



ENVIRONMENTAL ASSESSMENT

EXPANSION OF PROCESSING CAPACITY AT THE SMARTSKIP MATERIALS RECYCLING FACILITY

**No's 19 – 23 Fariola Street and No. 29 Derby
Street, Silverwater**

**Prepared for
Smartskip NSW Pty Ltd**

**By
BBC Consulting Planners**

Job No. 05-264
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Table of Contents

EXECUTIVE SUMMARY	5
1. INTRODUCTION	6
1.1 Overview	6
1.2 The Land to which the Project Relates	6
1.3 Summary of Development for which Approval is Sought	7
1.4 Planning Process	7
1.5 Consultation	10
1.5.1 Environmental Assessment Requirements	10
1.5.2 Department of Environment and Climate Change ("DECC")	11
1.5.3 NSW Roads and Traffic Authority ("RTA")	11
1.5.4 Auburn Council	11
2. THE FACILITY AND CONTEXT	12
3. PROJECT DESCRIPTION	16
3.1 Background – The Need for the Project	16
3.2 Description of Project	17
3.2.1 Access and Internal Circulation	22
3.2.2 Utilities	22
3.2.3 Signage	22
3.2.4 Employment	23
3.2.5 Hours of Operation	23
3.3 Construction Management	23
3.4 Capital Investment Value	23
3.5 Alternatives Considered	24
4. LEGISLATIVE FRAMEWORK	25
4.1 Relevant Acts	25
4.1.1 Environmental Protection and Biodiversity Conservation Act 1999	25
4.1.2 Protection of the Environment Operations Act 1997	26
4.2 State and Regional Environmental Planning Policies	28
4.2.1 State Environmental Planning Policy (Major Development) 2005	28
4.2.2 State Environmental Planning Policy (Infrastructure) 2007	29
4.2.3 State Environmental Planning Policy No. 33 – Hazardous and Offensive Development	29
4.2.4 State Environmental Planning Policy No. 55 - Remediation of Land	32
4.3 Local Planning Policies	33
4.3.1 Auburn Local Environmental Plan 2000	33
4.3.2 Draft Local Environmental Plan	34



4.3.3	Development Control Plans and Strategies	34
5.	ENVIRONMENTAL ASSESSMENT	38
5.1	Introduction	38
5.2	Statutory Planning Considerations	38
5.3	Environmental Assessment Requirements – Key Issues	38
5.3.1	Waste Management.....	38
5.3.2	Soils and Water.....	38
5.3.3	Air Quality.....	41
5.3.4	Traffic	45
5.3.5	Noise	50
5.3.6	Hazards.....	52
5.3.7	Other Issues.....	53
6.	DRAFT STATEMENT OF COMMITMENTS.....	54
6.1	General.....	54
6.2	Pre-Construction Phase	54
6.3	Construction Phase	56
6.4	Operational Phase.....	58
7.	CONCLUSION.....	61

FIGURES

- Figure 1: Location Plan
- Figure 2a: Aerial Photo – Fariola Street site
- Figure 2b: Aerial Photo – Derby Street site
- Figure 3: Zoning – Auburn LEP 2000

APPENDICES

- Appendix 1: Director-General’s Environmental Assessment Requirements;
- Appendix 2: Reduced copy of Fariola Street Survey Plans, prepared by Denny Linker and Co;
- Appendix 3: Reduced copy of Derby Street Survey Plan, prepared by Denny Linker and Co;
- Appendix 4: Project Application Plans for the Fariola Street site, prepared by Borg Architects;
- Appendix 5: Project Application Plans for the Derby Street site, prepared by Borg Architects;
- Appendix 6: Consultation letter provided to Auburn Council;



- Appendix 7: Traffic Impact Assessment, prepared by Cardno Eppell Olsen;
- Appendix 8: Noise Impact Assessment, prepared by Acoustic Logic Consultancy;
- Appendix 9: Construction Noise and Vibration Management Plan, prepared by Acoustic Logic Consultancy; and
- Appendix 10: Air Quality Impact Assessment, prepared by Heggies Australia.
- Appendix 11: Brochure and Specifications for Tennant 3640 Power Sweeper / Vacuum.



STATEMENT OF VALIDITY

Submission of Environmental Assessment

Prepared under Part 3A of the *Environmental Planning and Assessment Act, 1979*

Environmental Assessment prepared by

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In respect of	Project Application for an Expansion to an Existing Materials Recycling Facility - Smartskip, Silverwater

Applicant and Land Details

Applicant name	Smartskip NSW Pty Ltd
Applicant address:	No's 19 – 23 Fariola Street, Silverwater NSW 2128
Land to be developed	No's 19 – 23 Fariola Street, Silverwater NSW 2128 No. 29 Derby Street, Silverwater NSW 2128
Lot and DP	Lots 3, 4 and 5, DP 5818 (Fariola Street site) Lot 12, Section 49, DP 5818 (Derby Street site) Lot 11, DP 135314 (Derby Street site)

Environmental Assessment	An Environmental Assessment is attached.
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Statement of Validity	I certify that I have prepared the contents of the environmental assessment in accordance with the Director-General's requirements (dated 4 February 2009) and that to the best of my knowledge, the information contained in the environmental assessment is neither false nor misleading.
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Signature – Russell Hand
Date – 29 January 2010



EXECUTIVE SUMMARY

This Environmental Assessment report (“EA”) has been prepared on behalf of Smartskip NSW Pty Ltd to accompany a Project as defined in Part 3A of the Environmental Planning and Assessment Act 1979.

The Project to which this EA relates is the expansion of an existing materials recycling facility operating from No’s 19 – 23 Fariola Street and No. 29 Derby Street, Silverwater (“the Smartskip Materials Recycling Project”). The Fariola Street site comprises the main operations of the materials recycling facility and the Derby Street site is used for storage of empty waste bins and company trucks.

The Smartskip Materials Recycling Project comprises increasing the capacity from 21,000 to 80,000 tonnes of construction and demolition waste per year and associated changes to infrastructure.

Since 1995 the site has been used as a materials recycling facility pursuant to an approval granted by Auburn Council. The facility processes dry construction and demolition waste. The facility does so by receiving, storing, separating and transporting waste materials such as cardboard, timber, plastics, concrete, bricks and metals for subsequent processing.

The existing facility has the capacity to expand its waste throughput due to operational efficiencies gained since the facility first operated in 1995.

The site is zoned 4(a) General Industrial Zone under the Auburn Local Environmental Plan 2000 and materials recycling facilities are permissible with consent in the zone.

The Minister for Planning has declared the development to be a Project to which Part 3A of the Act applies.

The Environmental Assessment concludes that the site is suitable for the Project and that the Project is consistent with the public interest. An assessment of the impacts of the proposed development indicates that, subject to the implementation of appropriate mitigation measures and, in particular, those identified in the Draft Statement of Commitments forming part of the EA, the Project will not result in any significant adverse social or environmental impacts. Any potential negative impacts will be substantially mitigated by the measures outlined in this report.



1. INTRODUCTION

1.1 Overview

This EA has been prepared on behalf of the proponent, Smartskip NSW Pty Ltd, in relation to an application under Part 3A of the Act for approval for the Smartskip Materials Recycling Project comprising alterations and additions to the existing facility and an increase in the processing capacity of waste from 21,000 to 80,000 tonnes per annum.

Smartskip trades in the recovery of construction and demolition waste for processing and sale to domestic and export markets. Smartskip employees collect full waste bins from construction and demolition sites within the Sydney Metropolitan Region. These are transported to the Fariola Street site for sorting. The Derby Street site operates as a depot for empty waste storage bins and vehicles.

By declaration dated 23 November 2007, the Acting Director-General of the NSW Department of Planning, as delegate for the Minister for Planning, expressed the opinion that the proposed Project is of a kind described in Schedule 1 of State Environmental Planning Policy (Major Development) 2005 ("the Major Development SEPP"), and declared the Project to be a Project to which Part 3A of the EP&A Act applies.

Following the preparation of a Preliminary Environmental Assessment, the Director-General of the Department of Planning issued Environmental Assessment Requirements for the Project ("the DGEARs") on 4 February 2009, a copy of which is attached in **Appendix 1**. The EA addresses these requirements.

The EA concludes that the site is suitable for the Project and the proposed Project is consistent with the public interest. Any potential negative impacts will be mitigated by the measures outlined in the report.

1.2 The Land to which the Project Relates

The land to which this Project relates is:-

- No's 19 – 23 Fariola Street, Silverwater (Lots 3, 4 and 5, DP 5818) ("the Fariola Street site"); and
- No. 29 Derby Street, Silverwater (Lot 12, Section 14, DP 5818 and Lot 11, DP 135314) ("the Derby Street site").

The sites are located within the Silverwater Industrial Area to the north of the M4 Motorway and south of the Parramatta River (refer **Figure 1**). They are referred to in this EA as "the facility".

Survey plans for the sites are contained in **Appendices 2 and 3**.

1.3 Summary of Development for which Approval is Sought

Application has been made for alterations and additions to the existing facility and an increase in processing capacity from 21,000 to 80,000 tonnes per annum.

The proposed physical changes to the layout of the facility (i.e. to both sites) are indicated on the Project Application Plans in **Appendices 4 and 5**.

The development comprises:-

- Physical works on both sites including demolition and construction of minor ancillary structures, internal building modifications, relocation of car parking spaces, driveway widening and some site resurfacing; and
- Expansion of the existing processing capacity of the subject sites up to 80,000 tonnes per annum of dry construction and demolition waste.

1.4 Planning Process

Section 75B of the *Environmental Planning and Assessment Act, 1979* ("the EP&A Act") provides that Part 3A of the EP&A Act applies to the carrying out of development that is declared to be a Project to which this Part applies.

The Minister for Planning has formed the opinion that the Project Application is a Project to which Part 3A applies.

The Director-General of the Department of Planning has issued the Environmental Assessment Requirements ("DGEARs") for the Project (Appendix 1). The EA addresses the issues raised in the DGEARs in the sections indicated in the following table:

Requirement	Where addressed
GENERAL REQUIREMENTS	
The Environmental Assessment must include:	
• an executive summary;	Page 5.
• a detailed description of the following within the site and any associated areas: - historical operations / activities; and - existing and approved operations/facilities, including any statutory approvals that apply to these operations and facilities.	Section 3.

Requirement	Where addressed
- a detailed description of the Project including the: - waste strategy for the region, and the need for the Project within this broader strategic context; - alternatives considered, including not proceeding and expansion of the existing facility; and - plans of the proposed facility, stormwater management systems and associated infrastructure.	Section 4.
a risk assessment of the potential environmental impacts of the Project, identifying the key issues for further assessment.	Section 5.
- a detailed assessment of the key issues specified below and any other significant issues identified in the general overview of the environmental impacts of the proposal which includes: - a description of the existing environment, using sufficient baseline data; - an assessment of the potential impacts of all stages of the Project, including any cumulative impacts, taking into consideration any relevant policies, guidelines, plans and statutory provisions, and associated Regulations; and - a description of the measures that would be implemented to avoid, minimise, mitigate, rehabilitate/remediate, monitor and/or offset the potential impacts of the Project, including detailed contingency plans for managing any potential significant risks to the environment.	Section 5.
a draft Statement of Commitments, outlining all the proposed environmental management and monitoring measures;	Section 6.
a conclusion justifying the Project on economic grounds, social and environmental grounds, taking to consideration whether the Project is consistent with the objects of the Environmental Planning and Assessment Act 1979;	Section 7.
a signed statement from the author of the EA certifying that the information contained in the report is neither false nor misleading.	Page 4.

Requirement	Where addressed
KEY ISSUES	
Waste Management – at both the Fariola Street and Derby Street sites including: - a clear description of the activities which would be undertaken at both premises; - source, quantity input rates and type of waste; - classification, receipt, separation, stockpiling, processing and disposal; and - litter control.	Section 5.3.1
Soil and Water including: - the proposed erosion and sediment controls (during construction), - the proposed stormwater management system (during operations), - water harvesting and recycling; - measures to prevent mud and dust tracking onto roads; - an assessment of contamination groundwater and soils and proposed mitigation and management measures.	Section 5.3.2
Air Quality – including dust generation and management.	Section 5.3.3
Traffic and Parking – including details of access and parking; traffic volumes likely to be generated during construction and operation; and an assessment of the predicted impacts of this traffic on the safety and capacity of the surrounding road network: particularly the intersections of Silverwater Road/Fariola Street and Silverwater Road/Carnarvon Street.	Section 5.3.4
Noise – including construction, operational and traffic noise.	Section 5.3.5
Hazards - including fire management.	Section 5.3.6

Requirement	Where addressed
REFERENCES	
The Environmental Assessment must take into account relevant State government technical and policy guidelines. List attached to requirements.	These are considered in the EA and the specialist reports contained in the Appendices.
CONSULTATION	
During the preparation of the Environmental Assessment, you should consult with the relevant local, State or Commonwealth government authorities, service providers, community groups or affected landowners. In particular, you must consult with the: • NSW Department of Environment and Climate Change; • NSW Roads and Traffic Authority; and • Auburn Council. The consultation process and the issues raised should be described in the EA.	Section 1.5.

