



Skylife Properties Pty Ltd
PO Box 114
Enfield NSW 2136

1 November 2017

Sheelagh Laguna
Senior Planning Officer
Industry Assessments
320 Pitt Street
Sydney NSW 2001

Dear Sheelagh

Re: Mortdale SSD 7421 Response to queries from the Department of Planning and Environment

Skylife Properties Pty Ltd has prepared a response to emails from the Department of Planning and Environment dated 26 September and 30 October 2017 seeking clarification on matters relating to the Mortdale State Significant Development application.

In this regard, responses were prepared by the project consultants namely, Barker Ryan Stewart (BRS), SLR Consulting Australia Pty Ltd (SLR) and The Traffic Planning Partnership (TPPP). These responses have been incorporated into this letter:

Item 1	Stormwater quality	SLR
Item 2	Stormwater quantity	BRS
Item 3	SIDRA analysis	TPPP

Copies of information requested are appended at:

Appendix A	OPL-YA030 Storage of Hazardous Waste – Special Waste	Bingo Industries
Appendix B	Letter amending the Mortdale SSD application	Bingo Industries

1. Stormwater quality

The MUSIC modelling results presented in Section 4.2.3 do not provide an assessment against targets for the predicted pollutant removal rate. As is common practice, in the absence of site-specific targets, those presented in the Landcom Water Sensitive Urban Design – Book 1 should be adopted. The MUSIC modelling results for the development show that the stormwater system design does not achieve these targets and further consideration of this is required. Can you commit to providing the required infrastructure to meet these targets (similar to the infrastructure proposed for Bingo's application for the St. Mary's facility)?

RESPONSE:

On 23 October 2017, SLR's Technical Discipline Manager – Civil and Structural Engineering, Paul Delaney provided a response to the DPE's comments:

The site is an existing operation, with proposed redevelopment of part of the site. Additional water quality controls are proposed which will substantially improve the existing situation, so that



the post-development pollutant export is less than the existing. This means that the net water quality impact of the development is actually a benefit.

The pollutant modelling results from the SLR report, are reproduced below and compared to the Landcom WSUD guidelines.

Parameter	Predicted Pollutant Removal Rate (%)		
	Existing Site	Post development	Landcom
TSS	76	86	85
TP	29	57	65
TN	0	21	45
Gross Pollutants	5	84	

The pollutant removal rates are less than those recommended by the Landcom WSUD guidelines for nutrients, TP and TN. However, the Landcom WSUD guideline targets are primarily for application on residential development, with the target pollution removal rates being based on typical pollution export rates from typical urban areas, and the application of current best practice WSUD methods. The pollutant export rates for industrial land-uses can be significantly less than those for residential. The WSUD Technical Guidelines for Western Sydney, suggest that removal requirements for nutrients be assessed on a site-specific basis.

For the proposed development the rate of nutrient (TP, TN) loading to the stormwater should be very low since:

- All of the waste processing occurs under roof, with a separate leachate collection and management system which will not discharge to stormwater.
- The runoff from roof areas should be relatively clean.
- Runoff from hardstand/road areas should have a very low nutrient loading.

In summary,

- The development will actually reduce pollutant export rates from the existing situation.
- The application of the target removal rates from Landcom WSUD guidelines is not appropriate for industrial developments.
- The actual nutrient export rates (kg/year of TP, TN) from this site are likely to be very low (when compared to an urban development).

SLR's opinion is that additional water quality controls are not necessary or warranted at this site. However, if DPE has doubt around the water quality outcomes from this site, then a monitoring regime would provide improved certainty. If warranted by the monitoring results, additional water quality controls could be implemented – possibly including an additional rainwater tank, a higher specification gross pollutant trap or a first flush system.

2. Stormwater quantity

Whilst it is acknowledged that the predicted stormwater runoff volumes would not greatly change from the existing situation, adequate assessment of the proposed stormwater drainage system's capacity to cope with rainfall events has not been provided. It should be noted that the Georges River DCP (Section 3.7) requires onsite stormwater and drainage control to be designed for the 20 year ARI storm, with overland flow paths designed for the 100 year ARI event. Details of all modelling (e.g. DRAINS) of the stormwater system should be provided.

