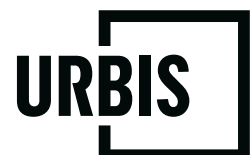




# **MATERIALS RECYCLING FACILITY – 600 WOODSTOCK AVENUE, ROOTY HILL**

Scoping Report

Prepared for  
**CHARTER HALL**  
30 September 2021



**URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:**

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Project Code	P0034971
Report Number	FINAL v 1 – 30.09.2021

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**We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.**

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# GLOSSARY AND ABBREVIATIONS

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
AQIA	Air Quality Impact Assessment
BAM	Biodiversity Assessment Method
BC Act	<i>Biodiversity Conservation Act 2016</i>
BC Reg	<i>Biodiversity Conservation Regulation 2017</i>
BCC	Blacktown City Council
BDAR	Biodiversity Development Assessment Report
CEEC	Critically Endangered Ecological Communities
DCP	Development Control Plan
DPIE	NSW Department of Planning, Industry and Environment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	Environmental Protection Agency
EPA Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPLs	Environment protection licences
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
HIPAP	Hazardous Industry Planning Advisory Paper
LEP	Local Environmental Plan
MRF	Materials Recycling Facility
OEMP	Operational Environmental Management Plan
PBP	Planning for Bushfire Protection
PCT	Plant Community Type
POM	Plan of Management
PSI	Preliminary Site Investigation
SEARs	Secretary's Environmental Assessment Requirements

Reference	Description
SEPP	State Environmental Planning Policy
Site	Lot 67 in Deposited Plan DP804292 (600 Woodstock Avenue, Rooty Hill)
SRD SEPP	<i>State Environmental Planning Policy (State and Regional Development) 2009</i>
SSD	State Significant Development
SSDA	State Significant Development Application
TEC	Threatened Ecological Communities
TIA	Traffic Impact Assessment
TfNSW	Transport for NSW
TPA	Tonnes per Annum

# 1. INTRODUCTION

This Scoping Report has been prepared on behalf of Charter Hall and in support of a proposed Materials Recycling Facility (**MRF**) at 600 Woodstock Avenue, Rooty Hill (**the site**). It seeks Secretary's Environmental Assessment Requirements (**SEARs**) for the preparation of an Environmental Impact Statement (**EIS**) that will accompany a State Significant Development Application (**SSDA**).

This section of the report identifies the applicant for the project and describes the site and proposed development. It outlines the site history and feasible alternatives explored in the development of the proposed concept, including key strategies to avoid or minimise potential impacts.

## 1.1. APPLICANT DETAILS

The applicant details for the proposed development are listed in the following table.

Table 1 Applicant Details

Descriptor	Proponent Details
Full Name(s)	Charter Hall c/o Urbis Pty Ltd
Postal Address	Level 8, 123 Pitt Street, Angel Place, Sydney NSW 2000
ACN	15 051 363 547
Nominated Contact	Richard Barry (Urbis)
Contact Details	02 8233 9946

## 1.2. SITE DETAILS

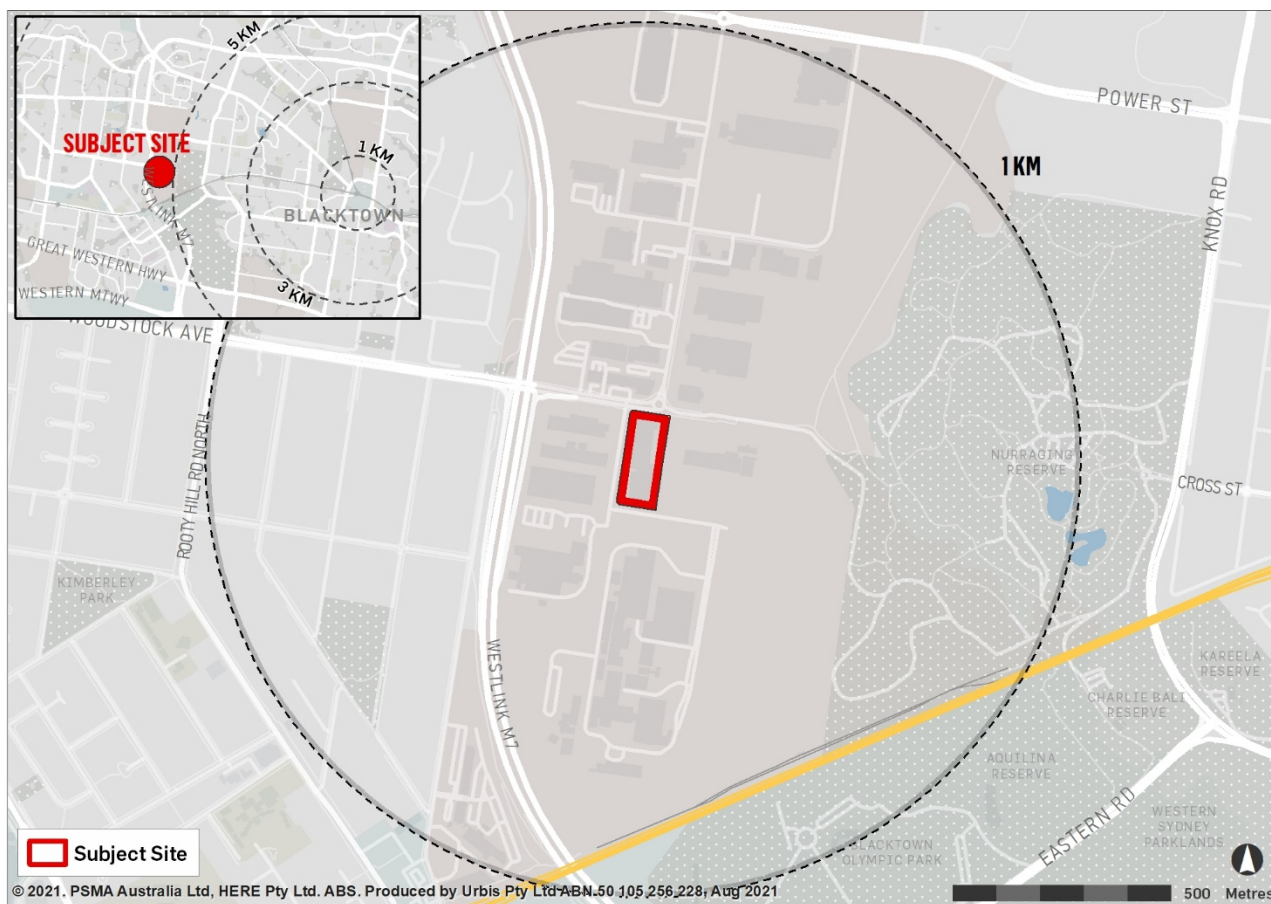
The site information relevant to the project is provided in the following table. A detailed description of the key features of the site and locality is provided in Section 2.3 of this report.

Table 2 Site Details

Descriptor	Site Details
Street Address	600 Woodstock Avenue, Rooty Hill
Legal Description	Lot 67 in Deposited Plan DP804292
Site Area	1.97 hectares (source: Deposited Plan)

A map of the site in its regional setting is provided as **Map 1**.

Map 1 Regional Context



Source: Urbis

### 1.3. PROJECT DESCRIPTION

Charter Hall are partnering with Cleanaway to design, construct, install and operate a new purpose built MRF that will process recyclables from the Blacktown LGA by early 2023. Cleanaway is Australia's largest waste, recycling, industrial and liquids service provider with a substantial network of state-of-the-art facilities, transfer stations, engineered landfills, liquid treatment plants and refineries.

The site has been purposefully selected following site investigations across Blacktown LGA, to meet strict site criteria for a purpose built MRF that will process materials including paper, cardboard, glass, aluminium, plastic, steel etc.

The objectives of the proposed development are described as follows:

- Demolition of most existing structures. The existing office building will be retained and refurbished.
- Construction and operation of a MRF with capacity of sorting 120,000 TPA.
- Ancillary office space of 587 sqm GFA located within the existing office building.
- Operational warehouse space of 6,732 sqm GFA, plus warehouse amenities (235sqm GFA) and a standalone weigh bridge office (18sqm GFA).
- 4 x truck weighbridges, truck parking, 40 on site car spaces for visitors and staff parking (including 14 tandem car spaces).
- The MRF will be designed for yellow lidded bins and Container Deposit scheme (**CDS**). Co-mingle materials to be processed are to include paper, cardboard, glass, aluminium, plastic, steel etc.



- The MRF will be designed with the capability of 24/7 operation with CCTV system, thermal scanners, MDB, MCC, Air room and SCADA control plant.
- The facility will be designed and constructed according to Australian Standards (National Codes, Building codes, Compliance with NSW Fire Rescue guidelines and EPA waste facility environmental management guidelines for waste facilities – Feb 2020
- This plant will be designed to have future capability to accommodate cardboard and recyclables materials from Commercial and Industrial Customers, but this will not result in the facility exceeding 120,000 TPA.

The proposed development has an estimated capital investment value of approximately \$50 million (subject to review in preparation of the EIS). Notwithstanding, the proposal is classified as an SSD under Schedule 1, clause 23(3) of the *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) due to the proposed sorting capacity of the MRF exceeding 100,000 TPA.

The Minister is the consent authority for the proposal in accordance with section 4.5 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*. Accordingly, this DA is being lodged with the DPIE as an SSDA seeking development consent for a Materials Recycling Facility.

## **1.4. PROJECT BACKGROUND**

### **1.4.1. Site History**

The site is currently owned by Insulco Pty Ltd. The site currently accommodates two industrial warehouses encompassing most of the site area that have been used for the manufacturing of insulation material.