1.5 Consultation

1.5.1 Environmental Assessment Requirements

The DGEARs require the following in relation to consultation:

“During the preparation of the Environmental Assessment, you should consult with the relevant local, State or Commonwealth government authorities, service providers or affected landowners.

In particular you must consult with the:

- *Department of Environment and Climate Change;*
- *NSW Roads and Traffic Authority;*
- *Auburn Council.*

The consultation process and the issues raised should be described in the EA.”

A description of the consultation undertaken with each of the above parties is contained below.



1.5.2 Department of Environment and Climate Change (“DECC”)

Heggies Australia, in the preparation of the Air Quality Assessment for the Environmental Assessment, have consulted with the DECC. A Senior Air Policy Advisor (Alex Todoroski) was consulted by Heggies as to the DECC’s recommendations on the nature of air emissions which were considered for the Project.

Acoustic Logic Consultants also consulted the DECC’s Acoustic Branch in the preparation of their Noise Impact Assessment.

BBC Consulting Planners met with Mr Chris McElwain, the DECC’s Unit Head for Waste Operations and Ms, Lesley Corkill of the Waste Operations Unit in May 2009 to discuss the DECC’s general requirements for the EA.

1.5.3 NSW Roads and Traffic Authority (“RTA”)

Cardno Eppell Olsen, in the preparation of the Traffic Impact Assessment, have consulted with the RTA.

They contacted the Development Impact Assessment Branch of the RTA’s Blacktown Office and were advised that the RTA would like to comment on the development when a formal Environmental Assessment was submitted to the Department of Planning. They also consulted the RTA regarding potential roadworks and road network improvements in the surrounding area, as well as the latest traffic data and the rigour of Cardno’s data collection.

1.5.4 Auburn Council

In the preparation of the EA, a letter was sent to Auburn Council by BBC Consulting Planners (**Appendix 6**) on 29 June 2009 asking whether the Council had any further issues to add from their correspondence to the Department of Planning advising considerations for the EA.

No written response has been received from Auburn Council, and we therefore assume there are no additional issues to be addressed that are not already captured by the Director-General’s Requirements.

2. THE FACILITY AND CONTEXT

The facility is located within a long established and large industrial area. The nature of surrounding land uses are shown on the aerial photos at **Figures 2a and 2b** and are described below. The uses surrounding the facility are generally industries or light industries, with a dominance of warehousing and factory units with components of office space.

Fariola Street Site	Derby Street Site
<i>General Description</i>	
No's 19 – 23 Fariola Street, Silverwater is on the southern side of Fariola Street between Wetherill Street to the west and Day Street to the east. The Fariola Street site houses the facilities waste processing activities. The Fariola Street site contains three main buildings, each of which were historically used as a metal foundry. They have been modified since, with side walls deleted to open up the centre of the site for materials processing. The northern building along Fariola Street houses the administration office. The eastern building houses a portion of the materials processing area and allows materials to be taken away by “walking floor” semi-trailers. The western building is used for a workshop and contains a washbay, tyre change area, truck maintenance area, oil/fuel storage area and yard staff amenities. The workshop roles, with the exception of refuelling, are generally now outsourced and the workshop building can be used for other purposes. The site has a flat topography and sits about 1m above the level of Fariola Street. The site is almost entirely covered by buildings or concrete driveways, car parking or storage areas. Landscaping comprises pockets of gardens immediately adjacent to the office at the centre of the site and in front of the workshop building toward the west of the site.	No. 29 Derby Street, Silverwater is on the north-western corner of the intersection of Derby Street and Day Street. The Derby Street site houses Smartskip's company vehicles and empty waste bins. However, many of Smartskip's drivers take vehicles with them each evening. The Derby Street site has a flat topography and is an open yard for storage. It has a natural fall toward the south-western corner. The site contains a large colourbond storage building, a small unused demountable office and a weighbridge. The site is enclosed by a 2m high brick fence and the gates to the site are clad in shade cloth, thus deterring any views from the public domain and adjoining sites. The site has large garden beds with a number of mature trees along the Derby Street side, but no landscaping along the Day Street side.

The Fariola Street site is the subject of an approval granted by Auburn Council in 1995 to operate as a materials recycling facility. The notice of determination to DA 45/95 granted development consent for:- <i>“Sorting of demolition and building waste and associated truck depot with alterations to existing buildings.”</i> Conditions of consent to DA 45/95 currently control the throughput of the site (i.e. 80 tonnes/day or 21,000 tonnes/p.a), the vehicle movements to and from the site, and the activities undertaken (e.g. conditions of consent state crushing shall not be undertaken).	
Surrounding Uses	
North of the Fariola Street site are a series of two storey industrial units at No's 16 – 24 Fariola Street with car parking between the buildings and the street. The sites contain a number of driveways onto Fariola Street which have been considered in the formation of the Project Application plans. The existing tenants to the north comprise distribution and logistics business, as well as a Materials Recycling Facility. South of the site is a large factory development containing car parking spaces around three main buildings. Immediately alongside the rear of the site are car parking spaces and a small factory building. East of the site is a metal foundry operation which is the source of much of the neighbourhood's noise environment. The foundry contains a series of factory buildings and silos. Immediately alongside the site are metal storage areas with skip bins and empty racking systems. Residential development within the Newington suburb is found some 300m to the east of the site, but these Newington dwellings are separated from the site by a great deal of industrial development.	North of the Derby Street site is a manufacturing business housed within a single storey factory set back from the street and containing car parking for the first 20-25m. Further north are warehousing, distribution and manufacturing industries housed within large factory buildings. South of the site is Derby Street, then a large manufacturing industry containing office accommodation at the corner facing the site. Further south is the suburb of Newington that starts some 170m away by line of sight and is commenced by the presence of the Sterling Apartments complex at the ends of Day Street and Carnarvon Streets. East of the site are distribution and manufacturing buildings houses within individual factory buildings and large industrial estates. Further east are residential uses in Newington some 170m away. West are industries extending to the Camellia suburb, comprising general manufacturing, distribution and service industries.

West of the site is a two storey industrial unit development containing two small tenancies. Further west is café along the Fariola Street frontage of an industrial building at the corner of Fariola Street and Wetherill Street.	
<i>Flora and Fauna</i>	
With the exception of grassed areas within the building setback and some garden areas alongside the front of the existing buildings along the street, the Fariola Street is devoid of any vegetation. No existing vegetation will be impacted by the proposed works associated with the Project.	With the exception of grassed areas along the street frontages and a large garden bed along the Derby Street frontage, the Derby Street site is devoid of any vegetation. No existing vegetation will be impacted by the proposed works associated with the Project.
<i>Access and Circulation</i>	
Access to the site is from Fariola Street via two existing driveways. Site access arrangements will not change. The site has provision for up to 9 staff car parking spaces. However, the site only requires 10 car parking spaces. The provision of 10 parking spaces is addressed in the Traffic Impact Assessment accompanying this EA. Pedestrian access to the site is available from Fariola Street via footpaving on the southern side of the road.	Access to the Derby Street site is from two existing driveways along Day Street, while a third driveway onto Derby Street is currently unused. The two driveways currently permit a circular path of travel within the site, allowing trucks to enter, unload empty bins and exit in a forward direction. Some of the trucks used by Smartskip are stored at the Derby Street site while others are driven home by their operators. An allowance for drivers to park their cars within the site is made. Pedestrian access to the site is available from footpaving all around the site.
<i>Historical Uses and Development Consents</i>	
Based on a review of Auburn Council's development application files, the Fariola Street site is likely to have been used in the past for a metal foundry and a transport and distribution facility. Most recently, consent was granted in 1995 to a development application for a materials recycling facility and truck depot.	The Derby Street site is currently used for the storage of empty waste bins and vehicles in conjunction with the Fariola Street site. Alterations and additions to the site, such as the weighbridge, demountable office and storage shed have been added. The prior use of the site is unknown.

Site Contamination	
The Fariola Street is fully sealed by buildings or concrete surfaces. As the Project does not disturb the existing surface coverings, other than the widening of the western driveway, the soils beneath the site will not be disturbed. As such, soil contamination is not a relevant matter in relation to the Fariola Street site.	It appears that the Derby Street site has been covered in gravel materials and used for the storage of empty waste bins. The prior use is unknown. The Project includes the concreting of the gravel portions of the site. Concrete will be poured onto the gravel surface and will not significantly disturb materials below. As such, soil contamination is not a relevant matter in relation to the Derby Street site.
Stormwater Management	
Within the centre of the Fariola Street site is a 100,000 litre on-site stormwater detention tank to capture and filter waste water. Stormwater is drained from a number of inlets within the site into the detention tank. The detention tank is emptied of soil and mud materials regularly. There is an up-gradient from the centre of the facility up to the driveways. There is thus no potential for waste water to discharge to adjoining properties as it is wholly contained within the site. The detention tank will continue to be utilised for the expanded processing capacity of the facility. By virtue of the on-site detention system, discharge of polluted water from the activities of the Fariola Street site is limited to rainwater potentially containing soil and dust particulate flowing down the driveways. In response to the potential for road contamination, Smartskip have installed driveway drains at the top and base of the facility entry and the base of the facility exit. These drains capture rainwater along the driveways and minimise water containing dust or mud from escaping the site.	The Derby Street site is overwhelming covered by gravel material and has no stormwater management system in place. The Project seeks approval to concrete the balance of the site and maintain the existing gravity flow for stormwater. The amount of stormwater discharge will be commensurate to the existing, as the existing gravel material is well compressed. The introduction of concrete in lieu of gravel will improve water quality due to the eradication of stormwater containing dust or mud

3. PROJECT DESCRIPTION

3.1 Background – The Need for the Project

There is an environmental and social need for the proposed Project in reducing New South Wales' reliance on costly and environmentally inappropriate landfill. The proposed development ensures that up to 80,000 tonnes of waste materials are diverted away from landfill and reused in the Australian and export economies.

General speaking, over the past decade, environmental consciousness among waste producers and waste recyclers has significantly increased. Waste recyclers, responding to markets created by the re-use of materials, have seen ongoing changes to waste legislation making resource recovery more viable and landfilling less viable. Recent changes to waste related definitions and licence categories for waste and the introduction of pricing mechanisms to discourage landfilling are two such means that create demand and need for the Project.

The Minister for the Environment (now Minister for the Environment and Climate Change) announced on 30 November 2005 that the Government levy on landfill per tonne in New South Wales was to increase approximately threefold between 2006 to 2010 from \$22 to \$56. The intention of this increase is to divert materials that can be recycled away from landfill. Smartskip strives to reduce waste streams by up to 70%, ensuring minimum landfill 'gate fees' when the balance of materials are disposed.

In 2006, the Productivity Commission conducted an inquiry into waste generation and resource efficiency in Australia. Among the many recommendations of the inquiry was increased targets for resource recovery and the promotion of resource recovery through government levies, subsidies and waste strategies.

In September 2006 the DECC gazetted amended waste recovery targets for packaging products applying under the Protection of the Environment Operations (Waste) Regulation 2005 ("POEO Regulation"). Targets relevant to the Project as established for NSW waste recovery efforts are as follows:-

Waste Materials	Target Recovery Rate
Paper and cardboard	80%
Steel	65%
Aluminium	75%
Plastics	Between 35 – 60% (depending on plastic type)

An inquiry into the Sydney Metropolitan Region's ongoing demand for putrescible landfill facilities was commenced in 2008 and remains ongoing. The inquiry is being undertaken on behalf of the NSW State Government by an independent waste expert. The outcomes of that



inquiry (“the Wright Report”) are yet to be released. However, the 2000 Wright Report, which investigated the same issues and is being reviewed as part of the 2008 – 2009 review, included the following general conclusions at that time:-

- There should be significant focus on behavioural changes for consumers and bolstering markets for recycling;
- New technologies and practices for waste diversion are emerging. Key to this is efficient and timely managed solutions for receiving, sorting and dispersing waste streams; and
- Sydney, as at January 2001, had a capacity for landfill of about 20.8 million tonnes and was using this capacity at a projected rate of 2.0 million tonnes per annum. Sydney faced a shortfall in landfill capacity until increased construction and demolition, municipal and commercial and industrial waste recycling infrastructure was created.

In 2005, a Commission of Inquiry was held in relation to an increase in capacity of the Eastern Creek Landfill Facility. The Commission recommended that the current landfill capacity of the site increase by 2.9 million tonnes, with an additional initial 500,000 tonnes if required. However, a fresh Commission of Inquiry over 2008 to 2009 is understood to be ongoing in relation to a further increase in capacity of the Eastern Creek Facility. This indicates that the demand for landfilling remains strong despite recent consumer behavioural changes associated with recycling. Accordingly, resource recovery infrastructure remains in high demand for environmental reasons. While municipal waste and commercial and industrial waste remain the highest contributors of landfill materials, the need to increase construction and demolition waste recycling is also evident.