RESPONSE:

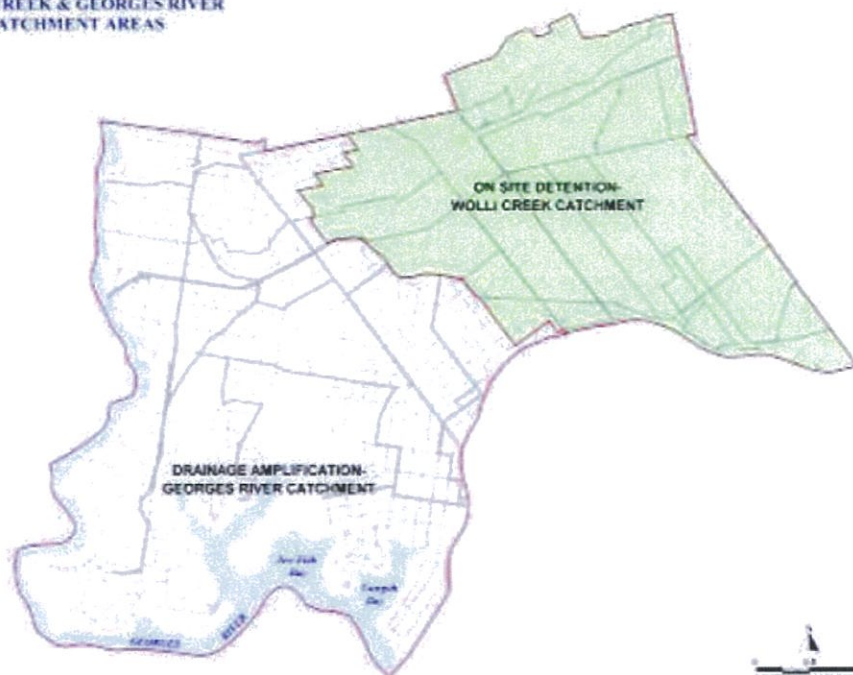
On 24 October 2017, Barker Ryan Stewart's Senior Civil Engineer, Glenn Jameson provided a response to the DPE's comments:

A review of councils DCP covering stormwater does not appear to provide clear guidance with the following points being provided within the DCP under the heading of On Site Detention;

- DS1.19 The rate of discharge of roof and pavement runoff from the site is to be controlled by the provision of an onsite detention system.
- DS1.20 On site detention facility shall be designed in accordance with Hurstville City Council's 'Drainage and On-Site Detention Policy'.

Councils Drainage and On Site Detention Policy found in Appendix 2 of the DCP indicates that the Hurstville area is broken up into the Wolli Creek Catchment nominated as the "On Site Detention" area and the Georges River Catchment which is noted as the "drainage amplification" area. The map follows.

**WOLLI CREEK & GEORGES RIVER
CATCHMENT AREAS**





As the subject site is located in the Georges River Catchment area, it appears that on site detention may not be required at this site.

To ensure that this is the intent of the DCP, a discussion with a council engineer (23 October 2017) revealed the following;

- That Appendix 2 is an old document that should have been updated when the DCP was revised.
- That if the proposal is submitted to council, that despite what Appendix 2 indicates that they will require OSD.

Further review of the proposal and the DCP indicates the following information:

- That the increase in impervious surface area is in the order of 375 sqm.
- The bunded area associated with the storage area located in front of the building is 342 sqm which drains to a contained pit that does not drain.
- And half of the roof area of the factory building will be directed into a 45,000 L rainwater tank and drawn from an ongoing basis to supply water for the factory's internal fogging device which suppresses dust formation.

Given this, it is believed that the stormwater disposal from the site will generally comply with the following clause from the DCP under the heading of "Design Solution".

DS1.32 Alternative water management and disposal options may be possible where water is recycled, minimised or re-used on the site and is to comply with:

- a. Environment Protection Authority's Environment Protection Manual for Authorised Officers: Technical Section (Car Washing Waste)
- b. Environment Protection Authority's Managing Urban Stormwater: treatment techniques

It is believed that the senior consultants from both SLR and BRS have investigated both water quality and water quantity matters adequately and have confidently concluded that additional water quality controls are not necessary or warranted at this site and stormwater disposal from the site will generally comply with Council's DCP.