### **1.4.2. Likely Future Strategies**

It is anticipated the following key strategies will be adopted to avoid or minimise the impacts of the project:

- Mitigation measures related to noise, vehicle movement and emissions are embedded into the design to minimise environmental impact. This includes the MRF being fully enclosed and the installation of rapid open and close roller doors for vehicles to enter and exit the facility.
- A robust Plan of Management (POM) to mitigate environmental impacts related to noise, vehicle movement, emissions and staff hours.
- The MRF is purpose built to meet and exceed all building code and environmental standards.

## 2. STRATEGIC CONTEXT

This section of the Scoping Report describes the way in which the proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the project which will be explored in further detail within the future EIS.

### 2.1. PROJECT JUSTIFICATION

The proposed development is aligned with the State, district and local strategic plans and policies applying to the site as outlined below.

### 2.2. GREATER SYDNEY REGION PLAN: A METROPOLIS OF THREE CITIES – CONNECTING PEOPLE

*Greater Sydney Region Plan: A Metropolis of Three Cities – connecting people* (the Region Plan) provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities - the Western Parkland City, Central River City and Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036.

The Plan includes objectives and strategies for infrastructure and collaboration, liveability, productivity and sustainability. The following matters are particularly relevant to the approved development:

- *Objective 16 - Freight and logistics network is competitive and efficient*
- *Objective 23 - Industrial and urban services land is planned, retained and managed*
- *Objective 35. More waste is re-used and recycled to support the development of a circular economy*

The site is located on the border of the Western Parkland City and the Central River City. The Region Plan supports the retention of industrial land and recycling waste, which aligns with the development aspirations for the site.

### 2.3. OUR GREATER SYDNEY 2056: CENTRAL CITY DISTRICT PLAN – CONNECTING COMMUNITIES

The site is located close to the boundary between the Western City District and the Central City District. However the Blacktown City Council area is officially listed as being within the Central City District and is considered such for the purposes of this report.

*Our Greater Sydney 2056: Central City District Plan – connecting communities* (the District Plan) is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

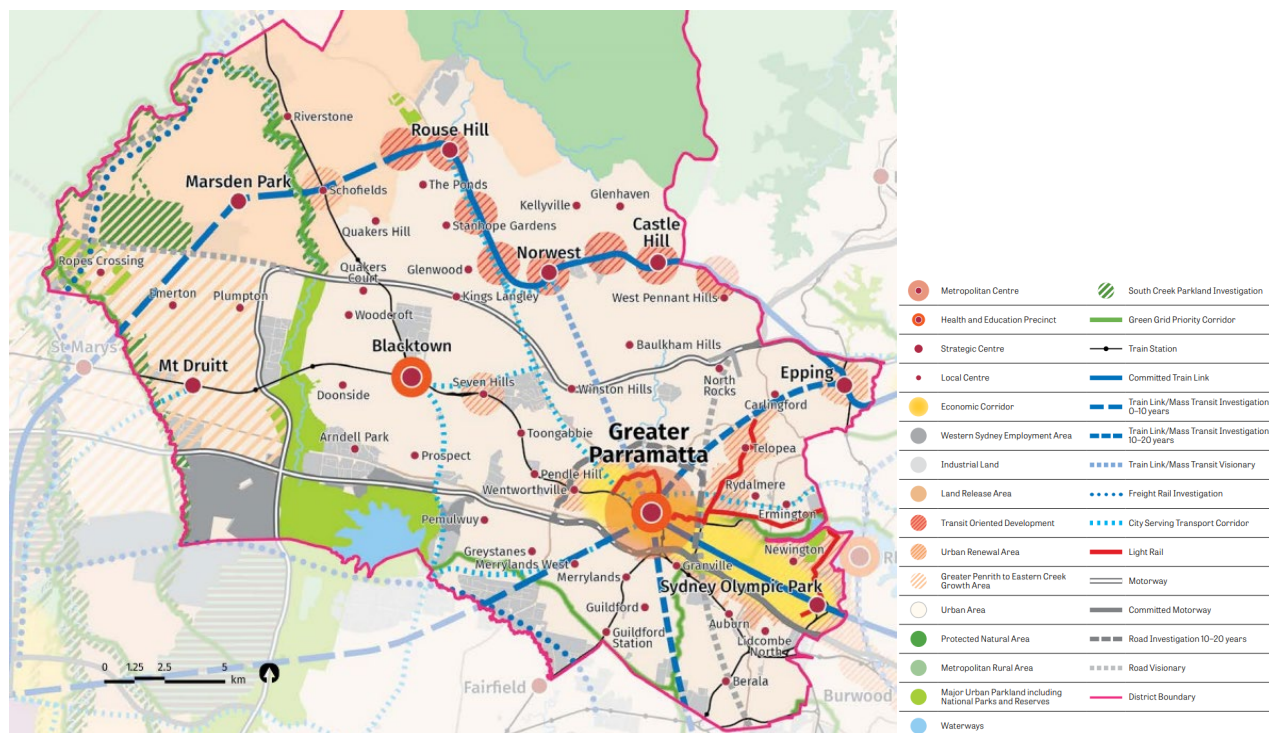
The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan (refer Figure 1) identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.

The planning priorities and actions likely to have implications for the proposed development are listed and discussed below:

- *Planning Priority C11 Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land*
- *Planning Priority C19 Reducing carbon emissions and managing energy, water and waste efficiently*

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

Figure 1 Structure Plan for the Central City District (Source: Central City District Plan, March 2018)



## 2.4. BLACKTOWN LOCAL STRATEGIC PLANNING STATEMENT 2020

The *Blacktown Local Strategic Planning Statement* ('the LSPS') was prepared by Blacktown City Council. The LSPS seeks to implement the provisions in the Region Plan and District Plan, setting a 20-year vision for land-use within the LGA in accordance with the EP&A Act.

The site forms part of the Mount Druitt Precinct (refer Figure 2) and is within a defined employment area which benefits from proximity to the M7 Motorway. The LSPS seeks to provide improved connectivity between the Western Sydney Employment Area and the Mount Druitt Precinct:

*The Western Sydney Employment Area to the south provides logistics, distribution and warehousing development and connects to arterial roads and Sydney's motorway network on the M4 and M7. Greater integration between the employment area and the Mount Druitt Precinct is needed. Improved connectivity across the Castlereagh Freeway will enhance equitable access to employment opportunities in the Marsden Park employment area.*

Infrastructure projects which Blacktown City Council proposes to advocate to the State government include the Woodstock Avenue to Luxford Road upgrade to four lanes and a new connection from the M7 Motorway to the Castlereagh Freeway (refer pages 30-31).

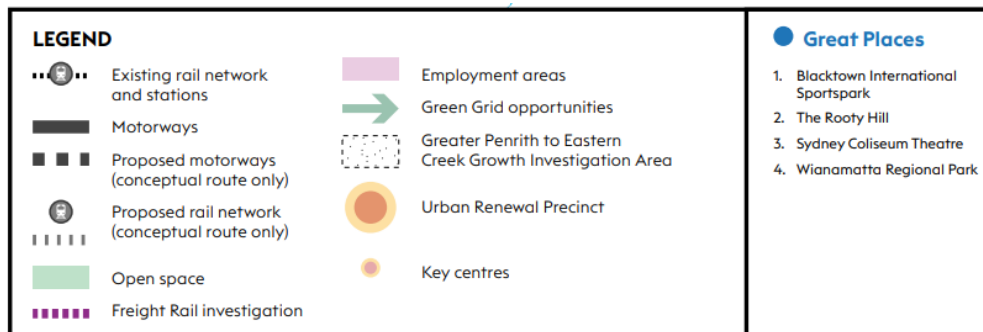
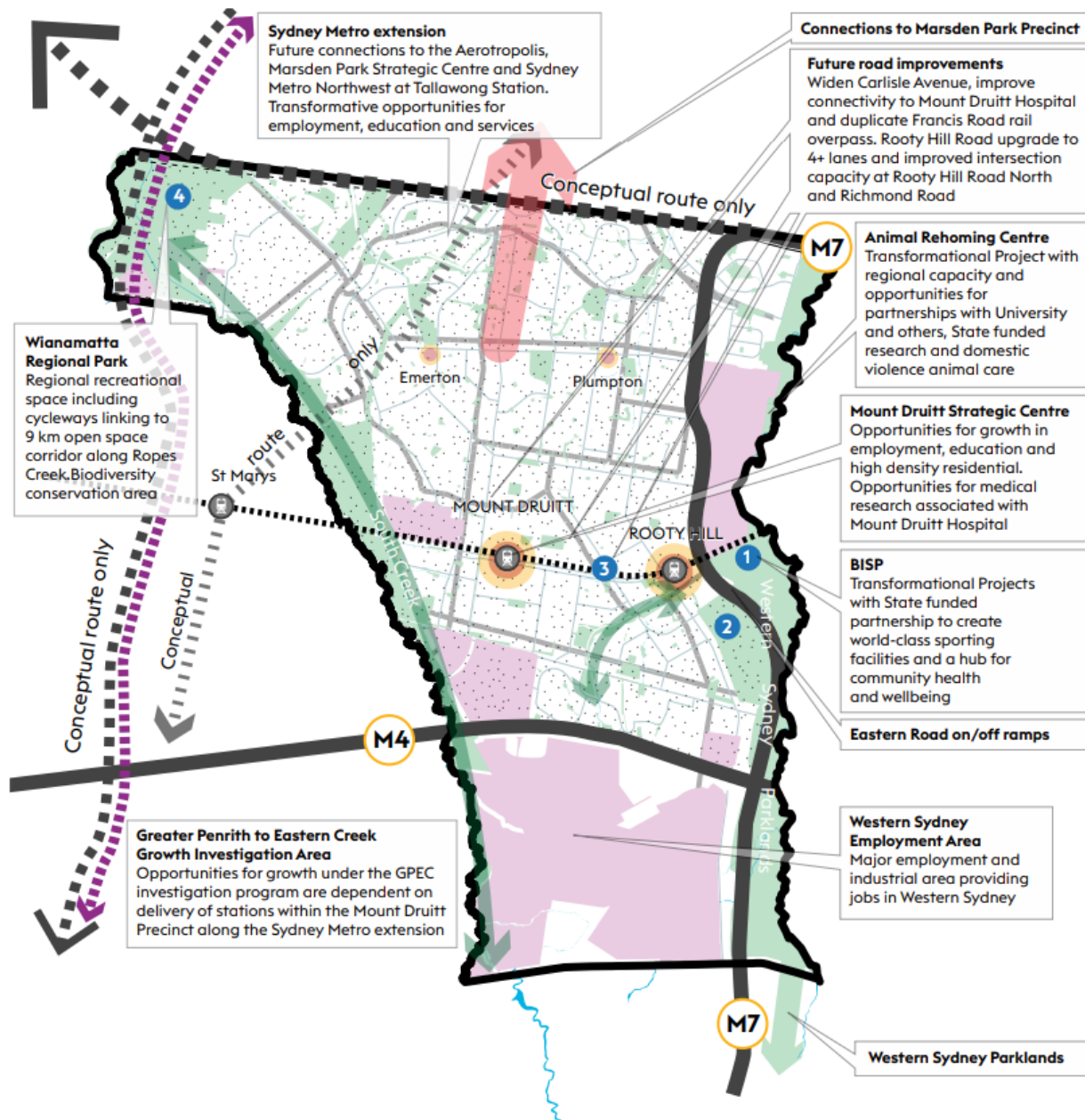
The proposed development aligns with the following Local Planning Priorities:

