

Request for Secretary's Environmental Assessment Requirements -Paper Trade Processing (Aust) Pty Ltd

49 Heathcote Road, Moorebank – June 2022



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Appendix B	Architectural Plans	Place Studio

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EXECUTIVE SUMMARY

This scoping document has been prepared by Mod Urban Pty Ltd on behalf of Paper Trade Processing (Aust) Pty Ltd and is submitted to the NSW Department of Planning and Environment (DP&E) in support of a formal request for Secretary's Environmental Assessment Requirements (SEARs).

The subject Site of this SEARs request is identified as 49 Heathcote Road, Moorebank (Lot 19 in Deposited Plan 246172) and affords an area of 7,018sqm. (Refer **Appendix A**). There is also a registered right of carriageway for use of a small section of driveway land owned by Lot 202 in Deposited Plan 749443. This right of carriageway is registered on title (on Lot 19 DP 246172) and is in Deposited Plan 1246038.

This registered right of carriageway benefits Lot 19 in Deposited Plan 246172 to permit access over that section of driveway (as owned by Lot 202 in Deposited Plan 749443, the adjoining site), as used by Paper Trade Processing (Aust) Pty Ltd.

The registration of this right of carriageway, on the title of Lot 19 in Deposited Plan 246172 remains indefinitely and allows the owner / occupier of the Subject Site the:

“full and free right for every person who is at any time entitled to an estate or interest in possession in the land herein indicated as the dominant tenement or any part thereof with which the right shall be capable of enjoyment, and every person authorised by that person, to go, pass and repass at all times and for all purposes with or without animals or vehicles or both to and from the said dominant tenement or any such part thereof”.

The location of the right of carriageway, registered on 30 August 2018 is consistent with the outcome of Land and Environment Court of NSW Proceedings No. 2017 of 47929 and permits the ongoing activities of the use of the Subject Site as a waste and resource recovery facility.

The land is currently owned by STORE HOUSE INVESTMENTS (NSW) PTY LTD ACN 094 273 711 AS TRUSTEE FOR STORE HOUSE INVESTMENT TRUST ABN 19 172 145 754 , the registered proprietor of the Site. The existing tenant, Paper Trade Processing (Aust) Pty Ltd leases the premises.

The Application and Existing Operations

The current use and operations (DA116/2016) of the site was approved 9 February 2018 by the NSW Land and Environment Court for the:

Use of the site as a waste and resource management facility for the processing and storage of 28,000 tonnes of material per annum.

The application was Designated Development under the Environmental Planning and Assessment Regulation 2000 and Integrated Development pursuant to the Protection of the Environment Operations Act 1997 requiring the activity to be licensed by the Environment Protection Authority.

The site currently employs a total of (9) nine employees.



The proposed development is considered State Significant Development (SSD) pursuant to Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021, as the proposal is for a *waste or resource transfer station* in metropolitan Sydney region that is proposed to handle more than 100,000 tonnes per year of waste.

The proposed development is also considered Designated Development pursuant to Schedule 3 of the Environmental Planning & Assessment Regulation 2021 (EP&A Regulation 2021), as the site is located on a floodplain and within 500m of a residential zone, and the facility has an intended handling capacity of more than 30,000 tonnes per year of waste

As the proposal is State Significant Development and Designated Development, an Environmental Impact Statement (EIS) is required to be prepared pursuant to Section 58 and Section 173 of the EP&A Regulation 2021. Following the provision of SEARs by the Minister, the Proponent will commence the preparation of the EIS for submission.

This SSD application and designated development application seeks approval for the use of the existing premises for the purpose of a '*waste or resource management facility*' being a paper, cardboard and plastic processing facility.

The proposal is also Integrated Development and requires approval under the Protection of the Environment Operations Act 1997.