Further to this, the proponent has ensured that sufficient water quality and water quantity measures were proposed during the preparation of the Mortdale Environmental Impact Statement such as:

- Use of Rocla's First Defence unit;
- 45kL rainwater tank and associated drainage to collect runoff from approximately half of the roofed area;
- Installation of bunds to surround product bays under the shed awnings to both prevent stormwater runoff entering the into material storage area under the awning and prevent leachate from coming into contact with stormwater; and
- Gross pollutant screens are currently fitted to all stormwater pits and litter baskets will be retrofitted into all inlet pits onsite to improve treatment performance.



3. SIDRA Analysis

Although baseline SIDRA analysis has been undertaken, it appears no SIDRA analysis has been provided for the expanded site scenario (220,000 tpa). Please provide this updated data.

RESPONSE:

The GTA Transport Impact Assessment (29/06/2016) assessed the intersections at Mortdale to operate at acceptable Levels of Service A and B. GTA assessed the intersections of Boundary Road/ Hearne Street, Boundary Street/ Barry Avenue/ Scott Street and Hearne Street/ Site access to operate well with minimal queues and delays on all approaches.

This study concluded that based on an annual throughput of 300,000 tonnes per annum (tpa), the impact of traffic generated by the development would not result in a significant change to the existing intersection Level of Service.

During the Response to Submissions stage of the Mortdale SSD project, the proponent reduced the proposed annual throughput to 220,000 tpa which resulted in a reduction of vehicle movements across the key peak periods.

The Transport Planning Partnership (RTS letter dated 3/04/2017) assessed these vehicle movements which resulted in a net change in vehicle movements during the AM (10 two-way movements or 5 vehicles) and PM (7 two-way movements or 4 vehicles) peak hours to be a minor increase from the existing situation.

This change equates to an additional 5 vehicles and 4 vehicles on the local road network during the AM and PM peaks (**Table 1**), to respectively and overall, have a negligible impact on the operation of key nearby intersections which were identified in GTA's TIA report.

Table 1: Anticipated 24-hour Traffic Profile of Two-way Vehicle Movements at RRF

	Existing Operation		Future Operation (300,000 tpa)		Future Operation (220,000 tpa)	
	Volume	Percentage	Volume	Percentage	Volume	Percentage
00:00	0	0.0%	2	0.5%	0	0.0%
01:00	0	0.0%	2	0.5%	0	0.0%
02:00	0	0.0%	2	0.5%	0	0.0%
03:00	0	0.0%	4	1.0%	0	0.0%
04:00	0	0.0%	4	1.0%	0	0.0%
05:00	0	0.0%	6	1.5%	0	0.0%
06:00	11	5.4%	17	4.0%	10	2.8%
07:00	17	8.2%	30	7.0%	12	3.4%
08:00	18	9.0%	34	8.0%	22	6.0%
09:00 ^a	22	11.0%	43	10.0%	32	8.8%
10:00	27	13.0%	52	12.0%	40	11.0%
11:00 ^b	29	14.0%	56	13.0%	42	11.5%
12:00	21	10.2%	39	9.0%	38	10.4%
13:00	20	9.9%	39	9.0%	32	8.8%
14:00	13	6.6%	26	6.0%	28	7.7%
15:00	13	6.5%	22	5.0%	22	6.0%
16:00 ^c	7	3.4%	9	2.0%	14	3.8%
17:00	6	2.8%	9	2.0%	14	3.8%
18:00	0	0.0%	9	2.0%	16	4.4%
19:00	0	0.0%	9	2.0%	16	4.4%
20:00	0	0.0%	6	1.5%	14	3.8%
21:00	0	0.0%	4	1.0%	12	3.4%
22:00	0	0.0%	4	1.0%	0	0.0%
23:00	0	0.0%	2	0.5%	0	0.0%
Total	204	100%	430	100%	364	100%

Notes:

^a Road network AM peak hour

^b Operational peak hour at Mortdale Resource Recovery Facility

^c Road network PM peak hour



TTPP believes that it is unnecessary to assess the impact of the additional trips in the future operation using SIDRA modelling software given that the traffic impact is very minor and that these intersections are currently operating at acceptable Levels of Service A and B.

