

11 November 2015

Ground Floor, Suite 01, 20 Chandos Street
St Leonards, NSW, 2065
PO Box 21
St Leonards, NSW, 1590

David Mooney
Department of Planning and Environment
23-33 Bridge Street
Sydney NSW 2000

T +61 2 9493 9500
F +61 2 9493 9599
E info@emmconsulting.com.au
www.emmconsulting.com.au

Sent via email: david.mooney@planning.nsw.gov.au

Re: Addendum to S75W modification application to MP09_0074

Dear David,

1 Introduction

An application was submitted on 30 September 2015 to modify the project approval MP09_0074 for a Waste and Resource Management Facility on land situated at 123-179 Patons Lane, Orchard Hills. The application sought to modify Conditions 18 and 19 within Schedule 3 and the definition of 'Site Establishment' within Schedule 2.

This addendum letter provides further information on the modification to the definition of 'Site Establishment' within Schedule 2 in response to a request for further information from the Department of Planning and Environment in a meeting with SRC Properties Pty Ltd (the proponent) on 13 October 2015. This addendum letter should be read in conjunction with the Environmental Assessment prepared by EMGA Mitchell McLennan Pty Ltd dated 25 September 2015 which was submitted with the modification application.

2 Further information on definition of 'Site Establishment'

The definition of 'Site Establishment' currently refers to construction works for Cell 1 and clay/shale extraction associated with the construction of Cell 1. This is incorrect and should refer to Cell 1A.

The emplacement of waste is approved within three 'cells' which are then further divided into three 'sub-cells' (see Figure 1). Cell 1A is a subset of Cell 1, being approximately one-third of the total Cell 1 area.

Figure 2.6 'Site Establishment Activities (Amended)' in the 'Further Modified Preferred Project Report' (shown as Figure 2 in this addendum letter) depicts the works to be undertaken as part of Site Establishment and is also included in the definition of Site Establishment in Schedule 2. Figure 2.6 clearly shows site establishment works within Cell 1A only and not the remaining sub-cells of Cell 1. The annotations on Figure 2.6 refer to the construction of a sump in Cell 1A and the excavation of clay and shale from Cell 1A.

Section 2.3 of the Further Modified Preferred Project Report, which describes the principal activities involved in site establishment, includes:

- viii) Installation of the required liners, drainage layout, leachate risers and associated infrastructure in Cell 1A (see Section 2.8.2 for details).