The proposed development will assist by contributing some of the 80,000 tonnes of waste processed at the facility for reuse, thus aiding the achievement of the State Government’s Policy on Waste Reduction, POEO Regulation targets and assisting the shift away from new landfill capacity in favour of markets for recycling of waste streams. The proposed Project will make a worthy contribution to the amount of general waste recycling in the Auburn LGA.

3.2 Description of Project

Application is made alterations and additions to the existing Smartskip Materials Recycling Facility and an increase in processing capacity from 21,000 to 80,000 tonnes of waste per annum.

The existing Materials Recycling Facility processed dry construction, demolition and packaging waste. The Applicant is confident that up to 80,000 tonnes of materials can be processed at the site due to the changes proposed to the Fariola St site associated with the Project. However, it is noted that 80,000 tonnes is the maximum that the site would process in a year under the Project and the actual daily amount of materials processed will be variable.



Specific details of the Project are contained below.

Summary of Development for which Approval is Sought

The Project comprises:-

- Physical works on both sites including demolition and construction of minor ancillary structures, internal building modifications, relocation of car parking spaces and driveway widening and site resurfacing.

Physical changes to the Fariola Street site are as follows:-

- Removal of existing demountable buildings and mechanical equipment from the workshop building along the western side of the site. The truck wash bay and repair station at the southern end of the factory would be retained. These changes free up space for 9 staff car parking spaces within the factory building;
- Relocation of existing car parking from the south-western corner of the site to the abovementioned western factory building;
- Installation of revised dust suppression sprinklers to capture any fine dust particles, particularly on windy days; and
- Widening of the existing eastern access driveway to cater for improved truck manoeuvring.

Physical changes to the Derby Street site are as follows:-

- Removal of an existing portable building from the site;
 - Removal of the existing Day Street northern driveway;
 - Removal of the existing Derby Street western driveway;
 - Construction of new gates and masonry walls to make good former driveway openings;
 - Reinstatement of the existing eastern Derby Street driveway;
 - Resurfacing the site to include a consistent concrete base. Currently the Derby Street site is a mix of gravel and concrete surfaces, but predominantly gravel. Concreting the site will ensure existing dust and stormwater impacts are minimised; and
 - New landscaping around the revised entry arrangements.
- Expansion of the existing processing capacity of the facility to 80,000 tonnes per annum of dry construction and demolition waste.

Types and Quantities of Materials Processed

The following materials are recovered at the Smartskip Materials Recycling Facility:-

- plastics used in packaging;
- cardboard used in packaging;
- heavy materials, including clean soil, bricks, concrete / cement and stone;
- timber and plasterboard sheeting; and
- metals.

Over a 12 month period, it is estimated that 20 – 30% of all materials at the facility, by volume, are sent to landfill.

The Smartskip facility employs procedures to ensure that unsuitable materials are not processed. Smartskip's account holders and new customers are regularly advised what items are prohibited and why they are prohibited.

Upon pickup from construction sites, Smartskip staff visually inspect materials. If unsuitable materials are found in a delivery either by visual inspection or following arrival at the Materials Recycling Facility, the customer is advised to rectify the situation at their own expense.

Materials that are not accepted at the facility include the following:-

- asbestos;
- glass;
- tiles;
- polystyrene;
- green waste
- domestic type waste;
- contaminated waste;
- putrescible waste;
- medical waste;
- hazardous materials;
- explosive materials;
- radioactive waste;
- poisonous materials;
- pressurised vessels;
- drums;
- sealed containers; and

- electrical transformers and circuit boards.

Despite all foreseeable safeguards in place, in the unlikely but inevitable event of asbestos materials being discovered after being unloaded and spread at the Fariola Street site, Smartskip employees line a skip bin with plastic, adopt safety precautions and dispose of the material to a licensed receiver. In response to Auburn Council's feedback to date, a formalised Asbestos Management Plan will be made, as provided in the Statement of Commitments of this EA.

Description of Processing Activities

Materials will be brought to the site by Smartskip's fleet of trucks. Smartskip vehicles range in size from small hook lifts to larger rigid vehicles with sliding bins. Vehicles up to 12.5m in length have been planned for in the expansion Project.

The types of skip bins used are:-

Bin Type	Attributes
3 tonne	<u>Volume:</u> 3m ³ <u>Dimensions:</u> 1.2m wide, 2.0m long, 1.2m wide
6 tonne	<u>Volume:</u> 6m ³ <u>Dimensions:</u> 1.4m wide, 3.6m long, 1.2m high
9 tonne	<u>Volume:</u> 9m ³ <u>Dimensions:</u> 1.5 wide, 3.9m long, 1.2m high Operable barnyard rear door.
10 tonne	<u>Volume:</u> 12m ³ <u>Dimensions:</u> 2.4m wide, 6m long, 0.85m high. Operable barnyard rear door.
15 tonne	<u>Volume:</u> 15m ³ <u>Dimensions:</u> 2.4m wide, 6m long, 1.2m high. Operable barnyard rear door.

Peak hour truck use has been assessed to be 7 lift trucks, 2 barnyard trucks and 1 walking floor truck. Walking floor trucks are semi trailers with a single, long trailer.

When materials are delivered, they are unloaded into a stockpile for inspection and sorting. The stockpile is on the western side of the Sorting Area shown in the Ground Floor Plan in Appendix 4. Sorting comprises the use of one excavator to initially pick out recycleable materials from the load and place them in suitable bins and stockpiles by categories (e.g.



timber, metals, etc). All bins within the site will be relocatable and therefore need not be fixed to the ground. The Ground Floor Plan depicts the location of the bins to be used for recycleable materials. It is not possible to provide estimates, by waste category, for recycleable waste. The quantities of the materials recovered will vary depending on market demand. For example, it may not be economically viable at a certain time to recover a significant amount of metals because of the small amount of metals being received or the low price for recovered metals achievable at foundries.

Once an initial sorting has taken place, the materials are then stockpiled within the eastern factory building into two piles – one stockpile for “heavy” recyclable materials and one stockpile for “light” non-recyclable materials. The materials are pushed or lifted into the stockpiles by an excavator and bulldozer. The stockpiles are maintained because, due to their volume, the materials are loaded directly into walking floor trucks rather than temporarily stored in empty bins.

Approximately 80% by volume of all materials are classed as “heavy”. Heavy materials include soil, sand, cement, rock and stone. They are sent for further processing and reuse by landscape suppliers, infrastructure providers, quarries and other users.

The remaining 20% of materials comprises lightweight waste that is not economically viable to sort, generally because any recyclable material within is small and mixed with non-recyclable waste. Light materials are sent to landfill or quarry rehabilitation sites.

The heavy and light stockpiles are limited in capacity due to the space within the eastern factory building. The heavy and light stockpiles can be up to approximately 300 tonnes each. However, the Project relies upon walking floor trucks visiting the site approximately once an hour to remove stockpiled materials. When the site is running efficiently, the last walking floor load of the day should lead to most, if not all, of the materials received that day being removed from the site.

If the waste throughput of the site reached the maximum 80,000 tonnes, the average daily processing would be around 260 tonnes per day, which in turn would be about 24 tonnes per hour. The capacity of the unloading area therefore needs to be around 24 tonnes per hour, and the capacity of the stockpiles needs to be slightly less. From experience, Smartskip know that the proposed waste unloading area is capable of accommodating up to 2 large skip bin loads at any one time (each being 9 – 15 tonnes), therefore 24 tonnes in an hour is spatially achievable. For the heavy and light stockpiles, even in a situation where none of the 24 tonnes received in a typical hour can initially be diverted into the recycleable bins, one walking floor collection truck can collect up to 30 tonnes.

Following sorting, stockpiled materials or full bins are loaded onto trucks for distribution to receivers such as landscape suppliers (e.g. as rubble for landscape works), construction companies (primarily for clean fill and roadbase), quarries (for clean fill and capping), metal recyclers and waste transfer stations.

No materials are dismantled or refined in the sorting process. In this regard, there will be no screens, shredders, shears or hammermills used at the site and excavators will not be fitted



with rockbreakers, augers or rocksaws. These types of equipment have been avoided because of the noise generated by screening, pounding and cutting activities. Additionally, shearers, shredders and hammermills have been eliminated due to potential for explosion hazards due to any inadvertent residual fuels and oils left in storage vessels or metal parts.

The machinery used in the processing of materials comprises 2 excavators and 1 bulldozer. One of the excavators is stored within the eastern factory and the remaining 2 implements are stored in the open sorting area, but under the roof canopy.

3.2.1 Access and Internal Circulation

Site access and parking arrangements are described and assessed in the Traffic Impact Assessment prepared by Cardno Eppell Olsen (**Appendix 7**).

Provisions have been made for 10 staff parking spaces within the Fariola Street site for office and yard staff and there can be up to 6 parking spaces at the Derby Street site for truck drivers. However, most drivers take their trucks with them at the end of the working day.

The Project includes physical alterations to the facility to ensure that waste bin trucks can enter, perform their required duties within the sites, and exit in a forward direction. At Fariola Street, this will eliminate the current practice of loaded bin trucks reversing into the site at the western driveway. At the Derby Street site, this will eliminate the current practice of empty bin trucks reversing into the site via the southern driveway along Day Street.

The improvements to truck circulation have come about by:-

- Fariola Street site – deleting one structural column (among 6) supporting the eastern factory building for greater truck circulation, widening the existing eastern factory roller door and widening the eastern driveway; and
- Derby Street site – deleting the northern driveway along Day Street, deleting the western driveway along Derby Street and reinstatement of an existing disused, centrally located driveway along Derby Street.

The current practice of walking floor trucks reversing into the eastern Fariola Street driveway is proposed to continue, albeit with a trained traffic controller assisting each time a walking floor truck arrives. It is envisaged that there will be 1 walking floor per hour in the peak hour, and generally 6 trucks attending the site each day, depending on demand.

3.2.2 Utilities

Services such as electricity, water and sewerage are available to the site and can be easily augmented for the Project.

3.2.3 Signage

No signage is proposed as part of this application.



3.2.4 Employment

There will be no additional staff as a result of the Project. The proposed expansion does not result in the need to employ any further staff than the existing 9 staff at the Fariola Street site. The increased processing capacity can be achieved using the existing fleet of vehicles and processing machinery. Efficiencies will be achieved by amendments to address current layout issues with each site.

3.2.5 Hours of Operation

The operating hours for the facility are 7:00am to 6:00pm Monday to Friday and 8:00am to 1:00pm Saturday. There will be no work on Sundays or public holidays. The Project will not alter the existing hours of operation.

Administrative staff work from 7:00am to 5:30pm and processing staff work from 7:00am to 4:30pm – 5:00pm. This will enable staggering of vehicles departing the site in the afternoon peak times.

Hours of construction are proposed to be from 7:00am to 6:00pm Monday to Friday and 7:00am to 4:00pm Saturdays, with no work on Sundays or Public Holidays.

3.3 Construction Management

The construction programme would need to occur in a staged manner to permit the ongoing use of the site for materials processing and incur as minimal impact on surrounding uses as possible. Some of the works would need to occur outside the operating hours of the facility, such as reconfiguring the existing dust suppression system.

Noise associated with night time works have been addressed in the Construction Noise and Vibration Management Plan in Appendix 9.

Details of construction management, including ingress and egress by construction vehicles will be addressed in the Construction and Environmental Management Plan lodged to address the Statement of Commitments contained in Section 6 of this EA.

Waste generated during construction is expected to be minimal because of the limited extent of works required. However, a Construction Waste Management Plan forms part of the Construction and Environmental Management Plan to be prepared in accordance with the draft Statement of Commitments of the EA.

3.4 Capital Investment Value

The capital investment value of the Project is \$200,000 due to the limited extent of works required. The Project will, however, process up to 80,000 tonnes of materials per annum. The Project will not need to employ any additional administrative or operational staff during



operation. Anecdotal, it is understood materials recycling facilities employ four times as many staff as landfill facilities, thus creating employment as well as environmental benefits.

3.5 Alternatives Considered

The preparation of the Project Application is the culmination of an extensive period of investigation, discussion and review. A number of elements in the development of the sites are fixed, including the location of vehicle access and associated internal driveways, the existing stormwater management system and the location of the existing buildings. The site boundaries are fixed and Smartskip do not wish to substantially alter the layout of the facility to ensure the site can remain operating while the processing expansion occurs.

The preparation of specialist reports during the designing of the Project has led to the consideration of a range of mitigation measures for such environmental issues as noise attenuation, air quality attenuation and visual impacts. The proposal before the Department represents the prevailing best case alternatives for managing and mitigating the environmental impacts of the Project.

4. LEGISLATIVE FRAMEWORK

4.1 Relevant Acts

4.1.1 Environmental Protection and Biodiversity Conservation Act 1999

The Commonwealth Environment Protection and Biodiversity Conservation Act 1999 ("the EPBC Act") commenced on 16 July 2000. The Act introduces a new assessment and approvals system for:-

- actions that have a significant impact on matters of national environmental significance;
- actions that have a significant impact on the environment of Commonwealth land; and
- actions carried out by the Commonwealth Government.

