
ENVIRONMENTAL ASSESSMENT REPORT

for

**MODIFICATION OF THE CHESTER HILL MATERIALS
RECYCLING FACILITY (06-0053 MOD1) TO INCLUDE THE
RECYCLING OF ADDITIONAL TYPES OF MATERIAL**

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CERTIFICATION OF VALIDITY

Submission of Environmental Assessment

Prepared under Section 75W of the *Environmental Planning and Assessment Act, 1979*

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Applicant and Site Details

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Applicant Address PO Box 14 Croydon Park NSW 2133
Subject Site 191 Miller Road, Chester Hill NSW 2162
Lot and DP Lot 8 DP 1039882

Statement of Validity I certify that I have prepared the contents of this Environmental Assessment Report in accordance with the Director General's Requirements (dated 20 November 2008) and that to the best of my knowledge, the information contained within this report is neither false nor misleading.

Signature
Peter Fryar

1.0 EXECUTIVE SUMMARY

This Environmental Assessment ('EA') Report has been prepared on behalf of No.1 Demolition and Excavation (NSW) Pty Ltd ('No.1 Demolition') also trading as Always Recycling Pty Ltd, to accompany an application under Section 75W of the *Environmental Planning and Assessment Act, 1979*, ('the Act') for the modification of the Project Approval to allow the recycling of building and construction waste including metal. This application relates to the Materials Recycling Facility at 191 Miller Road, Chester Hill, which was approved on 27 February 2007 under Part 3A of the Act (Project Approval 06_0052).

No.1 Demolition seeks to operate a Materials Recycling Facility at 191 Miller Road, Chester Hill ('the Site') generally in accordance with the terms and conditions of the Project Approval. The EA submitted with the original application identified the materials to be recycled as part of the approved operation to be ferrous and non-ferrous metals only. The original EA formed part of the Project Approval (Condition 2). It is proposed to modify the Approval to allow the recycling of building and construction waste including metal.

On 21 October 2008, advice was sought from the Director-General ('DG') of the Department of Planning ('DoP') as to whether the proposed use of the subject site for the recycling of building and construction waste including metal could be considered as an application to modify the Project Approval pursuant to Section 75W of the Act. The Request was reviewed and the DoP agreed to consider the proposal under Section 75W of the Act. The DG's Requirements were accordingly provided. This EA addresses the DG's Requirements in accordance with Section 75W of the Act.

This EA concludes that the proposed modifications are appropriate given the existing approval for the site to operate as a Materials Recycling Facility.

Director Generals Requirements

Requirement	Addressed within Report
The Environmental Assessment must include: <ul style="list-style-type: none"> • An executive summary 	Section 1
A detailed description of the proposal including: <ul style="list-style-type: none"> • Need for the proposal; • Alternatives considered; and • Plans for any new buildings 	Section 4
<ul style="list-style-type: none"> • Consideration of any statutory provisions 	Section 6
<ul style="list-style-type: none"> • Overview of the environmental impacts of the proposal 	Section 7
A detailed description of the key issues specified below and any other significant issues or environmental impacts including: <ul style="list-style-type: none"> • A description of the existing development • An assessment of the proposed impacts of the proposal • A description of the measures that would be implemented to avoid, minimise, mitigate, offset, manage and/or monitor the impacts of the proposal. 	Section 2 Section 7 Section 7
<ul style="list-style-type: none"> • A statement of commitments 	Section 8
<ul style="list-style-type: none"> • A statement from the author of the EA certifying that the information contained within the report is neither false nor misleading. 	Page 4

Key Issues	Addressed within Report
<ul style="list-style-type: none"> • Waste 	Section 7.1
<ul style="list-style-type: none"> • Development Controls 	Section 6
<ul style="list-style-type: none"> • Noise 	Section 7.2
<ul style="list-style-type: none"> • Soil and Water 	Section 7.5
<ul style="list-style-type: none"> • Air Quality 	Section 7.6
<ul style="list-style-type: none"> • Traffic 	Section 7.3
<ul style="list-style-type: none"> • Visual Impacts 	Section 7.7

2.0 INTRODUCTION

2.1 Overview

This EA has been prepared on behalf of No.1 Demolition, to accompany an application for 'Modification of Minister's Approval' made under Section 75W of the Act. The existing Project Approval (06_0052) permits the use of the site as a Materials Recycling Facility for the processing of ferrous and non-ferrous metals.