- *Local Planning Priority 9: Maximising opportunities to attract advanced manufacturing to, and innovation in, industrial and urban services land*
- *Local Planning Priority 16: Reducing carbon emissions and managing energy, water and waste efficiently*

While the GSC has recently commenced a review of this policy, the LSPS advocates the retention of the industrial lands as outlined in the following extract.

*The City's 3,000 hectares of industrial land and more than 200 hectares of land for business parks must be safeguarded to provide space for residents in Blacktown and Western Sydney to work, while creating investment opportunities for local, national and multinational companies.*

Figure 2 Mount Druitt Precinct (Blacktown LSPS 2020)



## 2.5. KEY FEATURES OF SITE AND SURROUNDS

### 2.5.1. Site Description

The site is identified as 600 Woodstock Avenue Rooty Hill within the Blacktown local government area. The site is legally described as Lot 67 in Deposited Plan DP804292.

The location of the site is illustrated in **Map 1**. Photographs of the current site condition are provided in **Figure 3**. An aerial photograph of the site and locality context is provided as **Picture 4**.

The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in **Table 3**.

Table 3 Key Features of the Site and Locality

Descriptor	Site Details
Land Configuration	<p>The site comprises a large industrial lot. It has an area of 1.97 hectares with the following dimensions - 200.89m (east) x 83m (north and south) x 216.89m (west) (source: Deposited Plan). The surrounding land generally comprises large industrial lots of a similar scale with varying areas and dimensions.</p> <p>Based on the desktop imagery and photography, it appears the site slopes gradually to the south.</p>
Land Ownership	<p>The site is currently owned by Insulco Pty Ltd.</p> <p>The surrounding industrial properties are owned by a range of land owners, including Fatidin Pty Ltd, Kellogg Rd Superannuation Pty Ltd and Kiddcorp Pty Ltd. The largest land owner appears to be CSR Ltd who owns the property immediately to the east along Woodstock Avenue.</p>
Existing Development	<p>The site currently accommodates two industrial warehouses encompassing most of the site area. The existing buildings appear to have been developed in phases. An office building abuts the northern elevation of the warehouse. There are smaller ad hoc industrial shed structures within the parking areas.</p> <p>The northern and southern boundaries are landscaped. The south-western boundary is partially landscaped and the eastern boundary adjoins a neighbouring site. The site has three vehicular access points, one each on the northern, southern and western boundary.</p>
Local Context	<p>The site is surrounded by industrial developments, with a variety of uses in the wider area as summarised below:</p> <p><b>North:</b> Woodstock Avenue connects the site and other surrounding developments directly to the M7 Motorway. The land further north comprises the Glendenning industrial estate which supports large-scale warehouses and industrial uses.</p> <p><b>East:</b> A concrete manufacturing facility adjoins to the east. The Western Sydney Parklands are located further to the east, comprising a significant vegetation corridor.</p> <p><b>West:</b> Kellogg Road bounds the site to the west. The land on the opposite side of the road contains large-scale industrial buildings. The M7 Motorway separates the industrial development from a low-scale residential area, including Rooty Hill and Plumpton, approximately 310 metres to the west.</p>

Descriptor	Site Details
	<p><b>South:</b> Kellogg Road bounds the site to the south. A steel manufacturing facility is located on the opposite side of the road, with Angus Creek and the Main Western railway line further south.</p> <p>Photographs of the surrounding land uses are provided as <b>Figure 3</b>.</p>
Regional Context	The site is located within the suburb of Rooty Hill, approximately 5km east of Blacktown CBD. The regional context is shown below in <b>Figure 1</b> .
Infrastructure	<p>The site benefits from excellent access to the Westlink M7 Motorway which provides a north-south regional connection between the M5 South-West, the M4 and the Hills M2 Motorways. The site is located approximately 220 metres east of the Westlink M7 Motorway.</p> <p>North-bound access from the Motorway and south-bound access to the Motorway is available via Woodstock Avenue. South bound access from the Motorway and north-bound access to the Motorway is available via Power Street, approximately 900 metres to the north along Glendenning Road.</p>
Site Access	The site has three existing driveway access points. These being onto Woodstock Avenue at the north eastern corner of the site, onto Kellogg Road on the south western edge of the site, and onto Kellogg Road on the south eastern corner of the site.
Easements and Covenants	<p>L941537 covenant dated 21 July 1970 which relates to the means of access to the site.</p> <p>R802611 covenant dated 19 March 1980 affecting the northern part of the site. This covenant relates to the transfer of land from the Minister for Decentralisation to Insulco Pty Ltd.</p> <p>I142230 easement for transmission line affecting the land along the northern boundary.</p>
Services	The site is currently serviced and will be assessed further in the EIS.
Contamination	A Preliminary Site Investigation is currently underway.
Stormwater and Flooding	Stormwater and flooding is currently being reviewed.
Flora and Fauna	<p>Landscaped areas at the northeast and southwest corners of the site contain mature trees and mulch covered ground. The northern, southern and western boundaries are landscaped with shrubs and grass.</p> <p>A small area of Cumberland Plain Woodland is located in the south-western corner of the site which is listed as a critically endangered ecological community (<b>CEEC</b>).</p>
Aboriginal Heritage	An Aboriginal Heritage Due Diligence assessment has concluded there is a low likelihood of the site containing Aboriginal artefacts. Refer to Section 6.1.8.



Figure 3 Site Photographs



Picture 1 Northern Elevation (on Woodstock Ave)

Source: Google Street View, image dated Dec 2020



Picture 2 Southern Elevation (on Kellogg Road)

Source: Google Street View, image dated Dec 2020



Picture 3 Western Elevation (on Kellogg Road)

Source: Google Street View, image dated May 2017

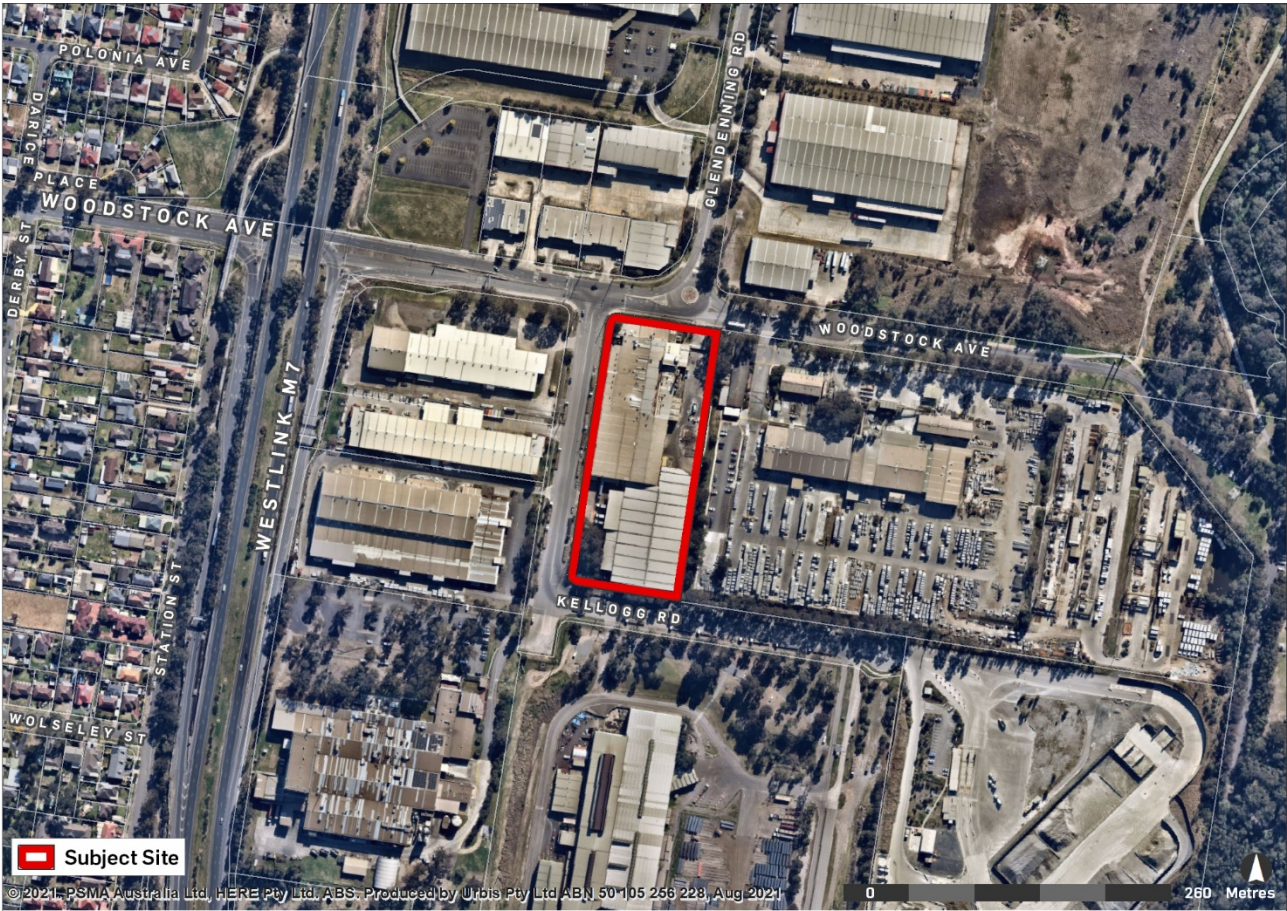


Picture 4 View along eastern boundary from Kellogg Road

Source: Google Street View, image dated Dec 2020



Picture 5 Aerial Photograph (source: Urbis, 2021)