The application specifically seeks consent for:

- Processing of 102,000 tonnes of material per annum This is broken down as follows:
 - Cardboard and paper - 84,000 tonnes
 - Plastics - 14,000 tonnes
 - Metal - 2,000 tonnes;
 - E-waste 2,000 tonnes
- Provision of conveyor belts and bale presses internal to the existing building for baling of paper, plastic and cardboard.
- Provision of two new awnings to the rear of the site.
- Hours of operation from 4am to 10pm Monday to Friday and 7am to 4pm Saturday.
- A total of twelve (12) employees on site at any one time; and

Operational Machinery Required

- Two Mac Presses – machines that process, sort and bale material;
- 4 x Conveyors – employees working on a picking line stand on the raised platform and pull specific material off the Mac Press conveyor belt as it passes;
- Container Ramp – ramp that is used for loading of material to be transported from Paper Trade to third parties;
- Above Ground Weighbridge; used for weighing incoming (and in some cases, outgoing) vehicles to ascertain the weight of the material they are delivering;
- 5 x Forklifts – used for moving materials and bales around the Site;
2 x Front loader – machinery that can push material around the floor and pick it up to move it.

- A new weighbridge in the same location as the existing to accommodate the increased capacity and update to weighbridge software.

As the facility is operational, the applicant does not intend to change the way the facility is operated other than to install any new equipment, provide additional machinery and additional staff to account for the increase in capacity.

- All product is purchased for value prior to its arrival at the facility.
- Product is received by trucks at the facility in either a loose load, or already baled from another site;
- All product received is either purchased from businesses in Greater Sydney in loose form, or from regional NSW which arrives at the Site already baled;
- Once processed on Site, the finished product includes bales of either paper, cardboard or plastic, which are transported for sale to mills within NSW, or to international customers.

A risk-based analysis has been used to identify the key environmental issues for further assessment, and assist the preparation of the SEARs for the proposed retrospective development.

These have been identified to include:

- Permissibility of the use;
- Soil and water;
- Air quality;
- Noise;
- Waste Management;
- Flora and fauna;
- Historical heritage;
- Traffic and transport;
- Infrastructure and Services;
- Visual amenity;
- Hazards;
- Fire Safety;
- Flooding;
- Site Layout and Design.

It is considered that the proposal given its operational history and low levels of impact are an appropriate use of the site at the intensity proposed.

It is therefore requested that the Department of Planning and Environment issue formal SEARs for the preparation of an Environmental Impact Statement for the proposal.



INTRODUCTION

1. Overview

This SEARs request has been prepared by Mod Urban Pty Ltd, on behalf of the applicant, Paper Trade Processing (Aust) Pty Ltd, and is submitted to DP&E in relation to the existing processing of paper, cardboard and plastics at the premises situated at 49 Heathcote Road, Moorebank (**the Site**).

1.1 Application Summary

This application seeks approval for the retrospective use of the existing premises for the purpose of a 'waste or resource management facility' being a paper, cardboard and plastic processing facility.

The application specifically seeks consent for:

- Processing of 102,000 tonnes of material per annum;
This is broken down as follows:
 - Cardboard and paper - 84,000 tonnes
 - Plastics - 14,000 tonnes
 - Metal - 2,000 tonnes;
 - E-waste 2,000 tonnes
- Provision of conveyor belts and bale presses internal to the existing building for baling of paper, plastic and cardboard.
- Hours of operation from 4am to 10pm, Monday to Friday and 7am to 4pm Saturday.
- A total of twelve (12) employees on site at any one time (an additional 3 x employees in total); and
- An additional 2 x forklifts and 1 x front loader.
- A new weighbridge in the same location as the existing to accommodate the increased capacity and update to weighbridge software.

Architectural Plans at **Appendix B** outline the site layout.

1.2 Background to this application and site

The following historical applications have been submitted to Liverpool Council for development consent.

- DA-1261/2013 - Development Application - storage of waste paper, cardboard and plastic and associated pressing and distribution refused 29/6/2015.
- DA-971/2015 - Development Application - usage as a warehouse and distribution centre for the purpose of storage, waste paper cardboard and plastic with associated pressing and distribution was rejected 9/10/2015.
- DA-592/2016 - Development Application - Use of the existing building for a waste management facility.
- DA-1160/2016 - Development Application - Retrospective use of the site as a waste and resource management facility for the processing and storage of 28,000 tonnes of material per annum. The application was Designated Development under the Environmental Planning and Assessment



Regulation 2000 and Integrated Development pursuant to the Protection of the Environment Operations Act 1997 requiring the activity to be licensed by the Environment Protection Authority.