No.1 Demolition proposes to operate the site as a Materials Recycling Facility, generally in accordance with the approved project application. The major difference is that the original approval limits the facility to the processing of ferrous and non-ferrous metals, while No.1 Demolition propose to process a variety of construction waste products including metal. This EA seeks to modify Conditions 2 and 4 within Schedule 2 of the Project Approval to allow for the processing of building and construction waste including, but not solely restricted to, ferrous and non-ferrous metals.

The Director General of the DoP has issued Environmental Assessment Requirements for the project which is attached at Appendix 1. These requirements are addressed within the EA.

This proposal is generally in accordance with the original approval, and therefore it is considered that the modified proposal is suitable for the site. Any potential issues associated with the development have been addressed within the EA, giving consideration to the consultant reports.

2.2 The Subject Land

The modified proposal relates to 191 Miller Road, Chester Hill, which is legally described as Lot 8 DP 1039882. The site is located on the eastern side of Miller Road and on the southern side of the Southern Railway Line. There is an existing 2 storey office building located at the front of the site and the approved Materials Recycling Facility has not commenced operations on the site.

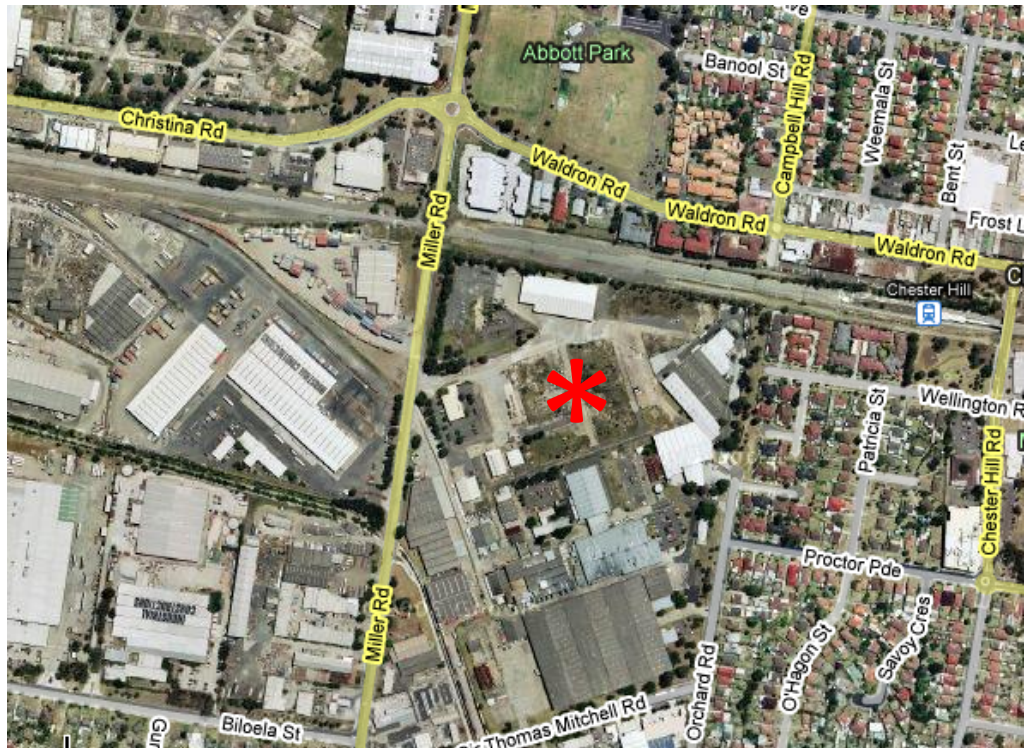


Figure 1: The Subject Site

2.3 Existing Consent

On 27 February 2007, the Minister granted approval for the use of the site as a “Materials Recycling Facility” (Project Approval 06_0052) by CMA Corporation. In summary, the approval granted consent for the construction and operation of a Materials Recycling Facility for the processing of ferrous and non-ferrous metals. The approval permits the facility to receive up to 100, 000 tonnes of ferrous and non-ferrous metal per annum. The cutting of metals is to be undertaken with industrial grade shearers, before being transported to Port Kembla.