Under the assessment and approval provisions of the EPBC Act, actions that are likely to have a significant impact on a matter of national environmental significance are subject to a rigorous assessment and approval process. An action includes a project, development, undertaking, activity, or series of activities.

The Act identifies seven matters of national environmental significance:-

- World Heritage properties;
- National Heritage places;
- Ramsar wetlands of international significance;
- nationally listed threatened species and ecological communities;
- listed migratory species;
- Commonwealth marine areas; and
- nuclear actions (including uranium mining).

The Commonwealth Government is considering amendments to the EPBC Act and its regulations to include "greenhouse triggers" and "access to biological resources".

There are no relevant World Heritage properties, National Heritage places, Ramsar wetlands, Commonwealth marine areas or Commonwealth lands on or near to the site. The Project has no impacts on any existing vegetation within the facility by virtue of its location within land previously developed for industrial activities.

It is concluded therefore that there will be no significant impact on any matters of national environmental significance arising from the development of the facility, and consequently the proposed activity is not considered to be a "controlled action" pursuant to the EPBC Act.

4.1.2 Protection of the Environment Operations Act 1997

Pursuant to Section 43(a) of the Protection of the Environment Operations Act 1997 (POEO Act), an environmental protection licence is required from the NSW Department of Environment and Climate Change (DECC) for the undertaking of “scheduled development works” which enable a “scheduled activity” to be carried out. Schedule 1 of the POEO Act contains the following relevant scheduled activities for which an environmental protection licence is required:

“34 Resource Recovery

(1) *This clause applies to the following activities:*

Recovering of general waste, meaning the receiving of waste (other than hazardous waste, restricted solid waste, liquid waste or special waste) from off site and its processing, otherwise than for the recovery of energy.

...

(2) *However, this clause does not apply to any of the following:*

- (a) *materials separation and sorting of less than 60 tonnes per year of waste lead acid batteries,*
- (b) *the treatment of sewerage within a sewerage treatment system (whether or not that system is licensed);*
- (c) *the recovery of stormwater.*

(3) *Each activity referred to in Column 1 of the Table to this clause is declared to be a scheduled activity if:*

- (a) *it meets the criteria set out in Column 2 of that Table, and*
- (b) *either:*
 - (i) *less than 50% by weight of the waste received in any year requires disposal after processing, or*
 - (ii) *the regulations under section 286 exempt the person carrying out the activity from the requirements of Section 48(2) as they apply to waste disposal (application to land), waste disposal (thermal treatment), waste processing (non-thermal treatment) and waste storage.*

Table

Column 1	Column 2
Activity	Criteria
Recovery of general waste	Involves having on site at any time more than 5,000 tonnes of waste Involves processing more than 120 tonnes of waste per day or 30,000 tonnes of waste per year
...	...

The proposed expansion of the existing facility fits within the description of the above activity. However, due to the market for recycled materials fluctuating (for example, the price for recycled timber being less than the cost to dispose of timber), the amount of materials that require disposal after processing can change, and may fall below 50% from time to time. As such, the development may also fit within the following description:-

“41 Waste processing (non-thermal treatment)

(1) This clause applies to the following activities:

Non-thermal treatment of general waste, meaning the receiving of waste (other than hazardous waste, restricted solid waste, liquid waste or special waste) from off site and its processing, otherwise than by thermal treatment.

...

(2) However, this clause does not apply to any of the following:

(a) processing of contaminated soil or stormwater, or sewerage within a sewerage treatment system (whether or not that system is licensed),

(b) the storage and transfer of liquid waste that is generated and treated on site prior to sewer discharge, or lawful discharge to waters.

(3) Each activity referred to in Column 1 of the Table to this clause is declared to be a scheduled activity if:

(a) it meets the criteria set out in Column 2 of that Table, and

(b) more than 50% by weight of the total amount of waste received per year requires disposal after processing.

Table

Column 1	Column 2
Activity	Criteria
Non-thermal treatment of general waste	Involves having on site at any time more than 2,500 tonnes, or 2,500 cubic metres, whichever is the lesser, of general waste. Involves processing more than 120 tonnes per day, or 30,000 tonnes per year, of general waste.
...	...

In accordance with the either or both of the above criteria, the proposed development will be a “scheduled activity” requiring an environmental protection licence from the DECC. The category for the licence would be determined in consultation with the DECC.

4.2 State and Regional Environmental Planning Policies

The State Environmental Planning Policies (“SEPPs”) and Greater Metropolitan Regional Environmental Plans (“REPs”) relevant to this application include:-

- SEPP (Major Development) 2005;
- SEPP (Infrastructure) 2007; and
- SEPP 55 - Remediation of Land.

Each of these instruments are addressed below.

4.2.1 State Environmental Planning Policy (Major Development) 2005

State Environmental Planning Policy (Major Development) 2005 was gazetted in May 2005 and aims to identify development of economic, social or environmental significance to the State or regions of the State, so as to provide a consistent and comprehensive assessment and decision-making process for that development. The Minister for Planning is the consent authority for development of the type, value or location generally as identified in the SEPP, and Part 3A of the Act applies to the development, referred to as “Projects”.

Subsection 6(1) of the SEPP specifies that:-

“Development that, in the opinion of the Minister, is development of a kind:

(a) that is described in Schedule 1 or 2 ...

is declared to be a Project to which Part 3A of the Act applies.”

Schedule 1 of the SEPP is entitled “Part 3A Projects – Classes of Development”. Clause 9 of Schedule 1 of the SEPP contains the following description:-

“Resource recovery or waste facilities

(1) Development for the purpose of regional putrescible landfills or an extension to a regional putrescible landfill that:

(a) has a capacity to receive more than 75,000 tonnes per year of putrescible waste, or

(b) has a capacity to receive more than 650,000 tonnes of putrescible waste over the life of the site, or

(c) is located in an environmentally sensitive area of State significance.

(2) Development for the purpose of waste transfer stations in metropolitan areas of the Sydney region that handle more than 75,000 tonnes per year of waste.

(3) Development for the purpose of resource recovery or recycling facilities that handle more than 75,000 tonnes per year of waste or have a capital investment value of more than \$30 million.



(4) Development for the purpose of waste incineration that handles more than 1,000 tonnes per year of waste.

(5) Development for the purpose of hazardous waste facilities that transfer, store or dispose of solid or liquid waste classified in the Australian Dangerous Goods Code or medical, cytotoxic or quarantine waste that handles more than 1,000 tonnes per year of waste.

(6) Development for the purpose of any other liquid waste depot that treats, stores or disposes of industrial liquid waste and:

(a) handles more than 10,000 tonnes per year of liquid food or grease trap waste, or

(b) handles more than 1,000 tonnes per year of other aqueous or non-aqueous liquid industrial waste."

(our emphasis in underline)

Having regard to the above criteria, the Minister for Planning has expressed the opinion that the expansion of the facility is a Project to which Part 3A applies.

4.2.2 State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 ("the Infrastructure SEPP") establishes the Roads and Traffic Authority as the traffic management authority to be consulted in relation to development proposals, and ensures it is given the opportunity to make a representation on a development proposal before the consent authority decides whether to approve a proposal. Schedule 3 of the Infrastructure SEPP identifies forms of development which are required to be subject to varying levels of consultation.

Any proposal for a "landfill, recycling facility or waste transfer station" is required to be referred to the RTA for comment.

4.2.3 State Environmental Planning Policy No. 33 – Hazardous and Offensive Development

State Environmental Planning Policy No 33 - Hazardous and Offensive Development ("SEPP 33") aims, among other things, to ensure that in considering any application to carry out potentially hazardous or offensive development, the consent authority has sufficient information to assess whether the development is hazardous or offensive and to impose conditions to reduce or minimise any adverse impact.

Under SEPP 33:-

- **potentially hazardous industry** means a development for the purposes of any industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on



the existing or likely future development on other land, would pose a significant risk in relation to the locality:

- (a) to human health, life or property, or
 - (b) to the biophysical environment, and includes a hazardous industry and a hazardous storage establishment.
- **potentially offensive industry** means a development for the purposes of an industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would emit a polluting discharge (including for example, noise) in a manner which would have a significant adverse impact in the locality or on the existing or likely future development on other land, and includes an offensive industry and an offensive storage establishment.

The Project is defined as an “industry” under the Auburn Local Environmental Plan 2000. The Project has been assessed under SEPP 33 below.

In determining whether the proposed development would otherwise fall within one of the above definitions consideration has been given to:-

- the former DUAP publication “*Applying SEPP 33: Hazardous and Offensive Development Application Guidelines, 1997*”;
- Circular No B27 published by the Department of Planning relating to SEPP 33; and
- the preliminary hazard risk assessment undertaken as part of this EA.

Having regard to the definition of “potentially hazardous industry” and the above material, the Facility is suitably located, will incorporate appropriate safety controls commensurate with the associated risk and will comply with the Department of Planning (former DUAP) guidelines. The expanded Facility will not process any hazardous materials and will store a small amount of fuel and oil for equipment within the existing bunded area that will form the new workshop. Inclusive in the hazard mitigation controls to be adopted for the site (which would form a condition of approval to the Project Application by virtue of the Statement of Commitments) is the requirement for fire protection systems to be compliant with the BCA and AS 1940 – Storage and Handling of Flammable and Combustible Liquids.

Accordingly, the Project is not considered to be a “potentially hazardous industry” on the basis of the lack of hazardous materials processed and the lack of hazardous material stored. It stands, therefore that the development is not considered to be a “hazardous industry”.

In order to determine whether the development is a “potentially offensive industry”, it is necessary to examine the whole proposal to determine whether it would emit a polluting discharge in a manner which would have a significant adverse impact on the locality. In

determining whether a development falls into the above definition, SEPP 33 requires that consideration be given to current circulars or guidelines published by the Department of Planning relating to hazardous or offensive development (Clause 8). The current guidelines are entitled "Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines". The guidelines provide advice on interpreting and implementing SEPP 33.

The SEPP 33 guidelines list relevant considerations in determining whether a proposed use may be a "potentially offensive industry" as outlined overleaf.

<u>Consideration</u>	<u>Comment</u>
<i>What supporting information should be supplied with a development for a potentially offensive industry?</i> <i>Consent authorities should seek information from the applicant on the quantity and nature of any discharges, and the significance of the offence likely to be caused by the development, having regard to the nature of the surrounding land use and the proposed controls. The need for any licences from the Environmental Protection Authority (EPA) should also be ascertained.</i>	The Department of Planning has before it sufficient information to assess the quantity and nature of air, water and noise discharges from the development. Specialist reports accompanying the EA have demonstrated that these discharges comply with relevant DEC standards and are therefore acceptable. The proposal requires an environmental protection licence under the Protection of the Environment Operations Act by virtue of the volume of materials processed, however, the EA demonstrates that the Project, after all necessary measures are in place to mitigate environmental impacts, will not emit a polluting discharge that would significantly affect the locality or future development. It follows therefore, that whether the proposal requires a licence under any pollution control legislation is not sufficient to determine if the proposal is "potentially offensive".
<i>Do any specific considerations apply in the assessment of a potentially offensive industry?</i> <i>The key consideration in the assessment of a potentially offensive industry is that the consent authority is satisfied there are adequate safeguards to ensure emissions from a facility can be controlled to a level at which they are not significant. An important factor in making this judgement is the view of the EPA (for those proposals requiring a pollution control licence under EPA legislation). If the EPA considers that its licence requirements can be met, then the proposal is not likely to be "offensive industry".</i>	The Project includes a series of environmental safeguards to ensure that no significant impacts causing offence to the locality will be created. When these mitigative measures are in place, the Project will not permit a polluting discharge which will have a significant adverse impact on the locality.

<i>Is compliance with EPA licence requirements sufficient to demonstrate that a proposal is not “offensive industry”?</i> <i>In most cases, compliance with EPA requirements should be sufficient to demonstrate that a proposal is not an offensive industry. In some cases depending on surrounding land uses, and particularly for proposals which do not require an EPA licence, consent authorities should also consider:-</i> <i>Do any other authorities need to licence the proposal?</i> <i>Can conditions be attached to further reduce the level of offence?</i> <i>If, after considering these matters, the consent authority considers that the level of offence will not be significant, then the proposal should not be refused for reasons due to offence.</i>	There is no reason to believe that the Project is potentially offensive industry. However, in any case, reasonable licence conditions and other conditions on approval of the Project can add an additional layer of safeguard. No other authorities need to licence the Project.
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On the basis of the above, the Project is not considered to be a “potentially offensive industry” as defined in the SEPP, and accordingly, the provisions of SEPP 33 do not apply to the Project.

4.2.4 State Environmental Planning Policy No. 55 - Remediation of Land

State Environmental Planning Policy No. 55 - Remediation of Land (“SEPP 55”) aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment by specifying that certain considerations be made by the consent authority when determining development applications in general, and by requiring that remediation work meets certain standards.

The Fariola Street is fully sealed by buildings or concrete surfaces. As the Project does not disturb the existing surface coverings, other than the widening of the western driveway, the soils beneath the site will not be disturbed. As such, soil contamination is not a relevant matter in relation to the Fariola Street site.