## 2.6. CUMULATIVE IMPACTS WITH FUTURE PROJECTS

The site is located within an established industrial precinct, including the immediately surrounding land within Rooty Hill and the industrial zoned land to the north within Glendenning.

A desk-top search was undertaken of the NSW LEP Tracker, the Major Projects Portal and Sydney Planning Panel websites to identify approved and likely future developments within the locality which may be relevant in the cumulative impact assessment of the proposal.

Table 4 Previous Approved Projects

Planning Reference	Development Description	Determination
MP05_00511 Kellogg Road, Rooty Hill	Rooty Hill Regional Distribution Centre (receipt of construction material by rail, on-site processing and distribution by road)	26 April 2006
MP05_0051-Mod-1 Kellogg Road, Rooty Hill	Rooty Hill Regional Distribution Centre (Mod 1 - Layout Changes)	22 March 2011
MP05_0051-Mod-2 Kellogg Road, Rooty Hill	Rooty Hill Regional Distribution Centre (Mod 2 - Design Changes)	29 June 2017
SSD-67672 14 Rayben Street, Glendenning	Glendenning Liquid Waste Facility (waste management facility)	11 January 2017
SSD-6767-Mod 1 14 Rayben Street, Glendenning	Glendenning Liquid Waste Facility -Modification 1: Amend Limits of Consent to increase used oil / industrial oily water throughput	9 July 2019
SSD-6767-Mod 2 14 Rayben Street, Glendenning	Glendenning Liquid Waste Facility – Modification 2: Combine total organic and waste oil quantities per annum	25 August 2020
SP-21-000083 201 Power Street, Glendenning	Demolition of existing buildings and hardstand areas, tree removal, construction of 3 warehouse buildings and distribution facilities with a total of 10 tenancies and ancillary	Under assessment (lodged 24 June 2021)

<sup>1</sup> <https://www.planningportal.nsw.gov.au/major-projects/project/19921>

<sup>2</sup> <https://mpweb.planningportal.nsw.gov.au/major-projects/project/4696>

<sup>3</sup>

<https://eservices.blacktown.nsw.gov.au/T1PRProd/WebApps/eProperty/P1/eTrack/eTrackApplicationDetails.aspx?r=BCC.P1.WEBGUEST&f=%24P1.ETR.APPDET.VIW&ApplicationId=SPP-21-00008>

Planning Reference	Development Description	Determination
	offices, landscaping, signage and car parking.	
DA-20-006754 56 Glendenning Road, Glendenning	Construction of warehouse and distribution centre development, consisting of 3 warehouses, new roads, 2 lot re-subdivision for road dedication, use for 24 hours, 7 days a week operation and instillation of solar panels.	Unknown (approved with lodgement date of 8 May 2020)
DA20-00675 (MOD-21-00370)	The overall intent of the proposed modifications is to resolve the built form of the approved Warehouse and Distribution Facility to cater for the committed tenants of each warehouse premise. In addition, there are a number of conditions that impact on the construction program for the development, which are sought to be amended as part of this application.	Under assessment (lodged 13 July 2021)
DA20-00675 (MOD-21-00398)	Minor amendment to conditions that impact on the construction program for the development.	Under assessment (lodged 22 July 2021)
DA-17-013235 18 Kellogg Road, Rooty Hill	Construction of two flour silos and minor associated works at the General Mills site	Unknown (approved with lodgement date of 10 July 2017)

The potential cumulative impacts of the project will be addressed in the EIS in accordance with the DPIE *Assessing Cumulative Impacts* guidelines.

## 2.7. AGREEMENTS WITH OTHER PARTIES

The applicant is not seeking to enter into any agreements with any authorities to facilitate the approval of the proposed development.

However, it is acknowledged the proposal will facilitate the delivery of a commitment by Cleanaway to Blacktown City Council for a new facility to be on-line by early 2023.

4

<https://eservices.blacktown.nsw.gov.au/T1PRProd/WebApps/eProperty/P1/eTrack/eTrackApplicationDetails.aspx?r=BCC.P1.WEBGU EST&f=%24P1.ETR.APPDET.VIW&ApplicationId=DA-20-00675>

5

<https://eservices.blacktown.nsw.gov.au/T1PRProd/WebApps/eProperty/P1/eTrack/eTrackApplicationDetails.aspx?r=BCC.P1.WEBGU EST&f=%24P1.ETR.APPDET.VIW&ApplicationId=DA-17-01323>

## 3. PROJECT

This section outlines the key features of the proposed development, including the project area, the conceptual physical layout and design (including likely mitigation measures), the main land use activities and the likely timing for delivery of the project.

It also includes a high-level of feasible alternatives which were considering having regard to the project objectives outlined in Section 1.3 of this report, including the consequences of not carrying out the development.

### 3.1. PROPOSED DEVELOPMENT

The key components of the proposed development are listed in the following table. A copy of the architectural concept drawings are attached as **Appendix B**.

Table 5 Project Details

Descriptor	Project Details
Project Area	The site has a total area of 1.97ha. The entire site is expected to be disturbed by the project.
Project Description	<p>The project comprises the demolition of most of the existing structures (retaining the office building), remediation of the site if required and construction of a purpose built Materials Recycling Facility development including the following key components:</p> <ul style="list-style-type: none"> <li>Maximum building height of RL 57.530 metres.</li> <li>Total GFA of 7,572 sqm</li> <li>Vehicle access will be provided via Kellogg Road (heavy vehicle) and Woodstock Avenue (staff and visitor private vehicles).</li> <li>On-site parking will be provided for: <ul style="list-style-type: none"> <li>40 staff and visitor parking spaces (including 14 tandem spaces)</li> <li>There will be no heavy vehicle parking or storage on site</li> </ul> </li> </ul>
Expected Capital Investment Value	\$50,000,000 (excluding GST) – subject to review in preparation of EIS
Staging/Phasing	<p>The project will include the following phases:</p> <ul style="list-style-type: none"> <li>Demolition: removal of existing buildings and structures.</li> <li>Remediation: Under investigation</li> <li>Site preparation (cut and fill)</li> <li>Construction</li> <li>Operation</li> </ul>

## 3.2. FEASIBLE ALTERNATIVES

Clause 7 in Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (the Regulation) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

Charter Hall has explored multiple site options and design concepts for the project. Design concepts have been prepared in consultation with key stakeholders, including Cleanaway (who will operate the facility), the Environmental Protection Agency (**EPA**), Transport for NSW, NSW Fire Brigade and Blacktown City Council (**BCC**). Project alternatives which were considered in respect to the identified need for the MRF are listed and discussed in the following table.

Table 6 Project Alternatives

Option	Assessment
Do Nothing	<p>The existing development has reached the end of its lifecycle and the existing structure is not fit for the proposed use as a MRF. Primarily as a MRF requires a purpose built facility to facilitate its operation and to ensure it meets strict building standards and EPA standards.</p> <p>The proposed MRF is required as Charter Hall and Cleanaway require a MRF to fulfil its contractual obligations to process recyclables collected from the Blacktown LGA by early 2023.</p>
Alternative Location	<p>Alternative locations within the Blacktown LGA have been explored. However, no other sites were available that met the requirements including size of site, vehicle access and site suitability in relation to compatibility with surrounding properties.</p>
Alternative Design	<p>Alternative options were explored including size of facility, location of car parking, setbacks and retention or deletion of the office building. The submitted design scheme has been developed in consultation with key stakeholders and minimising impacts, plus reusing the existing office building to reduce waste.</p>

Based on the summary in Table 2, the design concept and selected site are the most appropriate and suitable option for the required MRF.

The site has been purposefully selected due to its location, vehicle access and site suitability. The design concept has been developed with consideration of key building standards required to facilitate the bespoke nature of the proposed use and incorporate mitigation measures, including related to fire safety, noise, odour and vehicle movement.

Accordingly, the proposed design concept is the best outcome for the site.

## 4. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, including:

- *Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act 1999*
- *Waste Avoidance and Resource Recovery Act 2001*
- *Protection of the Environment Operations Act 1997*
- *NSW Biodiversity Conservation Act 2016*
- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning Assessment Regulation 2000.*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (1992 EPI 129)*
- *State Environmental Planning Policy No. 55 – Remediation of Land*
- *Blacktown Local Environmental Plan 2015*
- *Blacktown Development Control Plan 2015*

The following table categorises and summarises the relevant requirements in accordance with the DPIE guidelines and confirms the planning pathway for State significant development. Each of these matters will be address in further detail within the future EIS.