The EA submitted with Project Application 06_0052 states that the Facility will process only ferrous and non-ferrous metals. Condition 2,

within Schedule 2 of the Minister's approval requires that the development be undertaken in accordance with the EA. The proposed modification of the consent is discussed in Section 2.4 below.

Condition 4, within Schedule 2, states that the Facility shall not process more than 100, 000 tonnes of metal per year. The proposed use of the site by No.1 Demolition will comply with this condition although it is proposed to modify Condition 4 to limit the maximum amount of building and construction waste including metal processed on the site to 100,000 tonnes per year.

2.4 Modifications Being Sought

This application seeks to modify Conditions 2 and 4, within Schedule 2 of the Minister's approval, to allow for the Materials Recycling Facility to accommodate the processing of building and construction waste including, but not solely restricted to ferrous and non-ferrous metals. The proposal seeks to modify the consent to allow for the recycling of building and construction waste including metal, concrete, timber, bricks, tiles and rubber.

Project Approval 06_0052 sets out a number of conditions in Schedules 2-4 of the Project Approval Document. Specifically, Condition 2 contained within Schedule 2, states that:

"2. Terms of Approval

The proponent shall carry out the project generally in accordance with the:

- a) EA;*
- b) Final Statement of Commitment; and*
- c) Conditions of this approval*

If there is any inconsistency between the above, the conditions of this approval shall prevail to the extent of the inconsistency."

The Environmental Assessment (EA) which accompanied the original application states that:

"Application is made for approval to the construction and use of a portion of No. 191 Miller Road, Chester Hill as a materials recycling facility for the processing of ferrous and non-ferrous metal waste. No other waste will be processed at the facility".

No.1 Demolition propose to operate the site as a Materials Recycling Facility, generally in accordance with the approved plans. The proposed

Recycling Facility will involve the recycling of building and construction waste including metal, concrete, timber, bricks, tiles and rubber.

The modified proposal is generally in accordance with the Minister's approval which describes the approved use as a 'Materials Recycling Facility'. The major difference between the modified proposal and the approved use is that metal comprises only 20% of the volume of material to be processed within the proposed facility. Due to the variety of building waste products being processed on site, the proposal will involve the need for a variety of machinery, as discussed in Section 4.1 below.

The proposal does not involve any change to the form, scale or appearance of the existing office building.

The application seeks to modify the conditions of Project Approval No. 06_0052 in the following manner:

- (a) Condition 2 (Schedule 2) to be modified to indicate that the Development should be undertaken generally in accordance with the EA as modified by the Section 75W EA dated February 2009.
- (b) Condition 4 (Schedule 2) be modified to limit the proponent to process no more than 100,000 tonnes per annum of building and construction waste including metal.

Condition 4 is sought to be modified to limit the proponent to process no more than 100,000 tonnes of building and construction material including metal per annum.

An amended Statement of Commitments has been prepared to accompany the modified application

2.5 Consultation

The Department of Planning has advised that consultation with Bankstown Council and adjoining landowners is not required at this stage. This will be reviewed by the Department of Planning on receipt of this application.

3.0 SITE AND CONTEXT

The proposal relates to 191 Miller Road, Chester Hill, which is legally described as Lot 8 DP 1039882. The site is located on the eastern side of Miller Road and on the southern side of the Southern Railway Line. The site has a total area of 6.543 hectares, of which 2 hectares are occupied by the facility. This proposal does not involve any change to the area or location of the facility within the site. The site is located within a well established and large industrial area, with a range of surrounding uses as indicated below:

North

The Main Southern Rail Line and a range of uses including a fire station, industrial units, residential flat buildings, a nursing home and a child care centre are located to the north of the site. It is considered that the residential buildings are located an appropriate distance from the site to minimise any impact from noise. This issue will be further discussed in the 'Noise Impact Study' prepared by Spectrum Acoustics.

South

There are a number of industrial activities located to the south of the site along Orchard Road, including 'Aperio Group Packaging' and 'AquaCool' refrigeration. Land further to the south of the site is primarily comprised of residential dwellings.