- DA-1160/2016/A - Development Application - Modification to Development Consent DA-1160/2016 under Section 4.55 of the Environmental Planning and Assessment Act 1979, to locate the columns of two awnings abutting the site boundary (northern and western), whilst maintaining a three metre setbacks from the western boundary for proposed metal roofing was approved 8/8/2019.
- DA-1160/2016/B - Development Application - Modification to Development Consent DA-1160/2016 under Section 4.55 of the Environmental Planning and Assessment Act 1979. The modification seeks to extend the use of the facility for a further 3 years, from 30 April 2021 until 30 April 2024. Therefore, the applicant requests the modification to Condition 19A. The application is under assessment with Liverpool Council.



SITE ANALYSIS

2. The Site

The Site is identified as 49 Heathcote Road, Moorebank (Lot 19 in Deposited Plan 246176) and affords an area of 7,018.4sqm. (Refer **Appendix A**)

2.1 Site Description

The current use of the Site is utilised by the Paper Trade Processing facility for the processing and storage of recycled paper, cardboard, plastic and commingled product, for transport off the Site.

Existing attributes of the Site are noted as follows:

- The Site is occupied by a warehouse with single frontage to Heathcote Road to the east;
- The existing operational use of the Site is outlined in Section 2.2 below, however the Site does include the following Plant and equipment located on Site:
 - Two Mac Presses – machines that process, sort and bale material;
 - 4 x Conveyors – employees working on a picking line stand on the raised platform and pull specific material off the Mac Press conveyor belt as it passes;
 - Container Ramp – ramp that is used for loading of material to be transported from Paper Trade to third parties;
 - Above Ground Weighbridge; used for weighing incoming (and in some cases, outgoing) vehicles to ascertain the weight of the material they are delivering;
 - 3 x Forklifts – used for moving materials and bales around the Site;
 - 1 x Front loader – machinery that can push material around the floor and pick it up to move it;
- Access to the Site is achieved via Centenary Avenue which intersects Heathcote Road, and the Site is serviced by a slip/service road that is parallel to Heathcote Road;
- No native vegetation exists on the Site, however the front of the Site includes some turfed area and planted shrubs;
- In total, the existing facility comprises 3,470m² of gross floor area and 3,014m² of hardstand;
- Vehicle access to the Site is provided on the northern side of the building;
- A total of 9 on-site car parking spaces; and
- Service vehicle articulation areas.
- A total of nine (9) employees.

Figure 1 below identifies the Site and its surrounds.



Figure 1: Subject Site in yellow including the portion that benefits from an easement and surrounding development (Source: Six Maps)

2.2 Existing Operations

As the proposal seeks to increase the amount of product received on site, the applicant does not intend to change the way the facility is operated. In summary, the existing operation of the facility involves the following processes.

Types of Material Received and How Received	- The site presently receives a total of 28,000 tonnes per annum of paper, cardboard and plastic at the facility. This is broken down as follows: - Cardboard 18,000 tonnes - Paper 8,000 tonnes - Plastics 2,000 tonnes - Product is transported to Site by trucks in either a loose load, or already baled from another site;
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	• All product received is either purchased from businesses in Greater Sydney in loose form, or from regional NSW which arrives at the site already baled; • All product is purchased by the Site operator from external sites.
Finished Product	The final bales produced on site are transported for sale to mills within NSW, or to international customers.
Employees	The site is operated by a total of (9) nine employees. There is never a total of (9) employees on site at once owing to the nature of operational shifts, and casual and full time employment.
Existing Hours of Operation	Hours of operation from 4am to 10pm Monday to Friday and 7am to 4pm Saturday. At this stage, it is believed that these operating hours would not result in unacceptable environmental impacts (e.g. noise, traffic). This would be considered in the EIS.
Operational Machinery	4 x conveyor belts and 2 x bale presses internal to the existing building for baling of paper, cardboard and plastics.

