

Skylife Properties Pty Ltd  
PO Box 114  
Enfield NSW 2136

13 July 2017

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

Dear Sheelagh

**Re: Mortdale SSD 7421 Response to Submissions**

Skylife Properties Pty Ltd has prepared a response to an email from the Department of Planning and Environment (DP&E) dated 28 June 2017 seeking clarification on matters raised by agencies relating to the Mortdale RTS from:

- The Department of Planning and Environment;
- Georges River Council; and
- Fire and Rescue NSW.

In this regard, responses from specialist consultants regarding traffic, environment, design and operations from Bingo Industries Ltd have been prepared and incorporated into this letter to provide the DP&E with certainty on the Mortdale SSD application.

Detailed responses to matters raised by agencies are attached to this letter at:

<b>Appendix A</b>	Architectural Plans	Insight Architecture
<b>Appendix B</b>	Traffic	TTPP
<b>Appendix C</b>	Rejecting Loads and Non-Complying Waste (SOP-YA018)	Bingo Industries Ltd
<b>Appendix D</b>	Unexpected Asbestos Finds (SOP-YA020)	Bingo Industries Ltd
<b>Appendix E</b>	Recovered Fines Management (SOP-YA011)	Bingo Industries Ltd

On 30 June 2017, an assessment of Matters of National Environmental Significance under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) was undertaken by Brad Searle, Business Leader Environment of Arcadis at the request of the Proponent. This response has been included into response No. 9 to this letter.

## Department of Planning and Environment

### 1. Stockpiles

Stockpiles of finished products are to be stored in the processed material storage bays on the lower deck to a height of 6 metres. The Department has two concerns regarding this:

- From the diagrams provided, the design of the storage bays is such that they cannot contain a 6m high pile of waste material within. The dividing walls appear to be less than 6m high and the upper deck retaining wall (that forms the back wall of the bays) is quite low. Therefore, waste stacked to 6m could escape from the bays from all sides.
- In addition, Tables 3 and 4 of the RTS assume that the stockpiles could be fully stacked to 6m high and are thereby able to store 147m<sup>3</sup> of material each. Unless the stockpiles are fully enclosed in boxes filled to the brim, this is not practically achievable. It would therefore seem that the stockpile capacity of the site has been overestimated and should be revised.

### RESPONSE:

- The architectural plans at **Appendix A** have been updated to reflect:
  - the dimensions of the storage bays at 3.5m wide X 7m depth X 6m high = 147m<sup>3</sup> (**Figure 1**);
  - plant area (**Figure 2**); and
  - a materials bin within the shed for plasterboard (**Figure 2**).