East

There are a number of industrial uses located directly to the east of the site, with residential dwellings being located approximately 200m away from the subject site.

West

The land to the west of the site is primarily occupied by industrial activities, including a large freight and distribution company (Mainway Intermodal Terminals).

4.0 THE PROPOSAL

4.1 Proposed Works

The modifications proposed as part of this application are generally consistent with the works and use approved as part of the original application. The modified proposal will involve the processing of building and construction materials, including, but not solely restricted to, ferrous and non-ferrous metals.

The nature of the proposed modified use will involve the following:

- The recycling of building and construction waste which will include metal, concrete, timber, bricks, tiles and rubber.
- The facility will receive approximately 40-50 truck deliveries per day.
- Materials will be sorted and crushed through a crushing plant.
- The concrete and brick products will be crushed and sorted into an aggregate ranging from 30mm to 40mm in size and DGB road base, which is used under roads and under pavers for pathways.
- All timber received will be mulched on site for use as mulch in gardens.
- The steel will be sent to separate steel recyclers for future re-use.
- The topsoil collected within the material will be screened through a 'screener' to filter any materials left over from the recycling process. This will then be produced into top grade soil.
- Any material that is not recyclable will be transported to landfill.

All proposed physical works on site have been approved as part of the original Project Application. The works are described in the initial EA as being:

The modification proposed involves the processing of building and construction material as well as metal.

A breakdown of the proportion of materials to be recycled as part of the process is as follows:

- 20,000 tonnes p.a. – concrete
- 20,000 tonnes p.a. – metals

- 30,000 tonnes p.a. – inert and general solid waste
- 20,000 tonnes p.a. – topsoil
- 10,000 tonnes p.a. – timber/green material

As a result of the range of building waste products that will be processed on site, the proposal includes the use of for a variety of machinery (See Appendix 10). The types of machinery to be used on site are:

- 2 X Excavators (20 Tonne each)
- 2 X Rubber wheel loaders (12 Tonne each)
- Crusher
- Screener
- Trundle

The volume of materials processed on site will remain in accordance with the limit imposed under Condition No. 4 (Sch 2) being 100,000 tonnes per annum. The main difference between the approved use and the proposed use, is that the facility will process a variety of materials, not solely ferrous and non-ferrous metals.

4.2 Need for the Project

No.1 Demolition is a growing business, actively involved in the recycling of construction waste materials. No.1 Demolition currently operates from a site in Homebush, but require a larger site to expand and increase their recycling capabilities. The Materials Recycling Facility at Miller Road, Chester Hill is considered to be appropriate for the recycling and processing activities to be undertaken by No.1 Demolition.

The recycling and re-use of construction materials, will contribute to the sustainability of the construction industry. For example, the re-use of concrete and other construction materials enables the construction of 'pale roads' (as opposed to 'black roads'), therefore reducing the heat island effect. The recycling of building materials will minimise the amount of waste sent to landfill.

In 2006, amended waste recovery targets (published under the Protection of the Environment Operations (Waste) Regulation 2005) were released. Similarly, in 2005, the Minister for the Environment announced an increase in the Government levy on landfill. The proposed use of the site ensures that up to 100, 000 tonnes of building waste is recycled per annum, therefore contributing towards achieving these goals.

No.1 Demolition is an existing business that specialises in the recycling of a range of construction materials. It is necessary to modify Conditions 2 and 4 of the Project Approval to allow for the processing of general construction materials including ferrous and non-ferrous metals.

4.3 Alternatives

The proposed use of the site by No.1 Demolition is considered to be a favourable alternative because it is generally consistent with the existing use approved for the site as a Materials Recycling Facility. The proposed use is a sustainable practice that involves the re-use of construction materials, and is considered appropriate and favourable in terms of long term construction waste management.

5.0 OPERATIONAL DETAILS

5.1 Daily Operations

The daily operation of the proposed modified operation on the site will involve the transportation of construction waste materials to the site by No.1 Demolition's own vehicles, contractor vehicles and by the general public. It is expected that the site will receive 40-50 truck movements per day.

Once processed, the majority of materials will be transported to other locations around Sydney for immediate use or further processing.

The existing 2 storey office building will be used by No. 1 Demolition for administration purposes and staff amenities.