2.3 Site Surrounds

- All uses surrounding the subject Site are of a similar industrial scale and comprise a number of warehouse facilities used for manufacturing, warehousing, processing and distribution. Surrounding businesses within the immediate vicinity of the Site include a bus transportation company, a warehouse and manufacturing facility that produces road signs and infrastructure, and a paper printing facility.
- Cleanaway (a similar facility) located at Centenary Avenue, Moorebank, operate at the rear of the Site.
- Located opposite the Site on the eastern side of Heathcote Road is public open space which is accessible by surrounding residents.
- Residential development also exists to the east of the Site across Heathcote Road which is predominately low density in scale.
- The Site is also located close to major roads (including the M5 Motorway) making it a convenient location with good accessibility to and within the Sydney metropolitan region.
- The Site is located in the local government area of Liverpool City Council.

PROJECT SUMMARY

3. Description of Proposal

The application seeks consent for the use of the existing premises for the purpose of a waste or resource management facility being a paper, cardboard and plastic, metal and e-waste processing facility capable of accepting up to 102,000 tonnes of material per annum. The particulars of the operation are as follows:

Primary Land Use	<i>Waste or resource management facility</i> Processing and storage of recycled paper, cardboard, plastic and commingled product, for transport off the Site. Hours of operation from 4am to 10pm Monday to Friday and 7am to 4pm Saturday.
Operational Jobs	Retain existing nine (9) full time equivalent jobs, and add an additional three (3) employees to accommodate for increased capacity. Total of twelve (12) employees
Storage/Processing Capacity	<u>102,000 tonnes</u> per annum including the following: Cardboard and paper - 84,000 tonnes Plastics - 14,000 tonnes Metal - 2,000 tonnes ; E-waste - 2,000 tonnes
Operational Machinery	- Two Mac Presses – machines that process, sort and bale material; (existing) - 4 x Conveyors – employees working on a picking line stand on the raised platform and pull specific material off the Mac Press conveyor belt as it passes; (existing) - Container Ramp – ramp that is used for loading of material to be transported from Paper Trade to third parties; (existing) - A new weighbridge to replace the existing above Ground Weighbridge; used for weighing incoming (and in some cases, outgoing) vehicles to ascertain the weight of the material they are delivering; (proposed) - 5 x Forklifts – used for moving materials and bales around the Site; (a total of two additional forklifts are proposed) - 2 x Front loader – machinery that can push material around the floor and pick it up to move it. (a total of one additional front loaders are proposed)

Built Form	Provision of two new awnings to cover product to the rear of the site as per previous consent DA-1160/2016/A.
Landscape	No additional landscaping other than what currently exists on Site is proposed as part of this application.

3.1 Cost of Works

As the proposal seeks to increase the amount of product received over current consent capacities, and owing to there being no proposed built form works, there is no cost of works associated with the application.

The only cost is the provision of new equipment and a replacement weighbridge.

3.2 Consultation and Licensing

No community consultation has been undertaken in relation to the facility. There have been no known complaints to Liverpool Council in relation to the facility since it was granted development consent for its current operations in 2018.

The Proponent will be making an application in accordance with the requirements of the Protection of the Environment Operations Act 1997(POEO Act) to seek the vary their existing licence for the proposed capacity at the facility concurrently to this request for SEARs and lodgement of an EIS.



JUSTIFICATION

4. Preliminary Justification

The site is considered to be appropriate for the project as it allows for the continued use of the site for paper, plastics and cardboard and waste processing. The site design and layout of the facility is appropriate for the type of use.

The NSW Government has committed close to \$500 million to transform waste and recycling in NSW. The “Waste Less, Recycle More: A Five Year \$465.7 million Waste and Resource Recovery Initiative” (EPA 2013) states that *“more effort is needed to continue the recycling rate for waste from households, business and industry”* and further that *“significant infrastructure investment is required in order to keep up with the increasing waste generation rates and meet the NSW recycling targets”*. The options considered, and subsequently dismissed, in arriving to the current proposal included:

(a) ‘Do Nothing’ Scenario

This option was dismissed as the objectives of the project would not be met.

If the proposal was not to proceed, the site would be developed for other industrial purposes.