It is deduced that based on the existing situation and the expected increase in vehicle movements, it is expected that the future performance of these intersections would be similar to existing conditions.

In conclusion, it is believed that the information and clarification sought by the Department of Planning and Environment have been satisfactorily addressed in this letter.

Yours sincerely

Shivesh Singh
Planning Manager
Skylife Properties Pty Ltd



Appendix A

ONE PAGE SAFETY LESSON

No:	Systems and Procedures Man.	Head of Compliance	Date:	Rev. Date:	Ver. #:
OPL-YA030	Matthew Collares	Jim Sarkis	18/04/2016	18/04/2018	1
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Storage of Hazardous Chemicals – Special Waste

'Special waste' is a class of waste that has unique regulatory requirements. The potential environmental impacts of special waste need to be managed to minimise the risk of harm to the environment and human health.

For the purpose of classifying waste "Special waste" means any of the following:

- Clinical and related waste
- Asbestos waste
- Waste tyres
- Anything classified as special waste under an EPA gazettal notice.

The following are two types of special waste that may be found in loads of mixed waste brought to site

Asbestos

- Asbestos is prohibited on site.
- Asbestos is dangerous to human health if inhaled.
- There are a number of procedures that relate to unexpected finds of non-complying waste on site.
- All sites must have stock of asbestos bags.
- All sites must have an allocated 240 litre garbage bin dedicated to small unexpected finds of suspected asbestos containing material.
- The dedicated bin must have appropriate signage, be lined with plastic at all times.
- Finds of fibrous cement sheets and other asbestos containing materials suspected or with potential of asbestos content are to be handled as asbestos and in accordance with site procedures and with necessary PPE.
- Small finds are to be wetted down, placed in the asbestos bag and the bag placed in the allocated bin.
- The bin is to be secured at all times when not in use and located away from other site activities / waste.
- Follow site procedures for unexpected finds of Non Complying Waste (NCW).

Tyres

- Tyres are highly flammable and give off toxic gases when burnt.
- Tyres are to be kept separate to all ignition and flame sources and other waste materials and are not to be stored on site.
- Tyres are special waste and are prohibited in our recycling yards and need therefore to be rejected when spotted or tipped in inbound loads.
- If spotted after customer has left the site - store separately, transport separately and comply with trackable waste requirements when transported.
- Tyres have the same tracking requirements as asbestos if more than 20 tyres or 200kg (whichever is the lesser) are to be transported in the same load.

Confirm transport requirements for special waste with the Compliance Team prior to transport.



Appendix B

Bingo Recycling Pty Ltd ABN 82 163 894 362

31 October 2017

Sheelagh Laguna
Senior Planning Officer
Industry Assessments
Department of Planning & Environment
320 Pitt Street
SYDNEY NSW 2001

Dear Ms Laguna

Mortdale Recycling Facility SSD Application No. 7421
Property: 20 Hearne Street, Mortdale NSW 2223
Title Reference: Lot 102 in DP 585775 (102/585775)

We refer to the above SSD Application and request the following changes to the original application:

- a reduction in processing capacity from 300,000 tpa to 220,000 tpa;
- hours of operation (including delivery and removal of waste) reduced from 24 hours/day, six days per week to 6am to 10pm only, six days per week;
- a restriction on all vehicles accessing the site via Barry Avenue;
- removal of bin storage on site;
- an increase in operational staff numbers from 12 to 13 per shift; and
- update of Capital Investment Value from \$2,466,000 to \$3,745,020.

We confirm that the landowner of the Property (Bingo Property Pty Ltd) has consented to the above amendments.

If you have any questions, please do not hesitate to contact David Taylor, Head of Project Development, on 0414 995 809 or by email: david.taylor@bingoindustries.com.au.

Yours sincerely,



Damian Ryan
Director
On behalf of Bingo Recycling Pty Ltd