5.2 Employment

8 people will be employed per shift, for administration and processing functions on the site.

5.3 Hours of Operation

The hours of operation of the site (during construction and operation) will remain in accordance with the current Project Approval namely:

Construction

Monday – Friday: 7am – 6pm

Saturday: 8am – 1pm

Sunday: Nil

Operation

Monday – Saturday: 7am – 6pm

The operation of heavy machinery will only occur between 7am – 5pm Monday to Friday.

5.4 Signage

The Statement of Commitments (accompanying the original application) states that a prominent sign will be erected to ensure that all vehicles enter and exit the site in a forward direction.

5.5 Utilities

As stated in the initial EA:-

“Services such as electricity, water and sewerage are available to the site and can be easily augmented for the proposed development. A new electrical substation will need to be installed within the site based on advice from Integral Energy to date. The new substation will be located where a previous substation once was, as an easement for access to the former substation has not been extinguished.”

The same applies to the modified proposal.

5.6 Stormwater Management

A detailed Stormwater Management System was developed by Stormwater Engineers Wade Consulting as part of the approved development and forms part of the Project Approval. The modified development proposal does not involve any amendment to the approved Stormwater Management System as detailed in the Stormwater Management Report and Plans for the site.

Accordingly, there is no requirement to undertake any further assessment as the modification sought does not impact on the approved Stormwater Management System. Conditions No's 8-10 (Schedule 3) of the Project Approval address stormwater quality issues.

5.7 Access and Internal Circulation

Access to the site is obtained via the existing driveway from Miller Road. The driveway provides a 10m wide ingress driveway and an 8m wide egress driveway, separated by a raised concrete island. The Traffic Impact Assessment (Appendix 3) concludes that existing access arrangements comply with the requirements of AS 2890.1-1993 and the

RTA *Guide to Traffic Generating Developments* requirements for heavy vehicles on site.

Circulation within the site is facilitated by an internal roadway which circulates around the existing administration building and links to the passenger and heavy vehicle parking areas. The internal roadway has a width of 7m, which complies with the requirements of AS 2890.2-2002.

A 19m long semi-trailer turning template is provided on site to allow heavy vehicles to access the parking and loading/unloading area, and then exit the site in a forward direction. The Traffic Assessment indicates that both the truck and passenger parking areas provide adequate manoeuvring areas. Internal circulation of the site is considered to be appropriate for the types of vehicles accessing the site.

6.0 STATUTORY PROVISIONS

6.1 Environmental Planning & Assessment Act, 1979

This application for 'Modification of Minister's Approval' made under Section 75W of the Act. Section 75W relates to modifying the terms of the Minister's approval, including:

“(a) revoking or varying a condition of the approval or imposing an additional condition of the approval, and

(b) changing the terms of any determination made by the Minister under Division 3 in connection with the approval.”

This application relates to Section 75W 1(a), as the proponent seeks to modify Conditions 2 and 4 within Schedule 2 of the Project Approval. In accordance with the requirements of Section 75W(3), a request for the Minister's approval was lodged with the Director-General in October 2008. The Director-General provided the proponent with the DG's requirements, and these requirements have been addressed within this report (see Section 1).

6.2 Bankstown Local Environmental Plan 2001

Zoning

Under the Bankstown LEP 2001, the site is zoned 4(a) 'General Industrial'.

The relevant objectives of the 4(a) General Industrial Zone are:

“(a) to permit primarily industrial uses or uses which are inappropriate in other zones, and

(b) to limit retail development, except where:

(i) it is ancillary to an industrial use of land, or

(ii) it services the daily convenience needs of the local workforce and does not have an adverse impact on the viability of the business areas of the City of Bankstown.

(c) to promote a high standard of:

(i) building design (particularly along arterial roads), and

(ii) environmental management, energy efficiency and resource conservation, and

(d) to allow bulky goods salesrooms or showrooms only where they will not have an adverse impact on the viability of the business areas of the City of Bankstown.”

It is considered that the proposal is consistent with the objectives of the zone as it is a suitable form of industrial development that involves the sustainable re-use of construction materials.

Permissibility

Under Schedule 1, A ‘Materials Recycling Yard’ is defined as:

“a building or place used for collecting, dismantling or storing of second-hand or scrap materials for the sole purpose of recycling the metal, timber or other substances comprising them or from which they are made, whether or not by resale, but does not include a junk yard.”