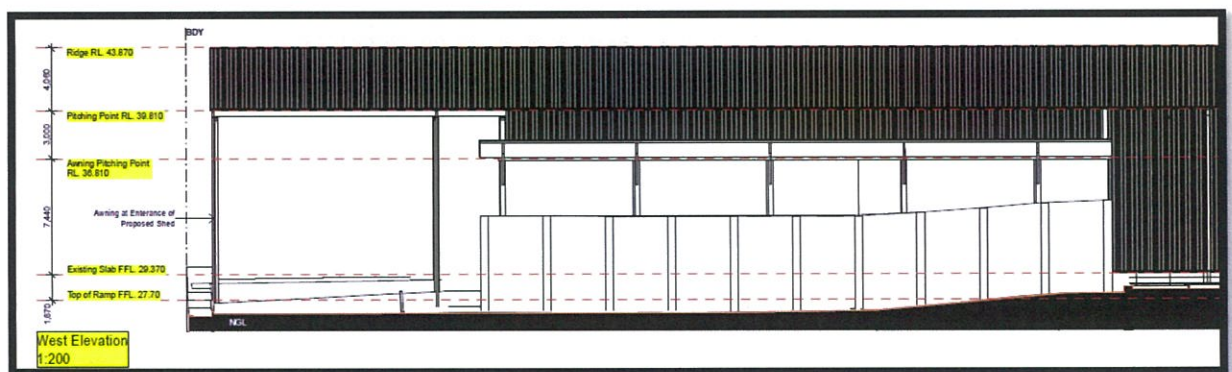
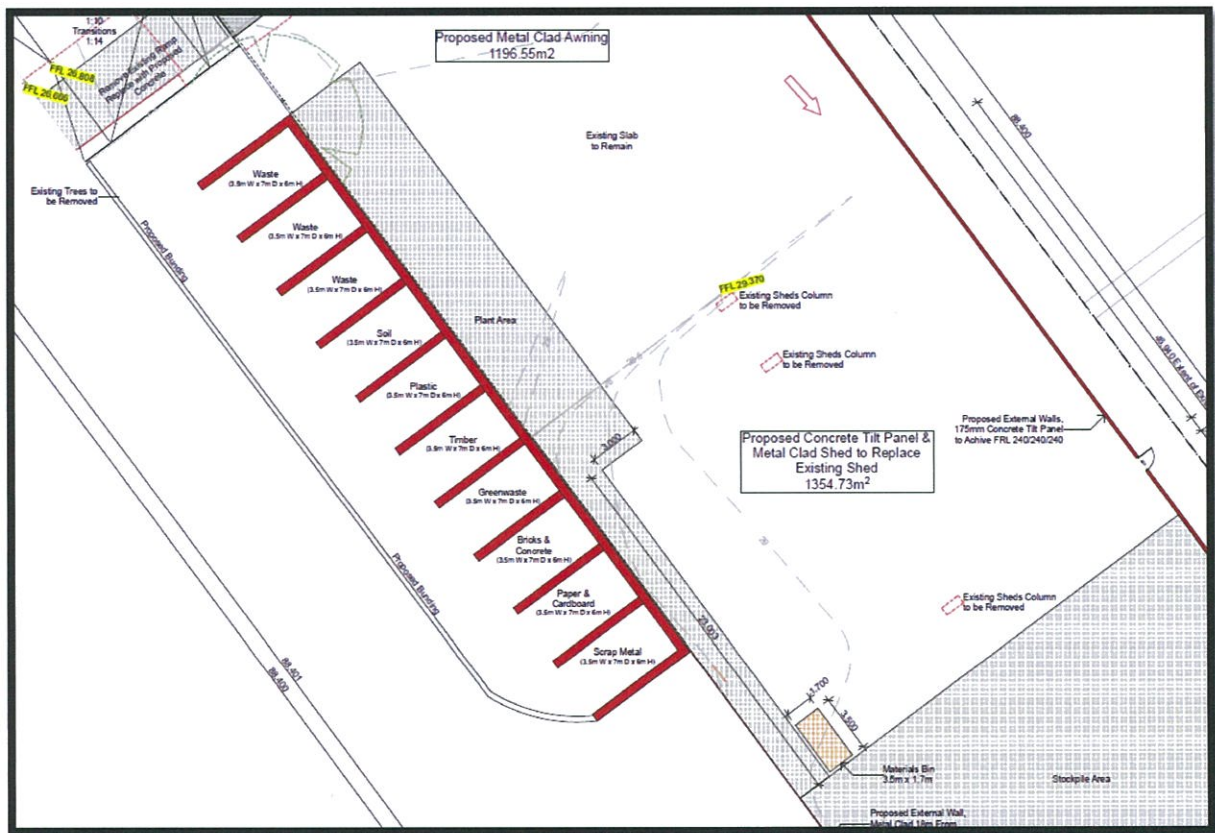


Figure 1: Storage bays





- b. Updated stockpile volumes have been calculated by reducing the total storage of each storage bay by approximately 30% as reflected in **Table 1 and 2** below. This reduction is considered conservative.

**Table 1 and 2** below represent maximum and minimum (worst case scenario) storage capacity as indicated in the RTS dated April 2017 (i.e. a volume which the site is unlikely to exceed at any time).

The low-density waste scenario represents a scenario where 100% of in-bound material is light waste. The high-density waste scenario is represented by a situation where 100% of the waste in the unprocessed waste stockpile is heavy material consisting of materials including but not limited to concrete, brick, rock, sand or soil. An updated breakdown of stockpiles identified the following:

**Table 1: Updated breakdown of stockpile capacity: High density waste scenario**

Storage Area	Area (m2)	Volume (m3)	Conversion factor (t/m3)	Tonnes
1. Stockpile - Tip Floor / Unprocessed Material	574	4,131	1.5	6,196
2. bay - residual	25	105	0.7	74
3. bay - residual	25	105	0.7	74
4. bay - residual	25	105	0.7	74
5. bay - soil	25	105	1.5	158
6. bay - plastic	25	105	1.1	116
7. bay - timber	25	105	1.1	116
8. bay - green waste	25	105	1.1	116
9. bay - brick & concrete	25	105	1.2	126
10. bay - paper & cardboard	25	105	1.1	116
11. bay - metal	25	105	1.1	116
12. Trucks (assumes max stacking of 28 trucks on site at any one time and average 1:1 density all inbound / outbound waste)		280	1	280
<b>TOTAL (tonnes at any one time)</b>	<b>819</b>	<b>5,181</b>		<b>7,557</b>