Table 7 Statutory Requirements

Statutory Reference	Requirement	Relevance
<b>Power to grant consent</b>		
<i>Environmental Planning and Assessment Act 1979</i>	The proposed development is declared to be State significant development in accordance with section 4.36(2) of the Act. The Minister for Planning or the Independent Planning Commission will be the relevant consent authority for the proposal in accordance with clause 4.5(a).	The proposed development is declared State significant development pursuant to the <i>State Environmental Planning Policy (State and Regional Development) 2011</i> . Development consent is sought from the Minister for Planning or delegated consent authority.
<i>State Environmental Planning Policy (State and Regional Development) 2011</i>	The proposed development is classified as State significant development in accordance with the SRD SEPP.	<p>The proposed development is categorised as a <b>waste and resource management facility</b> that is located in metropolitan Sydney and has capacity to process up to 120,000 TPA.</p> <p>The development is therefore categorised as State significant development pursuant to clause 23(3) of Schedule 1 of the SRD SEPP.</p>

Statutory Reference	Requirement	Relevance
<b>Permissibility</b>		
<i>Blacktown Local Environmental Plan 2015</i>	<p>The site is zoned IN1 – General Industrial in accordance with the LEP. The objectives of the zone are summarised below:</p> <ul style="list-style-type: none"> <li>▪ <i>To provide a wide range of industrial and warehouse land uses.</i></li> <li>▪ <i>To encourage employment opportunities.</i></li> <li>▪ <i>To minimise any adverse effect of industry on other land uses.</i></li> <li>▪ <i>To support and protect industrial land for industrial uses.</i></li> <li>▪ <i>To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.</i></li> <li>▪ <i>To minimise adverse impacts on the natural environment.</i></li> </ul>	<p>The proposed Cleanaway facility would be appropriately categorised as a ‘waste or resource management facility’ which is a group term defined in the LEP as follows:</p> <p><i>waste or resource management facility means any of the following—</i></p> <p>(a) <i>a resource recovery facility,</i></p> <p>(b) <i>a waste disposal facility,</i></p> <p>(c) <i>a waste or resource transfer station,</i></p> <p>(d) <i>a building or place that is a combination of any of the things referred to in paragraphs (a)–(c).</i></p> <p>A ‘resource recovery facility’ is defined as follows:</p> <p><i>resource recovery facility means a building or place used for the recovery of resources from waste, including works or activities such as separating and sorting, processing or treating the waste, composting, temporary storage, transfer or sale of recovered resources, energy generation from gases and water treatment, but not including re-manufacture or disposal of the material by landfill or incineration.</i></p> <p>A ‘waste or resource management facility’ is not specified in item 2 of the IN1 General Industrial zone (permitted without consent) or item 4 (prohibited) and accordingly, is permitted with consent. The proposed use is consistent with the objectives of the IN1 zone. The scale and nature of the use is compatible and consistent with industrial and warehouse land uses and will provide for employment opportunities. The proposed development can be sited and designed to minimise adverse effects on surrounding land users and the natural environment.</p>
<b>Other approvals</b>		

Statutory Reference	Requirement	Relevance
<i>Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act 1999</i>	The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) aims to protect matters of national environmental significance. It seeks to promote ESD through conservation and ecologically sustainable use of natural resources and promote the conservation of biodiversity.	<p>A Preliminary Ecological Information report prepared by Cumberland Ecology (<b>Appendix F</b>) identifies a small area of Cumberland Plain Woodland, which is listed as a critically endangered ecological community (<b>CCEC</b>).</p> <p>Further assessment will be undertaken with consideration of the EPBC status as part of preparation of a Biodiversity Development Assessment Report (<b>BDAR</b>).</p>
<i>Biodiversity Conservation Act 2016</i>	The purpose of this Act is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development.	<p>The Preliminary Ecological Information report prepared by Cumberland Ecology (<b>Appendix B</b>) identifies four vegetation communities including Cumberland Plain Woodland (a Threatened Ecological Community (<b>TEC</b>), planted native vegetation and exotic vegetation.</p> <p>A Biodiversity Development Assessment Report (<b>BDAR</b>) will need to be prepared in accordance with section 7.9 of the <i>Biodiversity Conservation Act 2016</i> (the <b>BC Act</b>) and the Biodiversity Offsets Scheme (<b>BOS</b>).</p>
<i>Waste Avoidance and Resource Recovery Act 2001</i>	<i>The Waste Avoidance and Resource Recovery Act 2001</i> (WARR Act) and associated Strategy seek to encourage the most efficient use of resources and to reduce environmental harm in accordance with the principles of ecologically sustainable development.	The proposal will be designed to be consistent with the requirements of the NSW EPA Strategy and WARR Act.
<i>Protection of the Environment Operations Act 1997</i>	<i>The Protection of the Environment Operations Act 1997</i> ( <b>POEO Act</b> ) seeks to reduce risks to human health and prevent the degradation of the environment from development activities. The POEO Act applies to development in NSW and is administered by the Environment Protection Authority ( <b>EPA</b> ).	Environment protection licences ( <b>EPLs</b> ) are required to be obtained under Chapter 3 to carry out certain work or conduct certain polluting activities that may relate to management of waste, air quality emissions, noise emissions and quality of water. Where required, EPLs are to be obtained following development consent and the licence conditions must be complied with during all activities and operations.

Statutory Reference	Requirement	Relevance
<b>Pre-condition to exercising the power to grant approval</b>		
<i>State Environmental Planning Policy (Infrastructure) 2007</i>	Clause 45: Development within or immediately adjacent to an easement for electricity purposes (whether or not the electricity infrastructure exists) requires the consent authority to be satisfied the matters listed in clause 45 have been addressed.	R802611 covenant dated 19 March 1980 affects the northern half of the site and relates to the transfer of land from the Minister for Decentralisation to Insulco Pty Ltd. This easement is located within the northern setback adjacent to the existing office building which is proposed to be retained.
	Clause 101: Development with a frontage to a classified road requires the consent authority to be satisfied the matters listed in clause 101 have been addressed.	Woodstock Avenue is a classified road and accordingly, these provisions will apply to the proposed development. The proposal will be assessed having regard to the classified road, including the retention of the existing vehicle access arrangements and the impacts of the proposed development on safety and efficiency of vehicle movements.
<i>State Environmental Planning Policy No 33—Hazardous and Offensive Development</i>	<i>State Environmental Planning Policy No 33—Hazardous and Offensive Development</i> (SEPP 33) aims to ensure a minimum level of assessment is applied to hazardous and offensive industries and their potential impacts.	The proposed development may be categorised as a potentially hazardous industry. Development proposals for a potentially hazardous industry require a preliminary hazard analysis (PHA) to be prepared by a suitably qualified consultant and submitted with the relevant planning application for approval. Further, the consent authority must consider the matters specified in clause 13 of SEPP 33.
<i>State Environmental Planning Policy No 55 – Remediation of Land</i>	<i>State Environmental Planning Policy No. 55 – Remediation of Land</i> (SEPP 55) provides a State-wide approach to the remediation of contaminated land. It requires a consent authority to assess the potential for land to be contaminated and the works required to remediate the land to ensure it is suitable for its intended use.	It is expected that a Preliminary Site Investigation is required to understand whether the previous or current land use activities associated with the operations at the site require further assessment and/or remediation in accordance with the contaminated land planning guidelines.



Statutory Reference	Requirement	Relevance
<b>Mandatory Considerations</b>		
<i>Environmental Planning and Assessment Act 1979</i>		
Section 1.3	The consent authority is to consider the objects of the EP&A Act.	Noted – these will be addressed in the future EIS.
Section 4.15	In determining a development application, a consent authority is to take into consideration such matters that are of relevance to the development subject of the development application, as stipulated in section 4.15.	Noted - these will be addressed in the future EIS.
Section 4.38	Section 4.38 contains the provisions for determining a State significant development.	Noted – these will be addressed in the future EIS.
Section 4.41	Section 4.41 identifies specific authorisations are not required for State significant development.	Noted – these will be addressed in the future EIS.
Section 7.11	Contributions Plan No. 1 – 1980s Release Areas applies to the subject land.	Noted – these will be addressed in the future EIS.

## 5. COMMUNITY ENGAGEMENT

The following sections of the report describe the engagement activities that have already been carried out for the project, including preliminary community views, and the engagement to be carried out during the preparation of the EIS.

### 5.1. ENGAGEMENT CARRIED OUT

Community engagement has previously been undertaken by Blacktown City Council in association with the preparation of the Blacktown LSPS. As detailed in Section 2.4, the long term strategic direction for the site and surrounding precinct is to be retained as employment lands. The proposed land use is consistent and compatible with the strategic direction of the Blacktown LSPS.

Preliminary engagement was undertaken with key stakeholders during the scoping phase to seek preliminary views and determine the future engagement activities as outlined below:

- Environmental Protection Agency (**EPA**)
- Transport for NSW (**TfNSW**)
- NSW Fire Brigade (*consultation is in progress*)
- Blacktown City Council (**BCC**)

The above activities were undertaken having regard to the community participation objectives in the 'Undertaking Engagement Guidelines for State Significant Projects' prepared by DPIE and dated July 2021.

### 5.2. STAKEHOLDER VIEWS

The key issues raised by the key stakeholders during the scoping phase and the way in which these have been incorporated into the current proposal are summarised in the table below.