The modified use would be defined as a ‘Materials Recycling Yard’ and is therefore permissible within the zone.

Clause 22 Acid Sulphate Soils

The Statement of Commitments submitted with the original application included a commitment that Acid Sulphate Testing would be undertaken prior to construction. This requirement will be included in the amended Statement of Commitments.

Clause 52 Development in the Industrial Zones

Clause 52 requires consideration of issues including parking, landscaping, amenity, access and energy efficiency, which are addressed in detail in Sections 5 and 7 of this EA.

6.3 Development Control Plans

Part D6 within the Bankstown Council Development Control Plan 2005 (‘the DCP’), provides a series of controls for development within the industrial zone. These controls do not relate specifically to ‘Materials Recycling Facilities’. The relevant controls within Part D6 are discussed below:

Section 6.2 — Acoustic Privacy

Section 6.2 requires consideration of the noise impacts of the land use on the surrounding residential area and suggests providing soundproofing for machinery (where necessary). This issue has been addressed by the ‘Noise Impact Study’ prepared by Spectrum Acoustics (See Appendix 2), and discussed in more detail in Section 7.2.

Section 6.3 — Pollution Control

The DCP requires that the occupier manage any fumes, odour emissions or water pollutants from the site. This issue has been addressed within Section 7.1 and the further Air Quality Impact Assessment prepared by Heggies (See Appendix 8) which addresses the modified proposal.

Section 9.1 and Section 9.2 — Parking

Section 9.1 requires that the number of car spaces provided complies with the requirements of DCP Part D8 (discussed below). Section 9.2 of the DCP also requires that the loading dock has minimum dimensions of 4m x 7m and is designed to allow for the safe manoeuvring of vehicles. The loading bay complies with this requirement.

Part D7 — Sustainable Commercial and Industrial Development

Part D7 of the DCP outlines the water and energy efficiency standards for development proposals. The proposal does not involve any change to the existing approved buildings and therefore these controls do not apply.

Part D8 — Parking

Part D8 outlines the parking controls for the Bankstown Area, however these controls do not relate specifically to a 'Materials Recycling Facility'. The Traffic Impact Assessment prepared by Thompson Stanbury and Associates addresses the parking requirements for a road transport terminal (which is the most closely related use). The DCP requires:

“Sufficient off-street employee and visitor parking to satisfy demand, plus 1 truck space for each vehicle present at the time of peak vehicle accumulation on site for both fleet and contract vehicle operators.”

The existing passenger vehicle parking area provides 74 spaces and is proposed to be utilised by the proponent. This number of car parking spaces is considered to be adequate, particularly as the facility will employ less staff than proposed by the original application.

An additional 10 spaces will be provided for heavy vehicle storage and loading/unloading area. The Traffic Impact Statement (Appendix 3) concludes that on the basis of 50 trucks entering the site per day, there will be an average of 4-5 trucks on site at any one time. The heavy vehicle parking area has been determined to be appropriate to

accommodate the daily operational demand of the facility, as well as any short term increased vehicle movement on site.

Part D9 Advertising

The Statement of Commitments (accompanying the original application) states that a prominent sign will be erected to ensure that all vehicles enter and exit the site in a forward direction.

7.0 ASSESSMENT OF KEY ISSUES

The following provides an assessment of the key issues associated with the proposed modification.

7.1 Waste Management

Construction Contaminant Management Plan

A Construction Contaminant Management Plan (CCMP) has been prepared by JBS Environmental, and addresses the health, safety and environmental issues during the construction phase. The Management Plan provides guidelines for on-site workers to respond to potential issues such as organic vapours, contaminated soil, heavy equipment and electrical hazards. The report also provides guidelines for No. 1 Demolition to ensure the appropriate management of stockpiled material, sediment control, air quality and waste disposal. In particular matters relating to Waste management are detailed under Section 5.4 of the report. A Waste Management Plan is to be prepared under condition 15 of the Minister's Project Approval.