The Derby Street site has been covered in gravel materials and is used for the storage of empty waste bins. The prior use is unknown. The Project includes the concreting of the gravel portions of the site. Concrete will be poured onto the gravel surface and will not significantly disturb materials below. As such, soil contamination is not a relevant matter in relation to the Derby Street site.

4.3 Local Planning Policies

4.3.1 Auburn Local Environmental Plan 2000

4.3.1.1 Zoning and Zone Objectives

The sites are located on land within Zone No 4(a) "General Industrial" pursuant to Clause 18 of the Auburn Local Environmental Plan 2000 – see **Figure 3**.

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

- "(a) to provide sufficient land to be used primarily for a broad range of industrial uses,*
- (b) to permit a range of uses that are compatible with industrial areas,*
- (c) to encourage industrial uses that will contribute to economic and employment growth of the locality,*
- (d) to prohibit shops in this zone, but permit minor retail development only where it is providing for the daily convenience needs of the local workforce or is ancillary or incidental to the main purpose of development."*

The proposal is considered to be consistent with each of the objectives of the 4(a) zone.

4.3.1.2 Permissible Uses

Industries are permissible in the 4(a) Zone with consent and are defined as follows:

"Industry means an undertaking involving the manufacturing, assembling, altering, repairing, renovating, ornamenting, finishing, cleaning, washing, dismantling, processing or adapting of any goods or articles for commercial purposes, but does not include any form of industry defined elsewhere in this Schedule."

Although "Materials Recycling Depots" are also permissible in the 4(a) Zone, the Project, due to its processing function, does not strictly meet with the definition as below:-

"Materials recycling depot means land used for the collection, storage, abandonment or sale of scrap metals, waste paper, rags, bottles or other scrap materials, or for the collection, dismantling, storage, salvaging, or abandonment of vehicles or machinery or the sale of their parts."

4.3.1.3 General Considerations

Clause of the LEP contains a number of provisions dealing with industrial development as follows:-

"22 General restrictions on development in industrial zones

Consent may be granted for development on land zoned 4 (a), 4 (b), 4 (c) or 4 (d) only if it would be compatible with the existing and likely future character and amenity of the surrounding area in terms of:

- (a) its scale, bulk, design, height, siting and landscaping, and*
- (b) its operation, and*
- (c) traffic generation and car parking, and*
- (d) noise, light, dust and odour nuisance, and*
- (e) privacy, and*
- (f) stormwater drainage, and*
- (g) hours of operation, and*
- (h) overshadowing."*

Each of these clauses are suitably addressed within the Environmental Assessment.

4.3.1.4 Special Considerations

The LEP contains controls on matters which do not affect the permissibility of the Project but which will be considerations in the assessment of the EA. These are summarised below:

- *Clause 48 – Surrounding Lots:-* specifies that the consent authority must not grant consent to development in a number of zones, including Zone No. 4(a) if it consider that the development will prevent the surrounding lots from being development in accordance with the LEP. The development satisfies this clause in that the surrounding lots can be developed for any permissible use within the Zone; and
- *Clause 59 – Services:-* requires the consent authority to consider the availability of water and sewer infrastructure prior to granting consent to development. Each site already has the benefit of existing urban services.

4.3.2 Draft Local Environmental Plan

Auburn Council has exhibited a draft LEP in accordance with the Department's Standard Instrument. At this stage, the draft LEP is in its early stages. It will be reviewed and considered whilst the Environmental Assessment is on exhibition and addressed as part of the Submissions Report for the Project.

4.3.3 Development Control Plans and Strategies

Auburn Council has in place a city-wide Development Control Plan (DCP) and a series of site-specific and issue-specific DCPs.



The city-wide DCP has been split into a number of parts, the relevant parts to the Project being:-

- Part A – General Requirements
- Part E – Industrial Development
- Part H – Car Parking and Loading

Part A sets out generic character statements for areas of the Auburn LGA, as well as information requirements for Development Applications. Part A is not directly applicable to the Project.

The relevant issues-based DCPs applicable to the Project would be:-

- Guidelines for Erosion and Sediment Control DCP 2000; and
- Mobility and Access DCP 2005.

However:-

- the Erosion and Sediment Control DCP is addressed via the draft Statement of Commitments requiring an Erosion and Sediment Control Plan to be prepared prior to construction in accordance with Landcom's *Blue Book*; and
- The Mobility and Access DCP is satisfied because the Project does not alter the existing structures at either site in any significant way. Access to the office building at Fariola Street for all persons is available, as is access all around the Fariola and Derby Street sites.

Parts E and H

These parts deal with development controls such as floor space ratio, setbacks, façade design, open space and the like. The following assessment is provided with respect to those controls considered relevant in this instance:-

Control	Comment
PART E – Industrial Development	
<u>Section 2.0 - Streetscape and Urban Character and Section 3.0 – Built Form</u> • Various design controls over facades, landscaping, fencing, setbacks and the like.	The existing appearance of the facility will be improved with changes to the Fariola Street western driveway and improvements to the Derby Street site driveways and landscaping. The amendments to the facility do not alter the building facades or built form. They seek to provide greater vehicle manoeuvring, delete redundant portions of the sites and provide some landscaping.

<u>Section 4.0 – Car Parking and Access</u> Car parking rates are provided. Various desired attributes for driveways.	Section 3.5 of the Traffic Impact Assessment (Appendix 7) addresses the amount of car parking provided relative to the DCP requirements. It also addresses issues with stacked parking spaces. The entry and exit points have been chosen for the Project having regard to the neighbouring properties and proximity to surrounding intersections.
<u>Section 5.0 - Landscaping</u>	The Project does not result in any amendments to the landscaping provided at the Fariola Street site. The Project will create additional landscaping with the deletion of the western Derby Street driveway. A continuous garden bed will be formed and planted with indigenous trees and shrubs. The Derby Street site will otherwise be screened by the existing 2.0m high fence and proposed new non-transparent gates.
<u>Section 6.0 – Operational Restrictions</u> • Hours of operation are generally 7am – 6pm Monday to Saturday. • Applications for potential noise generating industries should be accompanied by an Acoustic Report. Noise limits are provided. • Unsightly storage yards should not establish in the Auburn LGA. Such uses should: - be screened by a 2.5 high fence setback 4.5m from the boundary; - be screened by landscaping; - have gutter and footpath crossings constructed; - be sealed; - have runoff and silt traps installed; - have truck and car parking facilities. • Any machinery to be used or	The hours of operation for the Project are unchanged and are in keeping with the DCP. The existing hours are 7:00am to 6:00pm Monday to Friday and 8:00am to 1:00pm Saturday. There will be no work on Sundays or public holidays. An Acoustic Report is provided in Appendix 8. The Acoustic Report assesses the Project against the Council's DCP noise limits. The Derby Street site has a 2.0m high enclosing brick wall. It is screened by landscaping on the southern side, but not the eastern side. The Derby Street site will be sealed with concrete materials. It will drain via graded concrete to Council's stormwater system in the street and will not be subject to silt traps or the like because only empty skip bins and vehicles will be stored. Provision is made for the parking of up to 6 Smartskip trucks, noting however that drivers tend to take trucks with them at the end of a shift. The Air Quality Impact Assessment at Appendix 10 addresses issues associated with air pollution from the Fariola Street site.

processes should not result in air pollution emissions that have a detrimental impact on the environment. Development incorporates discharge systems designed to minimise the discharge of pollutants into the waste water and stormwater system.	The Fariola Street site is already 100% covered by buildings or concrete and the outside areas are serviced by a stormwater management system connected to a 100,000L detention tank. Stormwater from the open areas is thus not discharged to the Council's stormwater system, but is instead left to evaporate, with mud and soil materials regularly emptied. The workshop area of the Fariola Street site is bunded to contain oil or fuel spills. A spill kit is also contained in the western factory building adjacent to the workshop. The Derby Street site will be sealed with concrete materials to deter dust and stormwater quality issues compared with the existing gravel materials. The Derby Street site is currently subject to gravity flow. The Project does not contemplate any additional stormwater management infrastructure for this site. However, the sealing of the existing gravel areas with concrete will involve grading that concrete so that the site drains to the Derby Street driveway and into the Council's stormwater system.
PART H – Car Parking and Loading	
As the Project is associated with an existing and specialist use (i.e. a use not defined in the DCP parking schedule and containing existing buildings and layout), the Traffic Impact Assessment addresses the operational requirements for car parking and servicing. The loading and unloading areas of the sites, as well as the internal circulation, have been designed to cater for Smartskip's range of vehicles.	

5. ENVIRONMENTAL ASSESSMENT

5.1 Introduction

The following environmental assessment has been undertaken having regard to the matters raised in the DGEARs and all factors considered reasonable to a consideration of the impacts of the Project.

The environmental impacts have been identified through:-

- consultation with key stakeholders;
- the relevant legislative framework; and
- a detailed site analysis with assistance from various specialist studies on such matters as traffic and transport, air quality conditions, existing noise environment and the like.

5.2 Statutory Planning Considerations

Compliance of the Project with the provisions of the relevant Acts and State/Regional Environmental Planning Policies, Local Environmental Plans and Development Control Plans is discussed in Section 4 of the EA. The proposed development is permissible with the approval of the Minister and consistent with the applicable instruments.

5.3 Environmental Assessment Requirements – Key Issues

5.3.1 Waste Management

The Director General's Requirements require the Proponent to provide:-

- a clear description of the activities which would be undertaken at both premises;
- source, quantity input rates and type of waste;
- classification, receipt, separation, stockpiling, processing and disposal; and
- litter control.

All the above issues are addressed by the detailed description of the Project provided in Section 3.2 of the EA.

5.3.2 Soils and Water

Erosion and Sediment Controls During Construction

The draft Statement of Commitments contained in Section 6 of the EA includes the Proponent's proposal to prepare a Construction and Environmental Management Plan ("CEMP"). A part of that CEMP will be an Erosion and Sediment Control Plan. This will be



prepared in accordance with Landcom's "Managing Urban Stormwater Guidelines" (the Blue Book).

It is considered premature to prepare a detailed Erosion and Sediment Control Plan for the Project, as there is no approval yet granted for any works on the sites. The provision of erosion and sediment control measures is a detailed design matter once the construction of the works is designed and a builder is appointed.

The Erosion and Sediment Control Plan is anticipated to contain:-

- Details of bailing required for stormwater potentially being discharged to the street during construction;
- Details of bailing and/or filtration required for existing stormwater drains within the Fariola Street site during construction; and
- Details of vehicle washing, particularly tyre cleaning, to eliminate tracking any mud onto road surfaces.

Stormwater Management System

Within the centre of the Fariola Street site is a 100,000 litre on-site stormwater detention tank to capture and filter waste water from the open areas of the site. That detention tank will continue to be utilised for the expanded processing capacity of the facility. The additional processing capacity will not create any demand for additional stormwater capacity.

The existing stormwater management system is a closed system, in that water does not escape to the Council's stormwater system to enter into Parramatta River beyond.

By virtue of the on-site detention system, discharge of polluted water from the activities of the Fariola Street site is limited to rainwater potentially containing soil and dust particulate from the driveways. There is an up-gradient from the centre of the site to the driveways to form a catchment for the central detention tank. There is thus no potential for waste water to discharge to adjoining properties as it is wholly contained within the site.

Stormwater management at the Derby Street site will be via graded concrete surfaces providing gravity flow to the Derby Street driveway and on into Council's stormwater system. The sealing of the site with concrete materials will significantly improve the existing stormwater quality from gravel materials. However, by virtue of the fact that the site will only be used for storage of empty waste bins and the occasional truck, it is not proposed to install any stormwater quality treatment devices.

Preventative Measures for Mud and Dirt Tracking onto Roads

In the current site configuration, the Fariola Street site has some potential to track dirt and mud onto Fariola Street. This is caused by the current necessity for vehicles to unload within the processing area, often when dust suppression sprinklers are spraying a heavy mist over the processing area and soaking the concrete. Trucks then exit the site directly onto Fariola



Street, with a minimal “run up”, occasionally causing dirt to track onto the road. While this is part of the current process, the amount of dirt tracking onto Fariola Street is generally minimal and able to be cleaned with a sweeping mechanism.

At part of the Project, Smartskip will purchase a purpose-built outdoor “Power Sweeper” that will be used whenever dust or dirt is visible on Fariola Street. The Power Sweeper model likely to be purchased (subject to further discussions with the manufacturer) is contained within Appendix 11. It is a high powered vacuum capable of sweeping dirt, dust and gravel from the roadway in front of the site.

Consideration has been given to the installation of a facility to clean the wheels and tyres of trucks entering the site. In particular, the Roads and Traffic Authority questioned whether dust, mud or other particles could be tracked onto the carriageway of Silverwater Road. However, there is little justification for a wheel wash given the above proposed road vacuum and the increased truck run-up after tipping. Furthermore, there is not the physical space within the site to provide such a facility and not all loads carry dust laden materials. Having regard to the RTA’s concern, the significant distance between the site and Silverwater Road means there is minimal chance of dust or dirt tracking occurring on Silverwater Road.