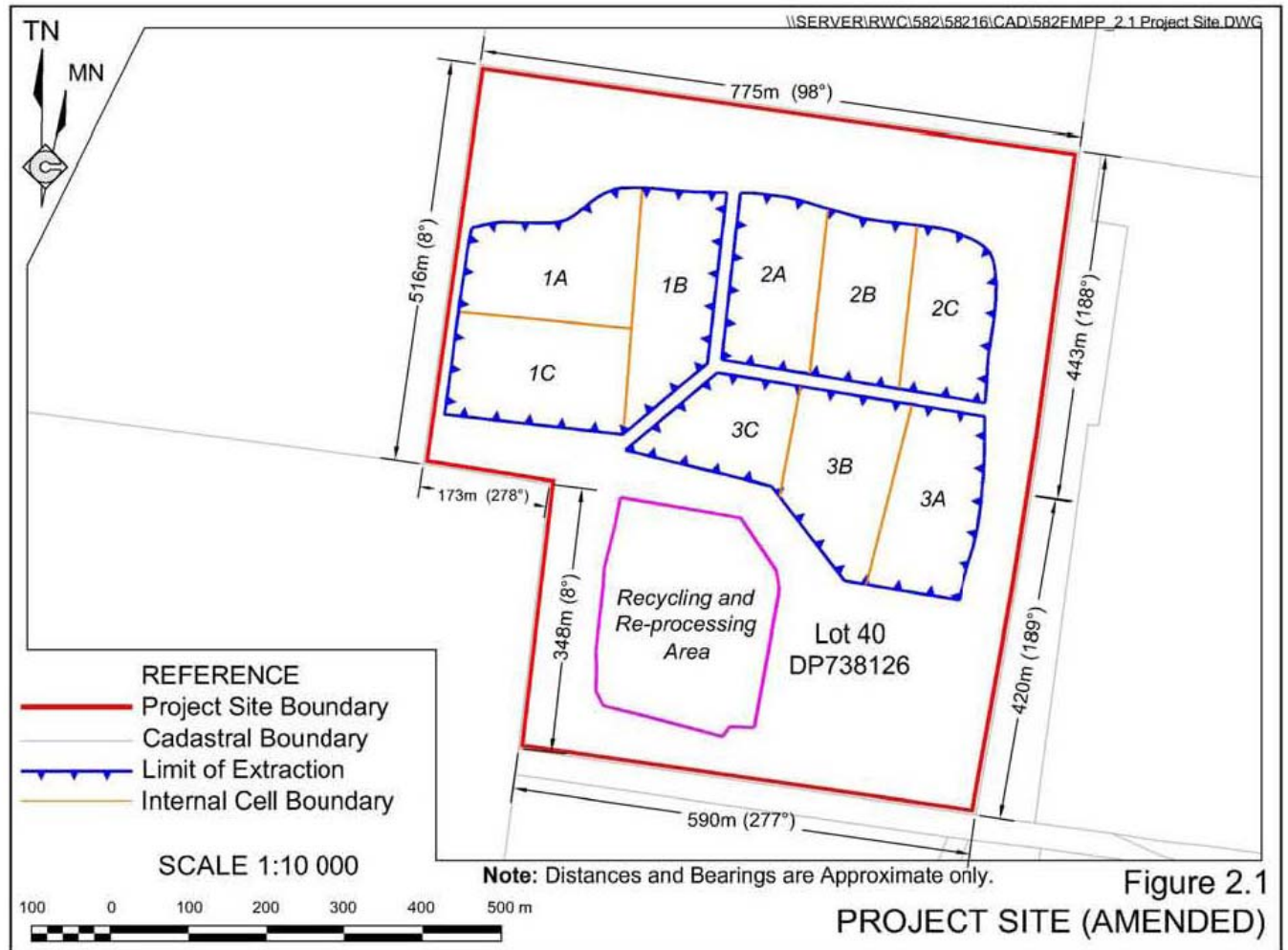
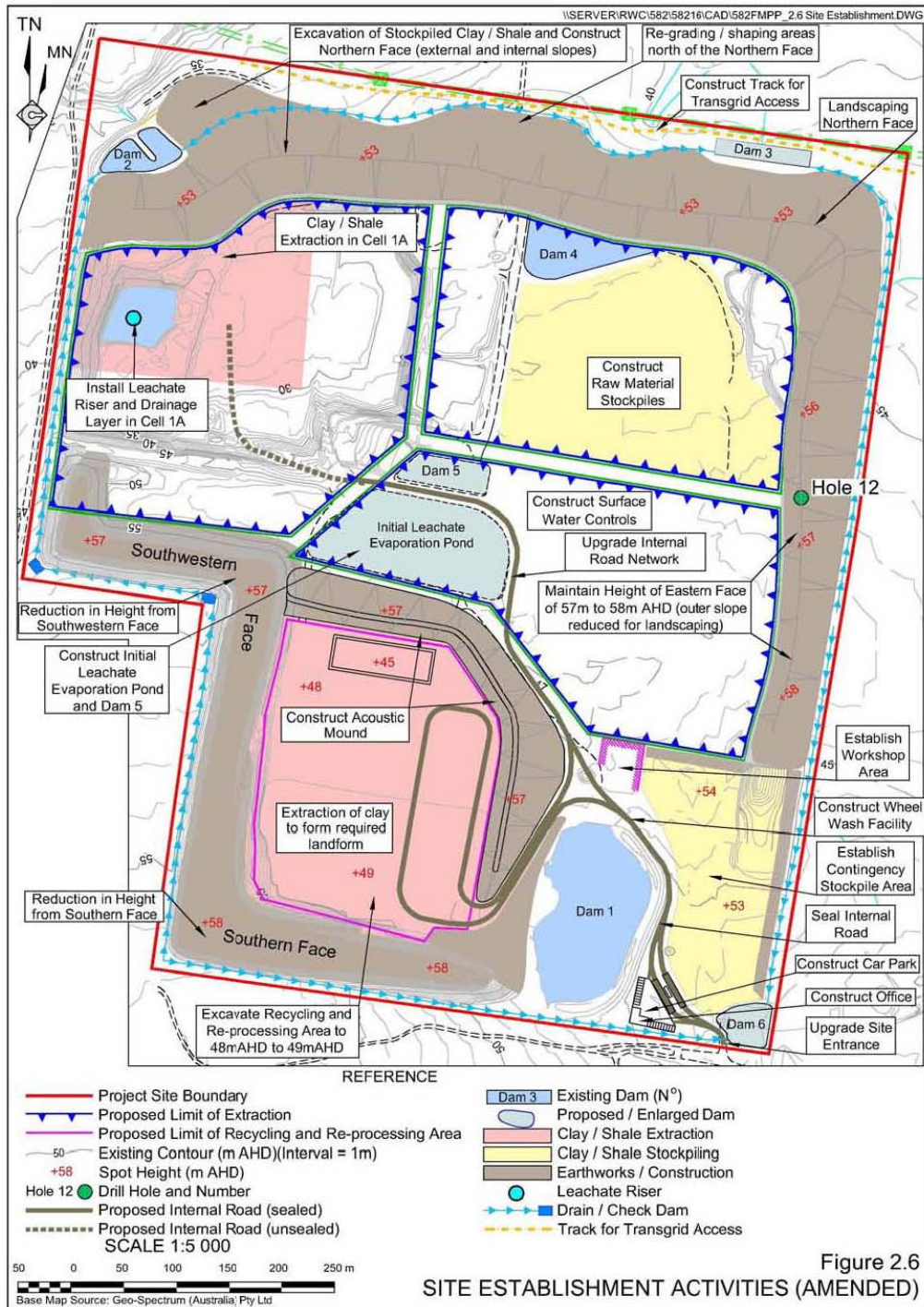