Table 8 Community Views

Issue	Respondent	Applicant Response
<b>Strategic Context</b>		
No strategic matters were identified during consultation	N/A	N/A
<b>Project and Key Alternatives</b>		
Design	BCC in principle supported the proposed layout of the site, scale of built form and setbacks and retention of the existing office building.	Noted
<b>Statutory Issues</b>		
Sydney Water	Section 73 application will be required.	Noted

Issue	Respondent	Applicant Response
<b>Future Community Engagement</b>		
Community engagement	Community engagement will be undertaken during the preparation of the EIS. No specific community stakeholders were identified; however, it is anticipated that adjoining land owners will be briefed regarding the proposal.	Noted
<b>EIS Matters</b>		
Odour/ emissions	<ul style="list-style-type: none"> <li>EPA identified potential for odour to be generated and should be managed with active ventilation.</li> <li>BCC identified modelling is required to identify odour/ emission impacts and any required mitigation measures.</li> </ul>	An Odour Report will be prepared to accompany the EIS.
Drainage	BCC identified requirement for a Stormwater Management Plan, incorporating on-site stormwater detention.	A full Stormwater Management Plan and Civil Plans will be prepared to accompany the EIS.
Acoustics	BCC requested an acoustic report to assess the sites acoustic impacts, considering the proposed 24/7 operation of the MRF.	An Acoustic Assessment will be completed to accompany the EIS.
Traffic	<ul style="list-style-type: none"> <li>EPA identified concerns for vehicles queuing to enter the site and potential for contaminants to leach onto the road.</li> <li>BCC requested further consideration of vehicle access to the site and the capacity for on-site parking (merit based assessment that will be below Blacktown's DCP requirement).</li> </ul>	A Traffic Impact Assessment ( <b>TIA</b> ) report will be prepared to accompany the EIS, to undertake a merit based assessment of the proposed number of parking spaces that complies with RMS minimum requirements. The TIA will contain a traffic management plan to mitigate potential traffic impacts.
Fire	<ul style="list-style-type: none"> <li>BCC requested details on the relevant fire standards for a MRF, provision of fire hydrants and sprinkler tanks.</li> </ul>	A Fire Safety Report will be prepared to accompany the EIS.
Site contamination	<ul style="list-style-type: none"> <li>EPA queried any requirement for leachate treatment on site and to sewer.</li> <li>BCC requested site testing to assess potential contaminants on site from previous land uses, including asbestos.</li> </ul>	A Geotechnical Report and a Preliminary Site Investigation Report will be prepared to accompany the EIS.
<b>Beyond Scope or Issues Not Relevant to Project</b>		
N/A	N/A	N/A

### 5.3. ENGAGEMENT TO BE CARRIED OUT

Further community and stakeholder consultation will be undertaken in the preparation and assessment of the EIS including:

- **Key Stakeholders:** it is proposed to consult with the following stakeholders during the preparation of the EIS:
  - Environmental Protection Agency (**EPA**)
  - Transport for NSW (**TfNSW**)
  - NSW Fire Brigade (consultation is in progress)
  - Blacktown City Council (**BCC**)
- **Other Interested Stakeholders:** the following actions will be undertaken to identify and engage with other interested stakeholders during the preparation of the EIS:
  - The identification of additional stakeholders will be targeted to include surrounding land owners/tenants.
- **Key Actions:** the following actions will be undertaken to keep the community informed regarding the project, obtain feedback from the community on the project and engaged with stakeholders on the detailed assessment of key matters:
  - A dedicated engagement strategy will be prepared following the issue of SEARs
  - Door knocks with surrounding land owners/tenants will be undertaken to discuss the proposal and any concerns.
  - Additional consultation actions may be identified following further engagement with key stakeholders and DPIE.

The proposed actions are consistent with the community participation objectives in the *Undertaking Engagement* guide as summarised below:

- Engagement will occur in a timely manner, before the submission of the EIS.
- The scale of engagement will reflect the scale and context of the proposal, noting the site is located within an established industrial precinct.
- Engagement will be clear, made publicly available and allow for direct engagement with targeted stakeholders.

The engagement consultant will be responsible for monitoring, reviewing and adapting the effectiveness of the engagement strategy to encourage community participation in the project.

## 6. PROPOSED ASSESSMENT OF IMPACTS

This section identifies the key impacts which will be further investigated and assessed within the EIS, including the proposed approach to assessing each of these matters. It also identifies the matters addressed in the scoping phase that are unlikely to result in significant impacts and do not warrant further consideration in the EIS.

### 6.1. MATTERS REQUIRING FURTHER ASSESSMENT IN THE EIS

The following section of the report provide a comprehensive description of the relevant matters and impacts which will be addressed in detail within the EIS. It outlines the matters and impacts of particular concern to the community and other stakeholders. It includes each of Key Issues and Other Issues as identified in the Scoping Summary Table (refer **Appendix A**).

#### 6.1.1. Compliance with Strategic and Statutory Plans

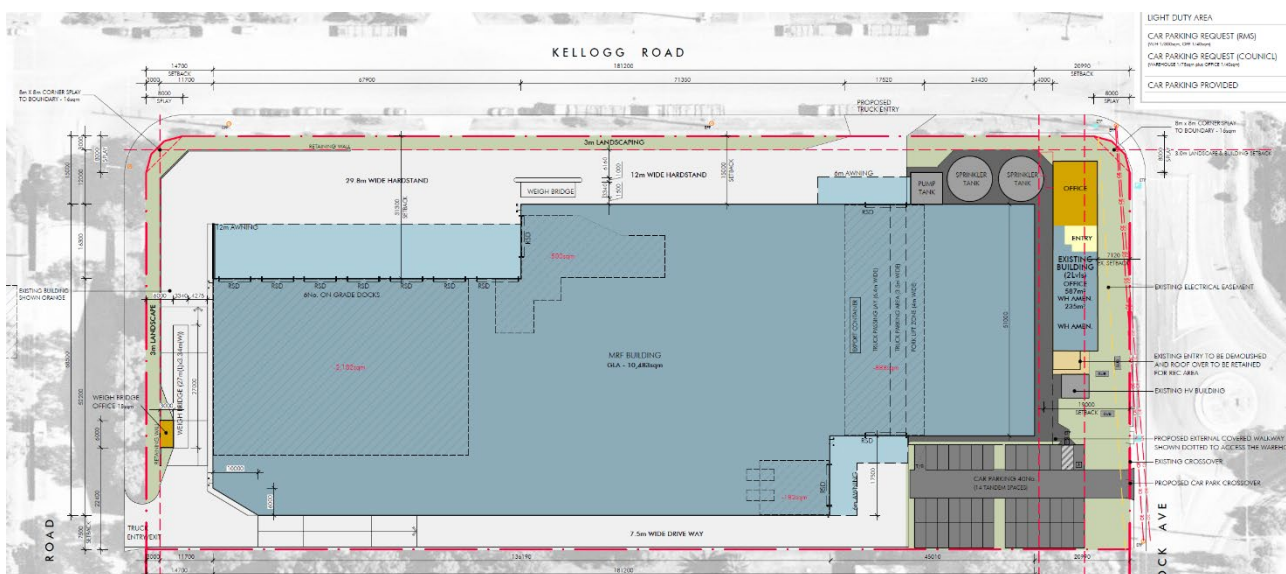
The proposed development is consistent with the surrounding land uses and industrial character of the broader precinct. The EIS will include a detailed assessment of the proposed development against the relevant strategic and statutory provisions previously identified.

#### 6.1.2. Built Form

The proposed development will be a purpose built MRF as shown in **Appendix B**. The built form will be consistent with the surrounding industrial warehouse building typology, comprising a maximum RL of 57.83m (approximately 13.7m height of building) and a gross floor area of 7,572 sqm.

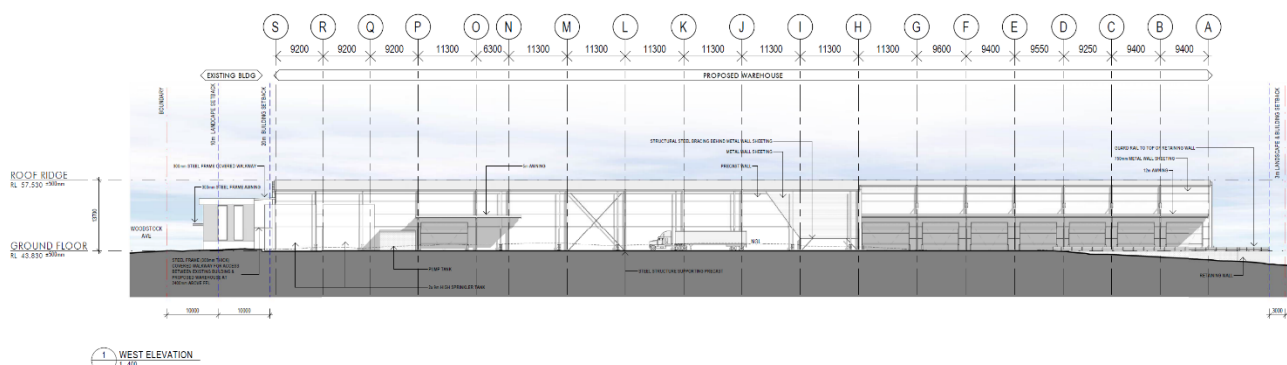
Key matters of consideration will include the façade design, setbacks and landscaping to soften the proposal's interface with the streetscape.

Figure 4 Indicative Site Layout



Source: Nettleton Tribe

Figure 5 Indicative Elevation



Source: Nettleton Tribe

The EIS will include a standard assessment of the proposed development against the relevant development controls. The site is not subject to height or FSR development standards under the Blacktown LEP 2015, and as such assessment of the built form of the proposed MRF will be undertaken via a merit-based assessment.

### 6.1.3. Odour/Emissions

The proposed development can be categorised as a potentially hazardous development. It has the potential to generate odour or emissions as a result of vehicle movement and the type of waste being sorted and recycled on site. Preliminary odour advice has been prepared by Northstar, to provide input on air quality and odour issues.