**Table 2: Updated breakdown of stockpile capacity: Low density waste scenario**

Storage Area	Area (m2)	Volume (m3)	Conversion factor (t/m3)	Tonnes
1. Stockpile - Tip Floor / Unprocessed Material	574	4,131	0.7	2,891
2. bay - residual	25	105	0.7	74
3. bay - residual	25	105	0.7	74
4. bay - residual	25	105	0.7	74
5. bay - soil	25	105	1.5	158
6. bay - plastic	25	105	1.1	116
7. bay - timber	25	105	1.1	116
8. bay - green waste	25	105	1.1	116
9. bay - brick & concrete	25	105	1.2	126
10. bay - paper & cardboard	25	105	1.1	116
11. bay - metal	25	105	1.1	116
12. Trucks (assumes max stacking of 28 trucks on site at any one time and average 1:1 density all inbound / outbound waste)		280	1	280
<b>TOTAL (tonnes at any one time)</b>	<b>819</b>	<b>5,181</b>		<b>4,253</b>

The EPA's advice to facilities when "authorised amounts" were introduced, was to determine a volume that the site will always remain below. Consequently, a 10,000 tonne at any one time limit is considered to be a reasonable volume which is unlikely to be exceeded and is supported by the scenarios provided above.

## 2. Vehicle stacking

The RTS has provided information regarding the capacity for 'stacking' on the site during the busiest peak hour, being 11am-12pm on weekdays. For a few hours before and after this time there is also considerable traffic, which could impact on stacking build up over the course of a day. The worst case scenario has not been taken into account, being a cumulative back up of trucks over time, especially due to unexpected circumstances. Since the limited size of the site is of particular concern to the Department, please provide additional evidence that the site can cope with the proposed traffic volumes in the above circumstances. Provide mitigation measures to be implemented in the event the site reaches stacking capacity.

### RESPONSE:

The Traffic Planning Partnership's (TTPP) response with regards to traffic is attached at **Appendix B** to this letter.



### 3. Timeframes

More information is required regarding the length of time incoming waste remains in the receival area before processing, as well as how long separated waste remains in the storage bays before removal.

#### RESPONSE:

Material will be removed from the storage bays on an “as needs” basis taking into consideration the desire to minimise truck movements. Accordingly, material will ideally be removed from a storage bay once there is enough for a full truck load. It is estimated that material may remain in the storage bays for approximately 24 to 48 hours. Material will be removed more frequently as required.

Waste will be continuously loaded into the processing plant during the hours of operation. We estimate that waste will remain in the receival area for approximately 24 to 48 hours.

### 4. Outgoing material

How is material from the storage bunkers transferred to trucks for removal from the premises? How often would each storage bunker be emptied (e.g. once per day, twice per day, once per week)?

#### RESPONSE:

A loader or excavator will transfer material in the storage bunkers onto the trucks. Refer to response to item 3 for clarification on timeframe.

### 5. Quality control

Provide details of the quality control mechanisms to be employed throughout the site. Provide details of the site’s process end-to-end quality controls. This is for the Department to assess how the quality of incoming waste material, the level of resource recovery and the ‘purity’ of the finished waste streams would be monitored and controlled on an ongoing basis. Some information is provided in the draft OEMP, however more details are required. For example, how and how often would separated waste material be tested to ensure it has been correctly separated and fit for purpose for recycling/re-use? How will the level of resource recovery be checked, corrected if necessary, and maintained?

#### RESPONSE:

Incoming loads are inspected prior to or at entrance to the site by a traffic controller. Where prohibited materials are found or suspected, the load is rejected as per SOP-YA018 - Rejecting Loads of Non-Complying Waste & Prohibited Materials (**Appendix C**). Incoming loads are again inspected by the weighbridge operator and where prohibited materials are found or suspected the load is rejected as per SOP-YA018. Incoming loads are the subject of another visual inspection on the tipping floor both prior to tipping and once tipped. Where prohibited materials are found or suspected the load is rejected as per SOP-YA018. Small unexpected finds of materials suspected to

be asbestos on the tipping floor or in the processing stage are managed as per SOP-YA020 - Unexpected Asbestos Finds (**Appendix D**).