(b) Development on an Alternative Site

Considerations to alternative sites were not made as the existing facility has historically been in operation on the Site. The current Site is considered appropriate for the proposed development for the following reasons:

- It will be located within a site zoned for industrial uses;
- The Site achieves appropriate separation from sensitive land activities including residential development;
- All potential environmental impacts of the proposal can be suitably mitigated through the design of the facility and ongoing management;
- The proximity to the regional road network provides increased economic benefits;
- The proposal generates further employment opportunities, during the operational phase;
- The proposal will not affect any area of heritage or archaeological significance; and
- The proposal can be developed to achieve appropriate visual amenity.

The proposal is justified on the basis it is compatible with the locality in which it is proposed while having no unacceptable economic, environmental or social impact.



LEGISLATIVE AND POLICY FRAMEWORK

5. Controls and Policies

The following current and draft Commonwealth, State, Regional and Local planning controls and policies have been considered in the preparation of this application:

- **Commonwealth Planning Context**
 - *Environment Protection and Biodiversity Conservation Act 1999*
- **State Planning Context**
 - *Environmental Planning and Assessment Regulation 2021*
 - *Environmental Planning and Assessment Act 1979*
 - *Protection of the Environment Operations Act 1997*
 - *Premiers Priority*
 - *State Environmental Planning Policy (Planning Systems) 2021*
 - *State Environmental Planning Policy (Resilience and Hazards) 2021*
 - *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- **Regional Planning Context**
 - *Greater Sydney Region Plan: A Metropolis of Three Cities*
 - *Western City District Plan*
- **Local Planning Context**
 - *Liverpool Local Environmental Plan 2008*
 - *Liverpool Development Control Plan 2008*

This planning framework is considered in detail in the following sections:

5.1 Environmental Planning and Assessment Regulation 2000

Section 4(1) – Designated Development

Section 7 (1) of the *Environmental Planning and Assessment Regulation 2021* (**the Regulations**) states that development described in Part 2 of Schedule 3 is declared to be Designated Development for the purposes of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The use of the premises as existing, is located within a floodplain, and within 500m of the nearest residential receivers, and therefore triggers designated development thresholds.

The premises has an intended handling capacity of more than 30,000 tonnes per year of waste such as plastic and paper which is also another trigger for designated development.

There are no other relevant Designated Development triggers applicable.

5.2 Environmental Planning and Assessment Act 1979

The EP&A Act is the overarching governing legislation for all development in NSW.

Section 4.7 of the Act is in respect of State Significant Development. The future EIS application will address Section 4.7 of the Act.



The proposal is also Integrated Development and requires approval under the Protection of the Environment Operations Act 1997. Section 4.8 of the Act is in respect of Integrated Development and the future EIS application will address Section 4.7 of the Act.

5.3 Protection of the Environment Operations Act 1997

The future EIS will be prepared in account of Section 48 of the *Protection of the Environment Operations Act 1997* (POEO Act) which relates to licensing requirements for scheduled activities (premises based).

The Proponent will be making an application in accordance with the requirements of the Protection of the Environment Operations Act 1997 (POEO Act) to seek the vary their existing licence for the proposed capacity at the facility concurrently to this request for SEARs and lodgement of an EIS.

5.4 EPA's Minimum Environmental Standards for Scrap Metal

In 2017, the EPA released the draft Proposal for minimum environmental standards in the scrap metal industry in an effort to improve the operation and management practices of the scrap metal waste / resource recovery industry.

The applicant has reviewed the proposed minimum environmental standards and can readily address and comply with all proposed standards. The EIS will demonstrate in detail compliance with the minimum environmental standards in the scrap metal.

5.5 Premiers Priorities

The Project aligns with the NSW Government's Premier's Priorities which include 12 key areas including economic growth, provision of infrastructure, protection of vulnerable communities, improving education and environmental protection. The proposed development aligns with the following key priorities as they relate to the proposed development as discussed below.

Creating Jobs

The NSW Government identifies NSW as leading the nation on key economic indicators, whilst also acknowledging that more can be done to attract new jobs and businesses to the State. The State Government had targeted the creation of 150,000 new jobs in NSW by 2019, aiming to make the NSW economy as competitive as possible and therefore help create employment opportunities across the state.

Whilst this jobs target was achieved in May 2016, the NSW Government is continuing to develop key initiatives that assist in the creation of jobs, such as creating jobs and apprenticeships for the construction sector to promote the strength and continued growth of the economy.

