels across the site to suppress dust and that dust levels would be monitored at appropriate locations in the context of sensitive nearby landowners. Finally, the conditions provide the Department with recourse should fugitive emissions occur.

## 4.2 Noise

### *Construction*

Since the length of the proposed construction period exceeds 6 months, operational noise criteria has been applied to both the construction and operation of the facility in accordance with the DEC's guidelines. Construction would involve minor excavation works, paving of the site and construction of the administration building. Tipfast's assessment demonstrated that the construction impacts would comply with the DEC's operational noise criteria for the proposal at the boundary of the site.

### *Operation – Plant and Equipment Noise*

Crushing units, trommels, loaders and trucks would be used to process the materials accepted at the facility. This equipment has a sound power level of up to 109 dB(A) and has the potential to generate noise beyond the boundary of the site.

Tipfast proposes to install 5 metre high acoustic barriers along three of the site boundaries to reduce noise emissions from the site. The acoustic assessment undertaken by Tipfast indicated that the noise emissions would not exceed the DEC's site and residential boundary criterion with the proposed mitigating measures in place. A comparison of the DEC criteria and the predicted noise emissions is provided in Table 4.

**Table 4: Predicted Daytime Noise Impacts with Mitigation Measures in Place**

Location	DEC Criteria	Predicted
	( $L_{Aeq}(15 \text{ minute})$ )	( $L_{Aeq}(15 \text{ minute})$ )
Site boundary	70 dB(A)	65 dB(A)
Nearest Residence (Junction of Wentworth and Baker Streets)	50 dB(A)	45 dB(A)

However, several adjacent landowners raised concerns that these barriers would not adequately mitigate noise impacts. Of particular concern is the lot adjoining the eastern boundary of the site. A two storey industrial premises has been approved for this lot, and the building would extend some 7 metres higher than the proposed acoustic wall on this shared boundary. The noise emissions experienced on the second floor of this building would therefore not be mitigated as effectively by the acoustic wall as those at ground level. In its response to submissions, Tipfast undertook to extend the acoustic wall to 10.5 metres along sections of the eastern boundary to mitigate noise impacts for the affected neighbour's second storey.

The Department, in consultation with the DEC, is satisfied that the proposed acoustic barriers would adequately mitigate the noise impacts, including those to the second storey units to the east of the site. In addition, noise emission limits provided by the DEC have been incorporated into the recommended conditions of approval. The recommended conditions also place restrictions on hours

of construction and operation, and require Tipfast to undertake noise monitoring within three months of commencement of activities at the site, and annually thereafter, to verify that the proposal is operating within environmental limits.

#### *Operation – Traffic Noise*

The proposal would generate 126 truck movements per day. These vehicles have the potential to generate noise impacts for residents in the vicinity of Baker Street and Wentworth Avenue. Tipfast's traffic noise assessment indicated that the proposal would increase traffic noise along Baker Street and Wentworth Avenue by less than 1 dB(A), which is less than the 2 dB(A) increase permitted in DEC guidelines. The Department is satisfied that the additional traffic movements do not represent a significant increase in traffic on these busy access routes, however, the recommended conditions require Tipfast to prepare a Noise Management Plan which would address driver behaviour and traffic noise associated with the proposal and ensure that traffic noise criteria are met.

### **4.3 Traffic Management**

#### *Construction*

Construction of the proposal is expected to take over 6 months and would involve the erection of buildings and acoustic fences, and the paving of most of the site. The Department believes that these construction activities would not generate significant amounts of traffic and would not have an adverse impact on the road network.

#### *Operation*

The operation of the proposal would generate 146 additional vehicle movements on the local road network per day (20 cars and 126 trucks). Table 5 shows the predicted increase in vehicle traffic volumes during the morning and afternoon peak periods. The proposal would generate a maximum of 22 vehicle movements per hour during peak periods.