Conforming waste is processed and separated into different recovered waste streams. Materials subject of resource recovery orders are sampled in accordance with the relevant resource recovery order issued by the EPA from time to time and managed as per SOP-YA011- Recovered Fines Management (**Appendix E**). All other materials not the subject of resource recovery orders are sent to secondary recyclers who use the recovered materials to make or contribute towards making recycled products. These secondary recyclers are lawfully able to accept such material and are generally licensed under the POEO Act.

All materials loaded on a truck for secondary recycling purposes notwithstanding the quality assurance checks taken place through the process are again visually inspected for non-conforming waste.

In terms of our separated waste streams, designated pickers are on a picking line who continue to do quality control to ensure products are free from cross contamination and non-conforming materials.

## **6. Glass and plasterboard waste**

If glass and plasterboard are to be recovered from the incoming waste stream, details must be provided regarding the suitability of the location of the skip bin, frequency of collection, and anticipated annual tonnage. Due to the restricted size of the site, it should be demonstrated that the bin and collection thereof will not conflict with traffic onsite. Details should also be provided regarding how glass and plasterboard are separated from the incoming stream and how they are transferred to the skip bins. If other 'minor' waste streams are to be recovered, the same information should also be supplied for them. The process flowchart should also be updated.

### **RESPONSE:**

Glass will not be recovered. Plasterboard will be placed in a separate materials bin as identified on the updated architectural plans.

## **7. Non-conforming waste**

Details are required about where and for how long unacceptable wastes would be stored before removal from the site.

### **RESPONSE:**

Incoming loads are the subject of three points of visual check prior to tipping; at the gate or before entering the gate, at the weighbridge and at the tipping floor. Where non-conforming waste is found or suspected, the load is rejected as per SOP-YA018 Rejecting Loads of Non-Complying Waste & Prohibited Materials. Where non-conforming waste is noticed after these stages, it is removed from site within approximately 24 hours to an appropriately licenced waste facility.



## 8. Job creation

Clarification is required regarding the number of jobs created by the development, as there is some inconsistency. Please confirm there would be 15 construction jobs created. The documentation describes that 13 operators would be required at the facility, however how many of these jobs are additional compared to the existing number of employees at the facility?

### RESPONSE:

Approximately 15 construction workers will be working on-site during the construction phase of the project at any one time.

Approximately 30 full-time employees will be required to support the facility operations with approximately 13 staff onsite per shift at any one time.

Currently there are 5 full-time employees who support the operations of the existing facility.

## 9. Matters of National Environmental Significance (MNES)

No preliminary assessment of MNES was provided with the EIS. This assessment is required.

### RESPONSE:

An assessment of MNES was undertaken by Arcadis (Brad Searle, Business Leader Environment dated 30 June 2017) on behalf of the proponent.

The Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places defined in the Act as Matters of National Environmental Significance (MNES) – as well as to govern actions undertaken on Commonwealth land. The MNES that are protected under the EPBC Act are:

- World heritage properties
- National heritage places
- Wetlands of international importance
- Listed threatened species and ecological communities
- Migratory species
- Commonwealth marine areas
- The Great Barrier Reef National Park
- Nuclear actions (including uranium mines)
- An action on Commonwealth land which is likely to have a significant impact on the environment
- Coal seam gas activities that pose risk to water resources.

In accordance with sections 67 and 67A of the EPBC Act, any works that have the potential to result in an impact on any MNES or on Commonwealth land are considered 'controlled actions' and require a referral to the Federal Minister for the Environment for approval.



A search of the EPBC Protected Matters Search Tool was undertaken on 30 June 2017 for the Proposal site and a one km buffer. The search identified a wetland of international importance (1), a number of threatened species (34), migratory species (17) and threatened ecological communities (7) potentially occurring within one km of the Proposal site (refer to attached EPBC search).

The DotE Protected Matters Search identified 36 threatened fauna species listed under the EPBC Act that are known, likely or which may occur within 10 km of the Proposal site, comprising:

- Eleven bird species
- Three fish species
- Six mammal species
- One reptile species.