The Project directly benefits job creation and more widely provides an integrated approach to waste management. The Project will create 3 new full-time equivalent jobs once the facility is in operation, in addition to the existing 9 full time jobs already provided on site.

Keeping our Environment Clean

The NSW Government has further committed to the reduction in volume of litter by 40% in NSW by 2020, identifying that up to \$180 million is spent annually in the cleaning up of litter, on top of the environmental and social costs associated with it. The results of the 2017-2018 National Litter Index noted the Government



had achieved a 37% reduction on the volume of litter in the state by 2018 and was on track to meet the target two years ahead of schedule.

Whilst the achieving of the 40% reduction is inevitable given the progress made through various government sponsored initiatives and programs, the government continues to push the agenda of reduction in waste with specific changes to the recycling and waste industry in NSW.

With its 2018 change in domestic Policy, China, which accepted 1.25 million tonnes of recycled material from Australia in 2016-2017, has begun to enforce restrictions on the importation of recycled materials under its National Sword policy. This policy has impacted the global market for recyclable material, including the recyclable material that is currently collected in NSW. The NSW Government's response saw the establishment of an inter-government taskforce which has recommended of a number of long and short-term solutions to not only reduce waste in the State, but how it is treated and processed. This includes the encouragement of development applications for waste processing and recycling facilities to address the growing issue of recycling and waste treatment in NSW.

5.6 State Environmental Planning Policy (Planning Systems) 2021

Part 2.2 State significant development of the SEPP declares development listed in *Schedule 1* of the SEPP as State Significant Development.

Schedule 1(23) of the SEPP pertains to *Waste and resource management facilities*, and lists the type of waste and resource management facilities that are declared as State Significant Development. The proposal meets the Criteria of Part 23 (2) of Schedule 1 as the proposed development is *Development for the purpose of waste or resource transfer stations in metropolitan areas of the Sydney region that handle more than 100,000 tonnes per year of waste*.

Therefore, the proposal for a waste transfer station on site for up to 102,000 of waste per annum is deemed State Significant Development.

The provisions of the SEPP will be addressed in detail in the future EIS application.

5.7 State Environmental Planning Policy (Resilience and Hazards) 2021

The SEPP applies to any development of potentially hazardous industry. It will require the consent authority to consider whether an industrial development is a potentially hazardous industry or a potentially offensive industry. No dangerous goods are proposed to be stored on the Site, thus SEPP will not be triggered.

The SEPP also outlines state policy for potentially contaminated land.

A consent authority must not consent to the carrying out of any development on land unless—

- (a) it has considered whether the land is contaminated, and*
- (b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- (c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

No excavation is proposed as part of the subject application and historical data indicates that the Site has been used for light industrial purposes since at least the mid 1990's.



No significant subsurface disturbance activities are proposed. On this basis, it is considered that the Site is suitable for the existing facility.

5.8 State Environmental Planning Policy (Transport and Infrastructure) 2021

Waste or resource recovery facilities are prohibited within the IN1 General Industrial zone (of the Liverpool LEP 2008), however they are permissible with consent pursuant to Division 23 of the Transport and Infrastructure SEPP 2021, as the Site is located within a prescribed zone (IN1 General Industrial). The proposed land use is therefore permissible within the IN1 Zone on the Site. Section 2.7 of the SEPP states that it prevails over other environmental planning instruments that are applicable to this Proposal.

Schedule 3 lists the types of development that are defined as Traffic Generating Development, for which the Proposal is listed under. Accordingly, formal referral to the Transport for NSW (**TNSW**) is necessary.

Accordingly, the EIS will be accompanied by a Traffic Impact Assessment which will assess the increase in volume of vehicle movements.

5.9 State Environmental Planning Policy (Industry and Employment) 2021

The provisions of *State Environmental Planning Policy (Industry and Employment) 2021* do not apply to the proposal as no signage is proposed as part of this application. Any future signage requirements for the Site will be subject of a separate development application.

5.10 Greater Sydney Region Plan: A Metropolis of Three Cities

The Greater Sydney Region Plan: A Metropolis of Three Cities (**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. In the same vein as the former *A Plan for Growing Sydney*, the Region Plan provides 10 high level policy directions supported by 40 objectives that inform the District Plans, local strategic planning statements and future comprehensive local environmental plans.