**Table 5: Vehicle Movements per day, by period**

<b>Period (hours)</b>	<b>In</b>		<b>Out</b>		<b>Total Vehicles</b>
	Cars	Trucks	Cars	Trucks	
<b>0600 – 1000</b>	10	21	0	21	<b>52</b>
<b>1000 – 1400</b>	0	24	0	24	<b>48</b>
<b>1400 – 1700</b>	0	18	10	18	<b>46</b>

All of the heavy vehicles associated with the development would use the intersection of Wentworth Avenue and Baker Street to access the site and the traffic generated by the proposal would increase traffic volumes by less than 3% on these roads. The EA predicted that the existing delays and levels of service at all nearby intersections would be unaffected by the proposal due to the low volume of additional traffic generated by the proposal. The proposal would increase heavy vehicle movements in the surrounding road network by a maximum of only 22 movements per hour (12 trucks, 10 cars) during peak periods. Given the current level of service at the Wentworth Ave/Baker St intersection, the Department believes that the proposal would not generate sufficient additional traffic to warrant the redesign or avoidance of this intersection.

Concerns were raised in submissions that the surrounding residential road network (rather than the main roads Baker Street and Wentworth Avenue) would be used by heavy vehicles associated with the proposal. Tipfast demonstrated in the EA that the vehicle weight limits that apply to residential roads in the vicinity of the site would make it illegal for heavy vehicles to use these roads and stated that they would not use residential roads in any case. Notwithstanding this, the recommended conditions of approval require that heavy vehicles associated with the project only access the site via Baker Street and Wentworth Avenue and that Tipfast prepare a Traffic Management Plan to enforce the heavy vehicle route, prior to the commencement of the construction of the facility.

The private access road to the site is used by several adjacent industrial premises (refer to Figure 2). The Department is satisfied that the private access road to the site has been designed to accommodate industrial traffic and that the additional vehicle movements generated by the proposal would not have a significant adverse impact on the operation of this private road. Vehicles would queue on site and enter and leave the site in a forward direction. Tipfast would be required to identify measures to manage driver behaviour and access arrangements in the Traffic Management Plan. The Department believes this Plan would ensure appropriate management of traffic and its impacts

associated with the proposal. The RTA was provided with a copy of the application, but did not raise any concerns about the proposal.

#### *Parking*

The proposal would employ 10 workers during operation. 21 off-street parking spaces are proposed that would accommodate these workers and visitors to the site. Tipfast also operates a fleet of 11 trucks for the collection and delivery of construction materials. Although these trucks would be based at a separate location, the vehicle movement areas within the site would accommodate parking for these trucks. Tipfast has demonstrated that the proposed parking arrangements are in accordance with relevant Council and RTA guidelines. Notwithstanding this, the recommended conditions of approval would require Tipfast to ensure that vehicles associated with the proposal do not park or queue outside the site. The Department is satisfied that suitable provision for vehicle parking will occur on site.

#### **4.4 Visual Amenity and Overshadowing**

The site is located within an industrial zone which is visually dominated by the Qenos facility to the south of the site (refer to Figures 4 and 5). These structures are up to 35 metres high and no visual mitigation has been provided to reduce their visual impact. A cement facility is also highly visible to the west of the site.



**Figure 4: Industrial facilities to the south of the site**



**Figure 5: Industrial facilities to the south of the site**

However, the Baker Street industrial precinct itself includes a number of light industrial facilities (such as a printery and warehouse) which have been designed with visual amenity in mind. Some submissions raised concerns that the visual amenity of the area would be adversely affected by the Tipfast proposal. The proposal would incorporate a three-storey administration building (12 metres high), a control tower (7.9 metres high) and perimeter fences (5 metres high) which would be visible beyond the boundary of the site.

The Department notes that a similar facility known as the Sell and Parker facility already exists a few lots east of the site on Baker Street. This facility has been designed to complement the streetscape, and the open-yard recycling activities that occur to the rear of the site are not highly visible (refer to Figure 6). The Department believes that the Tipfast proposal would have a similar impact on the streetscape.



**Figure 6: The Sell and Parker facility on Baker Street**

In order to ensure this, the Department's recommended conditions require all storage piles of materials to be a maximum height of 5 metres. The proposed landscaping and 5 metre high acoustic walls would provide additional visual screening of the open processing area. The Department is therefore satisfied that the facility would not result in a significant adverse impact on the visual amenity of the area.