Key issues identified by Northstar as detailed in **Appendix C** include:

- The potential for odour and other air pollutant emission generation.
- The sensitivity of the surrounding area
- The potential for cumulative impacts
- Mitigation measures

The EIS will include a detailed assessment of the proposed development and consider cumulative impacts. The assessment will be performed in general accordance with the following:

- *Protection of the Environment Operations Act 1997*
- *Protection of the Environment Operations (Clean Air) Regulation 2002.*
- *Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (NSW DEC, 2006a).*
- *Technical Framework: Assessment and Management of Odour from Stationary Sources in NSW (NSW DEC, 2006b).*
- *Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (NSW DEC, 2006c).*

The EIS will include a detailed assessment of the proposed development against the relevant development controls. Northstar has indicated the proposed detailed quantitative assessment (ie modelling) will be performed. Data will either be available from similar operations, or from specific data proposed to be collected by Cleanaway from a similar facility in Western Australia. Standard dispersion modelling techniques would be appropriate for the assessment.



### 6.1.4. Noise

The proposed development has potential to generate acoustic impacts as a result of vehicle movement and 24/7 operation. The purpose-built building has been built with full height precast concrete wall panels and insulation. The full operations of the MRF will be wholly inside.

The base building and plant equipment has been designed with noise attenuation. As per EPA regulations the sites operation will be conducted behind sensor rapid roller doors controlled by a state-of-the-art traffic control system.

The proposed operation is consistent with the surrounding existing use of the Industrial area. The operational usage of the facility will be compliant with requirements relating to the development, even during the night-time period.

Preliminary acoustic advice has been prepared by Acousticworks, to provide input on acoustic issues. Acousticworks identified the potential receiver locations in proximity to the site as below and detailed in **Appendix D**. The nearest sensitive receiver locations are as follows:

- The Westlink M7 Motorway separates the site from residential dwellings to the west.
- Woodstock Avenue separates the site from industrial premises to the north.
- An industrial premises is located adjacent the eastern site boundary.
- Kellogg Road separates the site from an industrial premises to the south.
- Kellogg Road separates the site from industrial premises to the west.

Figure 6 Nearest Sensitive Receivers



Source: Acousticworks

The EIS will include a detailed assessment of the proposed development and consider cumulative impacts. The assessment will be performed in general accordance with the following:

- *Blacktown Development Control Plan 2015, section 7.2.3 Noise pollution*
- *NSW EPA Noise Policy for Industry (2017)*
- *Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (NSW DEC, 2006a).*
- *Technical Framework: Assessment and Management of Odour from Stationary Sources in NSW (NSW DEC, 2006b).*
- *Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (NSW DEC, 2006c).*
- *NSW Road Noise Policy 2011*

Acousticworks has identified that the placement of noise monitors at nearby sensitive receivers has not been possible due to current Covid-19 restrictions. Accordingly, data from a previous noise survey collected between 28 June and 6 July 2021 was utilised to determine the criteria at the nearest residential receivers.

### **6.1.5. Site Contamination**

A Preliminary Site Investigation is underway and will advise on the geotechnical and contamination site conditions.

The EIS will include a detailed assessment of the proposed development and consider cumulative impacts. The assessment will be performed in general accordance with the following:

- *State Environmental Planning Policy No. 55 – Remediation of Land*
- *Blacktown Development Control Plan 2015, Part E*
- *Blacktown Development Control Plan 2015, Part H*
- *Blacktown Development Control Plan 2015, Part I*

### **6.1.6. Hydrology**

A Stormwater Management Plan will be designed in conjunction with the preparation of Civil Design Plans and will meet the engineering requirements set by Blacktown City Council.

The EIS will include a detailed assessment of the proposed development and consider cumulative impacts. The assessment will be performed in general accordance with *Blacktown Development Control Plan 2015, Part J*



## 6.1.7. Traffic and Parking

### Heavy Vehicle Movement

The site has been designed to allow one way traffic to circulate the facility with access and egress provided via designated entry and exit driveways off Woodstock Avenue. Heavy vehicles will access the site 7 days a week and typically comprise:

Table 9 Heavy Vehicle Movement

Vehicle type	Frequency of delivery (per day)	Peak arrival times
▪ Rigid truck movements	160 (80 in, 80 out)	5am and 1pm
▪ Articulated trucks (B-doubles, semi-trailers and truck and dogs)	60 (30 in, 30 out)	5am and 5pm

Vehicle swept paths will be provided with the EIS.

The EIS will indicate the location of truck loading zones on the site and a detailed queuing assessment will be undertaken during the preparation of the SSDA traffic report taking into consideration weighing timings, number of trucks, etc.

The traffic report will also recommend additional operational management procedures to ensure that all queuing is contained within the bounds of the site and avoid queuing impacts on the intersection of Woodstock Avenue and Kellogg Road.

The EIS will include a detailed assessment of the proposed development and consider cumulative impacts. The assessment will be performed in general accordance with *Blacktown Development Control Plan 2015, Part E*

### Staff and Visitor Parking

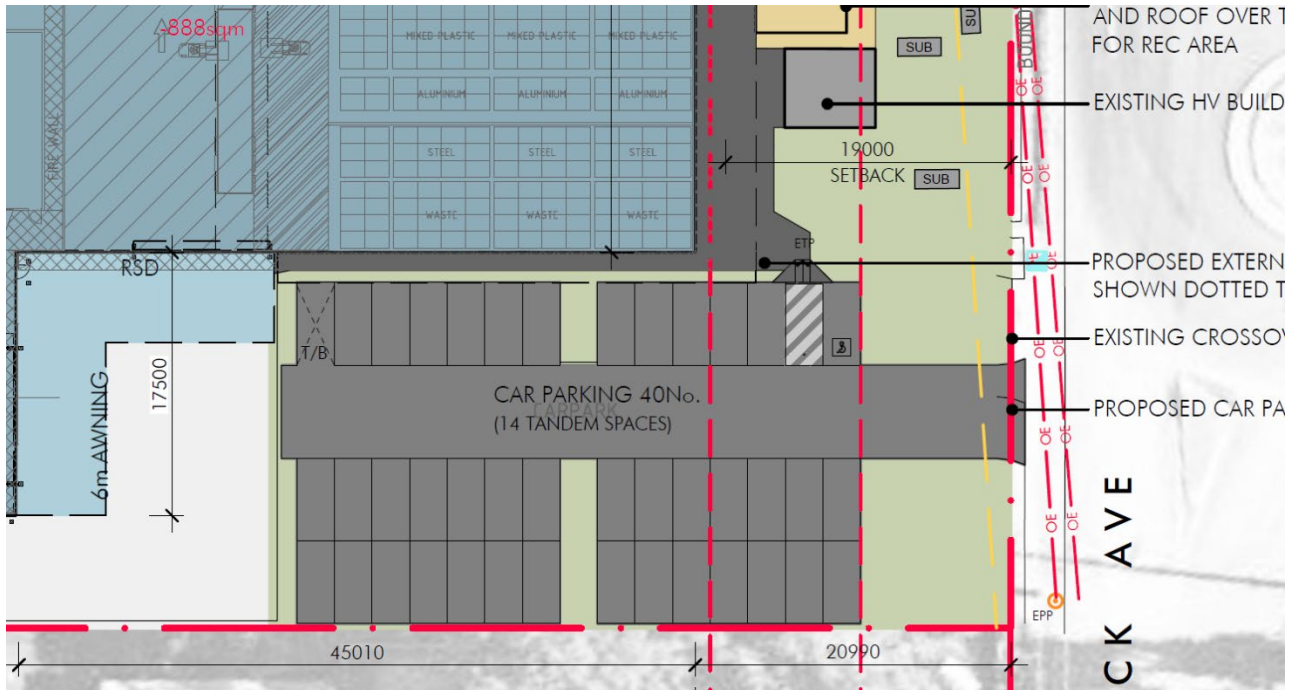
The proposed development includes 40 car parking spaces for staff and visitors, including 14 tandem car spaces. Car parking will be accessed via an existing driveway onto Woodstock Avenue, south of the existing roundabout. The proposed number of car spaces complies with the minimum RMS standards.

Traffix (**Appendix E**) has advised a detailed merit based assessment will be undertaken to justify the proposed variation with the minimum parking rates in the BDCP 2015. Their preliminary advice indicates that compliance with Council's requirement for 108 car spaces is not required based on the bespoke nature of the operations. The parking rates for light industrial, general industry and warehouse or distribution centres do not technically apply to the proposed 'resource recovery facility' and typically have a higher number of employees per shift than an MRF.

Consultation with BCC (refer Section 5.2) advised that an indicative parking arrangement could be provided which would demonstrate 108 on-site car spaces could be delivered to facilitate any future change of use. This will be demonstrated in the future EIS.

The use of the tandem spaces will be included in the Plan of Management, including allocation of spaces to allow shift workers to easily access on-site parking. The TIA will use the example at a similar facility operated by Cleanaway to demonstrate this management has been successfully implemented elsewhere.

Figure 7 Car Park Layout



Source: Nettleton Tribe

### 6.1.8. Aboriginal Heritage

An Aboriginal heritage due diligence assessment has been prepared by Artefact, to meet the requirements of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (Due Diligence Code of Practice).

A physical inspection of the study area has not been undertaken for this Due Diligence. At the time of initiating a site inspection, Covid-19 Delta variant restrictions resulted in the Blacktown City Council LGA being classified as a hot spot. The Deerubbin LALC were asked if they would be willing to undertake an inspection of the study area, but they declined for safety reasons. Instead, a desktop study was completed to assess the likelihood that Aboriginal sites would be disturbed or impacted during the proposed activity/development.

Artefact conducted an AHIMS search and identified seven recorded sites within proximity to the site as shown in Figure 10.

Figure 8 Results of AHIMS Search



Source: Artefact

Key conclusions identified by Artefact as detailed in **Appendix F** include:

- No previously recorded Aboriginal sites are located within the study area.
- The study area was developed in the early 1970s and the current building appears to be the only construction undertaken.
- The study area has been assessed as having low potential to retain intact archaeological deposits due to disturbance from construction impacts.