Figure 1 Project site cell layout



R. W. CORKERY & CO. PTY. LIMITED

Figure 2 Site establishment activities

Table 2.5 ‘Indicative Emplacement and Cell Rehabilitation Staging’ of the Further Modified Preferred Project Report describes the excavation and filling program and has been reproduced as Table 1 in this addendum letter. Table 2.5 states that in Year 1 of operation “Cell 1A is prepared to receive waste and filling commences” and that emplacement of waste within Cell 1 occurs between Years 1 – 7. This table is also replicated in Paragraph 57 of the Land and Environment Court proceedings No. 10928 of 2010.

Table 1 Indicative emplacement and Cell Rehabilitation Staging (replicated from Table 2.5 of the Further Modified Preferred Project Report)

Year#	Activity*
Year 1	Cell 1A is prepared to receive waste and filling commences. De-construction of the section of the existing eastern bund wall located over the clay/shale extraction area within Cell 2 is underway and all wastes placed in Cell 1A.
Year 2	Cell 1B is excavated and leachate infrastructure installed and is available for waste emplacement. The northern section of Cell 1A is capped and rehabilitated soon after.
Year 5	Cell 1C is excavated and leachate infrastructure installed and is available for waste emplacement. The northern section of Cell 1B is capped and rehabilitated soon after.
Year 8	Cell 2A is excavated and leachate infrastructure installed and is available for waste emplacement. Cell 1C is capped and rehabilitated soon after.
Year 10	Cell 2B is excavated and leachate infrastructure installed and is available for waste emplacement. The northern section of Cell 2A is capped and rehabilitated soon after.
Year 12	Cell 2C is excavated and leachate infrastructure installed and is available for waste emplacement. The northern section of Cell 2B is capped and rehabilitated soon after.
Year 15	Cell 3C is excavated and leachate infrastructure installed and is available for waste emplacement. The northern section of Cell 2C is capped and rehabilitated soon after.
Year 18	Cell 3B is excavated and leachate infrastructure installed and is available for waste emplacement. Cell 3C is capped and rehabilitated soon after.
Year 21 to 23	Cell 3A is excavated and leachate infrastructure installed and is available for waste emplacement. Cell 3B is capped and rehabilitated whilst Cell 3A is filled to finished levels. Cell 3A is capped and rehabilitated.
Year 24 to 25	The area of the recycling and reprocessing facility is filled to final levels and rehabilitated.

Notes: # Indicative only

* Assumes an average waste emplacement rate of 205,000 tpa

See Figure 2.9 for individual cell location

3 Closing

Given the above information, it is clear that the definition of Site Establishment should refer only to site establishment activities being undertaken within Cell 1A. Therefore, it is requested that the definition of ‘Site Establishment’ be amended to:

Site establishment includes:

- initial shaping of the northern and north-eastern bund walls;
- reshaping of the southern and south-western bunds;
- emplacement of onsite waste resulting from the reshaping of the bunds described above;
- construction work for buildings and infrastructure;
- road works required by this approval; and
- construction work for Cell 1A and any clay/shale extraction associated with the construction of Cell 1A.

and as otherwise shown on Figure 2.6 ‘Site Establishment Activities (Amended)’ of the FMPPR at p18 (Exhibit Z in Appeal No 10928 of 2010).

Site establishment excludes works and activities referred to in the definition of ‘Operation’ above.

If you require any further clarification please contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'R Thelwell', with a stylized flourish at the end.

Rachael Thelwell
Senior Environmental Planner
rthelwell@emmconsulting.com.au