In response to the potential for road contamination, Smartskip have installed driveway drains at the top and base of the eastern and western driveways. These drains capture rainwater along the driveways and minimise water containing dust or mud from escaping the site. Supplemented with regular sweeping of the site, as proposed in the draft Statement of Commitments, dust tracking onto the road shall be minimised as much as possible.

With the proposed changes to the facility, such as longer vehicle movements within the site before exiting and a finer mist of spray from the existing sprinkler system, dust and mud tracking on the road is to be further minimised.

Water Harvesting and Recycling

The Fariola Street site does not contain any rainwater harvesting and recycling. The site provides limited demand for rainwater harvesting or recycling due to the limited facilities and landscaping that could use recycled water. The installation of rainwater reuse technology would be cost prohibitive for the site in terms of any practical return on investment.

The Derby Street provides no opportunity for water harvesting or recycling as no activities other than storage of vehicles and empty skip bins occurs at that site.

Contaminated Groundwater and Soils

Due to the nature of the Project and the fact that the Fariola Street is fully sealed with concrete materials and buildings, the processes undertaken at the Fariola Street site give little potential for exposure of any contaminated soils. The materials processed at the facility are dry and clean demolition and construction waste and do not contain contaminated materials. The proposed works associated with the Project do not disturb the existing concrete surfaces. As such, the facility does not require the removal of any sub-surface soils and the soil conditions underlying the site are irrelevant to the Project.

The Derby Street site is proposed to be fully sealed by concrete surfaces. As such, there will be limited disturbance to soils during construction of the Project and no ongoing issues with soil contamination from the storage of empty waste bins and trucks. The nature of the use is not expected to cause pollution to soil or groundwater.

5.3.3 Air Quality

There is potential for the proposed works to impact upon the local air quality should the proposed works generate dust, particularly during dry and windy conditions. Emissions would also be generated by vehicles and machinery used in the undertaking of the Project works and the day-to-day operation of the facility.

The relevant operational air discharge associated with the activities at the Fariola Street site will be dry construction and demolition dust emanating from on-site working areas. The particulate matter is free from contaminants because contaminated waste is not accepted at the facility. Particulate from the waste sorting process is a fine dust.

Dust discharge is currently minimised at the Fariola Street site by a water sprinkler suppression system. The sprinklers spray a rather heavy droplet density onto waste stockpiles as waste is being tipped from a vehicle and sorted. The existing sprinkler heads are located on the awning roof above the centre of the site and along a portion of the southern boundary of the site, on the boundary fence and around 2.5m above ground level. The southern sprinklers are not currently used because materials are stockpiled and processed below the central sprinklers. With the Project expanding the sorting area further south, the southern sprinklers will be used in conjunction with the central sprinklers.

The existing sprinkler system can be improved in terms of dust suppression because the sprinkler fittings can spray a finer mist.

Heggies Australia were appointed to prepare an Air Quality Impact Assessment (Appendix 10) to address dust emissions from the Project.

Heggies have undertaken an assessment in accordance with the DECC's guidelines entitled *Approved Methods and Guidelines for the Modelling of Air Pollutants in NSW*.

Heggies have:-

- Conducted site inspections to determine the nearest receptor locations and to observe existing facility processes and air quality mitigation controls and procedures at the Fariola Street site;
- Established air quality goals for deposited dust, particulate matter in accordance with the DECC guidelines;
- Obtained meteorological data for the area and compiled one full year of hourly observations;

- Determined all potential sources of air emissions for operation of the facility. For each potential source of atmospheric emissions, they have estimated emissions rates;
- Using AUSPLUME v6.0 software, conducted atmospheric dispersion modelling to infer dust deposition and particulate matter concentrations for construction and operation of the Fariola Street site. This is then used to analyse predictions at nearest sensitive receptors; and
- Detailed safeguards and mitigation measures to limit pollutant emissions to acceptable levels at the Fariola Street site.

The nearest sensitive receptors for air quality pollutants include a café to the west and a café to the east of the Fariola Street site. The nearest residential properties are approximately 300m to the east of the Fariola Street site along Watt Avenue, Newington.

Figure 2 of the Air Quality Impact Assessment provides the locations of the sensitive receptors as follows:-

Figure 2 Sensitive Receptor Locations



Image Courtesy of Google Earth

The Air Quality Assessment did not model impacts from the Derby Street site because that site is operated as a storage yard for empty waste bins and corporate vehicles. Therefore air



quality impacts during operation of the facility were considered to be insignificant. Furthermore, the Project involves the concreting of currently unpaved portions of this site, thus the air quality impacts from the site will be improved over and above the existing situation.

For Fariola Street modelling, the Air Quality Assessment established background air quality in the area using 2006 and 2007 average Particulate Matter ("PM") records taken from a DECC air quality monitoring site 6km to the south of the site. It then modelled the following for the Fariola Street site:-

- the predicted PM emissions on a maximum 24-hour basis and an annual average basis;
- the predicted Total Suspended Particulate ("TSP") emissions on an annual average basis; and
- the predicted maximum incremental increase in deposited dust per month.

Each of the results of the modelling was adjusted for prevailing seasonal winds using data from a Bureau of Meteorology monitoring station in Sydney Olympic Park.

The worst case modelling scenario used in the assessment is a conservative situation where:-

- the maximum waste throughput is achieved (i.e. 80,000t per annum), with materials unloaded from trucks onto the concrete floor of the waste receiving area;
- one excavator is operated continuously, handling and sorting 100% of the 80,000 tonnes of materials. The other excavator used within the site is housed within the eastern factory building and was not required to be modelled due to the air quality shielding provided by the existing building;
- one front end loader is operated continuously and concurrently with the above excavator, handling and sorting 100% of the materials;
- existing emissions controls (i.e. water sprays and dust retention within existing building structures) are not taken into account; and
- the emissions rates for the machinery assumed that all activities will generate dust all the time. In reality, some materials received at the site (e.g. plastics or cardboard) will be processed without generating any dust.

The results of the air quality monitoring are presented in the following three tables, noting that the nearest receptor cafes are on each of the nominated corners and the nearest residential receivers are along Watt Ave.

Table 7 Predicted Annual Average PM₁₀ Concentration (µg/m³)

Receptor	Predicted Incremental Concentration	Adopted Background Concentration	Annual Average Concentration	DECC Goal
Cnr Fariola St/Wetherill St	1.6	20	21.6	30
Cnr Fariola St/Day St	1.0	20	21.0	30
Watt Av (Res. 1)	0.5	20	20.5	30
Watt Av (Res. 2)	0.5	20	20.5	30
Watt Av (Res. 3)	0.4	20	20.4	30

Table 8 Predicted Annual Average TSP Concentration (µg/m³)

Receptor	Predicted Incremental Concentration	Adopted Background Concentration	Annual Average Concentration	DECC Goal
Cnr Fariola St/Wetherill St	4	40	44	90
Cnr Fariola St/Day St	2	40	42	90
Watt Av (Res. 1)	1	40	41	90
Watt Av (Res. 2)	1	40	41	90
Watt Av (Res. 3)	1	40	41	90

Table 9 Predicted Dust Deposition (g/m²/month)

Receptor	Annual Average Incremental Dust Deposition (g/m ² /month)
Cnr Fariola St/Wetherill St	1.1
Cnr Fariola St/Day St	0.6
Watt Av (Res. 1)	0.3
Watt Av (Res. 2)	0.3
Watt Av (Res. 3)	0.2

Even with worse-case modelling (particularly without the existing dust sprinklers or building enclosures being factored into the modelling), the results above indicate that the Project will comply with the Project air quality goals. Given that the modelling generated conservatively high predictions for air quality emissions, there is a margin of safety to the assessment.

With the Project incorporating improvements to the existing dust suppression sprinklers to capture dust particles in the size range of 10 – 50 microns, the air quality performance will be greatly improved.

The Air Quality Assessment concludes as follows:-

"General dust and particulate emissions from trucks (unloading material), excavators and front end loaders are assessed through atmospheric modelling. The results indicate that under worst case operations, the 24-hour PM10 criterion of 50ug/m³, is not exceeded at the receptor locations. A maximum PM10 concentration of 50ug/m³ was predicted at the café adjacent to the site, however, on the basis of the worst case operational scenario modelled, this prediction should be viewed as conservatively high, with levels expected to be lower than those modelled during normal operation of the facility.

The existing dust suppression spray system and operational management controls are considered sufficient to control dust emissions from the site. Furthermore, an improvement will be created by the proposed installation of new sprinkler heads above the processing area to create a fine mist spray, designed to suppress dust particles in the size range 10 – 50 microns.

The annual average PM10 criterion of 30ug/m³ and TSP criterion of 90ug/m³ are not exceeded while the potential for dust deposition indicates that levels are significantly less than the project goal of 2 g/m²/month."

Accordingly, based on the worst case scenario, no mitigation measures are required for the Project to bring air quality impacts into compliance with DECC guidelines. However, the existing dust suppression sprinkler system will be upgraded to improve the efficiency of the operation of the sprinkler heads and augmented to ensure that the southern sprinklers are in use. This will also bring water quality improvements in that less waste water would pool on the floor of the waste processing area.

5.3.4 Traffic

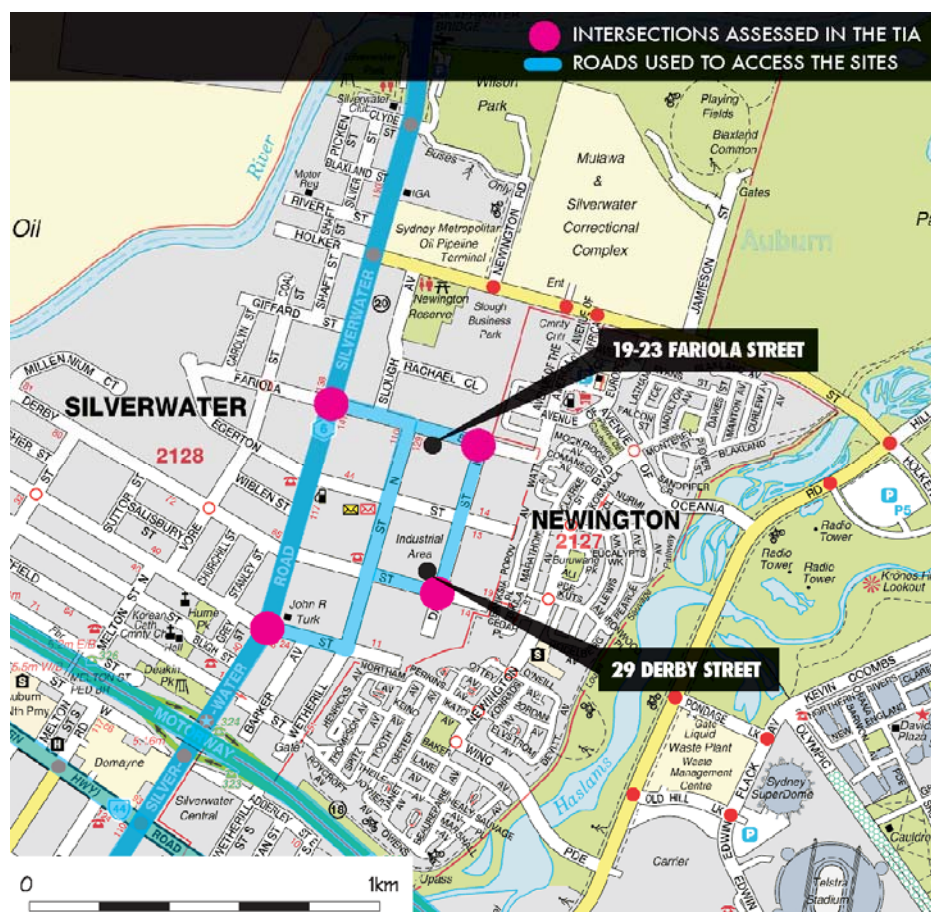
The Traffic Impact Assessment prepared by Cardno Eppell Olsen for the EA (Appendix 7) has assessed:-

- On-street parking occupancy on weekdays and weekends during operating hours of the facility;
- The on-site parking provision relative to the demand for parking by employees and under Auburn Council's requirements;
- The existing road network characteristics / conditions in the vicinity of the site;
- Accident data from the RTA on key access routes in the region to inform an assessment on road safety and speed;
- Background traffic growth assumptions and forecast volumes to 2019;
- The traffic likely to be generated by the Project;
- The ability of the local road network to accommodate the traffic movements projected for the Project;

- The proposed access arrangements and internal circulation; and
- The internal traffic management improvements that are required.