Due to the site being identified as having low potential to impact on archaeological deposits, Artefact recommends the following:

- In accordance with the due diligence guidelines, the proposed activity can proceed with caution, with no further Aboriginal archaeological investigation, assessment or mitigation measures required unless the SEARs require an ACHAR and Aboriginal consultation.
- Unexpected Aboriginal objects remain protected by the *National Parks and Wildlife Act 1974*. If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity should cease immediately. A qualified archaeologist should be contacted to assess the find and NSW Heritage, DPC and Deerubbin LALC must be notified.

The EIS will include a standard assessment of the proposed development and consider cumulative impacts.

## 6.1.9. Operational Plan

An Operational Plan will be prepared by the operator of the MRF (Cleanaway) to support the EIS and detail how the site will be managed. The EIS will include a standard assessment of the proposed development and consider cumulative impacts. The indicative operational guidelines are summarised as follows and subject to refinement during preparation of the EIS

### Hours of Operation

The facility has been designed with potential to operate 24 hours

### Capacity

Potential capacity throughput of 120,000 TPA

The likely material volumes that are to form the basis of the building requirement are as follows:

- Daily incoming volume – approximately 400 tonnes per day
- Co-mingled receival stockpile volume – 6 x 1,000m<sup>3</sup>
- Finished Goods Product storage volumes – approximately 5,000m<sup>3</sup>

### Shift Patterns and Staffing

The facility is to be designed to accommodate the following anticipated population numbers:

AREA		POPULATION
All areas	Male amenities	25 persons
	Female amenities	15 persons
	Total population	40 persons

The typical anticipated staffing requirements for the proposed development are as follows:

#### SHIFT HOURS:

- Day shift: 6am -2pm
- Afternoon Shift: 2pm – 10pm
- Night Shift (If required): 10pm – 6am

#### STAFFING NUMBERS:

- Day shift: 24 Staff (all inclusive)
- Afternoon shift: 20 Staff (all inclusive)
- Night Shift: 6 staff (all inclusive)

Initially only one shift will operate with an increase to two shifts or more, dependant on demand with time. When the plant is at capacity there will be approximately 4 hours down time per day allocated for plant maintenance and downtime.

The maximum anticipated employee numbers on the site at any time is expected to be a maximum of 40 staff. Shifts will be staggered to minimise overlapping of staff numbers.

### Product Storage

In addition to the requirements of the Building Code of Australia (NCC/BCA) & WHS Act, fire services, the following additional design guidelines have been considered:

- *EPA NSW Fact Sheet– Fire Safety in Waste Facilities, dated January 2020*
- *Fire Rescue NSW Fire Safety Guideline – Fire safety in waste facilities (Feb 2020)*

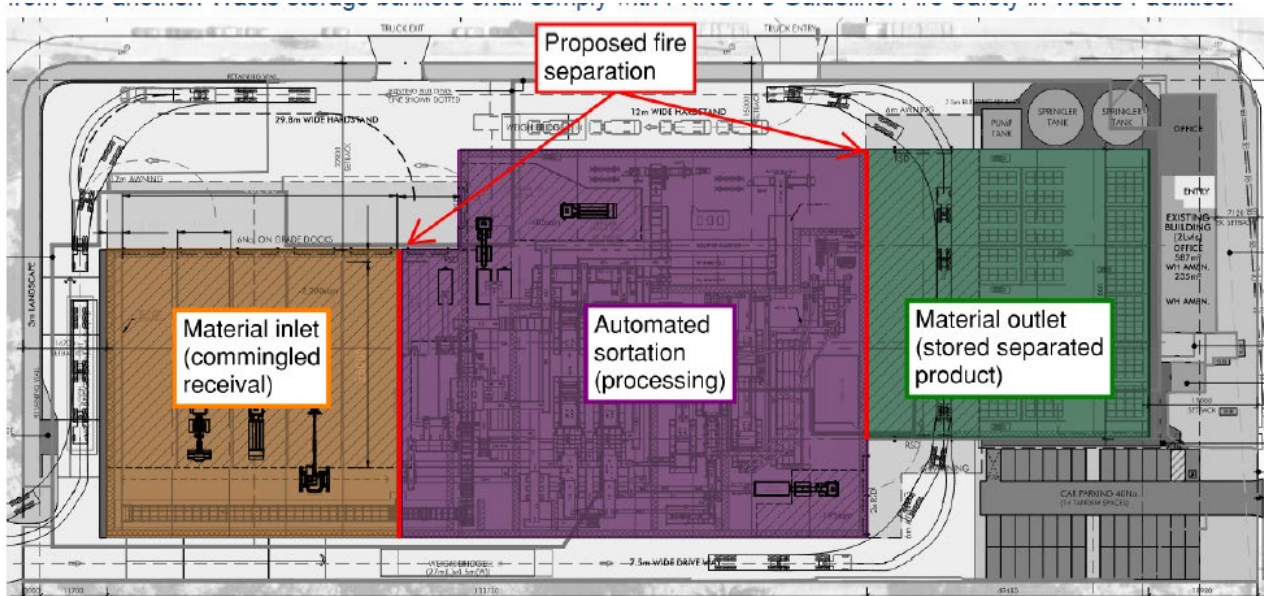
The proposed facility will receive inbound recyclable material into segregated bunkers with deluge systems. Stockpile of combustible material will be stored according to NSW Fire safety guidelines specifically designated for waste recovery facilities. The processed outbound material will either be baled and stored

indoors in bunkers or into metal containers ready for transportation. All other waste material generated will be stored in containers for transporting to other processing facilities.

### Additional Structural Fire Containment Measures

To further optimise the facilities operation additional structural fire containment measures have been included in the facility. These include but not limited to; thermal cameras, Water cannons, stockpile separation bunkers and push walls, separation and minimise stockpiles, fire protection of structural columns and fire walls to separate the facility into 3 fire containment zones as shown in Figure 11.

Figure 9 Indicative Equipment Layout and Fire Separation Structures



Source: PBD Architects

### Outputs

Recovered commodities will go to other Cleanaway facilities or clients to be used to manufacture new products domestically and nationally

Waste produced on site will be separated – 90% Dry Waste (Film, Food Trays, Plastic Bags, Textiles, Lost Small Recyclable Fibre and Plastics) and 10% Wet Waste (Nappies, Organics, Bags Garbage). Dry waste will be baled, and Wet Waste will be stored in packers. Both will be disposed of weekly or as required

Dry waste will be segregated from Wet Waste to go to Resource Co PEF plant where Cleanaway is an invested partner.

The likely volume expected to be produced by the plant:

- Dry Waste: Approximately 25 Tonnes per day
- Wet Waste 2: Approximately 2 tonnes per day



### 6.1.10. Terrestrial Flora and Fauna

A Preliminary Ecological Information report prepared by Cumberland Ecology (**Appendix G**) identifies four vegetation communities on the site. This includes a small area of Cumberland Plain Woodland, planted native vegetation and exotic vegetation as shown below in Figure 12.

Figure 10 Vegetation Communities Within the Study Area



Source: Cumberland Ecology

Cumberland Plain Woodland (**CPW**) is listed as a Threatened Ecological Community (**TEC**) and a Critically Endangered Ecological Community (**CEEC**) under the *Biodiversity Conservation Act* (**BC Act**) and the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**).

Accordingly, the impacts of the project must be assessed under the Biodiversity Offsets Scheme (**BOS**) with the preparation of a BDAR, which will provide a detailed impact assessment and cumulative assessment to accompany the SSD application.

Cumberland Ecology will adopt the standard requirements for completing a BAM assessment and identify the appropriate options to offset the loss of CPW.

## 6.2. MATTERS REQUIRING NO FURTHER ASSESSMENT IN THE EIS

This section of the report identifies the matters that do not require further assessment in the EIS. The following matters were considered within the scoping phase but considered unlikely to result in significant impacts that warrant further assessment.

### 6.2.1. Non-Aboriginal Heritage

A Preliminary Heritage Impact Statement (**HIS**) has been prepared by Artefact, to provide input on potential historical archaeological issues. A desktop study was completed to assess the site's prior land uses since early British settlement.

Key conclusions identified by Artefact as detailed in **Appendix H** include:

- The site does not contain any heritage items and there are no heritage items within proximity to the site.
- Due to site being located more than 1km from any heritage items, it is expected that the proposed development will have no direct (physical) or indirect (visual) impact to surrounding heritage items.
- As the proposal has been assessed as having nil impacts to surrounding heritage items, there are no cumulative impacts as a result of the proposed works.

Due to Artefact identifying the proposed development will have nil impacts to surrounding heritage items, it is considered that non-Aboriginal heritage is not relevant and no further assessment is required as part of the EIS.

Artefact recommends that an Unexpected Finds Policy is developed and to be implemented as a condition of consent in the unlikely event that relics are identified during ground disturbing works. All relevant staff, contractors and subcontractors should be made aware of their statutory obligations for heritage under the NSW Heritage Act 1977 and best practice as outlined in *The Burra Charter 2013*. This may be implemented as a heritage induction.

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**APPENDIX A**

**SCOPING SUMMARY TABLE**

## **APPENDIX B**

## **PRELIMINARY ARCHITECTURAL PLANS**

## **APPENDIX C**

## **ODOUR PRELIMINARY STATEMENT**

## **APPENDIX D**

## **NOISE PRELIMINARY REVIEW**

## **APPENDIX E**

## **PRELIMINARY TRAFFIC IMPACT ASSESSMENT**

## **APPENDIX F**

## **ABORIGINAL HERITAGE DUE DILIGENCE**

## **APPENDIX G**

## **PRELIMINARY FLORA AND FAUNA ASSESSMENT**



## **APPENDIX H**

## **HERITAGE IMPACT STATEMENT**