Under the Region Plan, the Site is identified as being within the Central River City which is envisioned to grow substantially capitalising on its location close to the geographic centre of Greater Sydney. Unprecedented public and private investment is contributing to new transport and other infrastructure leading to a major transformation of the Central River City. Similar to the adjoining Western Parkland City, the Central River City will be established on the strength of the new international Western Sydney Airport and Badgerys Creek Aerotropolis. A key objective of the Central River City is to optimise infrastructure and business investment, employment and liveability outcomes.

The Project is consistent with the liveable cities vision of the Region Plan which supports compatible land use development and sustainability outcomes. The proposed facility would divert waste from landfill (and increase the design life of landfills), and provide employment within the Central River City.



5.11 Western City District Plan

The Western City District Plan (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 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 Western City 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 District Plan 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 Project is considered consistent with several the Planning Priorities set out in the District Plan, specifically those outlined within the Direction for Building an efficient City. The proposed facility addresses the following objectives of the District Plan:

- Planning Priority W19 – Reducing carbon emissions and managing energy, water and waste efficiently
- The proposed facility will contribute to these objectives by reducing landfill, and emphasizing the importance of receiving residual material from higher order reuse and recycling facilities and activities.

5.12 Liverpool Local Environmental Plan 2008

The future EIS application will address the provisions of the Liverpool LEP 2008 and the Liverpool DCP 2008.

The relevant provisions of the Liverpool LEP 2008 are listed below.

Zoning and Permissibility

The Site is zoned IN1 General Industrial under the provisions of Liverpool Local Environmental Plan 2008 (LLEP).

The application seeks consent for a '*waste or resource recovery facilities*'. '*Waste or resource recovery facilities*' are prohibited within the IN1 General Industrial zone, however they are permissible with consent pursuant to SEPP (Transport and Infrastructure), Division 23. Despite, this the SEPP (Transport and Infrastructure) takes precedence over the LLEP.

Heights of Buildings

A 15m maximum building height applies to the site. No building works are proposed that result in a variation to this standard.

Floor Space Ratio

The maximum Floor Space Ratio which applies to the land is 1:1. The proposal does not seek to enlarge the building, thus no change to the Floor Space Ratio is required.



Heritage Provisions

No heritage items are located in the vicinity of the site.

Preservation of Trees

No trees are proposed to be removed as a result of the proposed facility.

Flood Prone Land

The site is located within Flood Prone Land and within a Flood Planning Area as identified by LLEP 2008.

5.13 Draft Environmental Planning Instruments

No draft Environmental Planning Instruments apply to the Site.

5.14 Liverpool Development Control Plan 2008

The Liverpool Development Control Plan (LDCP) 2008 applies to the Site.

The provisions of LDCP as they apply to the existing facility will be assessed as part of the future EIS.

ENVIRONMENTAL ASSESSMENT

Environmental Assessment

A screening analysis of the environmental issues applicable to the proposal is presented in the table below. This risk-based analysis has been used to identify the key environmental issues for further assessment, and assist the preparation of the SEARs for the proposal.

The analysis is based on preliminary environmental assessment of the Site only. The EIS for the proposal will fully address these items and other environmental issues relevant to the proposal.

Issue	Preliminary Analysis
Land Use	• The Site is zoned IN1 General Industrial under the provisions of Liverpool Local Environmental Plan 2008 (LLEP) • The application seeks consent for a 'waste or resource recovery facilities'. 'Waste or resource recovery facilities' are prohibited within the IN1 General Industrial zone under the Liverpool LEP 2008, however they are permissible with consent pursuant to SEPP (Transport and Infrastructure) 2021, Division 23.
Soil and Water	• No excavation is proposed as part of the subject application and historical data indicates that the site has been used for light industrial purposes. The application does not involve any disturbance to the ground surface, thus further consideration in respect of contamination is not required. On this basis, it is considered that the Site is suitable for the proposed development. • The Site currently consists of a hardstand with storm water and drainage infrastructure in place that has been subject of a separate approval. • The proposal does not propose any works or new built form that would impact on soil and drainage across the Site. • The Site is subject to local flooding and a flooding impact assessment will be prepared to accompany a future EIS for the proposed facility. It is anticipated that this will be a requirement of SEARs.
Noise	• The Site is located within 50m of the nearest residential receivers.