Local Road Network

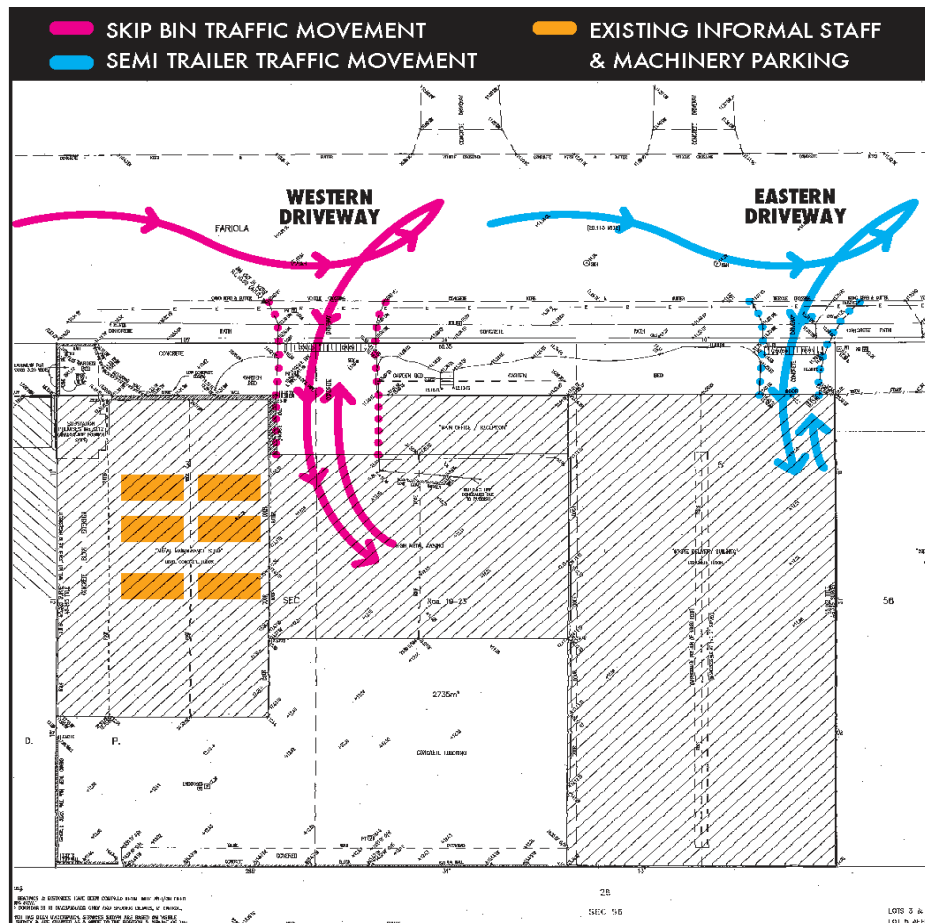
The local road network, including the key roads used to access the site and the intersections which have been assessed using traffic modelling software, are shown in the following figure:-



Access and Manoeuvring

Access to the Fariola Street site is from two driveways on each side of the street frontage. Light vehicles currently use the western driveway to enter and exit, corporate skip bin trucks use the western driveway to enter and exit and “walking floor” semi trailer trucks use the eastern driveway to enter and exit. Trucks cannot currently use a circuitous path of travel because of operational practices and the current layout of the site. This results in skip bin trucks currently reversing into the western driveway and semi trailers currently reversing into the eastern driveway.

The current access arrangements for the site are shown in the figure below:-



The Project includes physical alterations to the facility to ensure that light vehicles and skip bin trucks can enter, perform their required duties within the sites, and exit in a forward direction. At Fariola Street, this will eliminate the current practice of loaded bin trucks reversing into the site at the western driveway. At the Derby Street site, this will eliminate the current practice of empty bin trucks reversing into the site via the southern driveway along Day Street.

The improvements to truck circulation have come about by:-

- Fariola Street site – deleting one structural column (among 6) supporting the eastern factory building for greater truck circulation, widening the existing eastern factory roller door and widening the eastern driveway; and
- Derby Street site – deleting the northern driveway along Day Street, deleting the western driveway along Derby Street and reinstatement of an existing disused, centrally located driveway along Derby Street.



The current practice of walking floor trucks reversing into the eastern Fariola Street driveway is proposed to continue, albeit with a trained traffic controller assisting each time a walking floor truck arrives. It is envisaged that there will be 1 walking floor per hour in the peak hour, and generally 6 - 7 walking floors attending the site each day, depending on demand. Widening of the eastern driveway is required to provide additional turning space.

Swept paths in accordance with AUSTROADS are contained in the Appendices of the Traffic Impact Assessment. These show the turning paths for the vehicles associated with the Project.

Impacts on the Local Traffic Network

The Traffic Impact Assessment models the cumulative traffic impacts of light and heavy vehicle traffic from the Project. The peak hours adopted for the traffic modelling are 9:00am to 10:00am ("the AM peak") and 3:00pm to 4:00pm ("the PM peak"). These times reflect the commercial peak hour for Smartskip as skip trucks arrive from their pickup locations.

Four intersections in the vicinity of the site were modelling in terms of current operational efficiency during the AM and PM peak hours (see map above). Three of the four intersections, being Silverwater Road/Fariola Street, Day Street/Derby Street and Fariola Street/Day Street were found to be operating satisfactorily in each peak hour. However, the intersection of Silverwater Road/Carnavon Street is operating with an unsatisfactory level of service during the PM peak. It is operating above its capacity and each approach performs poorly. It is one of 3 access roads into and out of the Silverwater Industrial Estate and gets saturated from traffic trying the access the M4 Motorway and Parramatta Road.

However, the NSW Roads and Traffic Authority does not have any improvements proposed in current works programmes for Silverwater Road and the Project will contribute a negligible amount of additional traffic.

The truck generation of the Project is no more than 10 vehicles in the AM or PM peak hours, comprising typically 9 skip bin trucks and one collection truck (walking floor semi trailer).

The Traffic Impact Assessment adds the Project traffic generation to the local traffic network in the traffic modelling for 2016 and 2026 forecast years. It also adds between 0.5% and 1% to the local traffic network to account for natural increases in background traffic.

The results of the traffic modelling indicate there are marginal changes to the efficiency (i.e. level of service) of the four modelled intersections. Three intersections as above would continue to operate satisfactorily and would show a negligible or no impact from Smartskip vehicles. However, the intersection of Silverwater Road/Carnavon Street would remain at an unsatisfactory level of service. The actual traffic impact attributed to Smartskip vehicles at Silverwater Road/Carnavon Street is again minimal.

Parking

Informal car parking for staff is currently available within the western factory building. With the Project, 10 linemarked staff parking spaces are provided within the Fariola Street site for



office and yard staff and there can be up to 6 parking spaces at the Derby Street site for truck drivers. However, most drivers take their trucks with them at the end of the working day.

The conclusions and recommendations of the Traffic Impact Assessment include the following:-

“The Derby Street site currently generates approximately two vehicle trips in each direction during the peak hour. This volume is not expected to change with the increase in heavy vehicle movements at the Fariola Street site as most bins are expected to be returned to building sites upon unloading at the Fariola Street site.

It is proposed to provide a separate entry and exit driveway for the Derby Street site, with the entry being located in Day Street and the exit being a new driveway to Derby Street. This will provide for entry and exit in a forward direction.

The increased traffic (10 vehicle trips in each direction during the peak hour [at Fariola Street]) as a result of the proposed increase will have minimal effect on the level of service of the surrounding road system for the forecast years of 2016 and 2026.

The method of entering the site for the skip bins trucks and barnyard trucks is proposed to be changed so that they enter and exit the [Fariola Street] site in a forward direction, with all manoeuvring occurring with the site.

Operational changes within the [Fariola Street] site will provide a connection between the eastern and western driveways. Truck delivering materials will enter the site through the western driveway and exit via the eastern driveway.

Articulated vehicles picking up recyclable and waste materials will still need to reverse into the eastern driveway.

A total of 10 car parking spaces are to be provided on site for staff, with one space dedicated as a disabled parking space and the dimensions of all spaces to conform to AS 2890.1.

The following measures are recommended:-

- The access and egress of walking floor trucks be managed through traffic controllers to ensure that through traffic on Fariola Street are managed to reduce vehicle conflict points;*
- That all operational staff be fully trained to be traffic controllers;*
- The arrival of walking floor vehicles is given sufficient notice to allow for the traffic controllers to be ready to manage the traffic; and*

- *That the driveways and gutter crossings on the eastern and western driveways of the Fariola Street site be widened to accommodate the turning movements of trucks into and out of the site to conform to AS2890.1."*

The above recommendations are contained within the draft Statement of Commitments in Section 6.

Further Commitments have been added to the Statement of Commitments following feedback from the RTA's Sydney Regional Development Advisory Committee in December 2009.

5.3.5 Noise

The Noise Impact Assessment prepared by Acoustic Logic Consultancy (Appendix 8) comments on road noise arising from increased traffic resulting from the Project, operational noise arising from the use of the Project and construction noise.

The closest affected noise receptors are:-

- o Residential: Single dwellings and apartments within the suburb of Newington approximately 270m east of the Fariola Street site and some 170m east of the Derby Street site;
- o Commercial: The café at the corner of Fariola Street and Wetherill Street North; and
- o Industrial: The neighbouring developments to the east, west and south.

Operational and Traffic Noise

Acoustic Logic conducted unattended noise measurements over a 1 week period at a Watt Avenue residence to determine the background noise environment of the locality. The background noise levels at the monitoring location were found to be 45 decibels ("dB(A)") during the daytime period (7am to 6pm), 43dB(A) during the evening period (6pm to 10pm) and 44dB(A) during the night time period (10pm to 7am).

Main noise sources from the operation of the Project are mechanical plant, car park noise, truck loading and unloading and the processing of materials. Each activity of the site is assigned a generic noise emission level for the purpose of noise modelling. For example, materials sorting activities are expected to generate approximately 84dB(A) and a peak volume of 91dB(A).

Adopting the DECCW's *Industrial Noise Policy* Guidelines, Acoustic Logic determined Project noise limits in term of impacts on any residential receivers. These are as follows:-

Time Period	Measured Background Noise dB(A)	Project 'Amenity' Criterion dB(A)	Project 'Intrusiveness' Criterion dB(A)
Day Time	45	55	50
Evening	43	45	48
Night Time	44	40	49

For commercial receivers, the Project noise criteria is 65dB(A) at any time the Project is operational.

Auburn Council's Development Control Plan 2000 contains the same daytime and evening noise criteria for residential receivers as the Industrial Noise Policy, but is less stringent than the Industrial Noise Policy in terms of commercial receivers. The Auburn DCP does not provide noise criteria for night time.

Adopting the DECCW's *Environmental Criteria for Road and Traffic Noise* Guidelines, the Project noise goals for traffic on the local road network are 55 dB(A) during the Day Time (7am to 10pm) and 50dB(A) during the Night Time (10pm to 7am). However, the Project will not operate during the night time.

On-site noise measuring of various activities within the site was conducted to determine whether the Project, when in operation, would comply with the above noise criteria. These measurements were then corrected to account for distance attenuation, acoustic screening by existing buildings and the expected duration of the activity.

All noise emissions from the Project are predicted to comply with the Project noise criteria, provided that the following recommendation is adopted to curb noise from the collection of processed materials:-

- Walk-in floor trucks located within the collection area shall turn their engines off whilst loading and unloading.

This recommendation has been picked up in the draft Statement of Commitments in Section 6.

The results of the noise emission assessment are presented in the tables within Section 8 of the Noise Impact Assessment. These results have not been replicated here because it is not possible to summarise the data in a concise manner due to the different noise criteria applying at different times and different noise criteria applying to different activities.

The conclusion of the Noise Impact Assessment is as follows:-

"Potential noise impacts from the proposed Materials Recycling Facility expansion at 19-23 Fariola Street and 29 Derby Street, Silverwater has been

assessed using the DECC NSW Industrial Noise Policy, the Environmental Criteria for Road Noise, Auburn City Council DCP and the measured existing background noise levels that are representative of the existing ambient noise levels in the absence of the proposed development.

Provided the recommendations presented in Section 9 [of their report, being the walk-in floor recommendation above], then noise emissions from the proposed development will comply with the relevant noise emission guidelines and will be satisfactory."

Construction Noise

Acoustic Logic Consultancy have also prepared a Construction Noise and Vibration Management Plan ("CNMP") (Appendix 9).

Observed background noise in the vicinity of the site indicates that the ambient noise environment is typical of an industrial area. The existing metal forge to the east of the Fariola Street site dominates the background noise levels.

The proposed Project works would involve the use of a number of noise generating plant and equipment, including, but not limited to: excavators, a bulldozer and trucks.

The Construction Noise and Vibration Management Plan recommends noise management treatments and procedures for responding to noise issues, including any public complaints. The CNVMP advises that noise levels from the construction activities taking place for the Project will comply with the noise criteria established when the recommendations indicated within the Plan are adopted. The recommendations are included within the Statement of Commitments in Section 6.

5.3.6 Hazards

There are no fire hazards present within the Derby Street site, as that site is used, and will continue to be used, for the storage of empty waste bins and occasionally vehicles.

The Fariola Street site is little different to any industrial operation in that it stores fuels and oils for machinery like the excavators and the bulldozer. These automotive supplies are to be stored in a purpose-built storeroom that is bunded for 110% of the storage volume. The storeroom will be constructed adjacent to a workbay within the western factory building. There is a spill kit on site in addition to the bund.