In response to concerns about noise emissions (see section 4.2), Tipfast raised the height of the eastern acoustic fence to 10.5 metres. The eastern neighbour raised concerns that this fence would have an adverse visual impact on their property. The Department believes that the proposed 10.5 metres fence is acceptable for a number of reasons, including:

- that the proposed barrier would significantly reduce noise and dust impacts on the upper storeys of the adjacent industrial premises;
- that the 10.5 metre fence would be lower in height than the existing walls of the adjacent premises, which are 12 metres in height and constructed to the site boundary (refer to Figure 7); and
- that any shadows cast on the adjacent industrial premises would only be cast during the late afternoon, would be cast upon paved vehicle movement areas, and would be similar in size to those cast by the industrial premises on the Tipfast site during the early morning.



**Figure 7: Existing wall along eastern boundary of the site (note people in bottom right corner for scale).**

For these reasons, the Department is satisfied that the impact of the proposed acoustic fence is acceptable. Notwithstanding this, the recommended conditions of approval require Tipfast to consult with the eastern neighbour in the design and finishing of this fence, and report the results of this consultation to the Director-General prior to the commencement of construction.

#### **4.5 Soil and Water Quality**

##### *Contamination*

The site originally formed part of the former Ampol fuel terminal and contamination associated with this use has been identified and remediated in the previous decade. A Site Audit Statement was prepared in accordance with SEPP 55 following remediation of the land, and Tipfast has provided a copy of this Statement. The Department is satisfied that the land is suitably free from contamination to a standard appropriate for the proposed industrial development.

##### *Soil Erosion*

During the remediation of the former Ampol fuel terminal, the site was stripped and refilled with a 500-2000mm layer of unconsolidated clean fill. The construction of the proposal would involve removal of some of this fill. The recommended conditions of approval require Tipfast to prepare a management plan for soil erosion and sedimentation prior to the commencement of construction.

##### *Stormwater Management*

Approximately 85% of the site would be impervious paved area, and significant stormwater would be generated during rain events. Additionally, the water spraying of the site on a continuous basis would generate continuous flows of runoff from the site. All runoff would contain some degree of contamination from the dust and other by-products generated by the materials recycling process.

Tipfast proposes a stormwater management system that would capture and treat runoff (via a detention basin and infiltration trench) prior to re-use on the site or disposal to Council's stormwater system. Two 5000L tanks would also capture rainwater for re-use. The Department is satisfied that this system would adequately manage stormwater at the site. Notwithstanding this, the recommended conditions of approval require to Tipfast to finalise a detailed stormwater management system for the site, in consultation with Council, prior to the commencement of operations.

All other issues are considered to be minor and have been addressed as part of Tipfast's Statement of Commitments and Preferred Project Report (refer to Appendix B).

## **5. CONCLUSION**

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The Department has assessed the EA, submissions on the proposal, and Tipfast's response to submissions in accordance with the requirements of Clause 8B of the *Environmental Planning and Assessment Regulation 2000*.

In light of the proposed mitigation measures, the Department is satisfied that concerns regarding the air, noise, traffic and all other impacts associated with the development have been appropriately addressed. A number of conditions have also been recommended to ensure that the proposed project would not result in any significant impacts to the surrounding environment.

The proposed site is located within an existing industrial precinct which accommodates light and medium industrial uses. Similar recycling facilities to the east and north of the site are currently in operation, and these uses are compatible with the light industrial premises in the precinct. The site is located away from residential areas and access to the site would be via regional roads. The Department is therefore satisfied that the site is suitable for the proposal.

The Department believes that the proposed project would meet its key objective to move Tipfast's operations to a more accessible site that utilises appropriate technology to mitigate environmental impacts. The project would provide an important environmentally sustainable industry which would allow 100,000 tonnes of construction materials from the Sydney area to be processed and recycled each year. The Department is therefore satisfied that the proposal is in the public interest.

## 6. RECOMMENDATION

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It is RECOMMENDED that the Minister:

- consider the findings and recommendations of this report;
- approve the project application, subject to conditions, under section 75J of the *Environmental Planning and Assessment Act 1979*; and
- sign the attached project approval (see Appendix A).

David Kitto  
**Director**  
**Major Development Assessment**

Chris Wilson  
**Executive Director**  
**Major Project Assessment**

Sam Haddad  
**Director-General**