Due to the highly disturbed nature of the Proposal site it is not considered likely that any threatened fauna species, or habitat for threatened fauna species, are present within the Proposal site due to its longstanding history of disturbance.

The DotE Protected Matters Search identified 17 migratory species listed under the EPBC Act that are known, likely or which may occur within 10 km of the Proposal site, comprising:

- One migratory marine bird
- Seven migratory terrestrial species
- Nine migratory wetland species.

Given the low level of vegetation present within the Proposal site and its longstanding previous disturbance history, it is not considered likely that any migratory species utilise the Proposal site.

Given the low level of vegetation present within the Proposal site and its longstanding previous disturbance history, it is not considered likely that the Proposal site includes any Commonwealth Heritage Places.

Listed marine species are not considered in this assessment, due to the small scale of the Proposal site and the distance to the nearest.

The DotE Protected Matters Search did not identify any other relevant biodiversity MNES within 10 km of the Proposal site.

The soil and water assessment indicates that cumulative impacts will be minimal, and likely to result in an improvement in water quality. The proposal is not predicted to increase the volume or intensity of stormwater discharging from the site. Similarly, modelling predicts that additional stormwater quality measures proposed will improve the quality of stormwater discharge from the site and reduce the likelihood of negative cumulative impacts on the catchment.

## Georges River Council

### Traffic

As noted in the EPA comments, no consideration has been made in relation to traffic or noise on Barry Avenue. As such it is recommended that prior to any approval a Plan of Management is lodged, demonstrating how traffic movements are to be managed, so as to avoid truck movements on Barry Avenue. This plan of management is to form part of any approval.

In relation to the previously raised queueing issue both the Traffic Response and the Response to submission addendum Report state that it will be “unlikely” that vehicles will be required to queue outside the site on the basis of the reduced tonnage, increased queueing spaces and staggered delivery/pick-up times. However unlikely this event may be, should the Department be of a mind to approve the proposal, a condition of consent should be included specifying that no queueing of delivery vehicles is permitted on Hearne or surrounding streets.

In addition to this the traffic plan of management must demonstrate a means by which any queuing outside the site on surrounding streets is to be avoided during the operation of the use. The Department should also be satisfied that sufficient detail has been provided in the final traffic report in relation to how the daily stated 7% semi-trailer/truck-and-dog vehicle movements are to be accommodated in order that these movements do not interfere with the proposed queuing arrangement.

### RESPONSE:

The Traffic Planning Partnership’s (TTPP) response with regards to traffic is attached at **Appendix B** to this letter.

### Noise

In relation to the previously raised noise issue, the limiting of hours to 6am – 10pm Monday to Friday is a satisfactory response to ensure that surrounding residential receivers (especially on the corner of Hearne/Boundary and along Boundary Roads) are not unreasonably impacted by noise. In this regard, Council would state a strong objection to any future application to extend these hours for the reasons provided in previous correspondence.

Additionally as no detailed noise assessment has been undertaken in relation to potential impacts on residential receivers in Barry Avenue it is strongly encouraged that any future consent includes a precise and clearly worded plan of management that requires all vehicle movements to avoid Barry Avenue. Without such a plan of management, Council would object to the proposal.

### RESPONSE:

The proponent has previously committed to not using Barry Avenue for business operations.

### Plan of Management

Any future approval must include a Plan of Management including, as a minimum, the following:

- How drivers are to be site inducted/trained so as to limit vehicle movements to Hearne Street and Boundary Road only (avoiding Barry Avenue)

- How the daily operation of the site is to allow for the staggering of pick-up/drop off movements in order to avoid conflict between queuing MRV's and semi-trailers/truck-and-dog to ensure that no vehicles queue on Hearne (or surrounding) streets
- Incorporating all recommendations of development consent in relation to the operation of the proposal
- Providing for daily operation in accordance with all assumptions and recommendations within the supporting documentation accompanying the designated development application

**RESPONSE:**

An appropriate Operational Environmental Management Plan will be prepared for the approved facility.

**Fire and Rescue NSW**

The proponent agrees with the recommendations of FRNSW's letter dated 4 May 2017 (Ref. BFS17/916 (13435)).

We trust that the clarification provided above now addresses all the concerns raised by agencies and the proponent respectfully requests that the DP&E supports the Mortdale SSD application.

Yours sincerely



Shivesh Singh

Planning Manager

Skylife Properties Pty Ltd