7.2 Noise

- Operational Noise

A Noise Impact Assessment (Appendix 2) has been prepared by Spectrum Acoustics, in order to determine the necessary height for acoustic barriers around the site. The noise assessment was conducted by determining the noise levels generated by the concrete crushers, screeners, timber mulchers, forklifts and excavators. For example, the highest acoustic barrier (8m) is located adjacent to the concrete crusher (which was found to be the loudest individual noise source).

The Noise Impact Assessment concludes that the installation of noise barriers (Figure 3), will ensure that noise levels will comply with the noise intrusiveness criteria. The design, height and location by the

barriers has been modified to address the proposed use of No. 1 Demolition which involves a variety of machines.

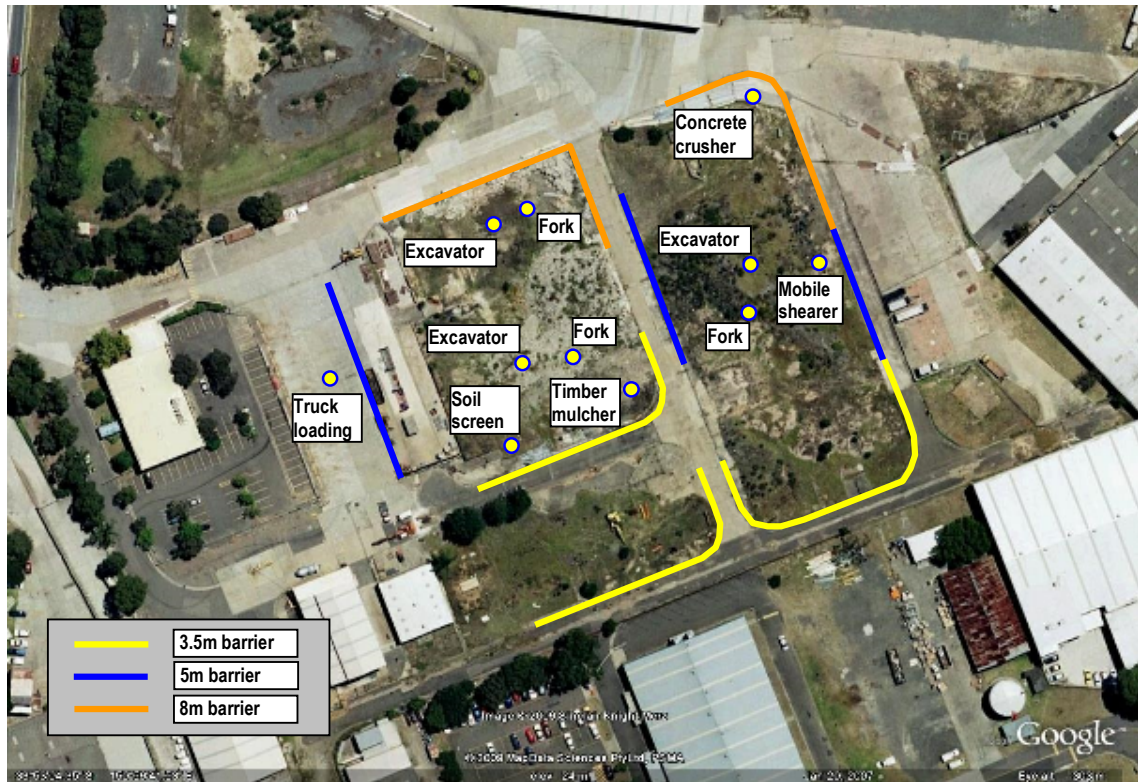


Figure 2: Acoustic Barriers

7.3 Traffic

A Traffic Impact Assessment (Appendix 3) prepared by Thompson Stanbury and Associates provides an assessment of likely traffic generation associated with the proposed facility. The report concludes that traffic generation from employees and truck deliveries, can be suitably accommodated by the surrounding road network.

As detailed in Section 5.2 of the report, the facility will employ 8 people, which will be associated with a maximum of 8 inbound and 8 outbound vehicle trips per day for employee vehicles. Approximately 40-50 truck movements are expected per day and the Traffic Assessment assumes a worst case scenario of 100 trucks per day (a maximum of 200 ingress and egress movements per day), which equates to 18 truck movements per hour.