Issue	Preliminary Analysis
	• The Site is sufficiently separated from any sensitive receivers by a noisy road being Heathcote Road. Significant background noise also exists from the nearby M5 Motorway. • Other surrounding land uses include primarily industrial land uses. • Any future EIS shall consider noise associated with traffic volumes generated from the Site's use, and operational plant and machinery. • No construction noise is anticipated as no construction is proposed.
Design, Built Form and Appearance	• No change to the built form is proposed under the subject application other than provision of two new awnings to the rear.
Traffic and Transport	• Owing to the increase in product received at the site from the currently approved 28,000 tonnes per annum to the proposed 102,000 tonnes per annum, there will be an increase in vehicle movements to and from the site. • A future traffic impact assessment will assess the increase in volumes of traffic to the site. • Suitable provision is made to accommodate and service the development in terms of traffic and transport. • On-site car parking currently exists for staff and visitors. The Site provides nine (9) formal parking spaces plus existing hardstand area opportunity for several overspill parking spaces and also benefits from kerbside frontage parking for four (4) spaces. • A Traffic Impact Assessment will be submitted with the future EIS to demonstrate existing vehicular movements to and from the Site, including assessment of proposed traffic generation. • Existing intersections will be reviewed. • Traffic assessment will also include swept path analysis.
Air Quality	• No air quality issues are proposed to occur in relation to demolition and construction, as neither of these works is proposed.

Issue	Preliminary Analysis
	- Owing to the type of product received, no significant levels of dust is generated from the Site, and dust suppression measures are not considered necessary for the Site. - No odour is generated from the operation of the facility.
Waste	- Conveniently located and sufficiently sized bin storage areas are provided on-site to manage waste and accommodate waste for collection by a private contractor. - A Waste Management Plan is to be included as part of the future EIS.
Flora and Fauna	- No tree removal is anticipated on the Site. - No known flora or fauna habitats exist on Site.
Heritage	No heritage items exist on Site or in the immediate surrounds. Therefore, no heritage impacts are anticipated.
Infrastructure and Services	- All necessary infrastructure to operate the facility is present on the Site. - No upgrades to infrastructure and services is proposed or required other than to replace the existing weighbridge and provide some additional operational machinery, unless outlined in future studies that will accompany the EIS as required by the SEAR's.
Hazards	No dangerous goods are received on Site or stored on Site.
Site Layout and Design	- The Site layout and design responds to the Site constraints, thus providing a highly functional development which enhances the visual amenity of the locality. - Suitable provision is made for service vehicles, cars and pedestrians within the Site. Detailed swept paths will be provided with the EIS and Traffic Impact Statement.
Flooding	The Site is affected by mainstream flooding from Anzac Creek which is located about 60

Issue	Preliminary Analysis
	m to the east of the Site on the eastern side of Heathcote Road. • Flood behaviour on Anzac Creek downstream (i.e. north) of the M5 Motorway is primarily influenced by backwater flooding from the Georges River. • There are no on-ground works proposed as part of this DA. Therefore, existing floodplain storage remains unchanged. • An Assessment of Flooding and Stormwater matters will be undertaken as part of the future EIS.
Fire Safety	• Appropriately certified fire safety systems are in place within the facility, and no upgrades are anticipated to be required.



CONCLUSION

6. Summary

The subject Site has been historically used by Paper Trade Processing (Aust) Pty Ltd for the processing and storage of paper, cardboard, plastics and comingled product. The use of the Site for this purpose is permissible with consent.

The preliminary assessment has identified potential impacts that may be satisfactorily mitigated and managed through a range of measures that have been identified within this document.

It is requested that the Department of Planning and Environment issue formal SEARs in a timely manner for the preparation of an Environmental Impact Statement for the proposal.

Should you require further information, please do not hesitate to contact me on 0417024997 or via email at modonnell@modurban.com.au.

We would also welcome an opportunity to meet with the Department to discuss any aspect of this request.