There is a former fuel bowser within the eastern factory building near the driveway. However, that fuel bowser and associated tank has been decommissioned but not removed. The bowser will need to be removed due to the driveway and roller door widening works proposed. As there is no longer any fuel stored associated with the bowser, there are no issues with the bowser removal.

The Proponent is ensure that fire protection systems are compliant with the BCA and AS 1940 – Storage and Handling of Flammable and Combustible Liquids.



In terms of hazardous materials entering the waste stream at Fariola Street, such as a gas cylinder or vessel containing oil, procedures as outlined in Section 3.2 are in place to ensure that such waste is not placed in any Smartskip bins. In the unlikely event that a hazardous material is found in a skip bin, that bin will not be collected. Further, in the extremely unlikely event that a hazardous material is found whilst at the Fariola Street site, the skip bin will be returned to the customer for that customer to suitably dispose of the unacceptable material.

5.3.7 Other Issues

Flora and Fauna

The works proposed as part of the Project do not have any impact on existing vegetation within the Fariola and Derby Street sites. On that basis, flora and fauna impacts are not relevant considerations in the assessment of the Project.

Aboriginal and European Heritage Impacts

The sites have been highly disturbed by industrial activities.

The Project does not include works that disturb the existing concrete hardstand across the Fariola Street site and only include a proposal to pour new concrete over areas of the Derby Street that are not already sealed.

The sites do not contain any heritage items and are not located in the vicinity of any heritage items listed in any environmental planning instruments. Accordingly, European heritage is not a relevant consideration to the Project.

Services

Investigations undertaken have indicated that all utility services are accessible to the sites and can be readily augmented and extended for the Project.

Social and Economic Effects

The proposed development will have positive social and economic impacts through the creation of additional resource recovery in the Auburn LGA and the associated benefits of sustained local employment and a service for the local construction and demolition industry.

6. DRAFT STATEMENT OF COMMITMENTS

In accordance with the Director-General's Environmental Assessment Requirements, this section provides draft Statement of Commitments to outline the measures the Proponent is prepared to make in respect of environmental management and mitigation at the site. The draft Statement of Commitments for the Project below specifies how the Project will be managed to minimise potential impacts during pre-construction, construction and operation.

6.1 General

- A. The development will be undertaken generally in accordance with the Environmental Assessment report prepared by BBC Consulting Planners, including accompanying appendices.
- B. The development will be undertaken generally in accordance with the following drawings:-

<i>Environmental Assessment Plans, prepared by Doerfler Borg Architects</i>		
<i>Fariola Street Site</i>		
A02 Issue A	Ground Floor Plan	Nov 2007
A03 Issue A	Site / Roof Plan	Nov 2007
A04 Issue A	Streetscape Elevation (North)	Nov 2007
<i>Derby Street Site</i>		
A05 Issue A	Site Plan	Feb 2008

- C. The Project will be constructed and operated in accordance with the Statement of Commitments.
- D. The Proponent will develop a program of informing key stakeholders including the Department of Planning, Department of Environment and Climate Change and Auburn Council, of demolition and construction staging and activities throughout the development process.

6.2 Pre-Construction Phase

Further Approvals

- A. Smartskip will obtain all necessary licences, permits and approvals required by State and Commonwealth legislation in undertaking the Project.
- B. The Proponent will obtain a Construction Certificate prior to the implementation of the engineering and building works.



Complaints Handling

Prior to construction commencing, the proponent will establish a complaints handling procedure available for community complaints.

Construction and Environmental Management Plan (“CEMP”)

The proponent will prepare and implement a CEMP to outline all environmental management practices and procedures to be followed during the construction of the Project. The CEMP is to contain the following plans and studies:

- a. an Erosion and Sediment Control Plan prepared in accordance with Landcom's Managing Urban Stormwater: Soils and Construction (“the Blue Book”);
- b. a Construction Management Plan;
- c. a Noise Management Plan and Noise Monitoring Program incorporating the mitigation measures outlined in the Construction Noise and Vibration Plan prepared Acoustic Logic Consultancy;
- d. a Dust Management Plan and Dust Monitoring Program incorporating the findings of the Air Quality Assessment prepared by Heggies Australia;
- e. a Construction Waste Management Plan addressing the type and quantities of materials to be removed from the site, the name and address of the contractor and the address of the proposed disposal site; and
- f. a Construction Traffic and Pedestrian Management Plan.

Site Management Plan

The proponent will establish a Site Management Plan before work commences on-site to detail safe work methods and procedures to be followed on-site and to ensure compliance with OH&S and statutory requirements. Such a plan to address safety risks during demolition and construction activity, including:-

- stability of adjacent structures;
- falls from heights;
- protection of the public; and
- traffic controls around the perimeter of the site.

Safety Plan

The construction contractor will establish a Safety Plan before work commences on site to detail safe work methods and procedures to be followed on site and to ensure compliance

with Occupational Health and Safety requirements. Such a plan is to address safety risks during demolition and construction activity, including:-

- Stability of structures;
- Falls from height;
- Protection of the public;
- Traffic controls at the entrance and exit to the site;
- Working with high voltage electricity supply; and
- Working with high pressure water supply.

6.3 Construction Phase

Hours of Work

- A. The hours of construction, including deliveries of materials to and from the site, shall be:
- Monday to Friday inclusive: 7:00am to 6:00pm;
 - Saturday: 7:00am to 4:00pm; and
 - No work on Sundays or Public Holidays.
- B. Notwithstanding the above, construction work may be undertaken outside the above hours where the delivery of materials is required outside these hours by the RTA, Police or other authorities.

Site Notices, Documentation

- A. The building contractor will ensure that a 24 hour contact telephone number is displayed and attended by a person with authority over the works for the duration of the Project.
- B. A site notice will be predominantly displayed at the Fariola Street and Derby Street boundaries of the sites for the purpose of informing the public of the Project details.
- C. A copy of the approved and certified plans, specifications and documents including conditions of approval shall be kept on site at all times.

Protection of Public Places and Local Approvals

- A. The proponent undertakes to obtain any approval necessary under the Local Government Act 1993 to erect a hoarding in a public place.
- B. The proponent undertakes to ensure that the public way is not obstructed by any materials, vehicles, skip bins or the like during the construction period.



- C. For construction activities which warrant the use of a mobile crane on the site or land surrounding the site, a permit will be obtained from Auburn Council. Any such permit will be obtained 48 hours in advance of any partial road closure required or 4 weeks in advance of any full road closure required.

Building Code of Australia

All building works will be carried out in accordance with the BCA as relevant at the time of lodgement of the Construction Certificate.

Services

The proponent will comply with the requirements of relevant public authorities in regard to the connection to, relocation and/or adjustment of services affected by the construction of the proposed development. Any public utility adjustments/relocation works necessitated by the Project shall be the responsibility of the Proponent.

Access, Traffic and Car Parking

- A. That 10 car parking spaces will be provided at the Fariola Street site and 6 truck parking spaces will be provided at the Derby Street site for the Project.
- B. The layout of the proposed car parking areas (including driveways, grades, turning paths, sight distance requirements, aisle widths, aisle lengths, and parking bay dimensions) shall be in accordance with AS 2890.1 – 2004 and AS 2890 – 2002 for heavy vehicles.
- C. That the driveways and gutter crossings on the eastern and western driveways of the Fariola Street site be widened to accommodate the turning movements of trucks into and out of the site to conform to AS2890.1.
- D. Vegetation and proposed landscaping/fencing shall not hinder sight lines to and from the proposed access driveways to motorists, pedestrians and cyclists.
- E. All works/regulatory signposting associated with the Project are to be the responsibility of the Proponent.

Noise and Dust Management

- A. During the construction of the Project, measures as outlined in the Noise, Dust and Traffic Management Plans as required by the Commitments in the pre-construction phase of the Project shall be implemented.
- B. During the construction of the Project, the recommendations of the Construction Noise and Vibration Management Plan shall be followed. These include, but are not limited to:-

- During resurfacing of hard stand areas, the concrete pump must be located such that there is no line of sight between the pump and the nearest residences; and
- Complaints handling procedures as outlined in Section 10 and 11 of the Noise and Vibration Management Plan shall be implemented.

C. New sprinkler heads above the processing area are to be installed to create a fine mist spray, designed to suppress dust particles in the size range 10 – 50 microns.

Outdoor Lighting

Any new outdoor lighting shall comply with AS 1158.3: Pedestrian Area Lighting, and AS 4282: Control of the Obtrusive Effects of Outdoor Lighting.

6.4 Operational Phase

General

A contact telephone number shall be provided via which the public may seek information or make a complaint. A log of complaints should be maintained and actioned by the site superintendent in a responsive manner.

Hours of Operation

The use of the premises shall be generally limited to the hours between 7:00am and 6:00pm Mondays to Friday and 7:00 to 1:00pm Saturdays. No work shall be undertaken on Sundays or Public Holidays. The operation of processing machinery shall only occur between the approved hours. There will be no processing of materials outside those hours.

Materials Handling

- A. All materials stockpiled within the site shall not exceed a height of 5m to ensure the effective operation of the dust suppression system.
- B. Any metal parts or compartments will be inspected prior to arrival at the facility to ensure there is no presence of residual liquids such as acid, fuel or oil.

Acoustic Matters

- A. At all times, the concurrent use of plant and machinery at the facility shall be limited to times only when necessary.
- B. All plant used in the construction and operation of the facility is to be properly maintained to ensure rated noise emissions levels are not exceeded.



- C. The use of the site shall not give rise to the emission of an “offensive noise” as defined in the Protection of the Environment Operations Act.
- D. The use of the site shall not exceed the established Project specific noise levels (“PSNL”) as determined by Acoustic Logic Consultancy in the Noise Impact Assessment.
- E. Vehicles, mobile and fixed plant shall be installed with the manufacturer’s low noise kits where possible, such as low noise exhaust attenuators.
- F. Walking floor trucks in the collection area shall turn their engines off whilst loading and unloading.
- G. Once operational, all on-site plant will be assessed and diagnosed by a qualified acoustical consultant to establish whether further noise controls at source are reasonable and practicable.

Air Quality Matters

- A. Water carts, sprinklers or hoses shall be used on any day there are visible dust emissions.
- B. The roads immediately in front of the sites shall be regularly swept to ensure that accumulated dust is collected. The road sweeper shall be a Tennant Power Sweeper Model 3640, or similar.

Odour

The facility will not accept any materials that cause or permit the emission of any offensive odour pursuant to the Protection of the Environment Operations Act.

Risk Management

- A. Fire protection systems are to be compliant with the BCA and AS 1940 – Storage and Handling of Flammable and Combustible Liquids.
- B. An Asbestos Management Plan shall be prepared.

Vehicle Access

- A. The driveways and car parking spaces shall be unobstructed at all times.
- B. The turning areas within the car park are to be kept clear of any obstacles, including parked cars, at all time.
- C. All skip bin vehicles are to enter and exit the site in a forward direction. A prominent sign shall be erected on the site to ensure that vehicles do so.



- D. The access and egress of walking floor trucks be managed through traffic controllers to ensure that through traffic on Fariola Street are managed to reduce vehicle conflict points.
- E. That all operational staff be fully trained to be traffic controllers.
- F. The arrival of walking floor vehicles is given sufficient notice to allow for the traffic controllers to be ready to manage the traffic.
- G. All vehicles shall be wholly contained on site before being required to stop.
- H. All loading and unloading is to be carried out on site.
- I. The swept path of the longest vehicle entering and exiting the sites, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS.

Maintenance

The proponent will keep the site in clean and tidy order during the operation of the Project.

7. CONCLUSION

This Environmental Assessment has been prepared to accompany an application made under Section 75E of the Environmental Planning and Assessment Act 1979 ("the Act") for approval to carry out a Project as defined in Part 3A of the Act.

The Project comprises alterations and additions to the Smartskip Materials Recycling Facility and an increase in processing capacity from 21,000 to 80,000 tonnes of materials per annum. The expanded recycling facility will serve as a collection and sorting facility for clean recyclable materials generated from construction and demolition sites in the local region.

The proposed facility will significantly contribute to the NSW Government's Policy on Waste Reduction. The facility will be able to accept up to 80,000 tonnes of waste materials from local sources, process it, and dispatch recycleable materials to recipient companies for further processing and reuse.

The Director-General has advised that the proposed development satisfies the criteria established for State Environmental Planning Policy (Major Development) and handed down the detailed requirements which have been addressed in this Environmental Assessment.

An assessment of the impacts of the proposed development indicates that, subject to the implementation of appropriate mitigative measures and in particular those identified in the Statement of Commitments forming part of the EA, the Project can operate in a manner which has no significant adverse social or environmental outcomes.

The EA concludes that the site is suitable for the Project and that the Project is consistent with the public interest. Any potential negative impacts will be substantially mitigated by the measures outlined in the report.

It is considered that the proposal is justified in that:-

- the site is appropriate and suitable for the Project; and
- the proposed development will not have any significant environmental impacts.

The provision of an expanded materials recycling facility will make a positive contribution to the economic base of the Auburn Local Government Area. The EA finds that Project can occur in a manner which is sustainable and that has no significant impacts on the environment.