Overall, it is concluded that passenger and heavy vehicle movements are comparable if not reduced to the traffic generated by the previous

use of the site. In addition, it is determined that Miller Road and the surrounding road network can accommodate the traffic associated with the facility.

7.4 Hazards and Risk

Risk Assessment Evaluation

A Risk Assessment Evaluation (RAE) which includes a Preliminary Hazard Analysis has been prepared by Stephen Grubits & Associates. In accordance with the recommendations of the RAE, the fire protection systems on the site will comply with the BCA and are required to cover any additional machinery required for the proposed recycling operations. Table 2 in the RAE Report (See Appendix 5) describes potential hazardous incidents that could occur on site, and indicates the safeguards that are to be implemented by No.1 Demolition to manage any risk or hazard.

The assessment report has rated the risk level of the facility at 6.7 million per year, which is significantly lower than the allowable risk level of 50 million per year under the NSW DoP Guidelines. Therefore it has been determined that the proposed modification to the facility is acceptable in terms of hazards and risk.

The recommendations of the Preliminary Hazard Analysis form part of the Draft Statement of Commitments. The recommendations of the report for the modified operation are as follows:-

“Fire protection systems to be compliant with the BCA and are to cover the additional building recycling operations;

Transport routes recommended by the RTA to be followed where practicable; and

The site Emergency Response Plan (ERP) be reviewed against AS 3745-2002 requirements and extended to cover the S75W building recycling activities proposed”

7.5 Water and Soils

A detailed Stormwater Management System was developed by Stormwater Engineers Wade Consulting as part of the approved development and forms part of the Project Approval. The modified development proposal does not involve any amendment to the approved Stormwater Management System as detailed in the Stormwater Management Report and Plans for the site.

Accordingly, there is no requirement to undertake any further assessment as part of the subject proposal as the modification sought does not impact on the approved Stormwater Management System. Conditions No's 8-10 (Schedule 3) of the Project Approval address stormwater quality issues.

7.6 Air Quality

An Air Quality Impact Assessment (Appendix 6) has been prepared by Heggies Pty Ltd, considering air quality impacts during construction and operation of the site. Any air quality impacts generated during the construction phase are considered to be insignificant, and will be controlled through good site management, vehicle maintenance and dust mitigation measures where necessary.

The report concludes that during the operation of the site as a Materials Recycling Facility, general dust and particulate emissions from trucks, excavators, front end loaders, crushers and screeners, will not exceed appropriate emission levels. The report states that *"It should be noted that a worst case assessment was conducted, in terms of modelled dust and particulate matter generation...with levels expected to be significantly lower during normal operation of the facility."*

7.7 Visual Impacts

A review of the original acoustic barriers proposed for the site has been conducted by Spectrum Acoustics (Appendix 2). This assessment concluded that a minor reconfiguration and reduction in height of some acoustic barriers is required. For example, the original proposal required a 4m high acoustic barrier along a significant portion of the southern boundary of the site, as well as a 3m high acoustic barrier in the north-western part of the site. The southern barrier has been reduced in length and reduced to 3.5m high. The north-western barrier has been moved to reduce amenity impacts to the north of the site. The 5m barrier in the south-eastern corner of the site has been reduced from 5m to 3.5m.

The amended configuration and heights has been determined by the type of machinery to be used by No.1 Demolition. The modified barrier height and reconfiguration is considered to be positive in terms of creating improved amenity in the area.

8.0 STATEMENT OF COMMITMENTS

See Appendix 8 for details

9.0 CONCLUSION

The modified use of the site as a Materials Recycling Facility for the processing of construction and building waste materials including metal is considered to be appropriate for the following reasons:

- The site will operate as a Materials Recycling Facility, generally in accordance with the Ministers Approval 06_0052.
- The site will process a range of construction waste, not solely ferrous and non-ferrous metals. It is considered that this change will not have any significant impact on the operation of the site or the surrounding areas as approved.
- The facility will process a maximum of 100, 000 tonnes per annum, as restricted by the existing Project Approval.
- As indicated by the consultant reports, the proposed modified use of the site does not result in any significant impacts in terms of traffic, waste management, noise, hazards and visual amenity.
- The proposed use of the site is considered to be substantially the same as the Project Approval granted for a 'Materials Recycling Facility' on the site.